

STATE OF CALIFORNIA  
Energy Resources Conservation  
and Development Commission

**DOCKET**

**08-AFC-13C**

DATE APR 18 2011

RECD. APR 18 2011

In the Matter of:

Petition to Amend the Calico Solar  
Project

Docket No. 08-AFC-13C

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

April 18, 2011

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

On behalf of the CALIFORNIA  
UNIONS FOR RELIABLE ENERGY

**STATE OF CALIFORNIA**

**Energy Resources Conservation  
and Development Commission**

In the Matter of:

Petition to Amend the Calico Solar  
Project

Docket No. 08-AFC-13C

**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 in any proceeding. The petition must set 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" the presiding member "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 was granted intervention in the application proceeding for the Calico Solar Project. CURE has been granted intervention in many 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

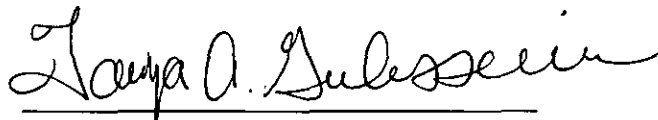
the Matter of Application for Certification for the High Desert Power Project, Docket No. 97-AFC-1, Order Granting Petition to Intervene at 2 (Dec. 24, 1997)). The same decision should be reached here.

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 18, 2011

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

On behalf of the CALIFORNIA UNIONS  
FOR RELIABLE ENERGY

Calico Solar – 08-AFC-13  
DECLARATION OF SERVICE

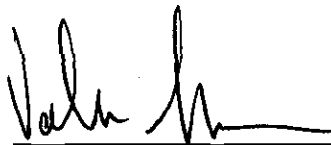
I, Valerie Stevenson, declare that on April 18, 2011, I served and filed copies of the attached PETITION TO INTERVENE BY CALIFORNIA UNIONS FOR RELIABLE ENERGY, dated April 18, 2011. The original document, filed with the Docket Unit, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at [www.energy.ca.gov/sitingcases/calicosolar/CalicoSolar\\_POS.pdf](http://www.energy.ca.gov/sitingcases/calicosolar/CalicoSolar_POS.pdf). The document has 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 *electronically to all email addresses on the Proof of Service list; and by depositing in the U.S. mail at Sacramento, CA, with first-class postage thereon fully prepaid and addressed as provided on the Proof of Service list to those addresses NOT marked "email preferred."*

AND

By sending an original paper copy and one electronic copy, mailed and emailed respectively to:

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

I declare under penalty of perjury that the foregoing is true and correct. Executed at South San Francisco, CA, on April 18, 2011.



---

Valerie Stevenson



**BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT  
COMMISSION OF THE STATE OF CALIFORNIA  
1516 NINTH STREET, SACRAMENTO, CA 95814  
1-800-822-6228 – WWW.ENERGY.CA.GOV**

***For the CALICO SOLAR AMENDMENT***

**Docket No. 08-AFC-13C  
PROOF OF SERVICE**

**APPLICANT**

Daniel J. O'Shea  
Managing Director  
Calico Solar, LLC  
2600 10th Street, Suite 635  
Berkeley, CA 94710  
[dano@kroadpower.com](mailto:dano@kroadpower.com)

**CONSULTANT**

Angela Leiba  
AFC Project Manager  
URS Corporation  
\*4225 Executive Square, #1600  
La Jolla, CA 92037  
[angela\\_leiba@URSCorp.com](mailto:angela_leiba@URSCorp.com)

**APPLICANT'S COUNSEL**

Allan J. Thompson  
Attorney at Law  
21 C Orinda Way #314  
Orinda, CA 94563  
[allanori@comcast.net](mailto:allanori@comcast.net)

Ella Foley Gannon, Partner  
Bingham McCutchen, LLP  
Three Embarcadero Center  
San Francisco, CA 94111  
[ella.gannon@bingham.com](mailto:ella.gannon@bingham.com)

**INTERESTED**

**AGENCIES/ENTITIES/PERSONS**

California ISO  
[e-recipient@caiso.com](mailto:e-recipient@caiso.com)

Jim Stobaugh  
BLM – Nevada State Office  
P.O. Box 12000  
Reno, NV 89520  
[jim\\_stobaugh@blm.gov](mailto:jim_stobaugh@blm.gov)

