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STATE OF CALIFORNIA

**Energy Resources Conservation and
Development Commission**

In the Matter of:

The Application for Amendment for the
Palmdale Energy Project

Docket No. 08-AFC-9C

CITY OF LANCASTER PETITION TO INTERVENE

August 17, 2015

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CITY OF LANCASTER PETITION TO INTERVENE

Pursuant to sections 1207 and 1712 of Title 20 of the California Code of Regulations, the City of Lancaster 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....”

Palmdale Energy, LLC ¹ seeks an amendment to the 2011 application for certification for the former Palmdale Hybrid Power Project, now the Palmdale Energy Project. Palmdale Energy, LLC proposes to construct a 645 megawatt natural gas-fired power plant to provide “flexible generation” to the California energy grid. This wholly new project contemplates new turbine technology to allow for frequent start-up and shut-down operations in order “to assist in the integration of renewable energy generated in

¹ On June 12, 2015, the Commission approved a transfer of ownership from the City of Palmdale to Palmdale Energy, LLC.

California.” The original proposal contemplated baseload generation to meet increased demand in the City of Palmdale and surrounding area, and it proposed to install approximately 50 MWs of solar energy. The new project’s larger turbines, use of duct firing and frequent start-ups and shut-downs would result in greater emissions of harmful criteria air pollutants, including CO₂, and, it has no clean energy component.

The City of Lancaster is a thriving, family-oriented community of nearly 160,000 residents who take pride in the City’s clean air and sustainable living policies. The City of Lancaster promotes solar energy, conservation and smart energy consumption. In fact, Lancaster has set ambitious goals for generating more clean energy than it consumes. Given the proposed project’s proximity to Lancaster, the City has an interest in this proceeding. The proposed project would be sited right on Lancaster’s southern border. Prevailing winds from the Antelope Valley would blow the project’s air pollution on to Lancaster neighborhoods. In addition, the proposed 645 MW fossil fuel power plant would generate more than 2 million tons of greenhouse gases every year. Given its potential carbon footprint, Lancaster questions whether a new fossil fuel power plant would ultimately undermine California’s ambitious carbon reduction goals.

The proposed project directly affects the City of Lancaster’s air quality. And the project’s potential greenhouse gas emissions would cancel out Lancaster’s hard work to foster low carbon resources. Accordingly, Lancaster’s participation will generally focus on preventing the proposed project’s air quality degradation and other negative environmental impacts for Lancaster communities and the state in general. The City of Lancaster intends to fully participate in all phases of this proceeding. Filings should be electronically served on the City’s counsel at the email address below.

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

Dated: August 17, 2015

Respectfully submitted,

/s/
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