

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

G0014-9

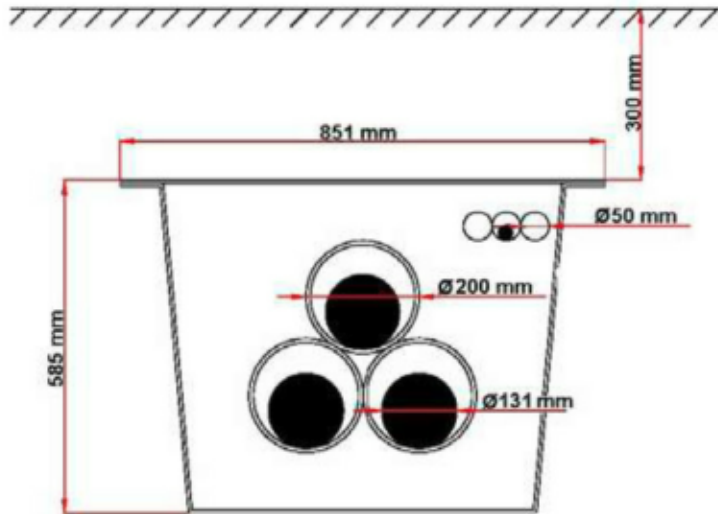
EMF and AC underground power line shielding

The following information is provided from a power industry equipment manufacturer that made efforts to reduce electromagnetic field (EMF) not from open above ground AC cables but from buried and specially shielded alternating current (AC) power lines, and the following result demonstrates the great difficulty involved in reducing electromagnetic fields, and the high levels that resulted even after burying the cables and adding special EMF shielding.

At 1 meter above ground, the electromagnetic fields were about 15 times higher than what is considered safe, even when the underground AC line was specially contained and shielded in a ferromagnetic raceway or conduit, and the EMF was about 60 times higher than what is considered safe for EMF exposure when the AC cables were buried under earth at 1.5 meters in depth.

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010



AC high power line raceway design and its installation

The ferromagnetic raceway is composed of different elements: the hull, the cover and the closing clips. The raceway is made of special steel, suitably protected against corrosion. The design of the described open raceway system (specially developed and designed by Prysmian) combines the closed perimeter shielding efficiency with an open shape and the absence of welding. The particular shape allows also the raceways to follow the curves of the trench and lateral and vertical variations of direction. It is important to underline that the

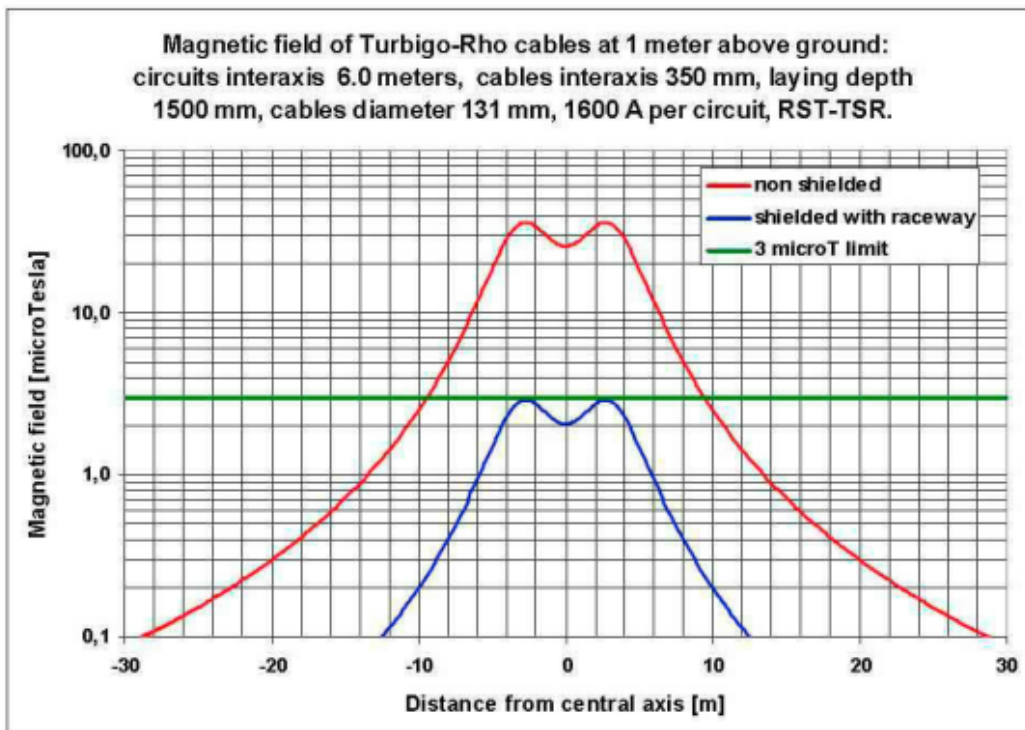
G0014-9 cont.

