

October 20, 2006

Billie Blanchard, CPUC / Lynda Kastoll, BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104-3002

Ref.: Sunrise Powerlink Project A.06-08-010, NOP for EIR/EIS

**SCOPING COMMENTS AND ALTERNATIVE ROUTING CONSIDERATIONS
FROM STARLIGHT MOUNTAIN ESTATES OWNERS (SMEO)**

I. INTRODUCTION

Starlight Mountain Estates Owners (SMEO) is submitting these Scoping Comments for consideration in the SDG&E Sunrise Powerlink Project EIR/EIS Scoping Report. The primary goal of these scoping comments is to provide adequate and compelling data, so that SMEO's comments, suggestions and alternative routing solution will be included as a recommendation in the draft and final versions of the EIR/EIS.

SMEO is making every effort to be an effective participant in the scoping process. SMEO has reviewed the project descriptions provided in the NOP, as well as the complete detailed project descriptions provide in the SDG&E application and PEA. SMEO has reviewed the CEQA impact assessment questions, and will be addressing each applicable impact area. SMEO has attended and participated in the previous scoping meetings and made verbal comments prior to submitting these written scoping comments. SMEO is also recommending a method for reducing negative impacts by suggesting a specific alternate plan.

SMEO is a party to the CPUC proceeding for A.06-08-010, and has submitted a protest of a portion of SDG&E's application based on many of the same ideas described in these Scoping Comments. A copy of SMEO's protest is included as Attachment-1 to these Scoping Comments.

II. BACKGROUND

SMEO is a community located in the Inland Valley Link portion of SDG&E's proposed Sunrise Powerlink Project. The SMEO community is specifically located a half mile North-East of San Diego Country Estates in Ramona, and the properties directly affected by the project are bordered by Mount Gower Open Space Preserve on three sides. The SMEO community has properties that are both directly and/or indirectly affected by the Sunrise Powerlink Project. The community has properties with varied improvements, as well as some unimproved properties.

The SDG&E Sunrise Powerlink Project is proposing to cross a portion of the SMEO community as described in section III below. All SMEO properties directly affected by Sunrise Powerlink Project, as well as all properties within approximately 2,000 feet of the project have resident owners.

The SMEO community can be characterized as family homes on small ranches, in terrain that consists of rolling hills, pastures, seasonal creeks, as well as mountain tops. Average property size ranges from 20 to 60 acres, and all properties have expansive and unobstructed views of the surrounding valleys and mountains, including views of a large part of the Mount Gower Open Space Preserve. The community is zoned as an agriculture preserve with several of the properties seasonally growing hay/grass for livestock feed and erosion control. The portion of the SMEO community that is directly affected by the Sunrise Powerlink Project is also a Designated Critical Habitat.

III. SDG&E'S PROPOSED PROJECT

The portion of Sunrise Powerlink Project in the SMEO community is a part of the Inland Valley Link starting approximately 200 feet west of N77 where proposed twin 230 kV underground lines exit Mount Gower Open Space Preserve and enter the SMEO private property. These proposed twin 230 kV underground lines then transition to overhead facilities in the SMEO community at N77 (Proposed structure I90), then continue East-North-Easterly approximately 3,600 feet until exiting the SMEO community and reentering Mount Gower Open Space Preserve roughly at the proposed structure I93. The overhead facilities from N77 / structure I90 to structure I93 parallels

the existing 30 foot wide 69 kV Right-Of-Way (ROW), and is placed within a proposed 170 foot expansion of the existing ROW. Total proposed consolidated ROW would be 200 foot wide, with the expanded ROW added to the northern side of the existing ROW. Please refer to Attachment-2; SDG&E local inset map page IV_P07 for a detailed satellite image and SDG&E proposed project structures.

IV. SMEO CONCERNS

SMEO has several concerns about the proposed Sunrise Powerlink Project, its affect on public scenic vistas and its planned crossing of the SMEO community. SMEO is specifically concerned about the transition from underground facilities to overhead facilities in the community. These concerns can be summarized in the following ways:

- A. Transition from underground facilities to overhead facilities across the SMEO community has a substantial adverse affect on public scenic vistas, and is clearly visible from many public areas and public trails within Mount Gower Open Space Preserve.
- B. Choice of overhead facilities in the SMEO community discriminates against the SMEO community. All of the justifications for using underground facilities through San Diego Country Estates and a part of Mount Gower Open Space Preserve in Ramona are also valid justifications to extend the proposed underground facilities through the SMEO community.
- C. Overhead facilities will damage property and significantly restrict the future highest and best use of the land in the SMEO community.
- D. Overhead facilities will damage the quality of life in the SMEO community.

In the following sections, SMEO is providing its own proposed detailed alternative to reduce negative impacts.

V. SMEO RECOMMENDATIONS

SMEO would like to make the following two separate recommendations for the CPUC/BLM to consider for the EIR/EIS:

A. Extend the proposed underground facilities currently ending at N77 (structure I90) approximately 0.6 mile to the north-east, thereby moving the transition to overhead to the end of the valley, to proposed structure I93.

SMEO's proposed route will extend/continue the 60 foot ROW and underground facility from the point it first enters the SMEO private property, at the road and private property gate (approximately at structure I125), and continue to follow the road (not going to N77) north-easterly from the gate until it reaches the paved portion of Oak Hollow Road. Then roughly continue to follow Oak Hollow Road which avoids the existing improvements, eventually leaving Oak Hollow Road and going east across a fenced pasture north of the steel building; then, continuing east-south-easterly until joining the existing service road and the existing 69 kV ROW; finally, continuing along said service road until reaching the new overhead transition point at structure I93. Please refer to Attachment-3; SDG&E local inset map page IV_P07 for a detailed satellite image and SDG&E proposed project structures with SMEO recommended underground routing, and Appendix-C; views of underground routing alternatives recommended by SMEO.

B. Consolidate and relocate the existing 69 kV overhead facility underground within the new SMEO proposed routing. Abandoning this existing ROW will minimize the new/additional underground ROW needed for recommendation A above. The scope of work and cost to consolidate this existing overhead transmission facility underground, while service crews and equipment are already on site will be minimal, and it will allow future expansion using available underground conduits with minimal or no impact on the SMEO community.

VI. IMPACTS TO CEQA ENVIRONMENTAL CHECKLIST

The following comments are based upon specific impacts to the SMEO community and surrounding Mount Gower Open Space Preserve that need to be evaluated in the Environmental Impact Report (EIR) for the proposed Sunrise Powerlink Project. The specific impacts taken from the CEQA Environmental Checklist are:

1. Aesthetics

Would the project:

- Have a substantial adverse effect on a scenic vista?
- Substantially degrade the existing visual character or quality of the site and its surroundings?

A. The Sunrise Powerlink Project proposes to use underground facilities through San Diego Country Estates (in Ramona) and across a part of Mount Gower Open Space Preserve. SMEO agrees with the use of underground facilities, especially across the Mount Gower Open Space Preserve. SMEO can speculate that one of the large considerations for this choice of underground across the park is to mitigate the damages to the public view sheds and scenic vistas available to the public in and around the park. Thus, SMEO is very concerned that the proposed underground to overhead transition point at N77, although outside the Mount Gower Open Space Preserve, is still clearly in the public scenic vistas and view sheds, and will cause a significant and substantially adverse effect on the scenic vistas. The proposed transition point from underground to overhead facilities is only about 200 feet from park boundaries. The proposed new overhead facilities are at least 2 times the height of the existing 69 kV facilities, so the change will be significant and visible from several public roads and trails within the park, especially when back-dropped against the horizon as it will be from many sites.

Extending the existing underground facilities north-east across the SMEO valley to transition to overhead at proposed structure I93 almost entirely reduces the negative aesthetic impact in the Mount Gower Open Space Preserve, as well as other public areas.

Please refer to Appendix-A for photographic views of proposed overhead transmission sites, taken from Mount Gower Open Space Preserve.

B. The SMEO community will also experience a significant visual and aesthetic impact, which will substantially degrade the existing visual character or quality of the community and its surroundings. The open rural setting available in the SMEO community enables virtually a 360 degree unobstructed view of the surrounding valley and mountains.

