

**Statement to the CPUC on the draft EIR/EIS on Sunrise Power Line
February 27, 2008
Julian, CA**

The results of the recent CPUC draft EIR/EIS on the Sunrise Power Link Project gave enormous insight into the proposed route and the other options to achieve the same objective. Of the top six alternatives with the least impacts (leaving out the pumped hydro project), the proposed Sunrise Project was last. The two top transmission alternatives were the TE/VS (transmission part of LEAPS Pumped Hydro Project) and the southern route (near SWPL). Both of these go through some National Forest but both avoid the Anza-Borrego State Park, and had about 31 compared to the Proposed Route's 50 unmitigatable significant impacts. Of the top two, TE/VS was about 32 miles of new transmission lines and connected to SCE territory, while the Southern Route was 110 miles and did connect to Imperial County. The Southern Route was co-located with the SWPL for 36 miles in a low fire risk area.

However, the top 2 alternatives could involve no transmission lines. Number 1 used a combination of 700 MW of new in-county gas power plants (1 baseload and 4 peakers) and 300 MW of in-county renewables. Number 2 was 1000 MW of in-county renewables. The only reason that the all renewables option was 2nd was that the CPUC choose to locate about 300 MW of solar power plants in Borrego-Springs with 47 miles of new transmission lines across the Anza-Borrego Park. Based on the studies done for the Energy Working Group of SANDAG (San Diego Association of Governments), this 300 MW component of this alternative could be located on ranchlands in the eastern part of San Diego County using smaller (5 to 50 MW) dispersed solar power plants and using existing 69 kV lines. This would have avoided the need for a transmission line to Borrego Springs (see www.sdres.org and click on San Diego Report). With this change, alternative 2 would have the lowest impacts and become the top choice.

As I listen to San Diego business persons, there was strong support for not one but two new transmission lines. That would be both Sunrise and the TE/VS lines. The key concern voiced was that we couldn't conduct business if the grid went down so more transmission lines were better. The business sector also recognized that it was also important to access the renewable energy in Imperial County.

The environmentalists objected. They felt the impacts and cost of these two lines were excessive and that we could finesse the problem by a combination of factors. The environmentalists presented this finesse-the-problem solution which included some existing power line upgrades, more cost effective energy efficiency, additional renewables, load management, additional in-county combined heat-power plants and some new gas fired plants by 2020. Their plan can be considered to a combination of the Alternatives 1 and 2 in the draft EIR/EIS without so much solar in Borrego Springs. They felt this approach would negate the need for any expensive new transmission lines that have a large number of significant and unmitigatable impacts. However, the environmentalists refused to consider the need to increase grid reliability by any additional transmission connection between San Diego and the outside world. They felt that lowering demand through more efficiency and stimulating in-County power sources would be enough. So where does this leave us in this attempt to bring together the different voices in the San Diego area? Let me suggest that we take the good ideas from these different voices and try to speak with a single voice.

I recommend that the CPUC consider a consensus position that tries to accommodate both the environmentalists and the business sector views and meets the needs of San Diego. The threat of blackouts in fire storms or other (earthquake) emergencies is real and a third major link to the outside world makes sense. Of the 4 transmission lines presented in the draft EIR/EIS, the one with the least impacts and most likely to have to lowest cost is the TE/VS link between SCE and northern San Diego County. One addition link is all that is needed to support the San Diego Regional Energy Goals (1) and

the choice of the lower cost and lower impacts is best. This like would increase access to wind renewables north of LA.

There is the issue of access to the emerging and significant potential renewables in Imperial County. There are 300 MW of existing capacity to transport renewables to San Diego. In addition, the high voltage transmission import capability to SDG&E territory can be increased by additional 200 MW on SWPL for about \$50 million. Beyond this total of 500 MW additional transmission capacity, additional renewables (geothermal, wind and desert solar plants) could be accommodated by using the preferred loading order. That is, in descending order of preference, energy efficiency, renewables, combined heat and power (CHP), fossil, and transmission as needed.

Using this as a decision tool for dispatching energy, as more renewables came on line they would displace fossil generated electricity. Currently, San Diego imports 65% of its energy. There is a great deal of room to displace fossil energy by renewables as we move into the future. This combined with more aggressive energy efficiency and urban solar such as PV, hot water, solar heated absorption air conditioning, increasing CHP, and developing the potential for smaller solar electricity plants in east-County San Diego, should provide a mix of energy sources to move San Diego into a sustainable future with a substantial amount of energy from inside San Diego County.

RECOMMENDATIONS:

The CPUC is faced right now with a narrow decision on the Sunrise Power Line. Based on this consensus approach to the regional energy needs, I suggest you turn down the request for the Sunrise Power Line. It is too expensive and generates too much environmental damage.

I further recommend that you accept the transmission part of the LEAPS project when this matter comes before you. This would insure additional redundancy and reliability needed by San Diego.

I also recommend that you initiate an inquiry into a small (200 MW) upgrade to the SWPL line which seems to be a very cost effective way to increase access to Imperial County renewables.

Finally, I recommend that you adopt the preferred loading as strict guide to all your future decisions. This will allow future out of County renewables to be carried on existing transmission lines after a preference has been given to energy efficiency. This would be done in parallel with urban renewables and promises to be the most cost effective and environmentally benign approach to San Diego's future energy.

Respectively Submitted

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Speaking As an Individual but Acknowledging That I Am a:
Member of the Energy Working Group of SANDAG
Board Member of the San Diego Renewable Energy Society (chapter of ASES)

1. The San Diego regional energy plan is "ENERGY2030 - The San Diego Regional Energy Strategy: Creating a More Secure Energy Future for the San Diego Region", May 2003 is supported by the SANDAG Board.