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

raceway design is an integral part of the system design and its dimensions are tailored for this project. Indeed they have to reach the optimum compromise between the EMF shielding effect and the minimization of the derating for the power cables. With the Specified layout (flat formation, 350 mm cable axial distance, 6 m distance between circuits) and the cables fully loaded, the EMF curves with and without raceway are as shown in Fig. 5.3.

G0014-9 cont.



EMF from underground AC power lines

Magnetic fields (1 micro-tesla = 10 milligauss) 3 microT = 30 mG at 1 meter above ground, which would be about 15 times higher than what is considered safe in the AC shielded ferromagnetic conduit (blue line), and about 12 microT = 120 mG at 1 meter above ground, or 60 times higher than what is considered safe for EMF exposure when the AC cables are buried under earth at 1.5 meters in depth (red line).

Comment Set G0014, cont. California Botanical Habitat

Sunrise A.06-08-010

One of the most important constraints is the electromagnetic field produced by electrical lines. For the underground cable portion only the magnetic field is present. Italian laws specify a maximum of 100 microT, with a threshold of 3 microT for those called "sensible receivers" (i.e. where human presence may last 4 hours per day). Where EMF have to be limited within 3 microT, cables are installed in trefoil formation, enclosed in a raceway (see Fig. 5.2) made of special high magnetic permeability material.

<http://www.empersdorf.com/380kv/gutachten/CIGRE%20Turbigo%20Rho%20Nov.2006.pdf>

G0014-9 cont.

Avoidance of nondamaging underground power line options

The people of this region have no idea why the CPUC and its consultants would not review and carefully consider the huge advantages that underground power lines offer, particularly when it addresses and solves 12 major problems (noted in the prior table: Underground DC power line advantages being ignored) that 1,000s of people have asked to have addressed at public hearings and in written form, including many public officials. The use of old or erroneous data to discredit a functional and proven technology that is being used worldwide with great success, along with providing major environmental and economic savings, is already obvious to the general public, who have repeatedly asked for the underground option to be the solution of choice, second only to the no new power lines option based on local wind and roof top solar.

Either going with underground DC power lines, or no new power lines at all, would each fulfill the CEQA requirements, because these are effective alternatives to massively damaging the environment with hundreds of huge pylons, over 700 new roads, along with

G0014-10

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

fire, aircraft and cancer risks that overhead AC high power lines present. The overhead AC power line approach proposed by SDG&E creates an unbelievable burden on the people of the entire San Diego County region, that will cost far in excess of \$20 billion in damages to homes, properties, wilderness regions, business, health and lives, none of which SDG&E plans to ever reimburse. And the people who actually care for the environment and their communities are then told that their burdens and the destruction they are supposed to endure is all for their benefit and to help bring them renewable energy (which the governor then repeats), all of which incidentally travels just fine on underground cables.

While we agree with the benefits of local renewable electric generation; however neither the environment nor the people would be damaged if SDG&E or the CPUC noticed the advantages of underground DC power lines. We will attempt to provide an introductory overview of the critical issues and the differences between underground DC and overhead AC technologies. If there are any unresolved details, we would be available to provide any additional research as needed.

The only problem that exists in this CPUC/BLM/Aspen review process is that the alternatives to causing damages are being ignored or not researched and not presented in any of the CPUC/Aspen review documentation, including the high capacity DC underground power line options, nor even a thorough economic analysis of an option based on local solar and wind projects distributed throughout San Diego County which can provide many 1,000's of megawatts. We would place consideration of underground DC power as the highest priority because the pylon based AC power line alternative is so extraordinarily damaging to people and the environment that the consequences would be irreversible.

I understand that there has previously been criticism of underground DC power, indicating that it would cost about double the price of overhead AC power lines as proposed by SDG&E and as reviewed by the CPUC's consultants (Aspen). However, more recent underground projects in the UK and the Netherlands show that those conclusions are obsolete and that a recent project of over 161 miles in length, delivering 1,320 megawatts,

G0014-10 cont.

Comment Set G0014, cont. California Botanical Habitat

Sunrise A.06-08-010

which is higher in capacity and longer than the Sunrise Powerlink, costs a total of \$870 million, which is \$530 million less than the Sunrise Powerlink.