Rich Rotte, Project Manager  
Bureau of Land Management  
Barstow Field Office  
2601 Barstow Road  
Barstow, CA 92311  
[richard\\_rotte@blm.gov](mailto:richard_rotte@blm.gov)

Becky Jones  
California Department of  
Fish & Game  
36431 41st Street East  
Palmdale, CA 93552  
[dfgpalm@adelphia.net](mailto:dfgpalm@adelphia.net)

County of San Bernardino  
Ruth E. Stringer,  
County Counsel  
Bart W. Brizzee,  
Deputy County Counsel  
385 N. Arrowhead Avenue,  
4<sup>th</sup> Floor  
San Bernardino, CA 92415-  
[bbrizzee@cc.sbcounty.gov](mailto:bbrizzee@cc.sbcounty.gov)

California Unions for Reliable  
Energy (CURE)  
c/o: Tanya A. Gulesserian,  
Jason W. Holder  
Adams Broadwell Joseph  
& Cardozo  
601 Gateway Boulevard,  
Ste. 1000  
South San Francisco, CA  
94080  
[tgulesserian@adamsbroadwell.com](mailto:tgulesserian@adamsbroadwell.com)  
[jholder@adamsbroadwell.com](mailto:jholder@adamsbroadwell.com)

Defenders of Wildlife  
Joshua Basofin  
1303 J Street, Suite 270  
Sacramento, California 95814  
*E-Mail Service Preferred*  
[jbasofin@defenders.org](mailto:jbasofin@defenders.org)

Society for the Conservation of  
Bighorn Sheep  
Bob Burke & Gary Thomas  
P.O. Box 1407  
Yermo, CA 92398  
[cameracoordinator@sheepsociety.com](mailto:cameracoordinator@sheepsociety.com)

Basin and Range Watch  
Laura Cunningham &  
Kevin Emmerich  
P.O. Box 70  
Beatty, NV 89003  
[atomictoandranch@netzero.net](mailto:atomictoandranch@netzero.net)

**INTERESTED**  
**AGENCIES/ENTITIES/PERSONS**

Patrick C. Jackson  
600 N. Darwood Avenue  
San Dimas, CA 91773  
*E-Mail Service Preferred*  
[ochsjack@earthlink.net](mailto:ochsjack@earthlink.net)

Gloria D. Smith, Senior  
Attorney  
Travis Ritchie  
Sierra Club  
85 Second Street, Second floor  
San Francisco, CA 94105  
*E-Mail Service Preferred*  
[gloria.smith@sierraclub.org](mailto:gloria.smith@sierraclub.org)  
[travis.ritchie@sierraclub.org](mailto:travis.ritchie@sierraclub.org)

Newberry Community  
Service District  
Wayne W. Weierbach  
P.O. Box 206  
Newberry Springs, CA 92365  
[newberryCSD@gmail.com](mailto:newberryCSD@gmail.com)

Cynthia Lea Burch  
Steven A. Lamb  
Anne Alexander  
Katten Muchin Rosenman,  
LLP  
2029 Century Park East,  
Suite 2600  
Los Angeles, CA 90067-3012  
[Cynthia.burch@kattenlaw.com](mailto:Cynthia.burch@kattenlaw.com)  
[Steven.lamb@kattenlaw.com](mailto:Steven.lamb@kattenlaw.com)  
[Anne.alexander@kattenlaw.com](mailto:Anne.alexander@kattenlaw.com)

**ENERGY COMMISSION**

Kourtney Vaccaro  
Hearing Officer  
[kvaccaro@energy.state.ca.us](mailto:kvaccaro@energy.state.ca.us)

Kerry Willis  
Staff Counsel  
[kwillis@energy.state.ca.us](mailto:kwillis@energy.state.ca.us)

Steve Adams  
Co-Staff Counsel  
[sadams@energy.state.ca.us](mailto:sadams@energy.state.ca.us)

Craig Hoffman  
Project Manager  
[choffman@energy.state.ca.us](mailto:choffman@energy.state.ca.us)

Jennifer Jennings  
Public Adviser  
*E-Mail Service Preferred*  
[publicadviser@energy.state.ca.us](mailto:publicadviser@energy.state.ca.us)