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DOCKET	
06-AFC-4	
DATE	DEC 18 2007
RECD.	DEC 18 2007

6 **STATE OF CALIFORNIA**
7 **STATE ENERGY RESOURCES**
8 **CONSERVATION AND DEVELOPMENT COMMISSION**

9 In the Matter of:

10 Vernon Power Plant Project

DOCKET NO.: 06-AFC-4

**PETITION TO INTERVENE BY CITY
OF LOS ANGELES**

11
12 Intervener CITY OF LOS ANGELES states:

13 1. Intervener City of Los Angeles ("City") petitions to intervene in the above-entitled
14 proceeding on behalf of its residents.

15 2. Intervener City's contact information is:

16 Los Angeles City Council District No. 14
17 Council Member Jose Huizar
18 200 N. Spring Street, Room 465, City Hall
19 Los Angeles, CA 90012
20 Tel: (213) 473-7014

21 Los Angeles City Council District No. 9
22 Council Member Jan Perry
23 200 N. Spring Street, Room 420, City Hall
24 Los Angeles, CA 90012
25 Tel: (213) 473-7009

26 3. Intervener City is a municipal corporation and charter city located in Los Angeles
27 County, California, adjacent to the City of Vernon. The City of Los Angeles' duties
28 and powers include protection of the environment and the public health of its
residents. The Vernon Power Plant application for certification indicates that it will
dramatically increase air pollution emissions in the Vernon area, which will disperse

1 toward neighboring and downwind communities. These air pollutants will directly
2 and dangerously affect the health of the residents of the City of Los Angeles,
3 especially children, seniors, and those with impaired lung function. Normal prevailing
4 winds will tend to blow air pollution emissions from the power plant towards the City
5 of Los Angeles, particularly the adjacent neighborhoods in the southern and eastern
6 parts of the City. These neighborhoods are already heavily impacted by air pollution
7 from industrial facilities, diesel trucks, and other sources. Boyle Heights and East Los
8 Angeles are densely populated, largely Latino areas of the City of Los Angeles in the
9 vicinity of the power plant and will be heavily impacted by the construction and
10 operation of an additional 943 megawatt combined-cycle electric generating facility.
11 Intervener City is very concerned about the cumulative pollution impacts of this
12 project on the health and well being of the residents of the City of Los Angeles and on
13 the environment.

14 4. It is in the interest of the City of Los Angeles and its residents to oppose development
15 of the proposed new 943 megawatt power plant due to the likelihood of increased
16 adverse health impacts on children and families in Los Angeles and to insure that toxic
17 air emissions from the proposed power plant are reduced and mitigated to the
18 maximum extent possible. It is necessary that the City intervene in the certification
19 proceedings to protect the City's environmental and public health interests and those
20 of its residents.

21 5. In addition to the impacts to the City and its residents described above, other issues are
22 likely to become clear through the California Energy Commission's ("CEC")
23 assessment process, which makes the City's participation as a full party-intervener
24 critical to ensuring that the public health and environmental issues are fully explored.
25 The interests the City seeks to further in this action are protection of the environment
26 and the public health of the City's residents. For these reasons, the City respectfully
27 requests the right to participate in the above-captioned matter as a party-intervener.

28 6. Intervener City reserves the right to present evidence and to cross-examine witnesses.

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**PROOF OF SERVICE
(VIA VARIOUS METHODS)**

I, the undersigned, say: I am over the age of 18 years and not a party to the within action or proceeding. My business address is 700 City Hall East, 200 North Main Street, Los Angeles, California 90012.

On December 18, 2007, I served the foregoing documents described as **PETITION TO INTERVENE BY CITY OF LOS ANGELES**, on all interested parties in this action by placing copies thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

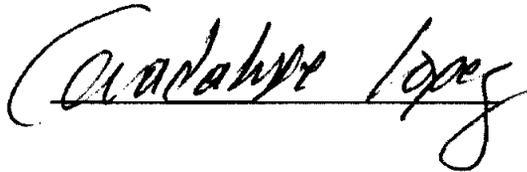
[X] BY MAIL - I deposited such envelope in the mail at Los Angeles, California, with first class postage thereon fully prepaid. I am readily familiar with the business practice for collection and processing of correspondence for mailing. Under that practice, it is deposited with the United States Postal Service on that same day, at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one (1) day after the date of deposit for mailing in affidavit; and/ or

[X] VIA ELECTRONIC MAIL - 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 below.

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

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 18, 2007, at Los Angeles, California.

GUADALUPE LOPEZ
(PRINT)



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

CALIFORNIA ENERGY COMMISSION
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VERNON POWER PLANT PROJECT – DOCKET NO. 06-AFC-4**

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