

STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission

DOCKET	
09-AFC-1	
DATE	<u>9/2/2009</u>
RECD.	<u>9/2/2009</u>

In the Matter of:

The Application for Certification for the
Watson Cogeneration Steam and
Electric Reliability Project

Docket No. 09-AFC-1

**PETITION TO INTERVENE BY
CALIFORNIA UNIONS FOR RELIABLE ENERGY**

September 2, 2009

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Pursuant to sections 1207 and 1712 of Title 20 of the California Code of Regulations, California Unions for Reliable Energy (“CURE”) petitions to intervene in this proceeding.

Section 1207(a) grants “any person” the right to file a petition to intervene which sets forth “the grounds for the intervention, the position and interest of the petitioner in the proceeding, the extent to which the petitioner desires to participate in the proceedings, and the name, address, and telephone number of the petitioner.” Section 1207(c) provides that the “presiding member may grant leave to intervene to any petitioner to the extent he deems reasonable and relevant....”

CURE is a coalition of unions whose members construct and operate power plants in California. Thus, the project directly affects the union members' immediate economic interests.

The project also affects the union members' long-term economic and environmental interests. Environmental degradation jeopardizes future jobs by causing construction moratoriums, depleting limited air pollutant emissions offsets, using limited fresh water, and putting other stresses on the environmental carrying capacity of the state. This reduces future employment opportunities. In contrast, well designed projects that reduce environmental impacts of electricity generation improve long-term economic prospects.

Union members are concerned about projects that cause serious environmental harm without providing countervailing economic benefits. The Commission's application process provides for a balancing of the project's socioeconomic and environmental impacts. CURE's ultimate position in this proceeding will be determined based on all of the factors that will be considered by the Commission.

CURE has been granted intervention in most other siting cases brought before the Commission since the enactment of AB 1890. The Commission rejected the only challenge to CURE's participation in those cases, finding CURE's interests "undeniably relevant" to the proceedings. (In the Matter of Application for Certification for the High Desert Power Project,

Docket No. 97-AFC-1, Order Granting Petition to Intervene at 2 (Dec. 24, 1997).) The same decision should be reached here.

CURE wishes to participate fully in all phases of this proceeding. Filings should be served on CURE at the address listed below.

For the foregoing reasons, CURE respectfully requests that the Commission grant its petition to intervene in this proceeding, and allow CURE to participate as a party.

Dated: September 2, 2009 Respectfully submitted,

_____/s/_____
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DECLARATION OF SERVICE

I, Bonnie Heeley, declare that on September 2, 2009, I served and filed copies of the attached PETITION TO INTERVENE BY CALIFORNIA UNIONS FOR RELIABLE ENERGY, dated September 2, 2009. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list located on the web page for this project at: <http://www.energy.ca.gov/sitingcases/watson/index.html>. The document has been sent to both the other parties in this proceeding as shown on the Proof of Service list and to the Commission’s Docket Unit via email and by depositing in the United States mail at South San Francisco, California with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list to those addresses NOT marked “email preferred.”

I declare under penalty of perjury that the foregoing is true and correct.
 Executed at South San Francisco, CA on September 2, 2009

_____/s/_____
 Bonnie Heeley

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