In more densely populated suburban communities (unlike the SMEO community), the view sheds and line of sight views are virtually eliminated by all the houses and various other structures found in this type of community. Power poles and transmission towers in the midst of an already congested space are relatively unobtrusive. In contrast, the visual impact of 120 foot metal poles or lattice towers, standing in the open like giant robots running through the center of our pristine, open valley would be a horrendous visual impact. The existing 69 kV poles are between 40 and 60 feet tall and 10 feet wide at the top, and basically look like normal power poles. Their look is not normally associated with high voltage lines. Adding a second parallel set of steel poles that are 110 to 170 feet tall and 36 feet wide at the top will definitely have a significant negative visual impact on the area. The visual contrast is strong, demanding the viewer's attention in a way that cannot be overlooked.

Extending the existing underground facilities north-east across the SMEO valley to transition to overhead at proposed structure I93 greatly reduces the adverse visual impact on the SMEO community and its surroundings. Please refer to Appendix-B for photographic views of proposed overhead transmission sites and existing 69 kV lines, taken from within the SMEO community.

2. Agriculture Resources

Would the project:

- Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?

On January 6, 2006 the Ramona Valley was designated as an official American Viticultural Area by the Federal Taxation and Trade Bureau. The area is recognized for its distinctive microclimate, elevation and soil attributes. Two of the owners in Starlight Mountain Estates are members of the Ramona Valley Vineyard Association. One presently has 2 ½ acres under cultivation for the planting of a vineyard in February, 2007. The other has 2 acres intended for a vineyard scheduled for 2008. If the Sunrise Powerlink goes overhead through our valley one of the vineyards will be completely eliminated and the other partially eliminated. Any acreage adjacent to the power lines will be useless for planting grapes because close proximity of a vineyard to power lines greatly increases the risk of bird damage to the crop.

In contrast, underground facilities in the SMEO valley will eliminate these problems.

3. Biological Resources

Would the project:

- Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites?

This is a partial list of less common wildlife species negatively impacted by an overhead facility in SMEO's community: Golden Eagle (nesting pair), Kestrel, Black Shouldered Kite, Barn Owl, Great Horned Owl, Mountain Lion, Bobcat, Mule Deer, and Wild Turkey. This wildlife hunts and grazes in and near SDG&E's proposed ROW.

SDG&E's proposed large array of poles and overhead lines will substantially interfere with daily hunting and grazing patterns for this wildlife. Whereas, SMEO's proposed consolidated underground facility will remove this adverse impact.

4. Hazards and Hazardous Materials & Transportation/Traffic

Would the project:

- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
- Result in inadequate emergency access?

SMEO's community is at the heart of the 2003 Cedar Fire burn area. While no lives were lost in that fire, some improvements and nearly all plants, trees, and wildlife were destroyed. During the firestorm, residents were limited in their ability to evacuate the area, and one family was completely unable to exit. Please see the letter written by Captain Cary Coleman, Intermountain Volunteer Fire Dept., which cites reasons why fire protection and fire suppression by air and ground crews will be reduced or eliminated (refer to Attachment-B of the Protest, which is Attachment-1 in scoping)

Adding SDG&E's proposed increased overhead matrix to SMEO's valley will create significant risk of loss, injury or death due to the following:

A. Fallen lines caused by fire or local high velocity seasonal winds will impair access. Access by emergency vehicles and available exit routes will be reduced or, in the case of three families with property within the ROW, possibly eliminated during a future wildland fire. Please see photo of homes within proposed ROW and the available access. Please refer to Attachment-2; SDG&E local inset map page IV_P07 for a detailed satellite image.

B. Transmission lines are known to be an ignition source for wildland fires. There are large areas of native plants within the ROW and between adjacent homes.

C. Residual power in lines that are de-energized during a wildland fire can produce deadly arcing in heavy smoke making travel under the lines extremely dangerous.

SMEO is proposing a transmission facility where the community is inherently shielded from the transmission lines. Therefore, SMEO's proposed underground alternative will dramatically reduce SMEO's risk of loss, injury or death involving wildland fires, and it will result in excellent emergency access.

5. Land Use and Planning

Would the project:

- Physically divide an established community?

SMEO's community is currently a cohesive neighborhood where the existing transmission lines blend effectively with the residential improvements. SDG&E's proposed overhead facility and its potential expansion will create a physical division by:

- A. Forcing altered use, limited use or non-use of land within its 200ft. ROW.
- B. Forcing limited use or non-use of narrow sections of land between its ROW and property lines

In comparison, SMEO's proposed underground facility preserves the land use integrity of SMEO's community with its narrow 60 ft. ROW and the absence of above-ground obstructions.

6. General Issues

- Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

There is great controversy about damage from long-term exposure to high EMF levels. Arguments are historically long, complex, and ongoing. SMEO is not interested in arguing this issue in any direction. However, there is a prevalent public fear about EMF levels that is widespread, regardless of whether the basis of the fear is justified or just incorrectly perceived. SMEO property values and related financial concerns will be negatively impacted by expanded overhead transmission in its community. Likewise,

SMEO's proposed underground alternative will clearly mitigate public fear of the new transmission lines.

SMEO's community has recovered well from the horrifying events of the 2003 firestorm. Our quality of life and daily routines are back in order. We are asking for mutual consideration in meeting the objective of the Powerlink project as well as preserving a quality of life that many of us have worked our lifetimes to experience.

VII. SUMMARY & CONCLUSION

SMEO confirms that it is not opposing the Powerlink project, but is interested in minimizing and reducing the negative impacts on its community. Extending the underground facilities through the SMEO community accomplishes this objective, and allows the project to be relatively unhindered. here.

SMEO believes that its alternate proposal is feasible and reasonable. Underground installation crews and equipment will already be in our community based on SDG&E's current proposal to enter the community underground. The change in the consolidated ROW width from overhead to underground (from 170 foot to 60 foot) will reduce the overall ROW requirements by approximately 8.3 acres across the SMEO community. Consolidation and repositioning of the existing 69 kV to underground facilities could reduce the additional ROW requirements even more.

Furthermore, extending the underground facilities through the SMEO community and routing to avoid existing improvements will also avoid the condemnation of several buildings, and other improvements - ultimately eliminating extensive financial disputes and the need for additional legal actions.

Scoping Comments -
Starlight Mountain Estates Owners (SMEO)

SMEO would like to extend an invitation to interested parties, to make an appointment to visit our community to get a feel for the current quality of life, to view the SMEO recommended underground alternative, and to meet with the owners directly affected by the proposed Sunrise Powerlink Project.

Very Sincerely,

/s/ Michael Page

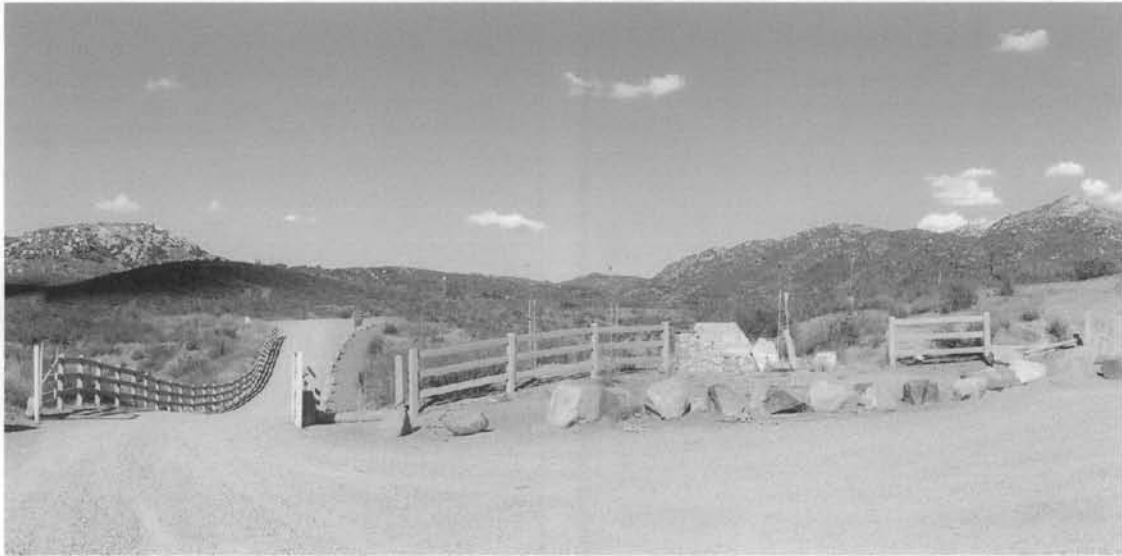


Michael Page
17449 Oak Hollow Road
Ramona, CA 92065
Tel. #: 760-788-9319
Email: oakhollowranch@wildblue.net

Appendix-A

Views of Scenic Vistas and View sheds from Mount Gower Open Space Preserve

Image 1 of 3



Entrance to Mount Gower Open Space Preserve
as seen looking North-East from the San Diego Country Estates

Note: An expanded view of this image shows 2 of the existing 69 kV poles on the horizon (just above roadway), in the same approximate location that the underground facilities are planned to change to overhead facilities. The approximate distance from this location to the poles is $\frac{3}{4}$ of a mile. The proposed 230 kV poles will be 2 to 3 times larger and much more visible in this scenic vista.

