MUSSEY GRADE ROAD ALLIANCE

"Preserving Historic Mussey Grade"

P.O. Box 683
Ramona, CA 92065
(760) 787 - 0794 T
(760) 788 - 5479 F

October 20, 2006 **BY EMAIL**

Ms. Billie C. Blanchard AICP
Regulatory Analyst V
Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, CA 94102-3298

Re: Scoping Comments for A. 06-08-010 Sunrise

Dear Ms. Blanchard:

Attached please find the scoping comments of the Mussey Grade Road Alliance with regard to the proposed power line project of San Diego Gas & Electric. In addition to the MGRA Final Scoping Comments document, I am also attaching the Prehearing and Protest filings of the Alliance and request that information provided about the Mussey Grade Road area be incorporated as part of the scoping comments of the Alliance.

If you have any problems downloading any portion of the email, please do not hesitate to contact me by return email: dj0conklin@earthlink.net

I encourage you to visit our community website at: www.musseygraderoad.org

Thank you for your attention to our concerns.

Sincerely,

/S/

Diane Conklin
Spokesperson

VIEW OF THE SOUTH PORTION OF KIMBALL VALLEY, INCLUDING THE EXISTING 6KV LINE TO BE USED AS THE CORRIDOR FOR THE PROPOSED SAN DIEGO GAS & ELECTRIC 230KV LINE AS PART OF ITS SO-CALLED "SUNRISE POWERLINK" PROJECT.

THIS EASEMENT TRAVELS IN A NORTH EASTERLY DIRECTION IN RAMONA, CALIFORNIA, THROUGH PRISTINE WILDLANDS ON ITS WAY TO SAN DIEGO COUNTRY ESTATES AND POINTS EAST. THE LINE SKIRTS THE 4,200 ACRE MONTE VISTA RANCH PRESERVE PURCHASED BY THE NATURE CONSERVANCY AS A PRIME WILDLIFE HABITAT ON ITS EASTERLY COURSE, WHILE IT RUNS DIRECTLY THROUGH THE COUNTY OF SAN DIEGO BOULDER OAKS RANCH PRESERVE ON ITS WESTERLY COURSE. THE BOULDER OAKS PRESERVE IS ONE OF FIVE SAN DIEGO COUNTY OPEN SPACE PRESERVES THROUGH WHICH THE LINE RUNS.

THIS IS ANOTHER VIEW OF THE PROPOSED ROUTE OF THE 230 KV LINE THROUGH KIMBALL VALLEY. THE LINE CROSSES KIMBALL VALLEY ROAD IN THIS PHOTO AND THE POLE FOR THE EXISTING 69KV LINE CAN BE SEEN ON THE LEFT OF THE ROADWAY. THIS ENTIRE AREA IN THIS PHOTO WAS COMPLETELY BURNED IN THE 270,000 ACRE CEDAR FIRE IN OCTOBER 2003. THIS UNAMED MOUTAIN IS BUT ONE MOUNTAIN IN A CHAIN OF THE INTER-COASTAL MOUNTAIN RANGE SURROUNDING HISTORIC MUSSEY GRADE ROAD (INCLUDING IRON MOUNTAIN, DOS PICOS, FIELDINGS CREST AND NUMEROUS UNAMED PEAKS). A MAJOR PORTION OF THIS AREA LIES WITHIN THE SAN DIEGO COUNTY MULTIPLE SPECIES CONSERVATION PROGRAM (MSCP) AND THE LAND IN FRONT OF THE MOUNTAIN IS CONSIDERED PRIME MITIGATION LAND WITHIN THE MSCP PLANNING AREA.

Biological Impacts

By Bonnie Morgal

After reviewing the Preliminary Environmental Assessment (PEA), we have a number of concerns that we recommend be addressed in the joint EIR/EIS. Much additional survey work will be required to adequately disclose environmental impacts, including an additional year of sensitive species surveys and protocol-level focused surveys for all threatened and endangered species. See discussion below on the Before-and-After-Impact (BACI) Study for survey recommendations.

Mitigation measures will also need to be more comprehensive and more clearly defined on a habitat and species-specific basis.

