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Dennis & Connie Berglund Sandy Creek Ranch 33408 Sandy Creek Lane P.O. Box 776, Pine Valley, CA 91962 (619) 478-2600 fax (619) 478-2555 Internet: http://www.sandycreekranch.com

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To: Billie Blanchard, SPL Project Manager Lynda Kastoll, Bureau of Land Management California Public Utilities Commission

SUBJECT: Opposition to the SRPL and Sempra's 1250 MW Mexico Wind Projects

We have prepared this letter of opposition to the proposed Sempra/San Diego Gas & Electric (Sempra) Sunrise Power Link (SRPL) and Sempra's 1250 MW Mexico Wind projects for the following reasons:

Summary

- 1. This is a Sempra project to promote Sempra goals of generating power in Mexico and is not a "hometown" San Diego Gas & Electric project as it is being portrayed.
- 2. Sempra is operating like T. Boone Pickens in his wind project where the overall idea of renewable energy is good, but the underlying methods are flawed. In this case, renewable energy is needed, but the Power Link transmission line is not.
- 3. There is only a marginal benefit (if any) to San Diego County residents.
- 4. The Power Link is being built to deliver electrical power from Sempra-owned Mexican power plants to Los Angeles. There is every indication that Sempra will build additional fossil fuel power plants in Mexico to provide electrical power to U.S. customers.
- 5. Renewable power sources can be built within San Diego County without the need for a transmission line, similar to the SCE solar energy projects in Los Angeles and Riverside counties. This is a better choice for San Diego.
- 6. There are significant security problems with the proposed alternate routes. Terrorist damage to 500 KV transmission lines crossing the Hwy. 8 corridor would both interrupt the power and render Hwy. 8 unusable.
- 7. The sensitive wildlife corridor of La Posta Creek will be permanently affected over a length of approximately 9 miles by the use of the proposed alternate routes, BCD South Option.
- 8. Local property values will be adversely affected by multiple proposed routes.
- 9. Sempra is pitting communities against each other to accomplish their primary goals of getting their power to their new market in Los Angeles.

Detailed Discussion

- 1. <u>Sempra Project to Promote Sempra Goals not Local San Diego Goals</u>
 - a. Sempra Energy would like you to believe that the SRPL is a local San Diego effort generated by the "hometown" electric company, S.D.G.&E. In reality, the SRPL is one element in a Sempra plan to generate power in Mexico and distribute this power to Los Angeles.
 - b. Sempra has built power plants in Mexicali, Mexico, which are not subject to either California or United States regulations.
 - c. The Sempra-financed Mexicali power plants are right across the border from the beginning of the proposed SRPL.
 - d. Now Sempra wants to develop Mexican wind power for U.S. consumption. Why should the U.S. have to rely on renewal power generated in another country?
 - e. Sempra has also financed and constructed a LNG manufacturing facility near Ensenada with a natural gas pipeline from that plant to the power plants in Mexicali.
 - f. In a North County Times news article dated June 6, 2007, Mr. Simones, vice president of Sempra, stated that all of the power being generated by the Mexicali power plants has already been sold to Southern California Edison for distribution in the Los Angeles region.
 - g. The only way for Sempra to move power from Mexicali power plants to Los Angeles is using a distribution line that runs through San Diego county.
- 2. <u>Sempra is Operating Like the T. Boone Pickens Wind Project</u>
 - a. Recent advertisements have shown T. Boone Pickens saying that America will be helped by generating electrical power using wind energy. This is true.
 - b. Unfortunately, Mr. Pickens does not say that he really wants the distribution line rights of way so they can be used for his water distribution projects. However, if you ask anyone in Texas, they will tell you that the water project is Pickens' first priority.
 - c. In the same way, Sempra tells us that we need to use renewable energy, and that energy will need to be developed in the eastern desert areas and require an expensive transmission line. In other words, Sempra is using the "green" value of renewable energy to cloak their desire for a Mexico to Los Angeles transmission line.
 - d. Most people do not realize that the San Diego rate payers will foot the bill for the transmission line in the same way as T. Boone Pickens wants to be provided with a corridor for his water distribution plan.
- 3. No Real Benefit to San Diego County Residents
 - a. There is no direct benefit to San Diego power customers because, by Sempra's own information, San Diego is not in need of the amount of power the SRPL is being planned to provide.