Appendix-A

Views of Scenic Vistas and View sheds from Mount Gower Open Space Preserve

Image 2 of 3

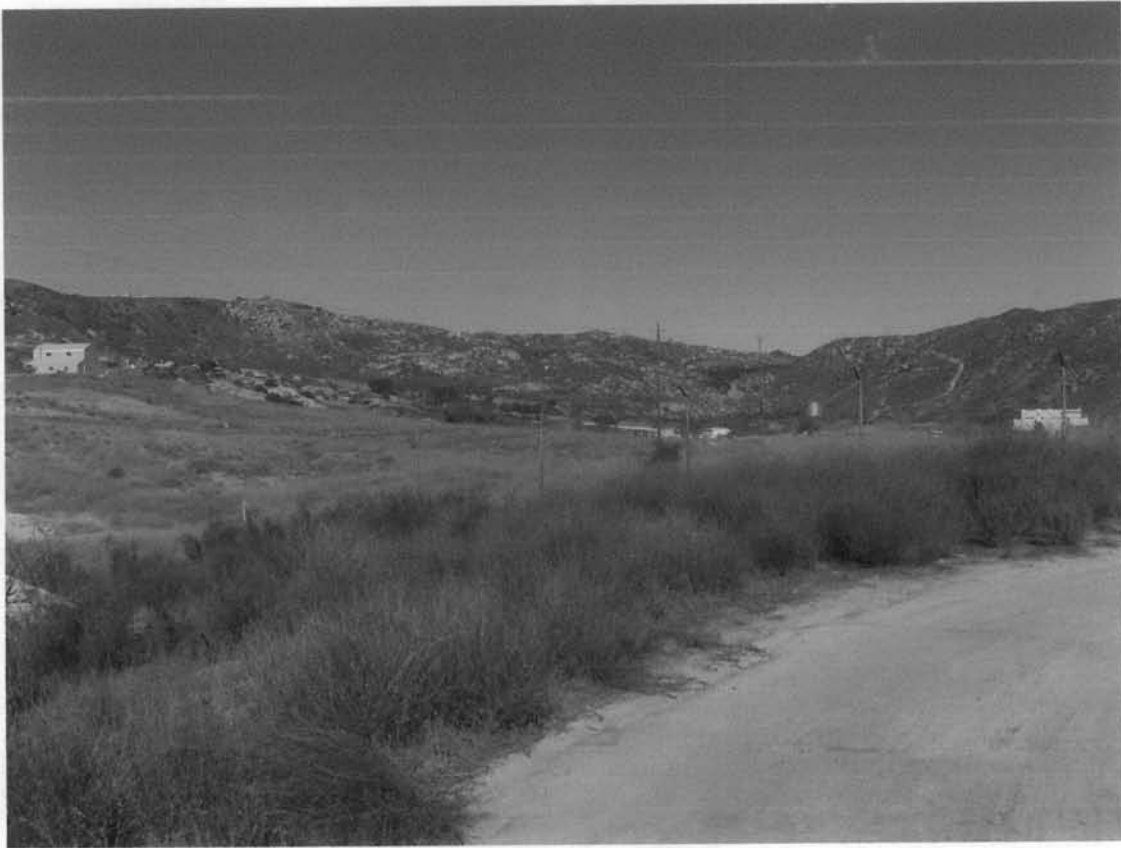


Site of transition from underground facilities to overhead facilities as seen from Mount Gower Open Space Preserve. The first 230 kV pole set (2 are required at a transition point) will be located approximately 250 feet directly ahead of this view point on a trail. About where the sandy spot is located slightly to the left of the middle of this image.

Appendix-A

Views of Scenic Vistas and View sheds from Mount Gower Open Space Preserve

Image 3 of 3



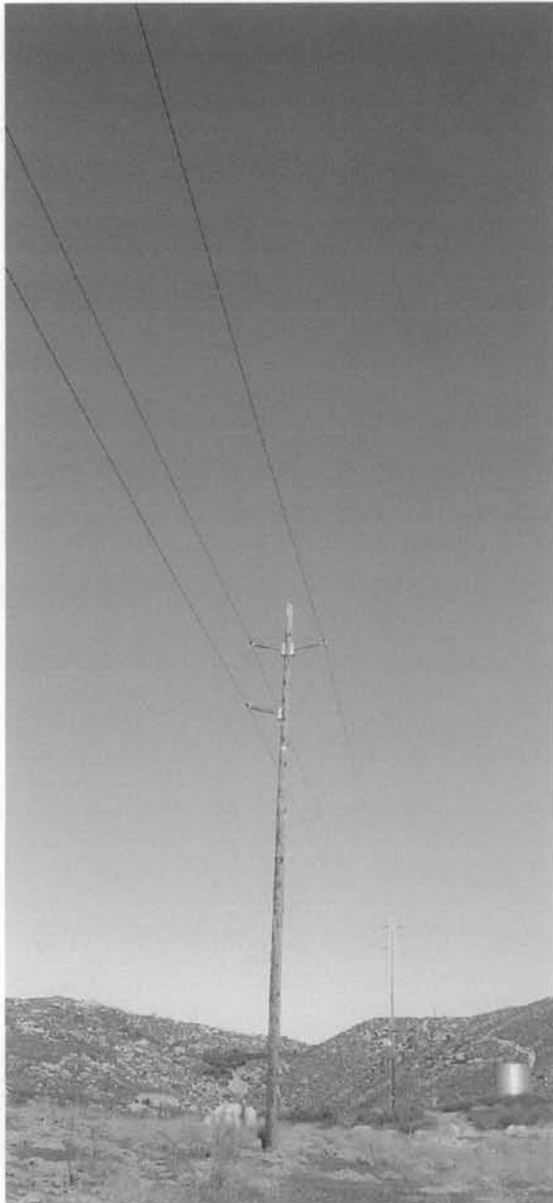
View of the existing 69 kV lines from Mount Gower Open Space Preserve. The proposed overhead 230 kV poles/lines will be visible all along this scenic vista.

Remember that the new poles will be 2 to 3 times taller.