Species populations, population sizes, and suitable habitat should be mapped for each sensitive species. The maps should be presented at a scale that allows the reader to clearly interpret the areas of suitable habitat and locations and sizes (# of plants or # of observations for animals) of known sensitive species populations. The methods for determining suitable habitat for each sensitive species should be clearly described. For example, the vegetation types, soil types, or other factors used to determine suitable habitat area should be defined for each species and be replicable by other scientists.

The proposed temporary (construction) and permanent impacts should be overlaid on maps with the known populations and suitable habitat for each sensitive species. The construction footprint should be altered and those changes depicted on maps (e.g., a narrower corridor) in areas where impacts to sensitive resources will be avoided.

There are a number of important open space preserves and other sensitive lands in the Inland Valley Link that are of special concern to the Mussey Grade Road Alliance (MGRA). The Powerlink is proposed to cross through the Boulder Oaks Ranch Preserve, BLM open space, and the edge of Monte Vista Ranch Preserve (not depicted in the NOP). Numerous sensitive plant and animal species are known to occur in the above-mentioned preserves and adjacent areas (CDFG 1999, *Conceptual Area Acquisition Plan, Iron Mountain-San Vicente Preserve*) in the vicinity of the proposed powerline. Several of these are federally listed as threatened or endangered or recognized by the state as rare or endangered; they include San Diego thornmint (Monte Vista Ranch), Coulter's saltbush and Parish's brittlescale (Ramona grasslands TNC Preserve), Encinitas baccharis (Iron Mountain area), Lakeside ceanothus (Boulder Oaks Ranch), Orcutt's brodiaea, delicate clarkia, Ramona horkelia, felt-leaved monardella, San Miguel savory, Gander's ragwort, San Diego fairy shrimp (Boulder Oaks Ranch), Quino Checkerspot butterfly (Foster Canyon), coastal California gnatcatcher, least Bell's vireo, and Golden eagle.

This is by no means an exhaustive list but includes the most sensitive species with known occurrences in the vicinity of the proposed powerline in the MGR area and surrounding environs.

Where significant impacts are unavoidable within dedicated preserves, installation of towers using helicopters should be considered to eliminate the need for new access

roads and ground-disturbing impacts between towers. This technique should also be considered within areas occupied by state or federally-listed species. This method has been employed by American Piledriving Equipment, Inc.

A detailed construction monitoring plan addressing each sensitive species and habitat should be prepared and should include an intensive contractor education program, daily tailgate meetings with a biologist, and continuous biological monitoring. Construction should be halted should any inadvertent impacts occur to sensitive species or habitats.

A Before and After Impact (BACI) Study should be conducted to determine the longer-term impacts on all sensitive species and vegetation communities from indirect effects and direct loss from the Powerlink. This should be a comprehensive, multiple-year study as was done for the Wildcat Canyon Road widening project by the County of San Diego. However, because of the large-scale of impact to biological resources, the study should involve not only an in-depth wildlife movement study as was performed by the County for the above-mentioned project, but also the following studies:

- Protocol-level focused surveys for all threatened or endangered species with a potential for occurrence in the project area two years prior to project construction and on years 1, 2, 5, and 10 post-construction.

- Focused surveys for all other sensitive plant and animal species including small mammal trapping, bat surveys, wildlife tracking, mountain lion collaring, etc. These surveys should be conducted in the project area two years prior to project construction and on years 1, 2, 5, and 10 post-construction.

- Exotic species surveys and detailed mapping of invasive plant species one year prior to project construction and on years 1, 2, 5, and 10 post-construction.

- An in-depth study should be designed to determine indirect edge-effect impacts from the Powerlink on biological resources over an extended time period (e.g., 2 years prior to 10 years post construction). Evaluation of the effectiveness of mitigation measures would be incorporated into the study.

A long-term resource management plan should be developed and implemented for the project area to mitigate impacts from edge effects and direct loss of habitat. The management plan would be informed by the BACI study and would incorporate an adaptive management strategy. The plan should aim to provide a net ecological benefit to the management area, rather than simply minimizing significant impacts. For example, broad scale removal of invasive exotic species that travel along disturbed corridors (e.g. perennial veldt grass) or invade moist meadows (e.g., canary grass), or invade riparian systems (arundo, tamarisk, eucalyptus, periwinkle, etc.).