- b. SDG&E has three new power plants in San Diego located in Miramar, Escondido, and soon to be completed in Otay Mesa.
- c. Two of the power plants generate 550 megawatts or more each.
- d. The SDG&E website states that with these power plants San Diego will only have a shortage of approximately 300 megawatts by 2010. This shortfall can easily be accommodated by the construction of one additional regional power plant.
- e. As evidenced by SDG&E's own website, San Diego does not have the power shortage that would require construction of the SRPL.
- 4. Delivering Non-Regulated Mexican Power to Los Angeles
 - a. As detailed in paragraph 1 above, conventional wisdom shows that the primary reason for the Sempra SRPL is to deliver nonregulated Mexicangenerated electrical power to the Los Angeles market.
 - b. Sempra is a large company that does not currently have a sizable stake in providing power for the Los Angeles area. It is easy to see that Sempra can get into that market using its power plants and its LNG plant in Mexico only if there is a distribution line. That distribution line would be the SRPL.
 - c. The article in the North County Times dated June 6, 2007, states without reservation that the Sempra-financed Mexicali power plants have been pumping out power exclusively for the United States market and specifically all power has already been sold to the Los Angeles region.
- 5. <u>Renewable Power from Distributed Sources is Better for San Diego</u>
 - a. It is a fact that, if power plants are distributed within a region, then there is only minimal or no requirement for high power distribution lines.
 - b. SDG&E has utilized this principle with the construction of regional power plants in Miramar, Escondido, and Otay Mesa.
 - c. In addition, San Diego has two existing power plants that are easily capable of being upgraded and utilized for local power. These are the South Bay power plant and the Encina power plant near Carlsbad.
 - d. These power plants distributed throughout San Diego county can be further enhanced through the use of distributed renewable energy generation such as solar and wind power.
 - e. This type of program is already being utilized by Southern California Edison where they are installing hundreds of megawatts of solar panels on existing buildings within the area that needs the power. This is a much better short- and long-term solution to providing regional renewable energy while not requiring old technology, expensive transmission lines.
 - f. There are other distributed sources that could be investigated including trash-to-energy and sea-motion power generation.

- 6. <u>Significant Security Problems Exist with Proposed San Diego Alternates</u>
 - a. Sempra has recommended several SRPL installation alternatives running through eastern San Diego county.
 - b. San Diego is unique in that it is a major port of entry plus a major military hub. Therefore, San Diego could be a prime target for terror operations.
 - c. San Diego also only has one major east-west transportation corridor, which is Hwy. 8.
 - d. The SRPL alternates cross Hwy. 8 as many as five times in eastern San Diego county.
 - e. If a terror activity, or a natural disaster, caused the power link to collapse across the freeway, both power distribution and the use of the only east-west transportation corridor would be destroyed.
 - f. Additonally, due to the close proximity of a major highway, a terrorist could quickly access the towers from the freeway and easily compromise one or more electrical distribution towers, unnoticed, which in turn would destroy the only east-west transportation corridor.
 - g. In particular, a Hwy. 8 crossing is being planned for the La Posta area. Due to the uneven terrain, this power line will be particularly low over the highway area. The power link could be easily compromised by launching a grounded cable over these lines, causing a line collapse and the interruption of traffic on both the Hwy. 8 freeway and the Old Hwy. 80 alternative.
- 7. <u>Sensitive Lands will be Permanently Affected</u>
 - a. Power Link distribution will affect sensitive lands in all parts of San Diego county.
 - b. In particular, the recently changed path which includes the BCD South Option will adversely affect the La Posta Creek wildlife corridor for approximately 9 miles beginning well below Hwy. 8 and continuing all the way to Thing Valley in the Laguna mountains.
 - c. Each of the property owners in this portion of the La Posta Creek wildlife corridor has taken great pains to ensure the open access to this wildlife corridor since the La Posta Creek bridge provides one of the very few passages under Hwy. 8 for migratory animals.
 - d. In our example, we and our neighbors have labored for over ten years to restore sensitive wetlands and a major animal migratory path.
 - e. Over these past ten years, we have been able to restore wetlands, encourage natural growth, which has in turn brought back deer, raccoons, possums and many species of birds including golden eagles.
 - f. Several pathways of the proposed east county alternates will directly affect this area and reverse all of the positive activities that the neighborhood has taken so many years to develop.

- 8. Local Property Values Adversely Affected
 - a. Sempra has proposed many power link alternatives throughout San Diego county.
 - b. Once a power link alternative is proposed, we have observed that the related property values have been immediately reduced.
 - c. In our specific example, we have appraisals and market information that show our lands have been adversely affected just by the information published by Sempra.
 - d. It is a reality that these properties will be held hostage and unable to be sold or transferred while Sempra continues to evaluate this large number of proposed alternatives.
- 9. <u>Sempra is Pitting San Diego Communities Against Each Other</u>
 - a. Reading through the SRPL project information and viewing the huge number of alternates that have been proposed by Sempra energy it is apparent that Sempra is trying to pit one community against another over the location of the SRPL.
 - b. Sempra has made no secret of the fact that they prefer the northern route and have concocted a noxious southern alternative so that the northern route will look more attractive. When you look at the northern route on the map, it is simple and straightforward. Compared to this route, the southern route looks like a snake that has been wound through the community in a very convoluted way, adversely affecting many property owners and a large amount of sensitive lands.
 - c. What other reason could there be when you also see that the southwest power link was installed in a simple straightforward manner along the Mexican border.
 - d. We can see no other reason for the large number of alternatives that touch so many areas of eastern San Diego county.

We hope you will seriously consider the points raised in this document because the construction of a major transmission line will affect both current residents and all future residents of eastern San Diego county.

Respectfully submitted,

Dennis H. Berglund

Connie Berglund