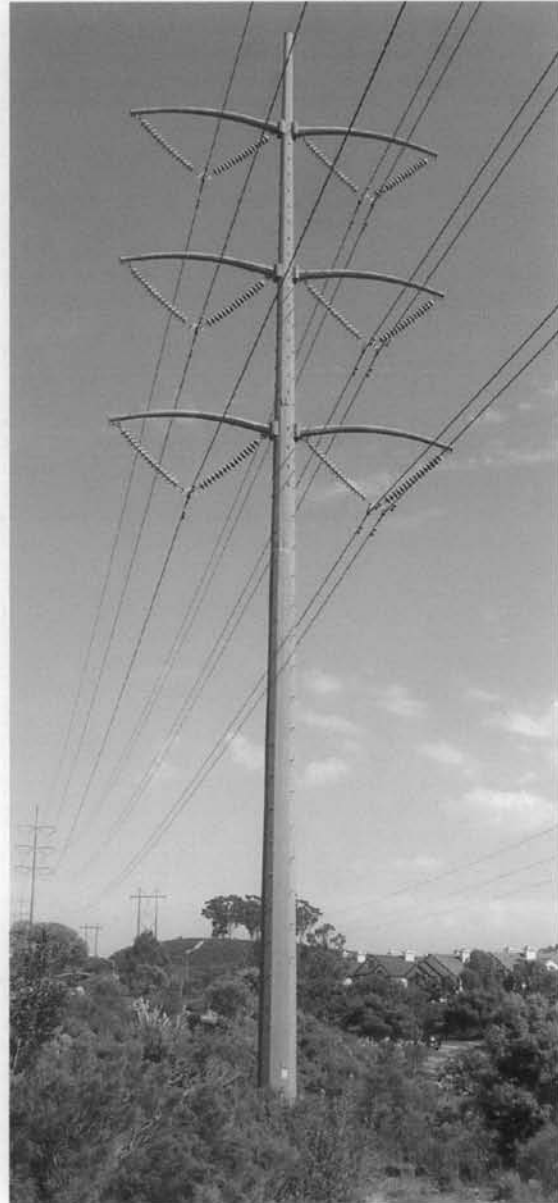
Appendix-B

Views of Existing Visual Character and Quality from inside the SMEO Community

Image 1 of 6



Existing 69 kV pole @ 150 ft



Proposed 230 kV pole @ 150 ft

Appendix-B

Views of Existing Visual Character and Quality from inside the SMEO Community

Image 2 of 6

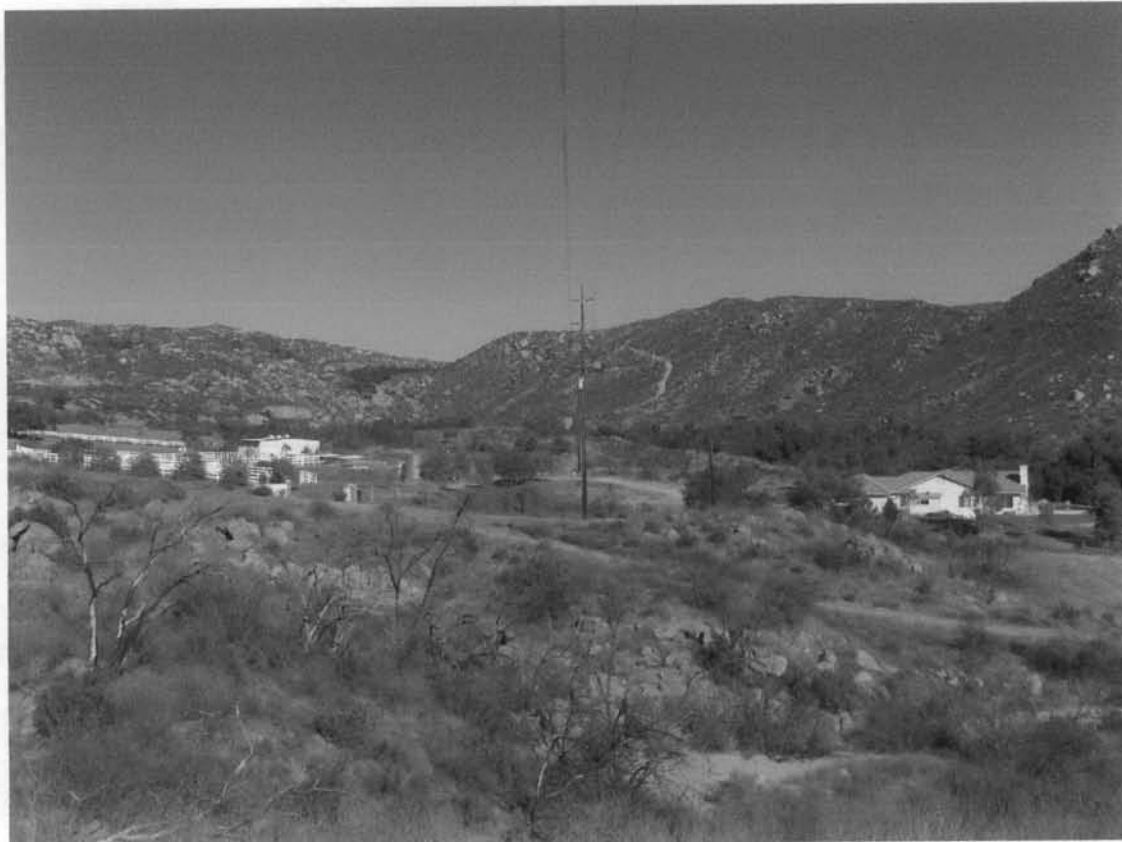


Existing 69 kV poles (2 each) are visible, but barely noticeable from this view.

Appendix-B

Views of Existing Visual Character and Quality from inside the SMEO Community

Image 3 of 6



Current property improvements including primary residence in this view is very near to the existing 69 kV lines. Expansion of the ROW an additional 170 feet to the North (left) will force condemnation of all improvements except the primary residence. Although the residence is less that 100 feet from the proposed 200 foot wide consolidated ROW.