Bonnie Hendricks, M.S. Biology

The author of these comments is a professional biologist of 18 years in San Diego. She was a founding member of the Iron Mountain Conservancy Tracking Team (1995-99) and subsequently a founding member of the Mount Woodson Wildlife Trackers (1999 to present). She has extensive experience with CEQA and MSCP issues, including conformance findings. Her comments on the biology are based on review of the existing technical documents and an independent analysis using current aerial photographs, USGS topographic maps, and regional vegetation mapping. She has an intimate familiarity with the project area due to wildlife tracking and hiking in the region. Years of observation have been accumulated on the following key properties (as well as other smaller parcels): Salvation Army (formerly First Presbyterian Church), MSCP Open Space Preserve (formerly Boulder Oaks Ranch and Boys and Girls Club property), Iron Mountain Open Space, Dos Picos Park, San Vicente Reservoir (City of San Diego), Sycamore Canyon Preserve, Mount Woodson Open Space, Wildwood Ranch, Meador Ranch, former Bud Heller Ranch, holdings of Morgal, Conklin, Klopp and Levin, BLM Open Space, Monte Vista Ranch, Barona Indian Reservation, Silverwood Wildlife Sanctuary, Oak Oasis Park, and Steltzer Park.

The Sunrise Powerlink Fire Hazard

Joseph W. Mitchell, Ph. D.
M-bar Technologies and Consulting
www.mbartek.com
jwmitchell@mbartek.com
Feb. 13, 2006

The Sunrise Powerlink, regardless of the final path proposed for it, would traverse many miles of extremely flammable vegetation between its eastern and western terminals. That power lines present a significant fire hazard is acknowledged by both fire agencies and utilities. This has prompted CDF, the US Forest Service, SDG&E, and PG&E to collaborate on the "Power Line Fire Prevention Field Guide"[12]. This reference guide makes the following observation:

"The potential exists that power line caused fires will become conflagrations during the long, hot and dry fire season commonly experienced in California. The very same weather conditions that contribute to power line faults also lead and contribute to the rapid spread of wildfire. The most critical of these weather factors is high wind, which is commonly accompanied by high temperatures and low humidity.
High, gusty winds may cause vegetation to sway into power lines, break off limbs or fall into power lines. High winds may also create vibrations in power lines that can lead to stress failures or cause loose connections to separate. Arcing usually accompanies such faults. Automatic reclosers re-energizing the line into the fault may cause repeated arcing and increase the probability of igniting vegetation."

Many of the communities potentially along the path of the Sunrise Powerlink are fire-weary, having suffered massive losses during the Cedar fire of October 2003 and the Pines fire of 2002. By the time the Powerlink, if constructed, becomes operational, the wildland fuel load in these communities will have returned to the level capable of supporting a major conflagration. Having another potential fire source in the backcountry would be perceived as an affront to communities that had recently suffered the loss of over 2,200 homes and 15 lives.

How significant is the risk? CDF statistics from 1998 indicate that 155 fires in their jurisdiction were ignited by power lines, representing a fraction of 3% of the total [7]. However, if we look at only major fires (leading to the greatest structure losses or acreage burned), the fraction caused by power lines seems to be higher – approximately 10% or more. Examining the 20 historically largest fires in terms of area gives three started by power lines: Laguna (San Diego, 1970), Campbell Complex (Tehama, 1990), and Clampitt (Los Angeles, 1970) [1]. In terms of structure loss, there were also three fires started by power lines: Laguna (San Diego, 1970), City of Berkeley (1923), and Sycamore (Santa Barbara, 1977)[2]. If we examine the top five fires for acreage and structure loss in the years spanning 1999 and 2004 [3,4,5] we find a similar pattern emerge: 5 of the 60 top slots were power line fires (the Geysers, Pines, and Poe fires). The Pines fire was near Julian, not far from the proposed routes, and was the largest fire in terms of structure and acreage loss in California during 2002.