Around the world over 50 major DC underground power lines have been installed, frequently to avoid environmental damages, ultimately at a lower cost, with greater reliability and considerably greater capacity, since the weight of the heavier copper cables is supported by the ground, naturally without EMF or ionization and related cancer risks. Since SDG&E regularly installs underground AC power lines throughout San Diego County, they could easily provide an underground link between Jacumba and Boulevard and continue with underground extensions throughout this scenic area. This region is not less valuable because 1,000 year old oak trees line our roads and because thousands of visitors travel our scenic highways. While these scenic qualities are easily destroyed, they cannot be replaced in this area for \$3 billion or even \$12 billion. While regard for our region may be irrelevant to SDG&E, an SDG&E planner recently said why do you care about underground power lines, you're not living in La Jolla, where underground power lines would be installed without hesitation. The SDG&E planner was concerned that the transformer they would place in an underground container would cost a couple of hundred dollars extra, and was willing to degrade the area and offer a cancer risk so his huge company could save perhaps \$200.

G0014-10 cont.

Impact report omissions

The CEQA requires that we consider alternatives which protect the environment, not destroy the environment simply because this isn't La Jolla and doesn't deserve any consideration, or because SDG&E can save a few dollars on a transformer. Nevertheless, these are the extraordinarily inconsiderate arguments we hear at CPUC hearings from SDG&E, which are tragically acknowledged as inevitable or repeated as gospel by the BLM and the CPUC's consultants. Unfortunately, SDG&E, the BLM nor the CPUC, nor it's consultants have ever provided an environmental review of the areas to be impacted including this latest: Environmental Impact Report / Supplemental Draft Environmental Impact Statement, nor in the prior: Draft Environmental Impact Report / Environmental Impact Statement and Draft Land Use Plan Amendment.

G0014-11

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

Environmental impact report omissions:

	Category	Damages
1	Geologic	Photo identify each geologic structure & exact location
2	Botanical	Photo identify each plant damaged: species & location
3	Animal species	Identify numbers & species lost per acre damaged
4	Roads	Measurement of bulldozed road width/length per pylon
5	Clearings	Measurement of work areas and fire security damages
6	Barriers	Fencing & gates to prevent off-road intrusions
7	Erosion	Deliver & install equivalent soils & rock at \$50 per sq ft
8	Restoration geological	Deliver-install equivalent soils & rock monuments \$75/ft
9	Restoration botanical	Over 40 years at \$50-\$75 per square foot
10	Home losses	Architectural, economic, environmental & family values
11	Business losses	Facilities, development, growth potential and losses
12	Ranch losses	Facilities, development, growth potential and losses
13	Conservancy losses	Geologic monuments & rare botany is not commercial
14	Paleoanthropology	Identification and protection not provided for region
15	Research facilities	Relocation of dedicated facilities & site not provided
16	Viewshed losses	170' tall pylons on mountain tops visible over 2 miles
17	Property losses	Equivalent access and environmental replacement value
18	Facilities losses	Loss of paleoanthropological and recreational facilities
19	Growth losses	Economic losses due to oppression & hazards
20	Future growth	Most economic value is in overwhelming in the future, measuring prior potential is the denial of compensation
21	Access losses	Urban, medical, cultural & transportation resource losses
22	Energy resource loss	Loss of local wind, geothermal or solar energy resources
23	Medical losses	Diagnostics at oncology centers and medical clinics
24	Cancer therapy	Chemotherapy, radiation, proton, stem cell therapies

G0014-11 cont.

G0014-12

G0014-13

Comment Set G0014, cont.
 California Botanical Habitat

Sunrise A.06-08-010

25	Losses of life	EMF and ionization of pollutants, > 3,000 fatalities
26	Recreational losses	Local losses to the region, current, planned & potential
27	Tourism losses	Local losses as a portion of \$90 billion/year for Calif.
28	Replacement costs	Equivalent location, environment, access, facilities
29	Construction costs	Facilities replacement, planning & fees
30	Security & insurance	Transportation, fencing, gates, video, insurance
31	Financial costs	For losses, restoration and replacement costs
32	Legal	Preparation, attorney and expert witnesses
33	Research expenses	Labor and professional expertise, for CPUC & legal
34	Collection costs	Legal, professional and title policies
35	Interest on debt	Compounded at > 1% per month above inflation

G0014-13 cont.

The botanical data in the report provided is not site specific or specific to the Jacumba, Bankhead Springs or Boulevard regions and did not review the properties, nor the rare, threatened or endangered flora and fauna that would be impacted by any of the power lines shown. The data was simply lifted from the California Native Plant Society web site. Incidentally, I have been on data collection projects with the California Native Plant Society and understand many of the identification issues, the regional distribution by species, climatic and drainage patterns that affect our area. Further many animal species that occupy a specific site may be witnessed only once in 50 years of continuously living on a site. I have many onetime only observations of threatened or endangered species in the regions mapped and supposedly studied by the CPUC consultants. I know of no naturalists who live in this area who have ever been asked for their observations or data, nor do I know of any studies conducted by CPUC consultants, including CPUC consultants I have spoken with. While the environmental review documents are huge, this appears to be largely boilerplate activity and does not constitute an environmental review. I have also included a review of rare, threatened and endangered species, based on CNPS data and other sources, relevant to the Jacumba to Bankhead Springs region.

