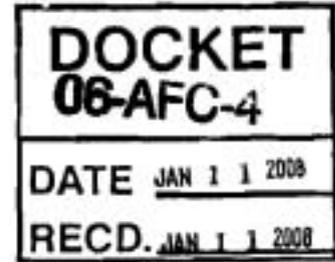


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7 Attorneys for COUNTY OF LOS ANGELES

8 STATE OF CALIFORNIA
9 STATE ENERGY RESOURCES
10 CONSERVATION AND DEVELOPMENT COMMISSION

11 In the Matter of:

12 Vernon Power Plant Project

DOCKET NO.: 06-AFC-4

13 PETITION TO INTERVENE BY
14 COUNTY OF LOS ANGELES

15
16 Intervener, County of Los Angeles, states:

17 1. Intervener, County of Los Angeles ("County"), petitions to intervene in the above
18 entitled proceedings on behalf of its residents.

19 2. Intervener contact information is:

20 Ellen Sandt
21 City Chief Executive
22 FE Off.
23 Kenneth Hahn Hall of Administration
24 500 West Temple St.
25 Los Angeles, California 90012
26 (213) 974-1186

27 Howard Choy
28 Division Manager - Energy Management
Internal Services Department
1100 North Eastern Avenue, Room 300
Los Angeles, California 90063

3. Intervener is a body corporate and politic and a political subdivision of the State of

1 California exercising authority within its boundaries to the full extent provided by the law. The
2 proposed Vernon Power Plant will be situated within the City of Vernon, which is within Los
3 Angeles County. Vernon Power Plant's application for certification indicates it will increase air
4 emissions in the Vernon area. The County, as a provider of regional governmental services, has an
5 interest to promote public health, safety, welfare and environmental quality for its region. Further,
6 the County has the additional responsibility to protect the interests of residents of the
7 unincorporated areas. Unincorporated areas are governed by the Los Angeles County Board of
8 Supervisors. County departments are responsible for delivering municipal services to these
9 communities. The unincorporated areas of East Los Angeles and Florence-Firestone are in close
10 proximity to the City of Vernon, and, as such, **normal** prevailing winds will likely carry pollution
11 from the power plant into their communities. The County is concerned about the **proposed** power
12 plant's potential impact on the County's land use efforts, on the public health, safety and welfare of
13 its residents, and on the region's environment.

14 4. Moreover, additional issues are likely to be raised through the California Energy
15 Commission's certification process, which makes the County's participation as a full party
16 intervener critical to ensure that land use, public health, safety, welfare and environmental issues
17 are fully explored. For these reasons, the County respectfully requests the right to participate in
18 the above captioned matter as a party-intervener.

19 5. Intervener reserves all rights, including, without limitation, the right to discovery, to
20 present evidence and to cross-examine witnesses.

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6. Intervener is represented by counsel. Please contact Intervener through its counsel:

Raymond G. Fortner, Jr., County Counsel
Joyce Aiello, Assistant County Counsel
Allison Morse, Deputy County Counsel
Behnaz Tashakorian, Senior Associate County Counsel
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(213) 974-1931
btashakorian@counsel.lacounty.gov

DATED: January 11, 2008

Respectfully submitted,

RAYMOND G. FORTNER, JR.
County Counsel

By 
ALLISON MORSE
Deputy County Counsel

Attorneys for COUNTY OF LOS ANGELES

1 **PROOF OF SERVICE**
2 **VERNON POWER PLANT PROJECT - DOCKET NO. 06-AFC-4**

3 STATE OF CALIFORNIA, County of Los Angeles:

4 Sandra Contreras states: I am employed in the County of Los Angeles, State of California,
5 over the age of eighteen years and not a party to the within action. My business address is 648
6 Kenneth Hahn Hall of Administration, 500 West Temple Street, Los Angeles, California 90012-
7 2713.

8 That on January 11, 2008, I served the attached

9 **PETITION TO INTERVENE BY COUNTY OF LOS ANGELES**

10 upon all Interested Party(ies) in this action by placing the original a true copy thereof
11 enclosed in a sealed envelope addressed as follows as stated on the attached mailing list:
12 **SEE ATTACHED SERVICE LIST**

13 **(BY MAIL)** by sealing and placing the envelope for collection and mailing on the date and
14 at the place shown above following our ordinary business practices. I am readily familiar
15 with this office's practice of collection and processing correspondence for mailing. Under
16 that practice the correspondence would be deposited with the United States Postal Service
17 that same day with postage thereon fully prepaid.

18 **(VIA ELECTRONIC MAIL)** Transmission via electronic mail was consistent with the
19 requirements of California Code of Regulations, title 20, sections 1209, 1209.5 and 1210.
20 All electronic copies were sent to all those identified on the Proof of Service list attached.

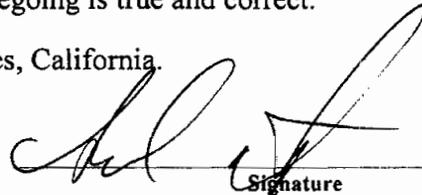
21 I declare that I am employed in the office of a member of the bar of this court at whose
22 direction the service was made.

23 I declare under penalty of perjury that the foregoing is true and correct.

24 Executed on January 11, 2008, at Los Angeles, California.

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Sandra Contreras
(PRINT)


Signature

**PROOF OF SERVICE LIST FOR THE MATTER OF:
VERNON POWER PLANT PROJECT - DOCKET NO. 06-AFC-4**

CALIFORNIA ENERGY COMMISSION

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**PROOF OF SERVICE LIST FOR THE MATTER OF:
VERNON POWER PLANT PROJECT - DOCKET NO. 06-AFC-4**

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**PROOF OF SERVICE LIST FOR THE MATTER OF:
VERNON POWER PLANT PROJECT - DOCKET NO. 06-AFC-4**

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