

STATE OF CALIFORNIA
Energy Resources Conservation
and Development Commission

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| DOCKET | |
| 11-CAI-02 | |
| DATE | OCT 12 2011 |
| RECD. | OCT 12 2011 |

In the Matter of:)
)
Complaint and Investigation) Docket No. 11-CAI-02
Jurisdictional Determination Regarding East and)
North Brawley Geothermal Developments)
_____)

INTERVENOR COUNTY OF IMPERIAL'S
JOINDER TO OPENING BRIEF OF ORMAT NEVADA, INC.

October 12, 2011

OFFICE OF THE COUNTY COUNSEL
COUNTY OF IMPERIAL
Michael Rood, State Bar No. 96628
940 Main Street, Suite 205
El Centro, California 92243
Phone: (760) 482-4400
Fax: (760) 353-9347
michaelrood@co.imperial.ca.us

REMY, THOMAS, MOOSE & MANLEY, LLP
Howard F. Wilkins, State Bar No. 203083
Sabrina V. Teller, State Bar No. 215759
Jeannie Lee, State Bar No. 263716
455 Capitol Mall, Suite 210
Sacramento, California 95814
Phone: 916-443-2745
Fax: 916-443-9017
Email: hwilkins@rtmmlaw.com
steller@rtmmlaw.com

Intervenor County of Imperial (“County”) hereby joins the Opening Brief of Ormat Nevada, Inc. filed in this matter on or about October 12, 2011, and fully incorporates by reference the Opening Brief herein. In addition, the County notes that a determination that these projects fall under CEC jurisdiction or a finding that these project should be aggregated would set a precedent that would make it very difficult for the County to develop the its significant natural and indigenous resources, including future geothermal projects.¹ For reasons set forth in Ormat’s Opening Brief, the County respectfully requests that the Commission dismiss CURE’s Complaint, with prejudice, and issue an order disclaiming jurisdiction over both North Brawley and East Brawley.

The County looks forward to continuing to work cooperatively with the CEC and its staff in its review of all renewable energy projects in Imperial County and thanks the CEC for its support for the full development of the County’s natural and indigenous resources to further the state’s goals and objectives in promoting the public’s health and welfare.

October 12, 2011

Respectfully submitted,
REMY, THOMAS, MOOSE & MANLEY, LLP

By



Howard F. Wilkins
455 Capitol Mall, Suite 210
Sacramento, CA 95814
(916) 443-2745 phone
(916) 443-9017 fax
hwilkins@rtmmlaw.com

Attorneys for Imperial County

¹ 9/26/11 RT 300:21 – 301:8.

DECLARATION OF SERVICE

I, Valorie Wood, declare that on, October 12, 2011, I served and filed copies of the attached INTERVENOR COUNTY OF IMPERIAL'S JOINDER TO OPENING BRIEF OF ORMAT NEVADA, INC., dated October 12, 2011. The original document, filed with the Docket Unit or the Chief Counsel, as required by the applicable regulations, is accompanied by a copy of the most recent Proof of Service list, located on the web page for this project at:

[<http://www.energy.ca.gov/proceedings/11-cai-02/index.html>]

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service list) and to the Commission's Docket Unit or Chief Counsel, as appropriate, in the following manner:

(Check all that Apply)

For Service to all other parties:

- ✓ Served electronically to all e-mail addresses on the Proof of Service list;
- ✓ Served by delivering on this date, either personally, or for mailing with the U.S. 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 service preferred."

AND

For Filing with the Docket Unit at the Energy Commission:

— by sending an original paper copy and one electronic copy, mailed with the U.S. Postal Service with first class postage thereon fully prepaid and e-mailed respectively, to the address below (preferred method);

OR

— by depositing an original and 12 paper copies in the mail with the U.S. Postal Service with first class postage thereon fully prepaid, as follows:

CALIFORNIA ENERGY COMMISSION – DOCKET UNIT
Attn: Docket No. 11-CAI-02
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.state.ca.us

OR, if filing a Petition for Reconsideration of Decision or Order pursuant to Tile 20, §1720:

- ✓ Served by delivering on this date one electronic copy by e-mail, and an original paper copy to the Chief Counsel at the following address, either personally, or for mailing with first class postage thereon fully prepaid:

California Energy Commission
Michael J. Levy, Chief Counsel
1516 Ninth Street, MS-14
Sacramento, CA 95814
mlevy@energy.state.ca.us

I declare under penalty of perjury under the laws of the State of California 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 the proceedings.

VALORIE WOOD



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

***IN THE MATTER OF COMPLAINT AGAINST
ORMAT NEVADA, INC. BROUGHT BY
CALIFORNIA UNIONS FOR RELIABLE ENERGY***

**Docket No. 11-CAI-02
(Revised 9/12/11)**

RESPONDENT

Ormat Nevada, Inc.
6225 Neil Road
Reno, NV 89511

COUNSEL FOR RESPONDENT

Christopher T. Ellison
Samantha Pottenger
Ellison, Schneider and Harris, LLP
2600 Capitol Avenue, Suite 400
Sacramento, CA 95816
cte@eslawfirm.com
sgp@eslawfirm.com

COMPLAINANT

California Unions for Reliable Energy
c/o Adams Broadwell Joseph
& Cardozo
Marc D. Joseph
Tanya A. Gulesserian
Elizabeth Klebaner
601 Gateway Boulevard, Suite 1000
South San Francisco, CA 94080
mdjoseph@adamsbroadwell.com
tgulesserian@adamsbroadwell.com
eklebaner@adamsbroadwell.com

INTERVENORS

*Imperial County Planning and
Development Services
Armando Villa,
Planning Director
801 Main Street
El Centro, CA 92243-2811
armandovilla@co.imperial.ca.us

*Remy, Thomas, Moose &
Manley, LLP
Howard F. Wilkins
455 Capitol Mall, Suite 210
Sacramento, CA 95814
hwilkins@rtmmlaw.com

**INTERESTED
AGENCIES/ENTITIES/PERSONS**

Imperial County Planning and
Development Services
801 Main Street
El Centro, CA 92243

Imperial County Air Pollution
Control District
150 South 9th Street
El Centro, CA 92243-2801

Imperial Irrigation District
333 E. Barioni Boulevard
Imperial, CA 92251

**ENERGY COMMISSION
DECISIONMAKERS**

ROBERT B. WEISENMILLER
Chair and Associate Member
rweisenm@energy.state.ca.us

KAREN DOUGLAS
Commissioner and Presiding Member
kldougla@energy.state.ca.us

Kenneth Celli
Hearing Officer
kcelli@energy.state.ca.us

ENERGY COMMISSION STAFF

Bob Worl
Project Manager
rworl@energy.state.ca.us

Jeff Ogata
Assistant Chief Counsel
jogata@energy.state.ca.us

**ENERGY COMMISSION
PUBLIC ADVISER**

Jennifer Jennings
Public Adviser
e-mail service preferred
[*publicadviser@energy.state.ca.us](mailto:publicadviser@energy.state.ca.us)