The probability of seeing 10% of large fires caused by power lines while only 3% of smaller fires were caused by power lines could be a statistical fluctuation, but this is somewhat improbable. Two possible causal connections can also be suggested here: 1) Power lines are more likely to be near human habitation than other ignition sources, thus making structure loss more likely. This would not explain the enhancement of large acreage files, though. 2) As noted in the CDF/USFS/SDG&E/PG&E guide [12], power lines are more likely to be a source of combustion during high wind conditions. These are the very conditions under which catastrophic wildfires take place [20].

Power lines and Firefighters

The presence of power lines complicates wildland firefighting. The power lines themselves are hazardous to firefighters. NIOSH reports 10 firefighter deaths due to power lines between 1980 and 1999[6]. Hazards from power lines include ground gradient, energizing of conducting equipment, contact with line, solid stream water contact, and flashover through charged smoke. Reports of line-to-ground flashover in heavy smoke were made during the Eagle Eye fire in Arizona [9].

Firefighters are trained in these hazards, and therefore will tend to avoid activities near potentially live power lines. This creates an "indefensible space" near the line where it is less likely that firefighting will be conducted.

Sometimes, firefighting resources need to be diverted from other tasks to protect a critical power line. Examples of fires where this occurred are:

Pack Rat Complex (AZ) 9/2002 [8]
Yellow Jacket Fire (AZ) 7/2004 [11]
Cave Creek Complex (AZ) 7/2005 [10]

Power lines and Ramona Airspace

Power lines are responsible for 6% of all helicopter accidents reported to the National Transportation Safety Board [13]. A Drug Enforcement Agency helicopter started the 2002 Pines fire when it struck a power line near Julian. As the pole heights are raised, the potential for interaction with low-flying aircraft will be significantly increased. This is true for all power lines everywhere, but this is a particular hazard in the Ramona area – which happens to be the only area where all the potential Powerlink routes converge.

Ramona generates several sources of low-altitude air traffic:

1. ***The CDF air attack base***. CDF fire suppression aircraft need to make low altitude runs in order to drop their retardant payload. Increasing their altitude makes their attack less effective.

2. ***Experimental aircraft***. Ramona is something of a Mecca for experimental aircraft enthusiasts [14,16,17] and hosts its own company headquarters for an experimental aircraft company [15].

3. ***Helicopter training school***. The Silver State Flight School, headquartered at Gillespie Field, often makes runs near the Ramona Airport, and over other Ramona areas, including near the proposed power line routes [19]. These inexperienced pilots can often be seen flying at low altitudes.

4. ***Marine Attack Helicopters***. The Sycamore Canyon substation is adjacent to the Marines' Miramar Air Station. While operation over backcountry areas are proscribed for low altitude flight, Marine attack helicopters have been seen by residents making low altitude attack runs over the areas east and north of the substation.

5. ***Ultra-light Aircraft***. The one existing ultra-light base near Barona was destroyed by the Cedar fire and has not reopened [18]. However, the operators are currently searching for another location in the area.

This unusual combination of low altitude flight sources would tend to pose a greater hazard for power line collision than would normally be expected.

Power Line Fire Mitigation Problems

It is possible to mitigate for the above risks, but the measures taken for fire risk mitigation only exacerbate other issues associated with the power line.

One method to reduce fire hazard along the line route is the removal of all fuel. This creates a wide swath of disturbed land, and significantly increases the ecological footprint of the project. This swath then becomes an attractive ingress for off-road vehicles, and a route by which non-indigenous and invasive species can be introduced.

Making the line more visible can reduce the risk to aircraft. The installation of lights on the towers or ornamentation along the line might reduce the risk to low-flying aircraft, but it greatly increases the visual impact of the project, thus further damaging view-sheds and reducing property values.

Joseph W. Mitchell is a physicist with a 15-year research career in elementary particle physics, and has worked at laboratories in Los Alamos, Hamburg, and Geneva. He has also worked in software for major electronics and software companies in Brussels and San Diego. He started M-bar Technologies and Consulting to raise consciousness about the risk of wind-driven firebrand ignition during wildland fires and to popularize his public domain WEEDS home protection system.

