

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 28, 2007

Judith B. Sanders, Counsel
California ISO
151 Blue Ravine Road
Folsom, CA 95630

**Re: Request for Information Regarding Proposed Sunrise Powerlink
Transmission Project, Application No. 06-08-010**

Dear Ms. Sanders,

As you are aware, the California Public Utilities Commission (CPUC) and the U.S. Bureau of Land Management (BLM) are preparing an Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for SDG&E's proposed Sunrise Powerlink Transmission Project. The California Independent System Operator (ISO) continues to participate in hearings regarding the Sunrise Powerlink. This is our second request for information to the ISO; the first was submitted on March 8, 2007.

As part of the EIR/EIS preparation process, we must identify indirect environmental impacts of SDG&E's Proposed Project and compare those impacts to the baseline conditions and reasonable alternatives. Our questions and background explaining our interest are presented below.

Background. In response to our data requests and in CAISO testimony filed April 20 2007, CAISO indicated that only 600 MW of geothermal would be built in the Imperial Valley absent the Sunrise or alternatives (i.e., the Green Path + LEAPS alternative). The April testimony shows an incremental 20.2 TWh of renewable energy in the base case for 2015 without Sunrise. For the Sunrise case, CAISO indicates that Sunrise allows development of 10.3 TWh of incremental Salton Sea/IID renewables, but the makeup of these resources is not clear (e.g., 1,600 MW of new geothermal generation plus 900 MW of new solar generation at Imperial Valley Substation, per CAISO testimony 1/26/07, p. 28). The Salton Sea/IID renewable resources may be considered under CEQA or NEPA as "connected" or "indirect" actions. We are also interested in further analysis of the air quality consequences of Sunrise with and without these renewables that have been attributed to Sunrise. We need to understand how CAISO's April 18 analysis of incremental power generation would be affected if the Salton Sea/IID renewable resources do not come online as expected.

Request ISO-4: Please summarize the renewable energy mix assumed by CAISO in the Base Case and the Sunrise case, showing the resource type and location of the 10.3 TWh of Salton Sea/IID renewables that "Sunrise allows"

according to page 34 of 88 of the CAISO March 1 testimony. To accomplish this, please expand Table 2.2 of the CAISO March 1 testimony to show the Salton Sea/IID resources that would occur in the Sunrise Case but not in the Base Case.

- Request ISO-5:** Please confirm that the additional renewable energy mix in the South Bay case is equal to that assumed for the Base Case, and that the additional renewable energy mix in the Green Path + LEAPS case is equal to that assumed for the Sunrise case. Please identify whether the errata and testimony filed on July 12, 2007 regarding CAISO's analysis of non-CAISO cases alter the level of renewable generation assumed by CAISO in its analysis of the CAISO Green Path + LEAPS case. Please tabulate the CAISO case assumptions for the South Bay case and Green Path + LEAPS case in a manner similar to those in Table 2.2 of the March 1 testimony.
- Request ISO-6:** Please describe the difference in generation and emissions by power plant between the Base Case and the three primary CAISO alternatives (i.e., Sunrise case, South Bay case, and Green Path + LEAPS case). Please identify which generators would provide the incremental power and which generators would be displaced, and provide an estimate of the change in annual emissions due to each of the three CAISO alternatives. Please tabulate the change in MWh output and emissions in a manner similar to that provided by CAISO in the April 18, 2007 response to our previous data requests.
- Request ISO-7:** Please describe the difference in generation and emissions by power plant between the Base Case and the CAISO Sunrise case assuming that the additional renewable energy mix is equal to that of the Base Case (i.e., Sunrise adds no generation resources beyond those in Base Case). Please tabulate the change in output and emissions as in request ISO-6.
- Request ISO-8:** Please describe the difference in generation and emissions by power plant between the Base Case and the CAISO South Bay case assuming that the additional renewable energy mix is equal to that of the Base Case. Please tabulate the change in output and emissions as in request ISO-6.
- Request ISO-9:** Please describe the difference in generation and emissions by power plant between the Base Case and the CAISO Green Path + LEAPS case assuming that the additional renewable energy mix is equal to that of the Base Case. Please tabulate the change in output and emissions as in request ISO-6.
- Request ISO-10:** Please confirm there was a typographical error in the April 18 CAISO response to request ISO-3, where the quantity of CO2 emissions should be "pounds" rather than "tons."

We would appreciate your prompt responses to these requests, which will allow us to maintain our current EIR/EIS schedule. If possible, please respond to these items within ten working days (by September 12, 2007). Any questions on this information request should be directed to me at (415) 703-2068.

Sincerely,

Billie C. Blanchard, AICP, PURA V
Project Manager for Sunrise Powerlink Project
Energy Division, CEQA Unit

cc: Sean Gallagher, CPUC Energy Division Director
Ken Lewis, CPUC Program Manager
Steve Weissman, ALJ
Traci Bone, Advisor to Commissioner Grueneich
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