MOUNTAINVIEW
POWER COMPANY, LLC℠

A SOUTHERN CALIFORNIA EDISON® Company

March 30, 2009

Chris Davis
Compliance Project Manager
California Energy Commission
1516 Ninth Street, MS 2000
Sacramento, CA 95814

RE: MOUNTAINVIEW POWER COMPANY LLC
(Docket No. 00-AFC-2)
PETITION TO AMEND TO CHANGE NAME OF OWNING ENTITY

Dear Mr. Davis,

As we have discussed, Mountainview Power Company, LLC (MVL) plans to liquidate and transfer all of its assets and liabilities to Southern California Edison Company (SCE). Currently, MVL is a wholly-owned subsidiary of SCE. The facility will continue to be referred to as the Mountainview Generating Station. Enclosed is a Petition to Amend (Petition) the March 2001 Final Decision on MVL to reflect the change of ownership. As described in the enclosed Petition, SCE will continue to operate the plant in the same manner as MVL has, with the same personnel. The requested change does not seek approval of any new third party ownership interests in Mountainview Generating Station.

SCE has received approval of the California Public Utility Commission and the Federal Energy Regulatory Commission (FERC) to effect the transfer of the plant assets to SCE. SCE requests that the California Energy Commission expeditiously review and approve our Petition. SCE plans to consummate the transaction on April 30, 2009.

SCE agrees to comply with all Conditions of Certification set forth in the March 2001 Final Decision and subsequent amendments.

If you have any questions regarding this request or the facility, please contact me at 909-478-1713, or Kimberly Brown at 909-478-1721.

Sincerely,

Ian Cuthbertson
Plant Manager

STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

In the Matter of:	)	**Docket No. 00-AFC-2**
	)	
	)	**PETITION TO AMEND TO CHANGE**
MOUNTAINVIEW POWER	)	**NAME OF OWNING ENTITY FROM**
COMPANY, LLC	)	**MOUNTAINVIEW POWER COMPANY, LLC**
	)	**TO SOUTHERN CALIFORNIA EDISON**
SOUTHERN CALIFORNIA EDISON	)	**COMPANY**
COMPANY	)	

I. INTRODUCTION

This Petition seeks to amend the Final Decision issued by the California Energy Commission ("CEC") for Mountainview Power Company, LLC, Docket No. 00-AFC-2, to recognize a transfer of ownership of the facility. Mountainview Power Company, LLC ("MVL") will liquidate and transfer all of its assets and liabilities to Southern California Edison Company("SCE"). Currently, MVL is a wholly-owned subsidiary of SCE. The facility will continue to be referred to as the Mountainview Generating Station. Petitioner requests review and approval of this administrative change.

II. SUMMARY AND ANALYSIS OF PROPOSED CHANGE

MVL is a wholly-owned subsidiary of SCE. Thus, SCE already owns and controls the MVL assets, albeit indirectly. The proposed transaction will simply streamline the ownership structure, allowing SCE to own and control the MVL assets directly. SCE has received approval of the California Public Utilities Commission and the Federal Energy Regulatory Commission to effect the transfer. SCE employees currently operate the facility, so the transfer of ownership will have no effect on the operation of the facility. This change, while technically a transfer of ownership, does not seek approval of any new third party ownership interests in the facility. SCE plans to consummate the transaction on April 30, 2009.

SCE agrees to comply with all Conditions of Certification set forth in the March 2001 Final Decision and subsequent amendments.

III. INFORMATION REQUIRED PURSUANT TO SECTION 1769(A)(1) OF TITLE 20 OF THE CALIFORNIA CODE OF REGULATIONS

A. Complete description of the proposed modifications (including new language for any conditions that will be affected – Section 1769(a)(1)(A)

The proposed modification is to simply change the owning entity from Mountainview Power Company LLC. to Southern California Edison Company. No changes to any Conditions of Certification are required or requested to implement this change.