Appendix-B

Views of Existing Visual Character and Quality from inside the SMEO Community

Image 4 of 6



Appendix-B

Views of Existing Visual Character and Quality from inside the SMEO Community

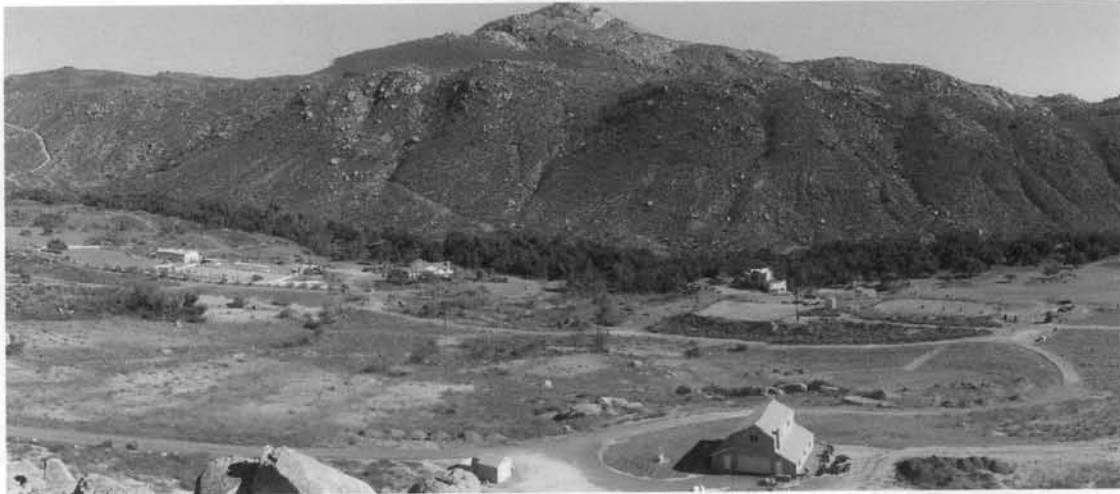
Image 5 of 6



Appendix-B

Views of Existing Visual Character and Quality from inside the SMEO Community

Image 6 of 6



Appendix-C

Views of Underground Routing Alternatives Recommended by SMEO

Image 1 of 6



Appendix-C

Views of Underground Routing Alternatives Recommended by SMEO

Image 2 of 6



Appendix-C

Views of Underground Routing Alternatives Recommended by SMEO

Image 3 of 6



Appendix-C

Views of Underground Routing Alternatives Recommended by SMEO

Image 4 of 6



Appendix-C

Views of Underground Routing Alternatives Recommended by SMEO

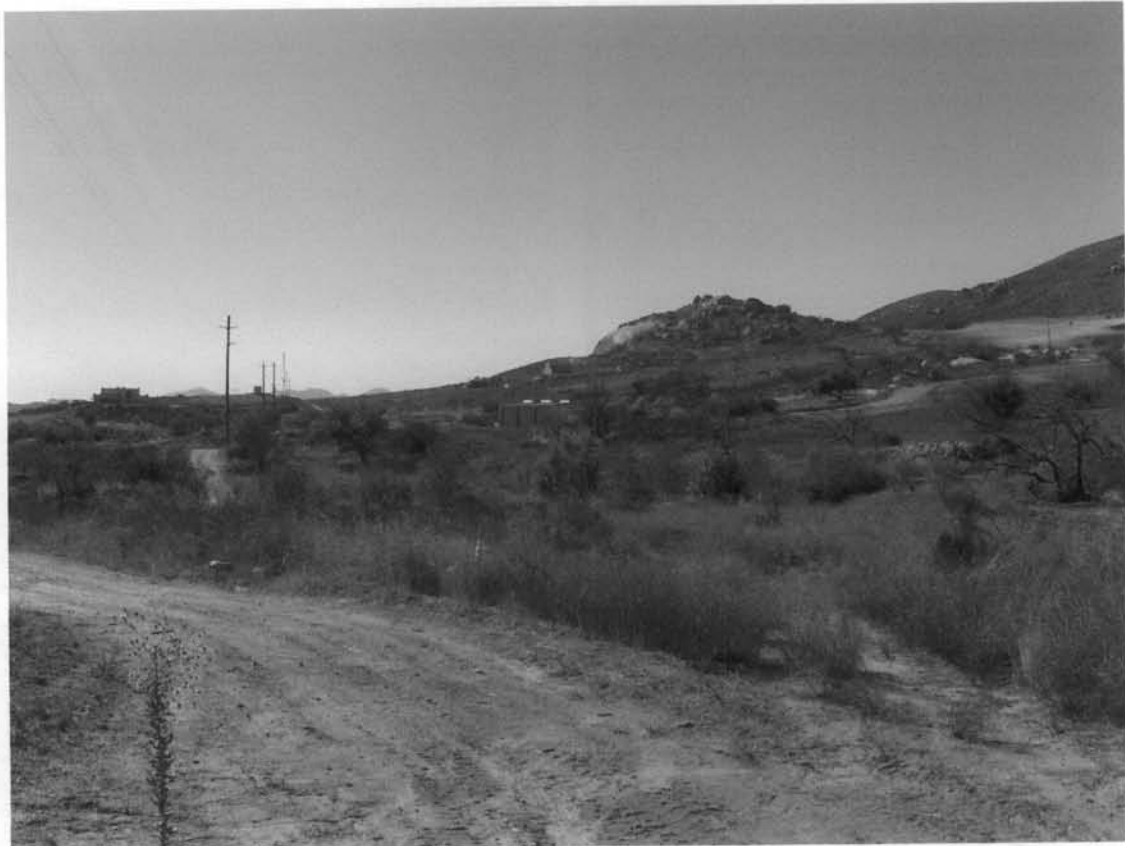
Image 5 of 6



Appendix-C

Views of Underground Routing Alternatives Recommended by SMEO

Image 6 of 6



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

In the matter of the Application of
San Diego Gas & Electric Company
(U 902-E) for a Certificate of Public
Convenience and Necessity for the
Sunrise Powerlink Transmission Project

Application No. 06-08-010
(Filed August 4, 2006)

Application No. 05-12-014
(Filed December 14, 2005)

PROTEST OF STARLIGHT MOUNTAIN ESTATES OWNERS

Michael Page
17449 Oak Hollow Road
Ramona, CA 92065-6758
Telephone: 760-788-9319
E-mail: oakhollowranch@wildblue.net

September 8, 2006

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OF THE STATE OF CALIFORNIA**

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PROTEST OF STARLIGHT MOUNTAIN ESTATES OWNERS

I. INTRODUCTION

Pursuant to Article 12 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Starlight Mountain Estates Owners (“Owners”) submit this Protest in opposition to the Application of the San Diego Gas & Electric Company (“SDG&E”) for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project (“Application”). The Application was filed on December 14, 2005. An amended Application was filed on August 4, 2006. Submission of this protest is timely pursuant to Rule 44.1 of the Commission’s Rules of Practice and Procedure.

The Community (“Community”) is a portion of Starlight Mountain Estates (approximately 400 acres), which is bounded on three sides by Mount Gower Open Space Preserve.

II. GROUNDS FOR PROTEST

Owners are protesting a portion of SDG&E’s Application, that is, the specified attributes of part of SDG&E’s proposed project. Owners protest relates to the section

(“Section”) of Segment 10P of the Application for overhead facility in Ramona from the point that the underground facility transitions to overhead (near N77 or N22) then northeastward approximately 0.6 mile along the preferred route for the Inland Valley Link. The exact locations of N77 and N22 are not clearly marked on the ground. SDG&E’s request to construct an overhead facility instead of an underground facility in the Section is not acceptable to the Owners and is not justified based upon the following:

- A. Choice of overhead facility for the Section discriminates against the Community
- B. Overhead facility damages property in the Community
- C. Overhead facility damages the quality of life in the Community

III. DISCRIMINATORY CHOICE OF OVERHEAD FACILITY

According to its Application, SDG&E’s proposed transition from underground to overhead facilities occurs at the southwestern boundary of the Section. Some impacts, opportunities and constraints listed in the Application are not accurately depicted for the Section and the Community. SDG&E’s analysis and justification for the underground facilities southwest of the Section are applicable and should be used within the Section. Therefore, SDG&E’s choice of an overhead facility for the Section discriminates against the Community. Some of the key discriminating points are listed below:

- a) Visual Impacts and Resources. In the Application, Chapter 4.9.2.1.1 Environmental Setting, Landscape Visual Quality, related to the Inland Valley Link of the proposed project, between N20B-N77-N22; “There are sensitive viewing areas ...and within Mount Gower Open Space Preserve. The preserve is

located southeast of the town of Ramona and east of the community of San Diego Country Estates. These communities provide public access into the preserve from neighborhoods that abut preserve lands. The preserve contains nearly pristine wilderness, consisting primarily of dense chaparral, oak woodlands, and meadows. Slopes within the preserve that face west-to-southwest are within the viewshed of many residences in San Diego Country Estates.”

The Community abuts and is surrounded on three sides by Mount Gower Open Space Preserve. So in comparison, these conditions also apply to the Section which serves as a visual background for the immediately adjacent Mount Gower OSP. The segment going from N77/N22 to N51 goes underground to help mitigate the visual impacts associated with the park. The segment going from N22/N77 northeastward through the Section and onwards, again crossing Mount Gower OSP towards N20B is also in the viewshed of part of the San Diego Country Estates, the public trails in Mount Gower OSP, and the Community. Construction of an overhead facility in the Section will spoil public visual enjoyment of the preserve and the surrounding areas, not just “...the viewshed of many residences in San Diego Country Estates.”

In the Application, Chapter 7.9.2.1 Inland Valley Link Impacts, Visual Resources, related to the proposed project and Impact VR-3: Existing visual character or quality of the site and its surroundings, between N20B-N77-N22; “In the segment from N20B-N77-N22, the Proposed Project would be built overhead parallel to an existing 69 kV line. In this area, the visual impact of the Project

would be primarily an incremental addition to the views and the new structure would add a new vertical form and straight line structure in a landscape that already contains these types of contrasts of line and form. The change to the existing landscape would be minor, and would not diminish the character or quality of views. The overall visual change would be low, and the visual impact would be adverse but less than significant. No mitigation beyond the standard APMs is proposed for this location.”

This statement is erroneous when applied to the Section and the Community. The existing 69 kV line is a “Weak” visual contrast. This single 69 kV line has three conductor cables, is mounted on wooden poles, approximately 40 ft to 60 ft tall and 10 ft wide at the top, residing in a 30 ft ROW. The general appearance is very similar to normal residential electrical/telephone poles, and its character is not normally associated with high voltage transmission lines (see “ATTACHMENT-A” photo of existing 69 kV lines).

The Application adds a new expandable double circuit 230 kV line with six cable sets mounted on steel poles, approximately 110 ft to 170 ft tall and 36 ft wide at the top, residing on a consolidated 200 ft ROW, including an upgrade of the existing single 69 kV line with three cables, mounted on steel poles, approximately 90 ft to 110 ft tall and 9 ft wide at the top.

These proposed changes could be viewed as incremental, but the overall visual change will be “High” corresponding to a “Significant” visual impact. This visual contrast is “Strong”, demanding the viewer’s attention in a way that cannot

be overlooked. There will be two sets of lines/poles generally 2 to 3 times higher than existing lines/poles, and the number of cables running between these poles will be 3+ times the current facility.

This “Significant” visual change in overhead facilities through the Community is also a “Significant” visual change in the public viewshed within Mount Gower OSP.

b) Fire Management. In the Application, Chapter 4.13.2.2 Environmental Setting, Public Health & Safety and Hazardous Materials, related to Fire Management in the Inland Valley Link of the proposed project; “Most of the 2003 wildfires in San Diego County occurred in the mountains to the east and southeast of the Inland Valley and Coastal link alignments. However, smaller wildfires have historically occurred within the PSA.” This statement is erroneous. The Community was, in fact, severely burned in the 2003 Cedar Fire. Fire crews were actually stationed within the Community and the Section during the fire. The Application, although addressing ground based Emergency Response issues in Impact HS-11, does not mention the potential restrictions placed upon air crews and their low altitude fire retardant drops near overhead facilities.

The proposed overhead lines in the Section will prevent or hamper future fire suppression by ground crews. Fire retardant air drops might be the only available outside fire protection for the properties in the Section. Significant increase of the height of the overhead facility in the Section will prevent air crews from safely entering the Community, rendering a potential elimination of fire

suppression capabilities (see “ATTACHMENT-B” letter from Intermountain Volunteer Fire and Rescue Department).

c) Topography. Topography and access to an underground facility in the Section will provide reduced construction costs, compared to the inherent costs of underground construction in areas southwest of the Section. An average slope of 3.5% and access from both sides of Owners preferred alignment in the Section makes underground construction less expensive than in other underground segments of SDG&E’s proposed route. Please note that it is not economically feasible to construct an underground facility more northeastward beyond the Section, because of challenging topography.

