

**STATE OF CALIFORNIA**

**Energy Resources Conservation  
and Development Commission**

In the Matter of:

The Application for Certification  
of the CHEVRON RICHMOND POWER  
PLANT REPLACEMENT PROJECT

Docket No. 07-SPPE-1

<b>DOCKET</b> <b>07-SPPE-1</b>
DATE JUL - 2 2007
RECD. JUL - 2 2007

**PETITION TO INTERVENE BY  
CONTRA COSTA BUILDING AND CONSTRUCTION TRADES  
COUNCIL**

July 2, 2007

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Pursuant to sections 1207 of Title 20 of the California Code of Regulations, the Contra Costa Building and Construction Trades Council (“CCBCTC”) 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 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 he deems reasonable and relevant....”

CCBCTC is a council of unions whose members work on refinery and power plant projects in Contra Costa County, California. Thus, the project directly affects the union members' immediate economic interests.

The project also affects the union members' longer 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.

Additionally, union members live in the communities that suffer the impacts of environmentally detrimental projects. Unions have an interest in helping to minimize the impacts of projects that would degrade the environment, and in enforcing environmental laws to protect their members.

Finally, union members are concerned about projects that cause serious environmental harm without providing countervailing economic benefits. The Commission's process provides for a balancing of the project's socioeconomic and environmental impacts. CCBCTC's ultimate position in this proceeding will be determined based on all of the factors that will be considered by the Commission.

Labor unions have 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 a labor union's participation in

those cases, finding the union'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.

CCBCTC wishes to participate fully in all phases of this proceeding. Filings should be served on CCBCTC at the address listed below.

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

Dated: July 2, 2007

Respectfully submitted,

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**PROOF OF SERVICE**

I, Bonnie Heeley, declare that on July 2, 2007, I deposited copies of the attached PETITION TO INTERVENE BY CONTRA COSTA BUILDING AND CONSTRUCTION TRADES COUNCIL via email or U.S. mail as follows:

Via U.S. Mail

CALIFORNIA ENERGY COMMISSION  
DOCKET UNIT

Attn: Docket No. 07-SPPE-1  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

Via email:

[docket@energy.state.ca.us](mailto:docket@energy.state.ca.us)  
[mdyas@energy.state.ca.us](mailto:mdyas@energy.state.ca.us)  
[PAO@energy.state.ca.us](mailto:PAO@energy.state.ca.us)

I declare under penalty of perjury that the foregoing is true and correct. Executed at South San Francisco, California, on July 2, 2007.

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Bonnie Heeley