References

1. California Department of Forestry; 20 Largest California Wildland Fires (By Acreage Burned); http://www.fire.ca.gov/FireEmergencyResponse/HistoricalStatistics/PDF/20LACRES05.pdf ; 5/1/2005

2. California Department of Forestry; 20 Largest California Wildland Fires (By Structures Destroyed); http://www.fire.ca.gov/FireEmergencyResponse/HistoricalStatistics/PDF/20LSTRUCTURES05.pdf ; 5/20/2005

3. California Department of Forestry; CDF 2004 Fire Season Summary; http://www.fire.ca.gov/FireEmergencyResponse/HistoricalStatistics/PDF/2004summary.pdf ; May 2005

4. California Department of Forestry; CDF 2002 Fire Season Summary; http://www.fire.ca.gov/FireEmergencyResponse/HistoricalStatistics/PDF/2002summary.pdf ; Feb. 2003

5. California Department of Forestry; CDF 2001 Fire Season Summary; http://www.fire.ca.gov/FireEmergencyResponse/HistoricalStatistics/PDF/2001summary.pdf ; Mar. 2002

6. DHHS (NIOSH) Publication No. 2002-112; Fire Fighters Exposed to Electrical Hazards During Wildland Fire Operations; http://www.cdc.gov/niosh/pdfs/hid15.pdf ;

7. Beall, Frank C.; URBAN-WILDLAND INTERFACE FIRE: THE I-ZONE SERIES; http://nature.berkeley.edu/~fbeall/XVIII/ignintro.htm ;

8. Wildfire News; http://www.wildfirenews.com/archive/091002.html ; LIGHTNING FIRE SOUTH OF TUCSON AT 130 ACRES; 9/1/2002

9. Wildfire News; http://www.wildfirenews.com/archive/080405.shtml ; SEAT PILOT WALKS AWAY FROM CRASH; 7/7/2005

10. Wildfire News; http://www.wildfirenews.com/archive/080405.shtml ; BLACK LINE PROTECTS BLACK CANYON CITY; 7/2/2005

11. Wildfire News; http://www.wildfirenews.com/archive/071704.shtml ; SITUATION HEATING UP IN PHOENIX; 7/8/2004

12. California Department of Forestry, et al.; Powerline Fire Prevention Field Guide; 3/27/2001; http://osfm.fire.ca.gov/powerline.html

13. National Transportation Safety Board; NTSB Helicopter Accident Study; http://www.nasdac.faa.gov/aviation_studies/ntsb_helicopter_accident_study/helicopter_accident_study.html ; April 2002.

14. North County Times; Dec. 24, 2005; Experimental Plane Crashes and Burns;
http://www.nctimes.com/articles/2005/12/25/news/inland/ramona/19_10_5312_24_05.txt

15. Hornet Light Tandem Aircraft trainer kit;
http://www.flyhornet.com/

16. Dee, John and Harry Abbot; http://www.ez.org/tufting.htm ;

17. Young Eagles of San Diego; http://www.flyyoungeagles.com/ ;

18. Ultimate High Aviation; http://www.ultimate-high.com/Locations.htm

19. Evans, Jim; Helicopters over Ramona; Ramona Home Journal; 9/1/2005;
http://www.ramonajournal.com/news/2005/0901/Front_page/001.html

20. Mitchell, Joseph W.; Brand Dilution; Wildfire Magazine; March 2005;
http://wildfiremag.com/ar/brand_dilution/index.htm

EARTHQUAKE IMPACTS

The Sunrise Powerlink route would traverse several active faults along its favored route. This route would take it through a region recently determined to be at risk for a "great earthquake" event in the near future.

In an article in Nature magazine (v. 411, 22 June 2006, pp. 968-971, 'Interseismic strain accumulation and the earthquake potential on the southern San Andreas fault system'), Yuri Fialko of the Scripps Oceanographic Institute analyzed GPS data for an area extending from northeast of through southwest of the Salton Sea, extending into the region of San Diego traversed by the SPL.

