

**UNITED STATES OF AMERICA**  
**BEFORE THE**  
**FEDERAL ENERGY REGULATORY COMMISSION**

The Nevada Hydro Company, Inc.                    )  
Application for Preliminary Permit for            )Docket No. P-14227-000  
Lake Elsinore Advance Pump Storage            )  
Project    )

**MOTION TO INTERVENE IN THE APPLICATION FOR PRELIMINARY**  
**PERMIT FOR THE LAKE ELSINORE PUMPED STORAGE PROJECT BY**  
**FRIENDS OF THE FOREST (TRABUCO DISTRICT) AND SANTA ROSA**  
**PLATEAU**

Pursuant to Rule 214, 18 C.F.R. §§385.214, of the Federal Energy Regulatory Commission’s (“FERC”) Rules of Practice and Procedure and the November 29, 2011 issued NOTICE OF PRELIMINARY PERMIT APPLICATION ACCEPTED FOR FILING AND SOLICITING COMMENTS, MOTIONS TO INTERVENE, AND COMPETING APPLICATIONS, Friends of the Forest (Trabuco District) and Santa Rosa Plateau (“Friends of the Forest”) submit this motion to intervene in opposition to the Lake Elsinore Advanced Pumped Storage Project.

**I. COMUNICATIONS**

The following person should be included on the official service list in this proceeding and

all communications regarding this proceeding should be addressed to:

Gene Frick  
Friends of the Forest  
4271 Baggett Drive  
Riverside, CA 92505  
(951) 977-9257  
[gfrick@cosmoaccess.com](mailto:gfrick@cosmoaccess.com)

## **II. BACKGROUND**

The Friends of the Forest is a nonprofit California Corporation whose mission is to monitor, protect and preserve the environmental integrity of the Trabuco District of the Cleveland National Forest and the Santa Rosa Plateau. Our members regularly use the Forest for recreation and enjoyment of the resources of the natural world so rapidly disappearing here in southern California. Many of our members own property which stands to be visually and financial impacted by the proposed project. Our members use the project area for recreational purposes. The project area is one of the few remaining readily accessible areas in southern California where it is possible to commune with our natural heritage without intrusion of human made artifacts. Our members have organized to keep it that way.

Prior to the formation of our corporation, our members formed a group called Communities Against Unnecessary Transmission lines In Our Neighborhood (CAUTION). CAUTION is now a committee within Friends and was an intervenor in the Valley Rainbow 500 kV Interconnect project. We are intervenors in the current Docket number A 10-07-001 at the California Public Utilities Commission which is considering an application by the Nevada Hydro Company to construct and operate the Talega-Escondido/Valley-Serrano 500kV Interconnect, a transmission line directly related to the subject project.

We have been actively engaged in a variety of public proceedings to ensure that environmental values take their rightful place in project assessment. Our membership includes residents of Horsethief Canyon, Lake Elsinore, Lakeland Village, Rancho Capistrano, Wildomar, Murrieta and La Cresta. The LEAPS project and associated transmission line in the Cleveland National Forest is within Friends' corporate purview.

### **III. STATEMENT OF INTEREST AND MOTION TO INTERVENE**

Pursuant to Rule 214, "any person" who "has or represents an interest which may be directly affected by the outcome of the proceeding" has the right to file a motion to intervene. 18 C.F.R. § 385.214(b)(2)(ii). The Friends of the Forest have a direct and substantial interest in this proceeding that is not, and cannot be, adequately represented by any other party.

### **IV. CONCLUSION**

For the forgoing reasons, the Friends of the Forest respectfully move the Federal Energy Regulatory Commission to intervene in this proceeding and request that we be accorded all rights and privileges of full parties thereto.

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Riverside, CA January 27, 2012

\_\_\_\_\_/s/\_\_\_\_\_  
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