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September 6, 2011

DOCKET	
11-CAI-02	
DATE	SEP 06 2011
RECD.	SEP 06 2011

VIA E-MAIL AND U.S. MAIL

California Energy Commission – Docket Unit
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Re: Docket No. 11-CAI-02, Petition to Intervene by Imperial County

Dear Sir or Madame:

Please find attached an addendum to the Petition to Intervene by Imperial County, dated September 2, 2001. The attached addendum addresses the requirement under California Code of Regulations, title 20, section 1207 for a petition to include the name, address, and phone number of the petitioner. With the exception of adding this information, no other changes were made to the petition.

Please do not hesitate to contact me with any further questions.

Very truly yours,

Howard F. Wilkins III

STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

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

ADDENDUM TO

PETITION TO INTERVENE BY

IMPERIAL COUNTY

September 6, 2011

OFFICE OF THE COUNTY COUNSEL
COUNTY OF IMPERIAL
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STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

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

PETITION TO INTERVENE BY IMPERIAL COUNTY

Pursuant to section 1207 of Title 20 of the California Code of Regulations, Imperial County 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 proceeding, 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...."

The County is the local jurisdiction in which the East and North Brawley Geothermal Developments that are at issue in this proceeding are located. The County Planning and Development Services is currently processing an application for a Conditional Use Permit for the East Brawley project and has caused a Draft Environmental Impact Report (EIR) to be prepared and published, in furtherance of the County's duties and responsibilities as a "lead agency" under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). The

County has fully complied with CEQA thus far in assessing the project's environmental impacts and is considering all feasible mitigation measures and project alternatives. The County is currently in the process of preparing a Final EIR consisting of responses to all substantive comments received on the Draft EIR and minor changes to the text of the Draft EIR. The County wishes to maintain its jurisdiction over the permitting process for this and similarly situated geothermal projects, especially with regard to the development and implementation of feasible mitigation, in furtherance of the County's police powers and obligations under State law to protect the public health and welfare of its residents, businesses and natural resources. Therefore, the County wishes to participate fully in the all phases of this proceeding. Filings should be served on the County's counsel of record at the address listed below.

Pursuant to Section 1207(a), the name, address, and telephone number of the petitioner is as follows:

Armando Villa, Planning Director
Imperial County Planning and Development Services
801 Main Street
El Centro, CA 92243-2811

The County opposes CURE's complaint and request for investigation and supports Ormat's motion to dismiss filed on August 29, 2011. For the foregoing reasons, Imperial County

respectfully requests that the Commission grant its petition to intervene in this proceeding, and allow the County to participate as a party.

September 6, 2011

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

By _____

Howard F. Wilkins
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Attorneys for Imperial County

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 8/19/11)

RESPONDENT

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

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COMPLAINANT

California Unions for Reliable Energy
c/o Adams Broadwell Joseph
& Cardozo
Marc D. Joseph
Tanya A. Gulesserian
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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

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*indicates change

DECLARATION OF SERVICE

I, Valorie Wood, declare that on, September 6, 2011, I served and filed copies of the attached Addendum to Petition to Intervene By Imperial County, dated September 6, 2011. The original document, filed with the Docket Unit or the Chief Counsel, as required by the applicable regulation, 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:

X Served electronically to all e-mail addresses on the Proof of Service list;

X 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:

X 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 Title 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 the U.S. Postal Service 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 proceeding.

Valorie Wood

*indicates change