

Martha Sullivan's Comments on Sunrise Powerlink DEIR/DEIS
(Applications A.05-12-014 and A.06-08-010)
 Submitted via e-mail on 4/10/08 to: sunrise@aspenerg.com

First, I want to commend the CPUC and BLM on the truly professional and thorough work that is reflected in this Draft EIR/EIS on SDG&E's application to construct the Sunrise Powerlink. As a 20-year employee of the CPUC (1979-1998), and subsequently a principal of Aspen Environmental Group (1998-2001), I have been very proud to be able stand before my neighbors, friends and colleagues in the San Diego region in the wake of the release of this Draft EIR/EIS. It was NOT easy to relocate here in 2001 (to help care for my elderly parents), and tell people where I had spent most of my career, in the wake of the Electric Restructuring debacle presided over by the CPUC, in which SDG&E ratepayers were the first to experience the price spikes and threats to electricity supply by unscrupulous power brokers (like Enron), who have been documented to have gamed the system.

It cannot be mere coincidence that the deadline for comments on this DEIR/DEIS (4/11/08) wound up being the same date upon which the Board of Directors of the San Diego Association of Governments (SANDAG) will consider whether or not to endorse Sunrise Powerlink. I will be addressing the SANDAG Board this date to share the same essential points I will make in these comments, and I welcome the opportunity to reinforce these two essential points.

1. I mentioned the Electric Restructuring debacle with which California kicked off the new millenium. We know now what many warned against (warnings which I personally witnessed before resigning from the CPUC in 1998) before that ill-considered policy was implemented -- that electricity marketers/brokers would game the new "market-based" system and gauge electricity consumers.

Scarily -- the CPUC is considering something similar now, in developing its recommendations to the CA Air Resources Board for a "cap-and-trade program" in which carbon emissions are capped and power generators can trade carbon credits (or "permits to pollute") among themselves. As pointed out in a March 10, 2008, *Los Angeles Times* editorial, between 22-32% of California's electricity "is generated out of state, and California can't regulate plants outside its borders ... (which) tend to be much dirtier than local ones."

This issue is extremely relevant to the consideration of Sunrise Powerlink, given SDG&E's insistence that Sunrise is intended to provide clean, renewable electricity toward meeting California's new mandate to cut its greenhouse gases by 25% by 2020. As the *LA Times* editorial also points out:

"A lot of this outside power comes not from individual plants but middlemen who buy power from plants all over the Western U.S. and sell it to investor-owned utilities in California. It's very hard to track where these power wholesalers are getting their juice. That presents an invitation for power dealers to game the system by pretending they're selling clean power when it's really dirty. It's also questionable whether the program would reduce emissions. If power wholesalers are the ones responsible for buying carbon credits, there's little incentive for dirty plants outside California to clean up their act." (emphasis added)

I call upon the CPUC and U.S. BLM to recognize this prospect in preparing the Final EIR/EIS for the Sunrise Powerlink, and to realistically assess the actual results of this new, massive "electricity pipeline" connecting substations at the U.S.-Mexico border (which connect to Mexican power plants NOT subject to U.S. environmental regulations, much less the more stringent California ones) and the lucrative Southern California power markets, not to mention the coal-fired and nuclear power plants in Arizona and beyond.

2. Just last week, Governor Schwarzenegger participated in a press event to unveil the nation's largest rooftop solar installation, by Southern California Edison -- which will power up to 160,000 households in SCE's service territory, which includes Los Angeles, Riverside, San Bernardino and Orange Counties. This announcement underscores the fact that the clean, renewable energy that is featured in at least two of the Draft EIR/EIS's "Environmentally Superior Alternatives" is achievable NOW, with current technology, and is not "impractical" on a large scale, as so often dismissed by the defenders of the status quo. The significance of this announcement has already

been noted in San Diego's press:

<http://www.nctimes.com/articles/2008/04/09/news/sandiego/a5dcbb2e5cecb38088257420005c2a69.txt>

I call upon the CPUC and U.S. BLM to recognize this project in preparing the Final EIR/EIS for the Sunrise Powerlink, both as a contributor toward California's renewable energy goals, but more importantly as concrete evidence that we ARE at the proverbial "tipping point," where the viability of renewable energy technology IS established and we no longer need to dismiss this as a viable alternative to the wires-and-smokestacks technology of our industrial past.

Thank you once more for the excellent work that went into, and is reflected in, the Draft EIR/EIS. I look forward to greeting the CPUC (and U.S. BLM) at the scheduled public hearing in Borrego Springs on May 12, 2008.

Sincerely,

Martha Sullivan, *proud member of
Communities United for Sensible Power (CUSP) and
supporter of the Smart Energy Solutions Campaign*

“We citizens and residents should not be expected to have to fight over and over and over again for land that has been set aside for a state park,” Virginia McIlwain of San Diego told PUC officials. “The Sunrise Powerlink is not the most effective and least costly. It is simply the most profitable for SDG&E..” (2/25/08 CPUC hrg in San Diego)