

STATE OF CALIFORNIA  
State Energy Resources  
Conservation and Development Commission

<b>DOCKET</b>	
<b>07-AFC-6</b>	
DATE	<u>OCT 01 2008</u>
RECD.	<u>OCT 01 2008</u>

In the Matter of: )  
CARLSBAD ENERGY CENTER )  
\_\_\_\_\_ )

DOCKET NO. 07-AFC-6  
ROB SIMPSON  
PETITION FOR INTERVENTION

Petitioner, Rob Simpson desires to participate fully with the rights and obligations of a party.. (Cal. Code of Regs., tit. 20, § 1207)

Petitioner is a resident of California and a citizen of the United States of America and wishes to preserve his First Amendment right to "*petition the Government for a redress of grievances.*"

Petitioner has 2 children ages 8 and 10 for whom he intends to preserve the planets ability to maintain human life. Clean energy independence is his clearest path to this future. Petitioner also has family, friends and potential business in the area of the proposed plant.

Petitioner interest is relevant to this particular proceeding as he considers the City of Carlsbad to be one of the most beautiful places in the State of California. Significant natural resources exist protected by a city government that has demonstrated leadership in environmental stewardship. Petitioner also accepts the "Responsibility" identified in the California Environmental Quality Act.

(a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.

e) Every citizen has a responsibility to contribute to the

preservation and enhancement of the environment.

(f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.

(California Public Resources Code section 21000)

Petitioner has demonstrated an interest in California Energy production and power plant licensing before the Commission. Specifically, Russell City Energy Center, Eastshore Energy Center, East Altamont Energy Center, Humboldt Bay Repower Project and now Carlsbad Energy Center. Petitioner has prevailed in his appeal to the United States Environmental Protection Agency, Environmental Appeals Board (EAB) petition 08-01 regarding the inadequacies of the Russell City Energy Center Permit. He will also likely prevail in his pending EAB appeal of the Humboldt Bay Repower Project.

Petitioner has functioned as a consultant in Power plant licensing cases for the County of Alameda, the City of Hayward, Chabot Las Positas Community College, Golden Gate University, the Audubon Society, Hayward Area Planning Association, Communities for A Better Environment, Citizens Against Pollution, California Pilots Association, Californians for Renewable Energy as well as other community groups.

Petitioner believes that he brings a perspective to licensing cases that is often otherwise unavailable to persons involved in their first siting. It is his intent to provide an independent and informed citizens perspective to the licensing process and hopes that the public can participate to ensure that any plant licensed in California at minimum observes State and Federal requirements for the public protection and preservation of the environment. Petitioner desires to assure that the Carlsbad Energy Center employs Best Available Control Technology, site specific integration. and provides full mitigation for all air quality and other identified impacts form the Energy Center.

Petitioner will fully participate in the proceeding. Petitioner desires to present evidence and cross examine witnesses. Petitioner is represented by himself.

Respectfully submitted on September 30, 2008 By

Rob Simpson  
Environmental Consultant  
27126 Grandview Avenue Hayward CA 94542  
510-909-1800 rob@redwoodrob.com



**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**

APPLICATION FOR CERTIFICATION  
FOR THE CARLSBAD ENERGY CENTER  
PROJECT

Docket No. 07-AFC-6  
PROOF OF SERVICE  
(Revised 9/10/2008)

INSTRUCTIONS: All parties shall 1) send an original signed document plus 12 copies OR 2) mail one original signed copy AND e-mail the document to the web address below, AND 3) all parties shall also send a printed OR electronic copy of the documents that shall include a proof of service declaration to each of the individuals on the proof of service:

CALIFORNIA ENERGY COMMISSION  
Attn: Docket No. 07-AFC-6  
1516 Ninth Street, MS-15  
Sacramento, CA 95814-5512  
[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)

APPLICANT

David Lloyd  
Carlsbad Energy Center, LLC  
1817 Aston Avenue, Suite 104  
Carlsbad, CA 92008  
[David.Lloyd@nrgenergy.com](mailto:David.Lloyd@nrgenergy.com)

Tim Hemig, Vice President  
Carlsbad Energy Center, LLC  
1817 Aston Avenue, Suite 104  
Carlsbad, CA 92008  
[Tim.Hemig@nrgenergy.com](mailto:Tim.Hemig@nrgenergy.com)

APPLICANT'S CONSULTANTS

Robert Mason, Project Manager  
CH2M Hill, Inc.  
3 Hutton Centre Drive, Ste. 200  
Santa Ana, CA 92707  
[robert.Mason@ch2m.com](mailto:robert.Mason@ch2m.com)

Megan Sebra  
CH2M Hill, Inc.  
2485 Natomas Park Drive, Ste. 600  
Sacramento, CA 95833  
[Megan.Sebra@ch2m.com](mailto:Megan.Sebra@ch2m.com)

COUNSEL FOR APPLICANT

John A. McKinsey  
Stoel Rives LLP  
980 Ninth Street, Ste. 1900  
Sacramento, CA 95814  
[jamckinsey@stoel.com](mailto:jamckinsey@stoel.com)

INTERESTED AGENCIES

California ISO  
P.O. Box 639014  
Folsom, CA 95763-9014  
[e-recipient@caiso.com](mailto:e-recipient@caiso.com)

City of Carlsbad  
Joseph Garuba,  
Municipals Project Manager Manager  
Ron Ball, Esq., City Attorney  
1200 Carlsbad Village Drive  
Carlsbad, CA 92008  
[jgaru@ci.carlsbad.ca.us](mailto:jgaru@ci.carlsbad.ca.us)  
[rball@ci.carlsbad.ca.us](mailto:rball@ci.carlsbad.ca.us)

Allan J Thompson  
Attorney for the City  
21 "C" Orinda Way #314  
Orinda, CA 94563

INTERVENORS

California Unions for Reliable Energy ("CURE")  
Suma Peesapati  
Marc D. Joseph  
Adams Broadwell Joseph & Cardozo  
601 Gateway Boulevard, Suite 1000  
South San Francisco, CA 94080  
[speesapati@adamsbroadwell.com](mailto:speesapati@adamsbroadwell.com)

\*Center for Biological Diversity  
c/o William B. Rostove  
EARTHJUSTICE  
426 17<sup>th</sup> St., 5<sup>th</sup> Floor  
Oakland, CA 94612  
[wrostov@earthjustice.org](mailto:wrostov@earthjustice.org)

Paul Kramer  
Hearing Officer  
[pkramer@energy.state.ca.us](mailto:pkramer@energy.state.ca.us)

Mike Monasmith  
Siting Project Manager  
[mmonasmi@energy.state.ca.us](mailto:mmonasmi@energy.state.ca.us)

Dick Ratliff  
Staff Counsel  
[dratliff@energy.state.ca.us](mailto:dratliff@energy.state.ca.us)

Public Advisor's Office  
[pao@energy.state.ca.us](mailto:pao@energy.state.ca.us)

ENERGY COMMISSION

JAMES D. BOYD  
Commissioner and Presiding Member  
[jboyd@energy.state.ca.us](mailto:jboyd@energy.state.ca.us)

KAREN DOUGLAS  
Commissioner and Associate Member  
[kdougl@energy.state.ca.us](mailto:kdougl@energy.state.ca.us)

DECLARATION OF SERVICE

I, \_\_\_\_\_, declare that on \_\_\_\_\_, I deposited copies of the attached \_\_\_\_\_, in the United States mail at \_\_\_\_\_ with first-class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above.

OR

Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210. All electronic copies were sent to all those identified on the Proof of Service list above.

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

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