Glenda Kimmerly P.O. Box 305 Santa Ysabel, CA 92070

February 23, 2007

Ms. Billie Blanchard, CPUC / Lynda Kastoll, BLM c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, CA 94104

Dear Ms. Blanchard and Ms. Kastoll,

Following are my EIR/EIS scoping comments regarding the alternatives to the proposed Sunrise Powerlink Project.

- 1. I object to the Basic Project Objective #3, identified by CPUC and BLM, which states "to accommodate the delivery of renewable energy from geothermal and solar resources in the Imperial Valley and wind and other sources in or outside of San Diego County". Solar and geothermal resources should not be specific to the Imperial Valley. The sun does shine in San Diego, and geothermal is a depletable resource, not infinitely renewable.
- 2. The **depreciation of property values** is of great concern and should be addressed by the EIR/EIS team. Property directly in the path of the proposed project and alternate routes for the lines, as well as property in the view shed should be included. Realtors along the path of the proposed Powerlink project, and in the areas of alternate routes for the lines will testify that real estate sales and values have already been negatively affected.
- 3. The **feasibility**, as defined by the State CEQA guidelines (Section 15364), of the Proposed Powerlink Project is highly questionable, especially considering the <u>cumulative</u> environmental impacts of the entire proposal, including future phases as stated by SDGE. The **non-wires alternatives bundled**, <u>including energy</u> efficiency, conservation, demand response, <u>in area</u> renewable generation, <u>in area</u> all source generation, plus transmission upgrades **meet CEQA's definition of feasibility**.
- 4. With regards to the **importance of energy efficiency**: Please refer to the copy of the enclosed brochure published by the CPUC and CEC in June of 2006 titled "Energy Efficiency, California's Highest Priority Resource", which lists the broader benefits of California's energy efficiency programs as lowering energy costs, strengthening California's economy, maintaining reliable energy service, and protecting the environment. We personally have reduced our electricity bill by 25-35% from last year by changing to fluorescent bulbs and with some energy conservation.
- 5. The **loss of electricity** along the 150 miles of transmission lines, and the lines of the alternate routes should be addressed by the ERI/EIS Team. This impacts the efficiency as well as the environment.

6. As it is part of the entire proposed project and alternate routes, the impact on the thousands of acres in Imperial Valley where the purported Stirling Energy solar dishes would be placed, including all of those impacts listed in the Summary of Potential Impacts, should be addressed by the EIR/EIS Team.

In summary, the **Non-Wires Alternatives bundled** to include energy efficiency, conservation demand response, in area renewable generation, in area all source generation, plus transmission upgrades meet CEQA's definition of feasibility, which takes into account economic, environmental, legal, social, and technological factors. Whereas, the proposed Powerlink Project including future phases, and the alternative routes are not feasible, especially considering the severe cumulative impacts it would impose.

Thank you for this opportunity to voice my opinions, suggestions, and concerns.

Regards,

Glends Kimmerly

Resident and Property Owner, Santa Ysabel

760-703-2835

Energy Efficiency California's Highest-Priority Resource



Lowering Energy Costs,
Promoting Economic Growth,
and Protecting the Environment

California Public Utilities Commission and California Energy Commission



Energy Efficiency California's Highest-Priority Resource

NERGY EFFICIENCY is California's highest-priority resource for meeting its energy needs in a clean, reliable, and low-cost manner. For more than three decades, California has adopted energy conservation and efficiency policies and made investments that are among the most aggressive in the nation. These efforts have saved more than 40,000 gigawatt-hours (GWh) of electricity and 12,000 megawatts (MW) of peak demand — avoiding the need to build 24 large (i.e., 500 MW) power plants, and equal to the energy required to power 3.8 million homes.

The broader benefits of California's energy efficiency programs and investments include:

- Reducing energy supply costs and lowering bills for customers.
 - Strengthening California's economy.
 - Maintaining reliable energy services and reducing price volatility.
 - Protecting the environment by reducing air pollution, greenhouse gases, and other environmental impacts of electricity generation.
 - Conserving water by reducing end-use water consumption.
 - Serving as a model for other states.

Energy conservation and efficiency have played, and will continue to play, an important role in meeting California's energy needs. California has only begun to tap its potential energy efficiency resources and can continue to achieve significant energy savings through investments in energy efficiency. The California Energy Commission estimates that, between 2003 and 2013, California can achieve 30,000 GWh of additional cost-effective efficiency savings.²

What Is Energy Efficiency?

Energy efficiency reduces demand for energy and peak electricity system loads. Common energy efficiency measures include hundreds of technologies and processes for homes, businesses, industry and manufacturing, and many other sectors of the economy. Examples include more efficient lighting, efficient heating and cooling systems, and superior energy management practices. The cost of these energy efficiency measures is more than offset by the resulting energy savings.

To establish the importance of energy efficiency to California's future energy picture, Governor Schwarzenegger has endorsed the *Energy Action Plan II* adopted in 2005 by the California Public Utilities Commission and the California Energy Commission. This plan established a "loading order" of preferred resources, placing energy efficiency as the state's top-priority procurement resource, and set aggressive long-term goals for energy efficiency. In addition, Governor Schwarzenegger's Climate Action Team is identifying and implementing strategies — including energy efficiency — to achieve the greenhouse gas emission reduction targets established in Executive Order S-3-05, issued by the Governor in June 2005.

Energy Efficiency Is Good for California

Energy efficiency is a proven, cost-effective resource for California. Through its energy efficiency programs, standards, procurement requirements, and partnerships with private and municipal utilities, the state of California is delivering a clean, reliable energy system that reduces costs for California's electricity and natural gas customers.

These programs include a variety of services that help businesses, households, government agencies, industrial facilities, and other customers lower their energy costs:

- Energy audits
- · Rebates for efficient appliances, lighting, and equipment
- Design assistance
- · Marketing and outreach

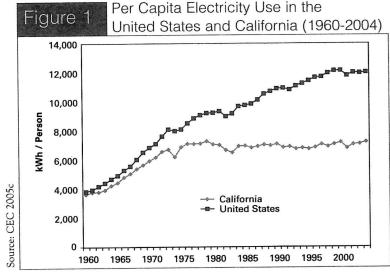
The benefits of energy efficiency are described below.

Lowers Energy Costs

California has a long, successful history of using energy efficiency to reduce demand for energy and peak electricity system loads, which reduces energy costs.

- Since 1975, California's building and appliance standards have reduced energy costs for individuals and businesses in California by \$56 billion. These standards are expected to save another \$23 billion by 2013.³
- Because of its energy efficiency standards and program investments, electricity use per person in

California has remained relatively stable over the past 30 years, while nationwide electricity use has increased by almost 50 percent (see Figure 1).⁴



Supports Economic Development and Creates Jobs in California

Energy conservation and energy efficiency support economic development and create jobs by lowering energy costs, which allows businesses and households to make greater investments in non-energy goods, equipment, and services and reduces the outflow of money spent on imported energy supplies.

- Since 1975, energy efficiency investments have increased the state's economy by 3 percent (i.e., \$31 billion) more than if the investments had not been made – equivalent to a net savings of \$1,000 per household.⁵
- Each dollar spent on energy efficiency in California provides about \$2 in net benefits.
- By 2010, California's building energy efficiency standards will create 8,000 new jobs in California with a net economic benefit of \$4 billion to the state's economy.