IV. DAMAGE TO PROPERTY IN THE COMMUNITY

Owners are facing dramatic devaluation of their properties. SDG&E proposes an unnecessary amount of private property to be used for its overhead facility within the Section: 200 foot wide consolidated ROW (approximately 14.5 acres) for overhead transmission versus 60 foot wide ROW (approximately 4.4 acres) for underground transmission. The proposed overhead facility and likely upgrades to the existing 69 kV lines significantly reduce or completely destroy the value of a variety of existing improvements. Expansion and consolidation with the existing ROW will force the condemnation of a 2600 square foot workshop/garage, two out-buildings, driveways, landscaping, well water holding tanks and house/irrigation management center, as well as an entire equestrian facility including corrals, shelters, staging area, tack room and dressage arena. Also, the proposed consolidated and expanded ROW also leaves large

areas adjacent to property lines unusable and worthless. Finally, future potential property divisions in the Section will be limited or impossible.

There is no conclusive evidence that ELF or EMF from high voltage power lines are without long-term harmful effects. However, predominant intense public fear of ELF/EMF exposure and the array of related unknowns will directly affect the marketability of real property within the Community. An underground facility through the community will help to mitigate this fear.

Installation of an overhead facility in the Section will radically diminish or eliminate the value of property interests in the Community.

V. DAMAGE TO QUALITY OF LIFE IN THE COMMUNITY

Owners have invested a lifetime of savings and years of personal effort into their homes and properties, which were designed and constructed with an orientation to the view of Mount Gower and the surrounding hills and valleys. The catastrophic visual effects of an expanding overhead facility will destroy this view and the Owners' long-term investments.

The Community is also engaged in a long and expensive recovery from the Cedar Fire. Owners' fire prevention and protection methods that proved successful during that fire have been enhanced. Regardless, the fear of future fire in the Community is always on each Owner's mind. Consequently, reduced fire protection and increased fire risk damage the Community's quality of life.

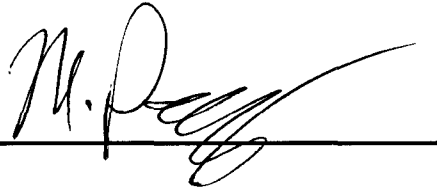
In summary, the horrific visual impact of an expanding array of overhead power lines, concern about reduced fire protection and increased corona noise will significantly damage the Community's present and future quality of life.

VI. CONCLUSION

In the event that the Commission rules in favor of SDG&E's Application, Owners respectfully request that the Commission order SDG&E to:

- a) Construct an underground facility in the Section within a 60 ft ROW, following a portion of Oak Hollow Road in order to avoid existing improvements, and along a route currently agreed upon among the Owners.
- b) Construct and Consolidate an expandable 69 kV facility underground with the underground facility described in "a" above, or ensure in the future that the existing 69 kV facility is maintained at its present size and visual scope.

Respectfully submitted,



Michael Page
17449 Oak Hollow Road
Ramona, CA 92065-6758
Telephone: 760-788-9319
E-mail: oakhollowranch@wildblue.net

September 8, 2006

(ATTACHMENT – A)

Existing 69 kV lines



Two poles are visible in this photo.

Visual contrast is very weak, typically not even noticed.

(ATTACHMENT - B)

Intermountain Volunteer Fire and Rescue Department

P.O. Box 1362, Ramona, CA 92065



September 1, 2006

RE: Impact of high power lines on fire protection

Dear Mr. and Mrs. York,

There are standard operating procedures within this department, and all departments, that address suppression and attack of both brush and structure fires in the proximity of high power electrical lines. In general, firefighters are not permitted to conduct fire fighting operations in the immediate area under or next to these electrical lines due to the danger of electrocution from downed or sagging lines, or potential electrical arching in certain conditions. There are procedures for coordinating with the electric company to get high power lines turned off during wild land fires, but this can be hampered by various bureaucratic complexities and the time it takes to make those arrangements.

Regarding your specific circumstances, the proposed power lines could present adverse fire response conditions in three ways:

1. **Access** - The lines will be aligned geographically with east/west direction of the canyon that contain your homes and out buildings. That alignment is also the direction of the prevailing winds in that canyon. Especially in Santa Anna wind conditions (high winds from the east), coupled with the confined area within the canyon and the limited ingress/regress, access to some of the residence structures, such as yours, Page and Schultz could be hampered or prevented in conditions such as those we experienced in the 2003 Cedar Fire Storm.
2. **Defensible Space** - The east/west alignment of the power lines also restricts the potential to create effective fire breaks between the surrounding natural brush and structures in the canyon.
3. **Attack** - The height of the proposed towers, as you described it, would probably prevent effective operation from CDF Air Tankers due to the maximum altitude limits for effective retardant payload, and the relatively close proximity of the lines to your residences.

Regards,

A handwritten signature in black ink, appearing to read "Cary Coleman".

Cary Coleman
Fire Chief

Intermountain Volunteer Fire and Rescue Department

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the California Public Utilities Commission's Rules of Practice and Procedure, I have this day served a true copy of **PROTEST OF STARLIGHT MOUNTAIN ESTATES OWNERS** to parties listed on the following pages.

Service was completed on all known parties to proceeding A.06-08-010 by e-mail with the document attached where available or, where e-mail service was not available, by causing true copies thereof, enclosed in sealed envelopes with first class postage prepaid, to be deposited in the United States Mail to each party named in the service list.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 8th day of September 2006, at San Diego, California.



Michael A. Page

***** SERVICE LIST *****

Last Update on 05-SEP-2006 by: LIL

A0608010 LIST

A0512014

***** APPEARANCES *****

Mary Aldern
36264 MONTEZUMA VALLEY ROAD
RANCHITA CA 92066
(760) 782-9036
hikermommal@yahoo.com

Connie Bull
24572 RUTHERFORD ROAD
RAMONA CA 92065
conniebull@cox.net

David Lloyd
Attorney At Law
CABRILLO POWER I, LLC
4600 CARLSBAD BLVD.
CARLSBAD CA 92008
(760) 268-4069
david.lloyd@nrgenergy.com
For: Cabrillo Power I, LLC

David Hogan
CENTER FOR BIOLOGICAL DIVERSITY
PO BOX 7745
SAN DIEGO CA 92167
(760) 809-9244
dhogan@biologicaldiversity.org

Frederick M. Ortlieb
Office Of City Attorney
CITY OF SAN DIEGO
1200 THIRD AVENUE, 11TH FLOOR
SAN DIEGO CA 92101
(619) 533-5800
fortlieb@sandiego.gov
For: City of San Diego

Diane Conklin
MUSSEY GRADE ROAD
RAMONA CA 92065
dj0conklin@earthlink.net

Rory Cox
AARON QUINTANAR/BILL POWERS
311 CALIFORNIA STREET, SUITE 650
SAN FRANCISCO CA 94104
(415) 399-8850
rcox@pacificenvironment.org
For: C/O Pacific Enviroment

David Kates
DAVID MARK AND COMPANY
3510 UNOCAL PLACE, SUITE 200
SANTA ROSA CA 95403-5571
(707) 570-1866
dkates@sonic.net
For: The Nevada Hydro Company

Regina DeAngelis
Legal Division
RM. 4107
505 VAN NESS AVE
San Francisco CA 94102
(415) 355-5530
rmd@cpuc.ca.gov
For: DRA

Jedediah J. Gibson
Attorney At Law
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO CA 95814
(916) 447-2166
jjg@eslawfirm.com

Norman J. Furuta
FEDERAL EXECUTIVE AGENCIES
10TH FLOOR, MS 1021A
333 MARKET STREET
SAN FRANCISCO CA 94105-2195
(415) 977-8808
norman.furuta@navy.mil
For: DEPARTMENT OF THE NAVY

Norman J. Furuta
FEDERAL EXECUTIVE AGENCIES
10TH FLOOR, MS 1021A
333 MARKET STREET
SAN FRANCISCO CA 94105-2195
(415) 977-8808
norman.furuta@navy.mil
For: Federal Executive Agencies

Brian T. Cragg
Attorney At Law
GOODIN MACBRIDE SQUERI RITCHIE & DAY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO CA 94111
(415) 392-7900
bcragg@gmsr.com
For: LS Power