He made the novel observation that the greatest part of the slip between the Pacific and American plates is being taken up about equally by two fault zones: the San Andreas, which runs along the east side of the Salton Sea, and the San Jacinto fault system. The San Jacinto system consists of the San Jacinto fault itself (which becomes the Superstition Hills fault) and the Coyote Creek fault, both of which run through Anza Borrego Desert State Park, and which intersect the SPL route. Some evidence also suggests that the strain may actually be accumulating on an unmapped fault between these two faults.

While San Diego has been historically regarded as being relatively "earthquake safe" for California, this new result emphasizes that this is more a matter of timing than of geological stability. Great earthquakes are expected to occur every 250-300 along this fault system, and that is roughly the time since the last evidence of a major quake in this area. Average displacements along the rupturing fault during such an event will be 4-7 meters, and the magnitude in the 7+ range.

Ground distortions of this magnitude would be likely to cause to line faults and breakage, and consequent fires in mountainous areas. With emergency services completely overwhelmed by other earthquake effects, it is unlikely that any fires along the SPL route would be attacked before they had spread significantly. Hence, the potential for a catastrophic wildland fire following a great earthquake is very high, and with the additional damage to water supply systems and transportation routes, there is the potential that this could lead to catastrophic loss of life and property.

System Alternatives

The System Alternatives should be fully evaluated and carried forward in the EIR/EIS. An evaluation of energy savings or MW contribution for each component of the alternatives should be provided in detail. Additionally, the system alternatives need to be combined and evaluated together as a whole. This would constitute the Energy Efficiency/Renewables/Distributed Generation/Demand Response Alternative.

This new system alternative would combine several of the previously identified alternatives plus a Residential and Commercial Cool-Roof Program and a Residential and Commercial Passive Solar Buildings Design Program. Thus the following components would be included in the Energy Efficiency/Renewables/Distributed Generation/Demand Response Alternative:

- Aggressive Energy Efficiency Program
- Aggressive Demand Response Program
- Residential Cool-Roof Program
- Residential and Commercial Passive Solar Buildings Design Program
- Rooftop Solar Generation
- In-area Generation
- Distributed Generation

These components should be combined as one alternative and fully evaluated in the EIR/EIS. A residential cool-roof program could create substantial energy demand reduction specifically at peak power times. Distributed generation could include solar and natural gas generation using micro turbines such as provided by Capstone Turbine Generation.

More aggressive energy efficiency measures should be included such as the following:

- Public education (in neighborhoods, schools, and community centers) to promote energy efficiency
- Advertising to promote energy efficiency (television, radio, mailers, billboards)
- Steepen the rates for excessive energy users
- Tree-planting to shade building exteriors on all new residential, commercial, and industrial developments
- Expand rebate program for energy-efficient appliances, etc.
- Expand rebate program for increased building insulation
- Refrigerators, water heaters, and pool filter pumps on timers to reduce load during peak demand periods
- Penalty for gross energy use during summer peak loads (stores with open refrigerator units, etc. would pay higher prices)
- Utilize smart grid to time discretionary loads to non-peak hours

The Energy Efficiency system alternative to the Sunrise Powerlink should not be eliminated due to the fact that is does not meet renewable objectives. A megawatt not consumed shouldn't need to meet renewable objectives to be a viable alternative to the Sunrise Powerlink. A megawatt not needed in a region is far superior to a renewable energy megawatt that degrades a desert state park during transmission.

The Commission needs to consider what the power is being used for and determine if there are better ways to provide the same benefit without the proposed Powerlink. Rather than discount the effectiveness of energy efficiency to justify the need for yet another power line. SDG+E and the San Diego region should be setting an example to America demonstrating how we as a region and a nation can transition from being the largest per capita energy consumers to being wise with our energy usage. The same number of years and budget needed for development of the Sunrise Powerlink could be used to implement alternative methods of meeting our energy needs through a number of incentives and programs.

Sunrise Powerlink will not meet renewable objectives of 20% generation by 2010 because the engineering and product development cycles on Stirling Energy Systems cannot be met reliably by 2010.

Cool-Roof Component

Energy reduction and economic benefits associated with a residential cool-roof program are substantial where all residential roofs in the service area have a high reflectivity value above 40%. Energy savings should be quantified based on peak demand times occurring during hot summer days.