G0014-14

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

G0014-14 cont.

Unfortunately, I have never observed any review, of any kind, of any power line alternatives for this region which were ever provided by the CPUC or its consultants, which is required by the CEQA to help find an alternative for the massive environmental damages which are being proposed in the CPUC documents. Apparently, there has never been any economic review of the environmental or property damages being proposed, no estimate of the full geological and habitat restoration costs, no estimate of medical costs or cancer fatalities, nor oncology expenses or number of lives lost, nor estimates of property devaluation, no equivalent property replacement valuations or costs, no economic data to address equivalent access, viewshed, habitat, air and environmental qualities, protection for threatened and endangered species, and so on. Naturally, having a commercial firm develop even thousands of additional pages of vaguely related information is not what we are suggesting, that would amount to perpetuating a deception. We would however encourage a public economic review based on measuring all damages, full restoration efforts and equivalent replacement costs, which would be available on the web for public input and for an open and public analysis process; not just for public reading or for sending in comments that are catalogued and then ignored.

How could the state sanction well over \$20 billion in property losses and environmental damages and not provide any economic review or any requirements for SDG&E to pay for those damages? Meanwhile, SDG&E is preparing to pay for easements at approximately .0001% of the value of the damages to ranches, homes, nature reserves, businesses and for all the property losses inflicted, while it continues to provide *plausible deniability* statements to avoid having to pay for the promotion (not cause) of cancers related to EMF and ionization by high power lines.

The environmental impact report that was provided doesn't describe how wilderness areas could be protected, instead it's a construction manual for SDG&E describing how construction should proceed and how wilderness could be devastated without getting caught for breaking laws. Such as:

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

G0014-14 cont.

Avoid blasting where damage to groundwater wells or springs could occur.

Blasting shall be managed with a Blasting Plan for each site. The Plan shall include the blasting methods, distance calculations to estimate the area of effect of the blasting, and surveys for wells and springs within the blast influence area. (Recirculated Draft EIR/Supplemental Draft EIS, page 2-198, July 2008)

Operational Impacts: Impact H-5: Creation of new impervious areas could cause increased runoff resulting in flooding or increased erosion downstream (Class II, Class III) Sempra RWEP (Mexico) (Class III).

Construction of turbine foundations and access roads would result in additional runoff through creation of impervious areas and compaction of soils. Impervious areas and compacted soils generally have higher runoff coefficients than natural areas. (Recirculated Draft EIR/Supplemental Draft EIS, page 2-198, July 2008)

Sempra Baja Wind Transmission Line (Mexico to U.S.) and SDG&E 69 kV Transmission Line (Class II).

Encroachment of project towers or associated facilities into a flow path or floodplain could result in flooding of or erosion damage to the encroaching structure, diversion of flows and increased flood risk for adjacent property, or increased erosion on adjacent property. This impact is likely to occur because the transmission route is located in an intermittent desert wash. (Recirculated Draft EIR/Supplemental Draft EIS 2-200 July 2008)

SDG&E 69 kV Transmission Line (Class I or II). To date, no TCPs have been identified within the 69 kV project alignment. However, the Sacred Lands File search conducted for the transmission line noted that lands sacred to Native Americans are present in the vicinity of Jacumba, in undisclosed locations. The BLM, as the Federal Lead Agency under NEPA and Section 106 of the NHPA has initiated government-to-government consultation with appropriate Native American groups and notification to other public groups regarding project effects on traditional cultural values. That consultation will determine whether there are TCPs that could be affected within this segment. Though impacts to TCPs are often significant (Class I), mitigation, as defined by NEPA (in King, 2003), can include "minimizing impacts by limiting the degree or magnitude of the action..." rectifying or reducing the impact, and/or "compensating for the impact by replacing or providing substitute resources or environments," which when properly coordinated Native Americans or other Traditional Groups can reduce the impact to less than significant (Class II). Implementation of Mitigation Measure C-4a (Complete consultation with Native Americans and other Traditional Groups) could potentially reduce impacts to TCPs to a level that is less than significant (Class II); however, in some cases impacts may remain significant (Class I). (Recirculated Draft EIR/Supplemental Draft EIS 2-140 July 2008)

Impact G-7: Project would expose people or structures to potential substantial adverse effects as a result of landslides, earthflows, debris flows, and/or rockfall Sempra RWEP (Mexico). (Class II) Slope instability including landslides, earth flows, debris flows, and rock fall has the potential to

