

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
SANTA ANA MOUNTAINS TASK FORCE OF THE SIERRA CLUB**

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, Santa Ana Mountains Task Force of the Sierra club (“SAMTF”) 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
4271 Baggett Drive
Riverside, CA 92505
(951) 977-9257
gfrick@cosmoaccess.com

II. BACKGROUND

SAMTF is a division of the Sierra Club with the specific intent of protecting the Trabuco District of the Cleveland National Forest and nearby lands. The Sierra Club is a nonprofit public benefit corporation and is not organized for the private gain of any person. It is organized under the California Nonprofit Public Benefit Corporation Law for public and charitable purposes. The purposes of the Sierra Club are To explore, enjoy, and protect the wild places of the Earth; to practice and promote the responsible use of the Earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives.

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 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 intend to keep it that way.

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.

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). SAMTF has 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, SAMTF respectfully moves 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/_____
Gene Frick

4271 Baggett Drive
Riverside, CA 92505
(951) 977-9257
gfrick@cosmoaccess.com

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