<u>An Obvious Problem Explained</u>

In Southern California peak electric power consumption occurs in the afternoons and early evenings of cloudless summer day. This peak in power consumption is due to air conditioning our buildings to counteract the high influx of solar energy experienced by our buildings throughout the long hot summer day.

The summer sun has the highest elevation, or angle above the horizon, making the sunlight's angle of incidence onto a rooftop near 90 degrees for a number of hours each day. With the incident solar energy striking our rooftops at such an angle there is significant absorption of the sunlight's heat energy into the attic space below. The attic space can easily reach 140 degrees Fahrenheit.

This heat gets trapped inside the attic and is the main reason why our houses remain hot well into the evening. Attic insulation only slows the infiltration of this intense heat into our living space. Once the ceiling insulation and drywall heat up, the ceiling begins to radiate the attic's heat downward into the living space below. Standing in the living space below an attic, an occupant's head is typically 2-3 feet away from the ceiling. The human head is quite sensitive to heat and the temperature of a person's head effects how hot a room feels. By having a hot ceiling near the occupant's head the building seems hotter than it really is, requiring more air conditioning for the occupants to feel comfortable (try wearing a wool hat in a warm room).

Cool Roofs and Peak Shaving

One sixth of the electricity consumed in the United States goes to cooling buildings [1]. Since that energy is primarily consumed in the summer months, it is reasonable to state that at least one third of the energy consumed during the summer peak power period is cooling San Diego's buildings.

Typical residential roofing materials have a reflectance value of about than 10% which means that 90% of the sunlight that strikes a roof is turned into heat. Cool roof materials as defined by the US Energy Star Rating Program must reflect more than 25% of the incident sunlight. This means that only 75% of the sunlight striking a roof is turned into heat. PG&E provides a $0.10 rebate per square foot on .25% reflectivity residential roofing. Additionally, PG&E has a Tier 2 rebate level for roofing materials that reflect over 40% of the incident sunlight at $0.20 per square foot rebate for residential buildings. SDG+E does not have a residential Cool Roof rebate program. Why are we building a new power line across valuable habitats to provide more power when our summertime loads could be easily shaved by alternative passive methods? How can SDG+E marginalize energy efficiency when reliably meeting peak power demands is the central need of an additional power line?

By reflecting the incident sunlight off the roof the unwanted heat passively reduces the heat load experienced by the building's roofing system. This significantly reduces the amount of heat trapped inside our attics on hot summer days and reduces the amount of power required to run air conditioning during the peak hours. By reducing the peak power needs of the community in combination with other system alternatives we can eliminate the need for the Sunrise Powerlink.

The effectiveness of cool roofs is well documented and there is currently a federal program that rates cool roofing materials for non-residential buildings. SDG+E should be required to scientifically evaluate what would be the net energy savings associated with converting a significant portion of San Diego's residential roofing material from traditional materials to Cool Roofing materials.

The conversion effort to cool roofing materials could be motivated through either a rebate program or some other means that SDG+E could implement where old roof's requiring replacement would get a portion of the 1.4 billion dollars estimated for the Sunrise Power Line. If the rebates for cool roofing were substantial enough, the general public would be motivated to make more energy-efficient decisions.

Unlike other energy efficiency measures that can be easily altered after installation the energy savings associated with a cool roof can be relied upon for a number of years. The cost of a new roof is significant which hinders the building owner from switching out the roof quickly. The performance of cool roofs over time has been documented and it has been shown that although there is some degradation in performance over the years, the overall benefit in reducing heating load is significant.

Cool Roof Effects on the Duration of the Peak Power Period

Obviously if we reduce the heat infiltration into our buildings the electrical peak power needs of the region will be reduced. But there are secondary benefits associated

with keeping the attic space cool during the hot summer months. The most significant is the reduction of latent heat stored in the attic. This will allow the house to cool down more quickly in the evening reducing air conditioning loads in the evening and shortening the duration of the peak power period. By reducing the duration of the peak power period there is a better match with rooftop solar electricity generation.

The amount of latent heat stored in the attic will be reduced. Included in the evaluation should be an estimate of the effect on the peak electrical power needs. Once the latent heat load associated with hot attics is reduced the peak power demand for electricity will not extend into the early hours of the evening. This would allow Rooftop Solar to be more able to shave peak power loads, thus increasing the effectiveness of the Rooftop Solar Program.

