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STATE OF CALIFORNIA
Energy Resources
Conservation and Development Commission

In the matter of:

SONORAN ENERGY PROJECT
Amendment (formerly BLYTH
ENERGY PROJECT PHASE II)

DOCKET NO. 02-AFC-01C

PETITION TO INTERVENE BY EDF RENEWABLE ENERGY, INC.

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PETITION TO INTERVENE

EDF Renewable Energy, Inc. (“EDF RE”) hereby petitions the California Energy Commission (“Commission”) to intervene in the proceedings for the Sonoran Energy Project (formerly Blythe Energy Project Phase II) (“Sonoran Project”), pursuant to Public Resources Code section 25214 and the California Code of Regulations, title 20, section 1211.7. Under applicable regulations, any person or group has the right to file a petition to intervene in any Commission proceeding. 20 C.C.R. § 1211.7(a).

EDF RE develops efficient, environmentally sited renewable energy projects for its electrical power generation portfolio and for third parties. EDF RE has more than 30 years of expertise in the renewable energy industry, with a portfolio of 7,903 MW of gross installed capacity focused on wind (onshore and offshore) and solar photovoltaic (“PV”) energy, and a presence in other segments of the renewable energy market, such as biogas, biomass, hydro, marine energy, and storage solutions.

The California Independent Systems Operator (“CAISO”) Generator Interconnection Queue (“Queue”) has listed the Sonoran Project as a combined-cycle natural gas facility for the past fourteen years. However, EDF RE has recently noticed that the fuel designation of the Sonoran Project queue position has changed from natural gas to solar PV. It thus appears as though the applicant has changed the plan of development for the Sonoran Project from a natural gas-fired facility to a solar power facility without yet notifying this Commission. EDF RE seeks to intervene in this proceeding in part to ascertain whether this is the case.

EDF RE is concerned that the continued presence of the Sonoran Project in the Queue, with no indication that it is a viable project, is causing harm to later-queued projects along the I-10 corridor in Riverside County, California. The fact that the Sonoran Project does not have a Power Purchase Agreement after fourteen years in the Queue, and the sudden conversion of the Sonoran Project to solar after all that time, are further indications of the non-viability of the Sonoran Project.

EDF RE’s concerns regarding the Sonoran Project arise from EDF RE’s expertise in transmission and interconnection matters, from the old age of the CAISO queue position that the Sonoran Project’s new solar power proposal would leverage, and from the persistent, ongoing delay of completion of the

Transmission Systems Engineering section of the Sonoran Project Final Staff Assessment, a delay which the applicant has premised upon certain long-awaited interconnection studies for a combined-cycle natural gas facility.

EDF RE is in the process of developing large-scale solar projects in the vicinity of the Sonoran Project. EDF RE's projects occupy CAISO queue positions which are later in time than the Sonoran Project's queue position. The deliverability (*i.e.*, the ability of project output to be delivered to aggregate CAISO load) and resource adequacy status of these EDF RE projects therefore could be impacted by the Sonoran Project's continued presence in the Queue, including by the recent conversion from natural gas to solar. As a participant in the local solar power market, EDF RE will also be indirectly affected if the Sonoran Project undermines local support for future solar power facilities. For instance, EDF RE anticipates strong local antipathy if the Sonoran Project announces the use of solar technology while continuing to pursue approval of a natural gas-fired facility from this Commission. EDF RE seeks intervenor status in this proceeding to protect its interests. EDF RE has not previously participated in this proceeding because these potential problems were not presented by the original proposal for a natural gas-fired facility.

EDF RE will be able to aid the Commission in this proceeding by providing valuable expertise regarding issues faced by electric generation facilities participating in the transmission and interconnection market in Southern California and the consequences of allowing a generator as large as the Sonoran Project to remain in the Queue seemingly indefinitely, as well as other implementation challenges generally faced by power facilities in Southern California. At this time, EDF RE intends to fully participate as a party in the Sonoran Project proceeding if the Commission grants this petition to intervene.

Under the Commission regulations, if no intervention deadline is set by the presiding member, a petition to intervene must be filed at least thirty days before the first evidentiary hearing. 20 C.C.R. § 1211.7(b). This petition is filed more than thirty days prior to the evidentiary hearing because the hearing has not yet been scheduled. EDF RE understands Commission staff currently are waiting for the Affected

System Impact Study from CAISO in order to complete the Transmission System Engineering analysis for the Final Staff Assessment Part B. *See* Sonoran Energy Project - Status Report No. 21 (20170801) (August 1, 2017, TN# 220488).

EDF RE will be represented in this proceeding by the counsel identified below. All filings should be served on EDF RE's counsel (email service preferred):

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

Dated: August 7, 2017

Respectfully submitted,



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