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April 8, 2008

CPUC/BLM
C/O Aspen Environmental
235 Montgomery Street, Suite 935
San Francisco, CA 94104

RE: Sunrise Powerlink Transmission Project

To whom it may concern:

On behalf of the Imperial County Board of Supervisors, I am writing today to express our support for the proposed Sunrise Powerlink transmission project. Specifically, the County supports the construction of new transmission along either of the Alternative 4, Southern Route (SWPL), or the SDG&E Proposed Project configurations. This letter will also address our comments regarding the Sunrise Powerlink Draft Environmental Impact Report/Environmental Impact Statement (DEIR).

The County is strongly opposed to Alternatives 1 and 2 in the Sunrise Powerlink DEIR, as these alternatives fail to recognize the critical importance of building new electric transmission infrastructure to utilize the vast resources of renewable energy within the Imperial County. Furthermore, they do not meet the Sunrise Powerlink project objectives and are contradictory to the clean energy policies set forth by the State of California.

The Lake Elsinore Advanced Pumped Storage project and the related Talega-Escondido/Valley-Serrano transmission line outlined in Alternatives 3 and 7 are not viable replacements for the Sunrise Powerlink since neither alternative provides access to clean, renewable energy to meet the needs of the San Diego region. Nor do these alternatives provide access to the vast amounts of renewable energy resources located in Imperial County, which is a critical concern to our Board.

Imperial County has the potential to become the renewable energy capital of the United States, and given the diversity of our renewable resource mix that includes wind, solar, and geothermal power, we are uniquely positioned to help California achieve its vision for a cleaner and greener energy future. The fact is Imperial County is already home to a thriving geothermal industry that produces 550 megawatts for California, with current projects underway to expand that production. The Imperial Valley Study Group estimates there are at least 2,000 additional megawatts of geothermal power that has yet to be tapped.

Additionally, the potential for solar energy development in the Imperial Valley is greater than the vast potential from geothermal. The California Energy Commission (CEC) estimates that there is more than 30,000 megawatts of solar energy potential in the Imperial Valley.

The development of renewable energy in the Imperial Valley has immense capabilities to help achieve the California requirement that Investor-Owned Utilities derive 20 percent of their energy supplies from renewable energy sources by 2010. Some municipal utilities have adopted similar standards. Furthermore, AB 32 requires significant reduction in greenhouse gas emissions that cannot be achieved without a drastic reduction in the state's dependence on fossil fuel generation. To meet these tough clean energy mandates, California utilities must have new transmission capacity to reach the green power supplies in Imperial County. The CEC concludes in its 2006 IEPR Update, that the lack of transmission lines connecting Imperial County to California load centers is a primary impediment to meeting the state's Renewable Portfolio Standard.

The Imperial County Board of Supervisors has evaluated of the potential transmission projects that have been proposed to interconnect Imperial County to the California and Arizona transmission grids. The County supports all viable transmission projects that will export renewable energy generation as long as they are built in a responsible manner.

The County commends the Imperial Irrigation District (IID) for taking a leadership role in making improvements to its local transmission grid. It is recognized there is significant value in the IID electric grid in order to meet the need for renewable energy generators to utilize the IID system to interconnect to new high voltage transmission lines that will export renewable energy to neighboring load centers. The IID transmission expansion plans, including the Green Path North and Midway-Bannister lines, will ensure a reliable delivery system and protect the interests of IID customers. These IID projects complement, but will not replace the need for the Sunrise Powerlink.

IID has filed comments with CPUC, and has made it clear to the County, that the SDG&E Alternative poses a risk of facilitating the "bypass" of IID's transmission system. Their concern is that existing and proposed renewable energy generators may decide to interconnect directly into a new transmission line, thereby depriving IID and its ratepayers of significant revenues. Given IID's commitment to develop new transmission projects, and their reliance on additional revenues to support said projects, Imperial County will actively oppose any effort to unnecessarily bypass IID's grid. Furthermore, IID's planned transmission improvements will eliminate or significantly reduce the likelihood that the geothermal energy potential in Imperial County would be designated as a "constrained resource."

After careful review that included discussions with the IID and SDG&E, community organizations, and two public meetings, the County of Imperial has concluded the Sunrise Powerlink is needed to export renewable energy to San Diego. The Sunrise Powerlink is critical to deliver the electricity supplies generated by green energy developers in Imperial County to SDG&E customers. Failure to approve and construct the Sunrise Powerlink would put several CPUC-approved renewable power contracts and the proposed projects in jeopardy.

Imperial County is counting on the expansion of the renewable energy industry in our region to provide new jobs, higher wages, economic development opportunities and a larger tax base to fund the vital services our constituents need and deserve. Projects like Stirling Energy Systems Solar Two alone would have a tremendous positive impact on the Imperial County. It will initiate an industry in the Imperial County that will be second only to agriculture.

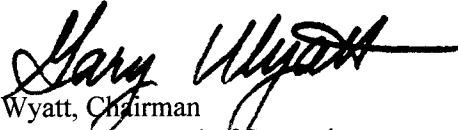
The Sunrise Powerlink will ensure green energy supplies can be delivered. That certainty will help attract more renewable developers and billions of dollars worth of infrastructure investments to our region.

Despite our strong support for the line, we are also very cognizant of the impacts to the farmers, landowners and citizens in the County from new transmission facilities. We realize it is also imperative that access to renewable energy and the resulting financial impacts be assessed when determining a route.

The County of Imperial believes it is appropriate for the CPUC to complete its environmental review of the project prior to us recommending a route through the Imperial County. We are confident the CPUC process will address the potential impacts to our County and appropriate mitigation. The County strongly encourages the CPUC, regardless of the final route selected, to fully consider all impacts to our constituents.

The County of Imperial urges the CPUC to approve the Sunrise Powerlink this summer. The project is the most beneficial alternative to utilize the vast resources of renewable energy in the Imperial County. It will have a powerful impact on the County's economic development and provide significant benefits to our environment throughout California.

Respectfully,



Gary Wyatt, Chairman
Imperial County Board of Supervisors

cc: Robertta Burns, County Executive Officer
CPUC Commissioner Dian Grueneich
Imperial Irrigation District