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

undermine foundations, cause distortion and distress to overlying structures, and displace or destroy associated project components. Given the moderate to steep slopes that comprise the RWEP area, slope instability presents a significant impact. The potential for project structures to be damaged by landslides, earthflows, debris flows, and/or rock fall is mitigable to less than significant levels (Class II). Mitigation includes ensuring that project structures are located outside of areas with unstable slopes and that boulders are removed from slopes or stabilized. Mitigation Measure G-3b and G-6a are recommended. (Recirculated Draft EIR/Supplemental Draft EIS 2-212 July 2008)

http://www.cpuc.ca.gov/Environment/info/aspensunrise/rdeir/rdeir/2_sempre_mex_wind.pdf

Apparently, what we are reading is how to implement damages in a more legally acceptable manner, which is still breaking California's environmental laws, since CEQA has never actually been addressed or resolved, which amounts to the production of a detailed construction manual, not ways that habitat and property damages, medical and personal damages, new roads and overhead power lines could be avoided altogether or even implemented with a 98% reduction in all impacts. The CPUC documents only reinforce the comparatively high impact construction methods without considering alternative technologies or notable reductions to environmental impacts. Nor do these documents provide for an analysis of underground transmission methods which are common in Australia and particularly in Europe where most of these turbines and the underground cables are built.

What is supposed to be an environmental review of alternatives to damages, is now apparently the reinforcement or the sanctioning of highly destructive construction strategies by the CPUC for the benefit of SDG&E. While Aspen tell us that the CPUC is not involved in reviewing construction in Mexico, consequently it's not for us to comment on, however the CPUC environmental documentation is a very detailed manual which describes construction procedures in Mexico, to do what? to help Sempra Energy with its construction efforts in Mexico? Does the CPUC work for Sempra Energy of Mexico? What other conclusions are there? Everything that could have helped the people of California protect themselves from unnecessary and brutal damages has been avoided in this report, nor does it protect

G0014-14 cont.

Comment Set G0014, cont. California Botanical Habitat

Sunrise A.06-08-010

wilderness or threatened species from completely needless damages or massive destruction. Naturally, I have no idea why the CPUC would claim to be protecting the environment and following California law, when they are preparing a manual to massively devastate this region, for absolutely no justifiable reason, which incidentally has been done before; however this is on a considerably larger scale and directly through the heart of San Diego's and California's most treasured wilderness regions. The CPUC documentation, so far, does not constitute an environmental review, nor offer a way to protect our most valuable wilderness from severe damages; it's a construction manual explaining how to legally cause damages, for Sempra's extraordinarily poorly considered projects, all paid for by the people of California.

After reading the environmental reports and statements in the latest CPUC documentation, we can't identify what plant or animal species would be impacted, or encountered in what areas, there are no photographs to help anyone in the area with identification efforts, nor even help any construction workers avert the destruction of threatened or endangered species. In our review and statement we provide such identification information which is relevant to the area approximately from Imperial County westerly including Bankhead Springs, over 7 miles, and from the Mexican border north, approximately 9 miles, to assist with identification on a regional basis. Naturally, site or parcel specific information would be essential, unfortunately it was not provided.

Incidentally, we are not against power lines or wind farms, we are against needless, severe and unreimbursed damages, particularly when there are underground alternatives that the CPUC and its consultants have been refusing to review or even consider, in spite of vast amounts of information which is available and which we compiled, which do in fact describe extraordinary benefits and at lower total costs. If the CPUC would fairly and thoroughly address these extremely important issues and nondamaging alternatives, as is required by law, and we would be extremely impressed that the CPUC process was considering the California environment, the requests and needs of the people and the California Environmental Quality Act. Further, if these extremely significant issues were

G0014-14 cont.

Comment Set G0014, cont. California Botanical Habitat

Sunrise A.06-08-010

being closely examined by Sempra and the CPUC, then billions of dollars in savings could be made in behalf of both Sempra Energy and the people of California, because these interests are not mutually exclusive, on anyone's closer inspection. Unfortunately, SDG&E, the BLM and the CPUC or its consultants have so far not addressed the issues of higher efficiency, or lower impact technologies, and have repeatedly made their position and lack of interest clearly known, in spite of hundreds of attempts by the people to address the issues of damages and low impact alternatives, such as underground power lines at every CPUC hearing held for the Sunrise Powerlink.

G0014-14 cont.