***** SERVICE LIST *****
Last Update on 05-SEP-2006 by: LIL
A0608010 LIST
A0512014

Carrie Downey
HORTON KNOX CARTER & FOOTE
895 BROADWAY
ELCENTRO CA 92243
(760) 352-2821
cadowney@san.rr.com
For: Imperial Irrigation District

John W. Leslie
Attorney At Law
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO CA 92130
(858) 720-6352
jleslie@luce.com
For: Coral Power, LLC and Energia Azteca/Energia de Baja California
(La Rosita)

Scot Martin
PO BOX 1549
BORREGO SPRINGS CA 92004
(760) 767-1045
scotmartin478@msn.com

Joetta Mihalovich
11705 ALDERCREST POINT
SAN DIEGO CA 92131

Diane J. Conklin
MUSSEY GRADE ROAD ALLIANCE
PO BOX 683
RAMONA CA 92065
(760) 787-0794
dj0conklin@earthlink.net

Don Wood Sr.
PACIFIC ENERGY POLICY CENTER
4539 LEE AVENUE
LA MESA CA 91941
(619) 463-9035
dwood8@cox.net

James H. Caldwell Jr.
PPM ENERGY, INC.
1650 E NAPA STREET
SONOMA CA 95476
(503) 796-6988
james.caldwell@ppmenergy.com
For: PPM ENERGY, INC.

Elizabeth Edwards
RAMONA VALLEY VINEYARD ASSOCIATION
26502 HIGHWAY 78
RAMONA CA 92065
(760) 789-8673
edwrdsgrfx@aol.com
For: Ramona Valley Vineyard Assoc.

Harvey Payne
RANCHO PENASQUITOS CONCERNED CITIZENS
600 W. BROADWAY, STE. 400
SAN DIEGO CA 92101
(619) 702-4307
hpayne@sdgllp.com
For: RANCHO PENASQUITOS CONCERNED CITIZENS

Billy Blattner
SAN DIEGO GAS & ELECTRIC COMPANY
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO CA 94102
(415) 202-9986
wblattner@semprautilities.com
For: San Diego Gas & Electric

Kevin O'Beirne
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO CA 92123
(858) 654-1765
ko'beirne@semprautilities.com
For: San Diego Gas & Electric

Patricia C. Schnier
BARBARA E. SCHNIER, ESQ.
14575 FLATHEAD RD.
APPLE VALLEY CA 92307
(760) 240-7668
barbschnier@yahoo.com
For: Self

Osa L. Wolff
Attorney At Law
SHUTE, MIHALY & WEINBERGER, LLC
396 HAYES STREET
SAN FRANCISCO CA 94102
(415) 552-7272
wolff@smwlaw.com
For: Cities of Temecula, Murrieta & Hemet

Paul Blackburn
SIERRA CLUB, SAN DIEGO CHAPTER
3820 RAY STREET
SAN DIEGO CA 92104
(619) 299-1741
sdenergy@sierraclubsandiego.org
For: Sierra Club, San Diego Chapter

Thomas A. Burhenn
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-9652
thomas.burhenn@sce.com
For: Southern California Edison

***** SERVICE LIST *****
Last Update on 05-SEP-2006 by: LIL
A0608010 LIST
A0512014

Michel Peter Florio
Attorney At Law
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO CA 94102
(415) 929-8876
mflorio@turn.org
For: TURN

Michael Shames
Attorney At Law
UTILITY CONSUMERS' ACTION NETWORK
3100 FIFTH AVENUE, SUITE B
SAN DIEGO CA 92103
(619) 696-6966
mshames@ucan.org
For: UCAN

Pam Whalen
24444 RUTHERFORD ROAD
RAMONA CA 92065
(760) 440-0202
pwhalen2@cox.net

***** STATE EMPLOYEE *****

Susan Lee
ASPEN ENVIRONMENTAL GROUP
235 MONTGOMERY STREET, SUITE 935
SAN FRANCISCO CA 94104
(415) 955-4775 X 203
slee@aspeneg.com

Tom Murphy
Vp., Sacramento Operations
ASPEN ENVIRONMENTAL GROUP
8801 FOLSOM BLVD., SUITE 290
SACRAMENTO CA 95826
(916) 379-0350
tmurphy@aspeneg.com

Billie C. Blanchard
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2068
bcb@cpuc.ca.gov

Traci Bone
Legal Division
RM. 5206
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2048
tbo@cpuc.ca.gov

Clare Laufenberg
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 46
SACRAMENTO CA 95814
(916) 654-4859
Claufenb@energy.state.ca.us

Judy Grau
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET MS-46
SACRAMENTO CA 95814-5512
(916) 653-1610
jgrau@energy.state.ca.us

Marc Pryor
CALIFORNIA ENERGY COMMISSION
1516 9TH ST, MS 20
SACRAMENTO CA 95814
(916) 653-0159
mpryor@energy.state.ca.us

Scott Cauchois
Division of Ratepayer Advocates
RM. 4209
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1525
wsc@cpuc.ca.gov
For: DRA

Robert Elliott
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2527
rae@cpuc.ca.gov

Thomas Flynn
Energy Division
770 L STREET, SUITE 1050
Sacramento CA 95814
(916) 324-8689
trf@cpuc.ca.gov

Aaron J. Johnson
Division of Ratepayer Advocates
RM. 4202
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2495
ajo@cpuc.ca.gov

***** SERVICE LIST *****
Last Update on 05-SEP-2006 by: LIL
A0608010 LIST
A0512014

Scott Logan
Division of Ratepayer Advocates
RM. 4209
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-1418
sjl@cpuc.ca.gov
For: DRA

Marcus Nixon
Consumer Service & Information Division
RM. 500
320 WEST 4TH STREET SUITE 500
Los Angeles CA 90013
(213) 576-7057
mrx@cpuc.ca.gov

Terrie D. Prosper
Executive Division
RM. 5301
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2160
tdp@cpuc.ca.gov

Steven A. Weissman
Administrative Law Judge Division
RM. 5107
505 VAN NESS AVE
San Francisco CA 94102
(415) 703-2195
saw@cpuc.ca.gov

Keith D White
Energy Division
AREA 4-A
505 VAN NESS AVE
San Francisco CA 94102
(415) 355-5473
kwh@cpuc.ca.gov

***** INFORMATION ONLY *****

Bob & Margaret Barelmann
6510 FRANCISCAN ROAD
CARLSBAD CA 92011
(760) 497-7777
ecp@ixpres.com

Jim Bell
4862 VOLTAIRE ST.
SAN DIEGO CA 92107
(619) 758-9020
jimbellelsi@cox.net

Pat/Albert Biane
1223 ARMSTRONG CIRCLE
ESCONDIDO CA 92027
patricia_fallon@sbcglobal.net

Eileen Bird
12430 DORMOUSE ROAD
SAN DIEGO CA 92129
(858) 538-9595
sanrocky@aol.com

Tom Gorton
BORREGO SUN
PO BOX 249
BORREGO SPRINGS CA 92004
tgorton@cableusa.com

Phillip & Eliane Breedlove
1804 CEDAR STREET
RAMONA CA 92065
(858) 618-5087
wolffmates@cox.net

G. Alan Comnes
CABRILLO POWER I LLC
3934 SE ASH STREET
PORTLAND OR 97214
(503) 239-6913
alan.comnes@nrgenergy.com

Brady Torgan
CALIFORNIA DEPARTMENT OF PARK&RECREATION
1416 9TH STREET, ROOM 1404-06
SACRAMENTO CA 95814
(916) 653-6884
btorgan@parks.ca.gov

Michael L. Wells
CALIFORNIA DEPARTMENT OF PARKS&RECREATION
200 PALM CANYON DRIVE
BORREGO SPRINGS CA 92004
(760) 767-4037
mwells@parks.ca.gov

J.A. Savage
CALIFORNIA ENERGY CIRCUIT
3006 SHEFFIELD AVE
OAKLAND CA 94602
(510) 534-9109
editorial@californiaenergycircuit.net

***** SERVICE LIST *****
Last Update on 05-SEP-2006 by: LIL
A0608010 LIST
A0512014

CALIFORNIA ENERGY MARKETS
517 - B POTRERO AVENUE
SAN FRANCISCO CA 94110
(415) 552-1764
cem@newsdata.com

CALIFORNIA ENERGY MARKETS
517-B POTRERO AVENUE
SAN FRANCISCO CA 94110
(415) 552-1764 X 17
cem@newsdata.com

