

## DOCKETED

<b>Docket Number:</b>	01-AFC-17C
<b>Project Title:</b>	Inland Empire Energy Center Project Compliance
<b>TN #:</b>	203348
<b>Document Title:</b>	Petition to Intervene
<b>Description:</b>	N/A
<b>Filer:</b>	Thomas A. Enslow
<b>Organization:</b>	Adams Broadwell Joseph & Cardozo
<b>Submitter Role:</b>	Intervenor Representative
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**STATE OF CALIFORNIA**

**State Energy Resources  
Conservation and Development Commission**

In the Matter of:

Petition to Amend the Inland Empire  
Energy Center Project

Docket No. 01-AFC-17C

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

November 18, 2014

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On behalf of the CALIFORNIA  
UNIONS FOR RELIABLE ENERGY

**STATE OF CALIFORNIA**

**Energy Resources Conservation  
and Development Commission**

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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 in any proceeding. The petition must set 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” the presiding member “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 was granted intervention in the original application proceeding for the Inland Empire Energy Center project (01-AFC-17). CURE has also been granted intervention in many 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: November 18, 2014      Respectfully submitted,

*Original signed by Thomas A. Enslow*  
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On behalf of the CALIFORNIA UNIONS  
FOR RELIABLE ENERGY

Submitted via E-File to Docket 01-AFC-17C