Community opposition to overhead AC

At all CPUC public hearings, the public opposition of the local residents, farmers, environmentalist and business owners has been overwhelmingly in opposition to the Sunrise Powerlink, including local overhead extensions for the wind farm in Mexico to the Jacumba Substation and the Boulevard Substation. Since local residents and business owners who would be impacted by the power lines did not receive any notification fewer people showed up at the August 4th 2008 review in Jacumba. In any case no public comments were being documented by the CPUC during the Jacumba review. Further the public response was one of extreme concern, and for those whose region was impacted, the response was extraordinarily negative, with the full expectation that the people's interests and concerns were going to be completely ignored by the CPUC, Aspen Environmental and the BLM, in favor of SDG&E's entrenched political connections and political contributions. Nevertheless many questions were asked regarding impacts to this area, including why SDG&E's request for local damages to the people, their environment, even our local portion of the Anza Borrego Desert State Park in Jacumba, was not reviewed and why alternative power line strategies including underground power lines were not considered. Susan Lee of Aspen mentioned exaggerated costs which were not verified by any equipment manufacturers, even though we tried to provide more contemporary information during many prior CPUC hearings

G0014-15

Comment Set G0014, cont. California Botanical Habitat

Sunrise A.06-08-010

and in writing on many occasions, which are a part of the record, unfortunately with no effect whatsoever.

We also offered to answer any related engineering, economic, health or environmental damage questions that the BLM, CPUC or Aspen Environmental might have, unfortunately their interest or knowledge of these issues appeared to be very limited or nonexistent. While we were very optimistic that the damage and environmental issues would be examined during early 2007, however after providing the requested information in great detail for over 1½ years, all with no interest or comprehension on the part of the CPUC or Aspen, we are inclined to believe that the public is correct, that there is no interest in providing an open or fair review process, since none of the information, nor the requests of the overwhelming majority of the people, have never received the slightest consideration along the southern route. These same concerns were also expressed by numerous public officials, who also received little to no consideration. We cannot help but believe that the CPUC review process has been sabotaged and is in violation of California Law. This view is not isolated. Both the Los Angeles Times and the San Diego Union Tribune have reviewed the process of political influence between Sempra Energy and the governor in relation to the Sunrise Powerlink. Further, comments by the State Attorney General's Office have confirmed these observations. Nevertheless, we are going to do our best to encourage a fair review process by the CPUC and its participants, even though information critical to any review of damages, the environment, health, property losses, economic damages and legal requirements has been so far been excluded from this review process. However, we cannot believe that the consultants working for the CPUC, nor most people working for the CPUC or the BLM have the slightest interest in addressing any of these issues; perhaps they wouldn't have the independence or ability, due to their political structures, to discuss any of the issues of environmental damages, economic losses, medical damages or engineering alternatives. Further, given many conversations with their consultants, while polite and politically adept, we cannot believe that these agencies would ever be in a position to hire anyone with consideration or interest in the community or the environment. These observations are also expressed in the many hundreds of comments provided by the people regarding a serious

G0014-15 cont.

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

need for the CPUC to pursue alternatives to environmental, property and personal damages, which have not been addressed in any functional way, nor appeared in any CPUC documents, nor can we realistically expect that there will be beneficial efforts considered by the CPUC, which we do find extraordinarily disappointing.

"Most Californians are surprised to learn that (power industry) generators and traders claim that even if they commit fraud or engage in price-fixing, they are immune from suit under state law."

"The Attorney General's involvement reflects a (California Public Utility Commission, CPUC) regulatory system unable or unwilling to police the very industry it governs."

California Attorney General's Energy White Paper
<http://ag.ca.gov/antitrust/publications/energywhitepaper.pdf>

"Law has become the practice of greed. I don't think lawyers are practicing law, they're practicing money, filing motions by the metric ton, taking depositions to send their children through law school."

U.S. Senator Alan Simpson of Wyoming, from a Public Broadcasting television transmission (via KCET) of the Senate's Supreme Court review of nominee Judge Anthony Kennedy on December 14, 1987. Anthony Kennedy then replied, "Every lawyer has a duty first to the

G0014-15 cont.

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

law. We've lost that to money. If a wage earner is hit by a law suit and they don't have an insurance company to back them up, they're in real trouble."

**"The state can only function if we are a part of one team."
Governor Schwarzenegger, August 20, 2008, NBC 5 pm news, KNBC Television.**

"I write to offer my support for the Sunrise Powerlink project before you for your consideration. The project's significance lies not in its supplying additional power for a thriving and growing region, but in doing so in a way that truly moves California into the future."

Governor Schwarzenegger's opening lines in his December 3, 2007 letter to Ms. Dian Grueneich, California Public Utilities Commissioner. Governor Schwarzenegger then proceeds to use the requirement for 20% renewable electrical resources to justify massive environmental and property damages.

Incidentally, the people of California also want California to "move into the future", and not devastate their environment, property or lives, which the people repeatedly indicated could be accomplished by utilizing advanced solar and wind technology which is local, without requiring huge overhead power lines to send the solar generated power 150 miles to the west where solar panels also work well, nor build 700 new, 170 foot tall pylons, and alternatively utilize completely underground power lines to fully avoid environmental, property and medical damages.

During a long break in Borrego Springs (May 12, 2008) after Dian Grueneich had spoken to a staff member and was not occupied, I thought I would ask if Ms. Grueneich, who happens to be the CPUC commissioner assigned to the oversee the Sunrise Powerlink, if she

G0014-15 cont.