B. Necessity for the proposed modification – Section 1769(a)(1)(B)

This change is necessary to effect the ownership change from MVL to SCE. SCE expects to complete MVL's liquidation and distribution of MVL's assets to SCE on April 30, 2009.

C. If the modification is based upon information that was known by the petitioner during the certification proceeding, an explanation why the issue was not raised at that time. – Section 1769(a)(1)(C)

This change is not sought based on information that was known to the Petitioner at the time of the certification proceeding.

D. If the modification is based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision, an explanation of why the change should be permitted– Section 1769(a)(1)(D)

The modification is not based on new information that changes or undermines the assumptions, rationale, findings, or other bases of the final decision.

E. An analysis of the impacts the modification may have on the environment and proposed measures to mitigate any significant adverse impacts– Section 1769(a)(1)(E)

Changing the entity that owns the facility will have no effect on the environment. For that reason, no measures are required to mitigate potential environmental impacts.

F. Impacts of the modification on the facility's ability to comply with applicable laws, ordinances, regulations and standards– Section 1769(a)(1)(F)

This modification will have no negative impact on the facility's ability to comply with any laws, ordinances, regulations or standards. The owner change will not result in any changes in the personnel managing the compliance for this project.

G. How the changes will affect the public– Section 1769(a)(1)(G)

There will be no effect on the public resulting from changing the owning entity.

H. Property owners potentially affected by the changes– Section 1769(a)(1)(H)

The requested modification will have no effect on any property owners.

I. Potential effect on nearby property owners, the public, and the parties in the application proceedings. – Section 1769(a)(1)(J)

There will be no effects on parties to the original application proceeding, property owners or the public. The Final Decision issued in the original application proceeding was almost eight years ago and this type of change is not expected to affect any parties.

IV. CONCLUSION

Because changing the owning entity of Mountainview Generating Station is a minor, administrative change, and because all information required by Title 20 of the California Code of Regulations §1769 is provided, Southern California Edison Company and Mountainview Power Company LLC respectfully request the CEC to approve this Petition.

Dated: March 30, 2009

By: _____

Ian Cuthbertson, Plant Manger

STATE OF CALIFORNIA
ENERGY RESOURCES CONSERVATION
AND DEVELOPMENT COMMISSION

In the Matter of:	)	**Docket No. 00-AFC-2**
	)	
	)	**DECLARATION OF IAN CUTHBERTSON IN**
MOUNTAINVIEW POWER	)	**SUPPORT OF PETITION TO AMEND TO**
COMPANY, LLC	)	**CHANGE NAME OF OWNING**
	)	**ENTITY FROM MOUNTAINVIEW POWER**
SOUTHERN CALIFORNIA EDISON	)	**COMPANY, LLC TO SOUTHERN**
COMPANY	)	**CALIFORNIA EDISON COMPANY**

I, Ian Cuthbertson, declare:

1. I am the Plant Manager of the Mountainview Generating Station. I have personal knowledge of the matters set forth herein and could competently testify thereto if called as a witness to this proceeding.
2. In or about March of 2001, Mountainview Power Company, LLC received from the California Energy Commission a Final Decision approving the Mountainview Power Project's application for Certification.
3. Subsequently, Southern California Edison Company purchased Mountainview Power Company, LLC, which continued to operate as a wholly owned subsidiary of Southern California Edison Company.
4. Mountainview Power Company, LLC requests the Commission to approve the Petition to change the owning entity of Mountainview Generating Station to Southern California Edison Company.
5. The Petition requests no changes to any Conditions of Certification.
6. Southern California Edison Company agrees to comply with all Conditions of Certification as set forth in the initial Final Decision and all subsequent condition amendments.

This declaration is made under penalty of perjury under the laws of the State of California and is executed at Redlands, California on the date set out below.

Dated: March 30, 2009

Ian Cuthbertson, Plant Manager
Southern California Edison Company