



June 2, 2010

California Energy Commission
Attn: Paul Kramer, Hearing Officer
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Re: **Calico Solar Project, Docket No. 08-AFC- 13**

Dear Mr. Kramer,

Please find enclosed for filing the original and one extra copy of Sierra Club's Petition to Intervene in the Calico Solar Project Siting Proceeding. Please return a file-endorsed copy in the self-addressed, stamped envelope provided. If you have any questions or need additional information, please contact me at (415) 977-5766 or violet.lehrer@sierraclub.org. Thank you for your attention to this matter.

Sincerely,

Violet Lehrer
Program Assistant
Sierra Club Environmental Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105

STATE OF CALIFORNIA

**Energy Resources Conservation
and Development Commission**

In the Matter of:

The Application for Certification for the
Calico Solar Project

Docket No. 08-AFC-13

**SIERRA CLUB
PETITION TO INTERVENE**

June 2, 2010

Gloria D. Smith, Senior Attorney
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STATE OF CALIFORNIA
**Energy Resources Conservation
and Development Commission**

In the Matter of:

The Application for Certification for the
Calico Solar Project

Docket No. 08-AFC-13

**SIERRA CLUB
PETITION TO INTERVENE**

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

Sierra Club is one of the oldest conservation groups in the country with over 700,000 members nationally in sixty four chapters in all fifty states including the District of Columbia and Puerto Rico. Sierra Club participates in various energy dockets before public utility and energy commissions nationwide. One of Sierra Club’s top priorities is to help speed the country’s

transition from an energy economy dependent on cheap fossil fuels to a robust clean energy economy based on renewables. We believe solar energy is the cleanest, most abundant, renewable energy source available, particularly in the West. At the same time, Sierra Club is a long time protector of our public lands. We believe solar projects can and must be sited in an environmentally responsible way.

Sierra Club has an interest in ensuring that the preservation of important desert ecosystems is not needlessly sacrificed to meet our renewable energy goals. For this and future utility-scale solar projects to be acceptable in the Mojave desert, projects must be sited and configured on our public lands in a manner that fully considers both the requirements of a given project *and* the existing desert ecosystem.

Sierra Club is concerned about this particular project's potentially significant impacts on biological and other natural resources. Sierra Club's participation would focus on finding solutions to avoid and/or reduce significant project-related impacts. Sierra Club's ultimate position in this proceeding will be based on the totality of the information developed for the Commission.

Sierra Club has been granted intervention in other renewable siting cases. In California, Sierra Club moved to intervene in the Ivanpah Solar Electric Generating System (07-AFC-05). The Commission granted that petition on March 25, 2009. Sierra Club wishes to participate fully in all

phases of this proceeding. Filings should be served on Sierra Club at the address listed below.

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

Dated: June 2, 2010

Respectfully submitted,

Original signed by:

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BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT
COMMISSION OF THE STATE OF CALIFORNIA
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1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION
For the CALICO SOLAR (Formerly SES Solar One)

Docket No. 08-AFC-13

PROOF OF SERVICE

(Revised 5/28/10)

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DECLARATION OF SERVICE

I, Violet Lehrer, declare that on June 2, 2010, I mailed hard copies of the attached Petition to Intervene, dated June 2, 2010. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at: [www.energy.ca.gov/sitingcases/solarone].

The documents have been sent to both the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit, in the following manner:

(Check all that Apply)

FOR SERVICE TO ALL OTHER PARTIES:

- sent electronically to all email addresses on the Proof of Service list;
- by personal delivery;
- by delivering on this date, for mailing in the United State Postal Service with first-class postage thereon fully prepaid, to the name and address of the person served, for mailing that same day in the ordinary course of business; that the envelope was sealed and placed for collection and mailing on that date to those addresses **NOT** marked "email preferred."

AND

FOR FILING WITH THE ENERGY COMMISSION:

- sending an original paper copy and one electronic copy, mailed and emailed respectively, to the address below (*preferred method*);

OR

- depositing in the mail an original and 12 paper copies, as follows:

CALIFORNIA ENERGY COMMISSION
Attn: Docket No. 08-AFC-13
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

I declare under penalty of perjury that the foregoing is true and correct, that I am employed in the county where this mailing occurred, and that I am over the age of 18 years and not a party to this proceeding.

Original signed by:

Violet Lehrer