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

had the opportunity to review any of the alternatives that hundreds of people were asking for, which repeatedly included underground power lines. However, as I began to ask the question, Ms. Grueneich immediately cut me off, saying that it was inappropriate for me to discuss the Sunrise Powerlink for legal reasons. Not having read anything in the law which precluded anyone's speaking at a public hearing, I figured she must know the legal requirements better than I could ever know. However, a few days later by accident, I happened to notice the specific regulations which do not inhibit Ms. Grueneich or any commissioner from speaking or listening to anyone. So, Ms. Grueneich just stood there until another staff member reported something to Ms. Grueneich. I then asked one of Ms. Grueneich's staff members if anyone on their staff had ever reviewed local sustainable solar and wind energy or underground power lines. Ms. Grueneich's staff member was a bright and alert person, who said that they didn't review any of those options and was completely unfamiliar with any information related to underground power lines in the U.S., Europe or Australia. She however realized that a number of people had publicly requested consideration of this alternative by the CPUC at this public hearing, because it would be protective of the environment. I then mentioned that underground power was unfortunately being ignored by the CPUC review process and was discredited as being too costly, when the total cost of underground power lines that we could review of equivalent length and greater capacity were actually less costly than the proposed Sunrise Powerlink. She then mentioned that they would look into this option, which I felt was a wonderful response, but perhaps too optimistic to be a real possibility.

Now this entire conversation took about 1 minute to address all the most relevant issues, which Ms. Grueneich could have accommodated in her free time at this public hearing, which is certainly not against any law; it is in fact her job description and duty under the law to be informed and discuss these details with the people, particularly at a public hearing, which unfortunately she refused to do. Naturally, Schwarzenegger's letter to Ms. Grueneich may well be a clearly implied requirement to obey SDG&E, which SDG&E proudly displays on its web site, since gifts to Schwarzenegger's campaign and charities have been received from Sempra Energy, the parent company of SDG&E, with influences or reins which

G0014-15 cont.

Comment Set G0014, cont. California Botanical Habitat

Sunrise A.06-08-010

have been described in detail by the Los Angeles Times and the San Diego Union Tribune, which comes as no surprise to the people at any CPUC hearing. Nevertheless, government officials appear to be extremely careful about following hundreds of minor regulations, perhaps intentionally using pieces of those regulations to confuse others, so they can do whatever they feel obligated to do, while huge issues that would devastate the state or cause many billions of dollars in damages to the people are completely ignored.

G0014-15 cont.

EX PARTE COMMUNICATIONS

Public utilities, property owners and others will be required to honor the Commission's ban on written or oral communication about the substance of the (their own) case with "decisionmakers," such as the Administrative Law Judge, Commissioners, or Commissioner's personal advisors, **except during a hearing, or a public meeting or workshop.**

http://docs.cpuc.ca.gov/Word_Pdf/sb_177/manual_sb177.pdf

STATEMENT OF SUPERVISOR JACOB

County of San Diego

RAMONA, CALIFORNIA, FEBRUARY 26, 2008 - 7:10 P.M.

SUPERVISOR JACOB: Well, thank you both again so very, very much for being here in

Ramona and being downtown and being in Pine Valley, and I know you'll be in Julian, and accommodating the people that are most affected by this line.

I hate to make a request to break your rules right away, but if I could request five minutes, and I'll try to get done in less time, I would greatly appreciate it.

ALJ WEISSMAN: One grand, limited exception, yes. Granted.

SUPERVISOR JACOB: If that's all right with everyone else.

I do represent the people of San Diego County's Second District, which encompasses the eastern portion of the county. And my district includes many of the communities that would

Southeastern communities

Page 90

Comment Set G0014, cont. California Botanical Habitat

Sunrise A.06-08-010

be affected by this proposed Sunrise Powerlink proposal by SDG&E, which includes Ramona and Julian, Santa Ysabel, Pine Valley, all of the communities that would be around the — along the Alternative D and the southeastern portion of the region also. So it's my district. These are my people, and these are properties in my district.

The County of San Diego is finalizing its formal comments on the Draft Environmental Report and will be submitting those technical comments before the April 11th deadline. I have reviewed the Draft EIR. I have not read all 7,000 pages, but in particular I have focused on the executive summary.

I do remain steadfastly opposed to the project in the entirety and even more so after reading the environmental document, and that would include Preferred Route and Alternative Route D.

As the Draft EIR points out, there are cheaper and less destructive ways to meet future energy needs. If the speakers here tonight seem especially upset, it's because this area is still reeling from the massive fire storms of last October, fires likely started by SDG&E power lines.

