

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

tgulesserian@adamsbroadwell.com

SACRAMENTO OFFICE

520 CAPITOL MALL, SUITE 350  
SACRAMENTO, CA 95814-4715

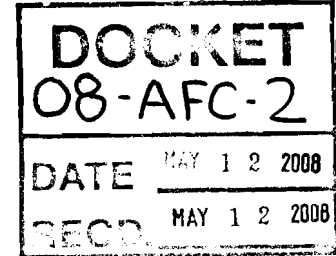
TEL: (916) 444-6201  
FAX: (916) 444-6209

DANIEL L. CARDOZO  
THOMAS A. ENSLOW  
TANYA A. GULESSERIAN  
MARC D. JOSEPH  
LOULENA A. MILES  
GLORIA D. SMITH

FELLOW  
RACHAEL E. KOSS

OF COUNSEL  
THOMAS R. ADAMS  
ANN BROADWELL

May 12, 2008



CALIFORNIA ENERGY COMMISSION

Attn: Docket No. 08-AFC-2

1516 Ninth Street, MS-4

Sacramento, CA 95814-5512

Re: Application for Certification, Beacon Solar Energy Project, 08-AFC-2

Dear Docket Clerk:

Enclosed are an original and two copies of Petition to Intervene by California Unions for Reliable Energy. Please process and return a conformed copy in the envelope provided. This Petition was previously sent to the Docket Office via email.

Thank you for your assistance.

Sincerely,

Tanya A. Gulesserian

TAG:bh  
Enclosures

2162-010a

**STATE OF CALIFORNIA**

**Energy Resources Conservation  
and Development Commission**

In the Matter of:

The Application for Certification for the  
BEACON SOLAR ENERGY PROJECT

Docket No. 08-AFC-2

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

May 12, 2008

Tanya A. Gulesserian  
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  
tgulesserian@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  
BEACON SOLAR ENERGY PROJECT

Docket No. 08-AFC-2

**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. 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 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 p. 2 (Dec. 24, 1997).) The same decision should be reached here.

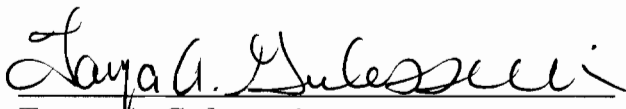
CURE wishes to participate fully in all phases of this proceeding.

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: May 12, 2008

Respectfully submitted,



Tanya A. Gulesserian

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

tgulesserian@adamsbroadwell.com

Attorneys for the CALIFORNIA UNIONS  
FOR RELIABLE ENERGY

## PROOF OF SERVICE

I, Bonnie Heeley, declare that on May 12, 2008, 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 08-AFC-2  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

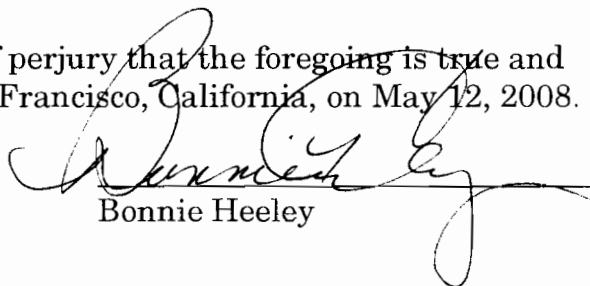
CA Independent System Operator  
151 Blue Ravine Road  
Folsom, CA 95630

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5 and 1210. All electronic copies were sent to those identified on the Proof of Service list below.

Via email to:

[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)  
[Gary L. Palo@fpl.com](mailto:Gary.L.Palo@fpl.com)  
[Kenneth Stein@fpl.com](mailto:Kenneth.Stein@fpl.com)  
[Duane McCloud@fpl.com](mailto:Duane.McCloud@fpl.com)  
[Guillermo Narvaez@fpl.com](mailto:Guillermo.Narvaez@fpl.com)  
[Shead@ensr.aecom.com](mailto:Shead@ensr.aecom.com)  
[jluckhardt@downeybrand.com](mailto:jluckhardt@downeybrand.com)  
[Kldougla@energy.state.ca.us](mailto:Kldougla@energy.state.ca.us)  
[jbyron@energy.state.ca.us](mailto:jbyron@energy.state.ca.us)  
[kcelli@energy.state.ca.us](mailto:kcelli@energy.state.ca.us)  
[bpfanner@energy.state.ca.us](mailto:bpfanner@energy.state.ca.us)  
[jbabula@energ.state.ca.us](mailto:jbabula@energ.state.ca.us)  
[pao@energy.state.ca.us](mailto:pao@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct. Executed at South San Francisco, California, on May 12, 2008.

  
Bonnie Heeley