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<b>Project Title:</b>	Morton Bay Geothermal Project (MBGP)
<b>TN #:</b>	259495
<b>Document Title:</b>	Petition to Intervene by Jobs to Move America
<b>Description:</b>	Petition to Intervene by Jobs to Move America
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<b>Submitter Role:</b>	Intervenor Representative
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**STATE OF CALIFORNIA**  
**STATE ENERGY RESOURCES**  
**CONSERVATION AND DEVELOPMENT COMMISSION**

IN THE MATTER OF:

MORTON BAY GEOTHERMAL  
PROJECT APPLICATION FOR  
CERTIFICATION

Docket No. 23-AFC-01

**PETITION TO INTERVENE BY**  
**JOBS TO MOVE AMERICA**

October 9, 2024

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**I. INTRODUCTION**

Pursuant to Cal. Code Regs., tit. 20, § 1211.7, Jobs to Move America (“JMA”) respectfully files this Petition to Intervene (“Petition”) in the Morton Bay Geothermal Project (“Project” or “MBGP”) Application for Certification (“AFC”) proceeding, Docket No. 23- AFC-01.

Section 1211.7(a) grants “any person” the right to file a petition to intervene which sets forth “the grounds for 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, mailing address, e-mail address, and phone number of the petitioner.” The presiding member may grant intervention and impose reasonable conditions on an intervenor’s participation. (*Id.* § 1211.7(c)). “An intervenor is a party to a proceeding.” (*Id.* § 1211.7(c)).

This Petition is timely because the scheduling order issued on September 15, 2023, by the Presiding Member of the California Energy Commission Committee designated to conduct proceedings in this matter set a deadline to file a Petition to Intervene of ten days after the filing of the Final Staff Assessment, and the Final Staff Assessment has not yet been filed in this matter. Furthermore, the default deadline to file a Petition to Intervene is 30 days before the first evidentiary hearing. (*Id.* § 1211.7(b)), and the Commission has not yet set a date for an evidentiary hearing on this matter. This Petition is also timely under the proposed (but not yet approved) schedule submitted by CEC Staff and the Project Applicant on September 27, 2024, which proposes October 16, 2024 as the final day on which to petition for intervention.

## **II. POSITION AND STATEMENT OF INTEREST**

Jobs to Move America is a non-profit, 501(c)(3) strategic policy center that works to increase transparency and environmental and economic responsibility through work that is rooted in racial, environmental, and economic justice and community organizing. JMA seeks to advance a fair and prosperous economy with good jobs and healthier communities for all. JMA believes that economic opportunity and environmental safeguards go hand in hand, and that the key to both is robust, meaningful participation in planning processes by members of the communities directly affected.

JMA works in coalition with labor organizations, churches, and other community organizations in the Imperial Valley to identify the economic and environmental issues of most concern. Members of JMA's coalition live and work in the areas immediately surrounding the Project. Agricultural runoff, factory farming, and lack of oversight for large-scale agricultural processes have contributed to negative health impacts from poor air and water quality for residents across Imperial County. Degraded air quality contributes to higher levels of asthma, lung damage, bronchitis, cancer and brain & nervous system damage in the region. This is especially true for those in younger and older demographics, and impacts poor and transient populations disproportionately. Imperial County is over 86% Hispanic or Latino, and a large percentage of its workforce is composed of transient populations due to its proximity to the US-Mexico border.

JMA believes that geothermal energy production has the potential to create environmental benefits for the state and nation as a whole, but if not done right, to concentrate environmental and public-health harms in immediately surrounding communities. JMA also believes that good environmental stewardship requires active participation by impacted communities, and that engaging community members in the planning process requires the engagement of community organizations, churches, environmental advocates, and labor organizations.

### III. GROUNDS FOR INTERVENTION AND SCOPE OF PARTICIPATION

The Commission has routinely granted requests to intervene by environmental organizations, labor unions, and similar coalitions in prior siting cases and permit proceedings for power plants. In this matter, the Commission has already granted Petitions to Intervene filed by California Unions for Reliable Energy (CURE) and United Automobile, Aerospace and Agricultural Implement Workers of America (UAW) Region 6, and Supporters Alliance for Environmental Responsibility. The same decision should be reached here.

If granted intervention, JMA intends to participate fully in all of the remaining phases of this proceeding and on all topics relevant to the Commission's consideration of the Project, including, but not limited to: air quality, biological resources, greenhouse gas emissions, cultural and tribal cultural resources, hazardous waste, public health, worker safety, socioeconomics, water resources, environmental justice, and transportation.

JMA reserves the right to participate in other topics. JMA may participate in all aspects of this proceeding, including, but not limited to, discovery, workshops, testimony, briefing, and cross-examination of witnesses.

#### IV. CONTACT INFORMATION

All filings in this proceeding should be served on:

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#### V. CONCLUSION

For the foregoing reasons, JMA respectfully requests that the Committee grant its petition to intervene in this proceeding and allow JMA to participate as a party without limitation.

Dated: October 9, 2024

Respectfully Submitted,



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