

**POSSIBLE ALTERNATIVE
TO SAN DIEGO GAS AND ELECTRIC'S
PROPOSAL FOR A 500 KV TRANSMISSION LINE**

INTRODUCTION

My name is Don Coltrain. My mailing address is POBox 600, Pine Valley, California. My career includes almost 25 years at Southern California Edison, where I attained the title of Supervising Power Contracts Engineer, and six and one half years at Imperial Irrigation District ("IID") where I was the Assistant Manager of the Power Department. During my career, I developed over 100 power contracts including transmission agreements, power purchase, sales, and exchange agreements, generation plant purchases and sales, and litigation settlement agreements. I have testified before the CPUC and the Federal Energy Regulatory Commission.

PURPOSE OF PRESENTATION

During the meeting at Pine Valley on November 14, 2006, I proposed to San Diego's representatives they evaluate the possibility of entering into a displacement arrangement. This arrangement might delay if not completely eliminate the need for the subject transmission line. Because it was not included as an alternative in the study, I believe it is necessary to bring this alternative before the CPUC for its evaluation.

BACKGROUND

IID's transmission facilities and entitlements access various points of interconnection with the transmission facilities operated by others. For example, it has an ownership interest in the portion of the Southwest Power Line 500-kV transmission line between Palo Verde Switchyard and Imperial Valley Substation; an ownership of the transmission facilities between USBR Blythe Substation and the IID system; and an entitlement to the unused capacity in the KN and KS lines to Coachella substation. IID has the right to schedule bidirectional energy deliveries on these transmission facilities as long as the energy schedules in each direction do not exceed transmission entitlements. IID has done so in the past while conducting transactions with utilities such as San Diego, Pacific Power and Light, Salt River Project, Arizona Public Service, and, yes, at one time Enron.

ALTERNATIVE

An arrangement could be made whereby IID would absorb the energy generated by San Diego's entitlements to generation in IID's area and simultaneously schedule the energy from its system for San Diego's account. This arrangement could more fully utilize the existing facilities and delay or perhaps avoid the need to build additional transmission facilities.

RECOMMENDATION

It is recommended arrangements be made for a disinterested third party to determine San Diego's needs, run load flows, determine the amounts of available transmission capacity available to implement the alternative, and, as necessary, review the contracts which would be involved in its implementation. The third party's evaluation should be completed prior to acceptance of the Environmental Impact Statement.

Respectively submitted.



Donald H. Coltrain
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