

ADAMS BROADWELL JOSEPH & CARDOZO

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

601 GATEWAY BOULEVARD, SUITE 1000
SOUTH SAN FRANCISCO, CA 94080-7037

TEL: (650) 589-1660

FAX: (650) 589-5062

gsmith@adamsbroadwell.com

SACRAMENTO OFFICE

1225 8th STREET, SUITE 550
SACRAMENTO, CA 95814-4810

TEL: (916) 444-6201

FAX: (916) 444-6209

DANIEL L. CARDOZO
RICHARD T. DRURY
THOMAS A. ENSLOW
TANYA A. GULESSERIAN
MARC D. JOSEPH
OSHA R. MESERVE
SUMA PEESAPATI
GLORIA D. SMITH

OF COUNSEL
THOMAS R. ADAMS
ANN BROADWELL

April 12, 2007

DOCKET	
07-AFC-1	
DATE	APR 12 2007
RECD.	APR 16 2007

CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 07-AFC-1

1516 Ninth Street, MS-4

Sacramento, CA 95814-5512

Re: Application for Certification, Victorville 2 Hybrid Power Project;
Docket No. 07-AFC-1

Dear Docket Clerk:

Enclosed are an original and 12 copies of Petition to Intervene by California Unions for Reliable Energy. Please process and return a conformed copy in the envelope provided.

Thank you for your assistance.

Sincerely,



Gloria D. Smith

GDS:bh
Enclosures

1994-002a

STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

The Application for Certification
for the VICTORVILLE 2 HYBRID
POWER PROJECT

Docket No. 07-AFC-1

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

April 12, 2007

Gloria D. Smith
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Voice
(650) 589-5062 Facsimile
gsmith@adamsbroadwell.com
mdjoseph@adamsbroadwell.com

Attorneys for the CALIFORNIA UNIONS
FOR RELIABLE ENERGY

STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

The Application for Certification
for the VICTORVILLE 2 HYBRID
POWER PROJECT

Docket No. 07-AFC-1

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

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.

Additionally, union members live in and next to the communities that suffer the impacts of environmentally detrimental projects. Unions have an interest in helping to minimize the impacts of projects that would degrade the environment, and in enforcing environmental laws to protect their members.

Finally, 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: April 12, 2007 Respectfully submitted,



Gloria D. Smith
Marc D. Joseph
Adams Broadwell Joseph & Cardozo
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
(650) 589-1660 Voice
(650) 589-5062 Facsimile
gsmith@adamsbroadwell.com
mdjoseph@adamsbroadwell.com

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In the Matter of:

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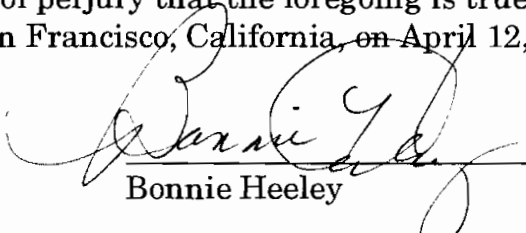
PROOF OF SERVICE

I, Bonnie Heeley, declare that on, I deposited copies of the attached PETITION TO INTERVENE BY CALIFORNIA UNIONS FOR RELIABLE ENERGY in the United States mail at South San Francisco, California, with first class postage thereon fully prepaid and addressed to the following:

CALIFORNIA ENERGY
COMMISSION
DOCKET UNIT
ATTN: Docket Unit 06-AFC-4
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Via email to:
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct. Executed at South San Francisco, California, on April 12, 2007.



Bonnie Heeley