In addition, the region has endured SDG&E's controversial Sunrise campaign for more than two years. This divisive effort has pitted rural communities against urban communities and tried to turn northern communities against southern communities.

Fortunately, many of us have seen through SDG&E's propaganda, and SDG&E has presented the CPUC's decision as a choice. That choice is approve Sunrise or suffer rolling blackouts. That's SDG&E's choice.

Yet, as the Draft EIR thankfully indicates, and as expert after expert has testified, Sunrise is a false choice. The EIR's top two alternatives clearly show that this region, its economy and its landscape are better served by local, not imported, generation. In commercials and glossy brochures, SDG&E's impressive public relations machine has boiled down the pitch for Sunrise into a snappy sound bite. SDG&E says this: Sunrise will bring us the three Rs: Renewables, reliability, and reduced costs.

Unfortunately, SDG&E overlooked a fourth and important R, reality.

Here's the reality about renewables. There's enough capacity on the existing Southwest Powerlink to bring wind, solar and geothermal energy from the Imperial Valley into this

Southeastern communities

Page 91

G0014-15 cont.

Comment Set G0014, cont. California Botanical Habitat

Sunrise A.06-08-010

region without building Sunrise. SDG&E's own testimony reveals that the utility can meet California's renewable mandate without building Sunrise.

The unproven Stirling Solar Dish Project, the cornerstone of SDG&E's renewable claims, has been delayed again. The company has not filed an application for construction with the California Energy Commission. Worse yet, Stirling officials have testified they won't move forward with a type of technology that has long suffered from hydrogen and engine seal leaks.

Finally, if SDG&E is as committed to renewable energy as it claims, then why last summer did the company lobby against increasing the state's renewable mandate?

Here's the reality about reliability: A massive extension cord through our fire-prone back country does not equal greater reliability. It equals perilous danger.

In my discussions with SDG&E, the utility used the 2003 Cedar Fire as an argument for Sunrise. SDG&E said that Sunrise was needed because if the existing Southwest Powerlink were to go down in a fire, Sunrise could assure reliability.

Huh. Well, guess what? SDG&E officials downplayed the likelihood of the regions' having two massive fires at the same time. That argument was debatable until October of 2007. It turned out SDG&E was right. We didn't have two massive fires at the same time, we had seven. The Southwest Powerlink went down in the Harris Fire. And had Sunrise had been built, it would have been out of service too because of the path of the Witch Fire.

Here's the reality about reduced costs: Repeatedly, we have seen the alleged financial benefits of Sunrise drop dramatically because of SDG&E's own miscalculations, math errors and faulty assumptions about power plants. First it was \$447 million. Then \$204 million. Then \$129 million, less than one-quarter of the line's original cost savings estimates.

The Utility Consumers Action Network, UCAN, and other energy stakeholder groups have done some remarkable research into the cost-effectiveness of upgrading existing infrastructure and investing in solar, proposals that have largely been ignored unfortunately by SDG&E.

I think it's time for SDG&E to retire the claims about the three Rs. The facts don't support them. The region needs to turn its focus to the three Es: Existing infrastructure, emerging technologies and efficiency measures.

G0014-15 cont.

Comment Set G0014, cont.
California Botanical Habitat

Sunrise A.06-08-010

G0014-15 cont.

The state of California is standing at the threshold of a whole new era in energy development. And in my mind, Sunrise is really a battle between the dying past and the promising future.

California, with its million solar roofs campaign and its investments in energy research, is blazing trails when it comes to renewables. The state and its Governor have put its money where its mouth is. That investment is paying off.

This month a story in The New York Times describes California as the world's, and I quote, next big solar market and its entrepreneurial center, unquote. An economist said of California, and I quote: We're at the dawn of a revolution that could be as powerful as the Internet revolution, unquote. A venture capitalist said companies are just starting to blossom from venture funding, and through innovation and volume, prices are coming down.

Change is scary, and SDG&E is likely protecting an old way of doing business. Yet the financial sector and the energy sector are all saying the same thing: hulking lines and massive steel are antiquated concepts. Distributed generation, self-reliance and new green technologies are here to stay whether SDG&E likes it or not.

Imported power, in Sunrise's case much of it from fossil-fuel plants, is a thing of the past. So by approving Sunrise, California would be building a billion-dollar monument to the past. We don't want that. We don't need it, and it will be outdated before it's even finished.

By turning down this line, the Commission sends an important message to the San Diego region: San Diegans need to create in-basin generation and become self-sufficient and safer from fire. And with your help, we can force our utility to do the right thing.

Again, thank you so much for the opportunity of allowing me to speak and being here tonight.

(Applause)

ALJ WEISSMAN: Thank you. In Supervisor Jacob's defense, in Commission hearings there are no curtain calls, so they'll have to —

SUPERVISOR JACOB: I have no control over that.