Legal & Regulatory Department
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM CA 95630
e-recipient@caiso.com
For: CALIFORNIA ISO

Tom Blair
Energy Administrator
CITY OF SAN DIEGO
9601 RIDGEHAVEN COURT, SUITE 120
SAN DIEGO CA 92123-1636
(858) 492-6001
TBlair@sandiego.gov

Jennifer Porter
Policy Analyst
DIEGO REGIONAL ENERGY OFFICE
8520 TECH WAY SUITE 110
SAN DIEGO CA 92123
(858) 244-1180
jennifer.porter@sdenergy.org

Donald C. Liddell
Attorney At Law
DOUGLASS & LIDDELL
2928 2ND AVENUE
SAN DIEGO CA 92103
(619) 993-9096
liddell@energyattorney.com

Andrew B. Brown
Attorney At Law
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO CA 95814
(916) 447-2166
abb@eslawfirm.com

Dan Perkins
ENERGY SMART HOMES
983 PHILLIPS ST.
VISTA CA 92083
(760) 315-2055
perkydanp@yahoo.com

Rebecca Pearl
Policy Advocate, Clean Bay Campaign
ENVIRONMENTAL HEALTH COALITION
401 MILE OF CARS WAY, STE. 310
NATIONAL CITY CA 91950
(619) 474-0220
rebeccap@environmentalhealth.org
For: ENVIRONMENTAL HEALTH COALITION

Epic Intern
EPIC/USD SCHOOL OF LAW
5998 ALCALA PARK
SAN DIEGO CA 92110
(619) 260-4806
usdepic@gmail.com

Steve/Carolyn Esposito
37784 MONTEZUMA VALLEY ROAD
RANCHITA CA 92066
(760) 782-9011
cesposit@sdcoe.k12.ca.us

Mary Kay Ferwalt
24569 DEL AMO ROAD
RAMONA CA 92065
(760) 789-9192
mkferwalt@yahoo.com

Diane I. Fellman
Attorney At Law
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO CA 94102
(415) 703-6000
diane_fellman@fpl.com

Kelly Fuller
PO BOX 1993
ALPINE CA 91903
k.d.fuller@sbcglobal.net

Willie M. Gaters
1295 EAST VISTA WAY
VISTA CA 92084
(858) 829-1983
williegaters@earthlink.net

***** SERVICE LIST *****
Last Update on 05-SEP-2006 by: LIL
A0608010 LIST
A0512014

Carolyn Morrow
GOLIGHTLY FARMS
36255 GRAPEVINE CANYON ROAD
RANCHITA CA 92066
(619) 977-9961
Csmmarket@aol.com

Laurel Granquist
PO BOX 2486
JULIAN CA 92036
celloinpines@sbcglobal.net

Karl Higgins
President
HIGGINS & ASSOCIATES
1517 ROMA DRIVE
VISTA CA 92083
(760) 727-5227
karlhiggins@adelphia.net

Christopher P. Jeffers
24566 DEL AMO ROAD
RAMONA CA 92065
polo-player@cox.net

Glenda Kimmerly
PO BOX 305
SANTA YSABEL CA 92070
kimmerlys@yahoo.com

Richard W. Raushenbush
Attorney At Law
LATHAM & WATKINS LLP
505 MONTGOMERY STREET, SUITE 2000
SAN FRANCISCO CA 94111
(415) 391-0600
Richard.Raushenbush@lw.com

Lara Lopez
16828 OPEN VIEW RD
RAMONA CA 92065
soliviasmom@cox.net

Audra Hartmann
Regional Director, Gov'T Affairs
LS POWER GENERATION
980 NINTH STREET, SUITE 1420
SACRAMENTO CA 95814
(916) 441-6242
ahartmann@lspower.com

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, SUITE 1440
OAKLAND CA 94612
(510) 834-1999
mrw@mrwassoc.com

Dave Downey
NORTH COUNTY TIMES
207 E. PENNSYLVANIA AVENUE
ESCONDIDO CA 92025
(760) 740-5442
ddowney@nctimes.com

David T. Kraska
Attorney At Law
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442
SAN FRANCISCO CA 94120
(415) 973-7503
dtk5@pge.com

Jason Yan
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B13L
SAN FRANCISCO CA 94105
jay2@pge.com

Michael S. Porter
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MAIL CODE 13L RM 1318
SAN FRANCISCO CA 94105
(415) 973-6625
mspe@pge.com

John Raifsnider
PO BOX 121
JULIAN CA 92036-0121
(760) 765-2722
skyword@sbcglobal.net

Carolyn A. Dorroh
RAMONA COMMUNITY PLANNING GROUP
17235 VOORHES LANE
RAMONA CA 92065
(760) 789-4429
carolyn.dorroh@cubic.com

Maureen Robertson
Editor
RAMONA SENTINEL
611 MAIN STREET
RAMONA CA 92065
(760) 789-1350
maureen@ramonasentinel.com

***** SERVICE LIST *****

Last Update on 05-SEP-2006 by: LIL

A0608010 LIST

A0512014

Joseph Rauh
RANCHITA REALTY
37554 MONTEZUMA VALLEY RD
RANCHITA CA 92066
(760) 782-3632
joe@ranchitarealty.com
For: RANCHITA REALTY

Aaron Quintanar
RATE PAYERS FOR AFFORDABLE CLEAN ENERGY
311 CALIFORNIA STREET, STE 650
SAN FRANCISCO CA 94104
(415) 399-8850 X302
rcox@pacificenvironment.org

Paul Ridgway
3027 LAKEVIEW DR.
PO BOX 1435
JULIAN CA 92036-1435
cpuc@92036.com

Abbas M. Abed
Electric And Gas Procurement
SAN DIEGO GAS & ELECTRIC
8315 CENTURY PARK COURT,CP21D
SAN DIEGO CA 92123
(858) 654-8253
amabed@semprautilities.com

Central Files
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP31E
SAN DIEGO CA 92123
(858) 654-1766
centralfiles@semprautilities.com

E. Gregory Barnes
Attorney At Law
SAN DIEGO GAS & ELECTRIC COMPANY
101 ASH STREET, HQ 13D
SAN DIEGO CA 92101
(619) 699-5019
gbarnes@sempra.com
For: San Diego Gas & Electric

Matthew Jumper
SAN DIEGO INTERFAITH HOUSING FOUNDATION
7956 LESTER AVE
LEMON GROVE CA 91945
mjumper@sdihf.org
For: SAN DIEGO INTERFAITH HOUSING FOUNDATION

Greg Schuett
PO BOX 1108
JULIAN CA 92036
gregschuett@mac.com

Sheridan Pauker
SHUTE,MIHALY & WEINBERGER LLP
396 HAYES STREET
SAN FRANCISCO CA 94102
(415) 552-7272
wolff@smwlaw.com
For: Cities of Temecula, Hemet and Murrieta

Case Administration
SOUTHERN CALIFORNIA EDISON COMPANY
ROOM 370
2244 WALNUT GROVE AVENUE
ROSEMEAD CA 91770
(626) 302-4875
case.admin@sce.com

Clay E. Faber
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT-14E7
LOS ANGELES CA 90013
(213) 244-5129
cfaber@semprautilities.com
For: San Diego Gas & Electric Company

Wally Besuden
President
SPANGLER PEAK RANCH, INC
PO BOX 1959
ESCONDIDO CA 92033
(702) 429-7525

Justin Augustine
THE CENTER FOR BIOLOGICAL DIVERSITY
1095 MARKET ST., SUITE 511
SAN FRANCISCO CA 94103
(415) 436-9682 302
jaugustine@biologicaldiversity.org
For: The Center for Biological Diversity

Craig Rose
THE SAN DIEGO UNION TRIBUNE
PO BOX 120191S
SAN DIEGO CA 92112-0191
craig.rose@uniontrib.com

******* SERVICE LIST *******

Last Update on 05-SEP-2006 by: LIL

A0608010 LIST

A0512014

Scott J. Anders
Research/Administrative Center
UNIVERSITY OF SAN DIEGO - LAW
5998 ALCALA PARK
SAN DIEGO CA 92110
(619) 260-4589
scottanders@sandiego.edu

Kevin Woodruff
WOODRUFF EXPERT SERVICES, INC.
1100 K STREET, SUITE 204
SACRAMENTO CA 95814
(916) 442-4877
kdw@woodruff-expert-services.com



SMEO Sunrise Scoping Comments ATT2



SMEO Sunrise Scoping Comments ATT3_.bmp