Cool-Roof Conclusion

The Cool-Roof Program when coupled with a low-wattage (60W) thermally-activated attic fan could effectively replace a 2,000W air conditioning load with a 60W attic fan. When this load reduction is multiplied by the number of potentially participating residents across the County, an enormous reduction in energy consumption would be realized. The Sunrise Powerlink proposes to add 1,000 MW of import capability by 2010. SDG+E provides electric service to more than 3 million customers. If 516,000 households were to participate, the amount of energy saved by cool roofs/attic fans alone would equal the amount of power imported by the Sunrise Powerlink.

1. Painting the Town White and Green **Arthur H . Rosenfeld, Joseph J. Romm, Hashem Akbari, Alan C. Lloyd.** February/March 1997 issue of MIT's Technology Review. http://eetd.lbl.gov/HeatIsland/PUBS/PAINTING/

2. **ENERGY STAR® Program Requirements for Roof Products**
http://www.energystar.gov/ia/partners/product_specs/eligibility/roofs_elig.pdf

ADDITIONAL MISCELLANEOUS MATTERS

1. ALTERNATIVES: Many reasonable alternatives to the Sunrise power link have not been considered. There are many that need discussion and detailed scientific and engineering analysis by all parties.

- These include:

(a) Using local existing and planned power plants instead of building new transmission. The number of power plants in San Diego is increasing. A new 600 Mw combined-cycle natural gas plant was added in Escondido by the proponents this year, and another will be added in 2008 in Okay Mesa by Alpine. Existing plants in Chula Vista and Encina could be repowered with CC generators and continue to provide power with greater efficiency than at present, reducing carbon dioxide emissions slightly. There is general agreement that there is surplus capacity in San Diego to meet base load needs for a long time. The only mode where capacity might need to be increased during next few decades is peak generation, mainly during June-August, mainly during the afternoons from 3:00-8:00 PM.

The most appropriate solution is to use the new and repowered existing plants to meet these peak demand needs, with possible additions of peaker plants in San Diego. This would be less expensive that building the Sunrise power link, less environmentally destructive, insure greater independence from interruptible sources in others areas, including generation in the Republic of Mexico, or distant states. This is the most logical, lowest-cost alternative by far, and would provide the greatest prospects of reliability.

(b) Expand the capacity of existing transmission lines, including the 500 Kv SWPL by using HTLS aluminum conductors that can carry 2-3x the power of steel cables. These are in use now for 230 kV circuits, and 500 Kv is likely to be the next development. Technology exists now to reconductor the existing transmission lines into San Diego County to make the Sunrise power link unnecessary.

(c) Replace SWPL or its cables, if feasible, with DC transmission, which can also increase the capacity of the SWPL by 3x. This would require construction of an inversion station at the Miguel substation, similar to one in Los Angeles serving the Pacific DC inter-tie.

(d) Transmit the energy from the Mexicali plants and possibly new sources in Imperial Valley to Tijuana inside the Republic of Mexico using and adding capacity to existing 230 Kv circuits that connect Mexicali to Tijuana, then connecting to California using and adding capacity to the existing Tijuana-San Diego 230 Kv inter-tie.

(e) Encouraging enhanced energy conservation measures, including real-time metering, greater using of daylighting technology, and increased installation of solar photovoltaic sources on commercial buildings, such as mall and warehouses, and on public buildings such as schools and public buildings. This could be achieved by

providing incentives for enhanced cooperation between governments, utilities, and the building industry.

2. RELIABILITY. The idea that the Sunrise power link is the best answer to logical concerns about reliability should be carefully examined and will probably not seem reasonable upon closer scrutiny. Most power outages are local, due to debris blown into overhead power lines or accidents with overhead lines. Very large-scale blackouts (such the great NE blackout of 2003) are not prevented by long-distance transmission. Small incidents have produced problems that have cascaded through large power grids, producing catastrophic failures over large areas and driving hundreds of plants offline. Local generation probably would be associated with greater protection from such massive and catastrophic grid failures.

Additionally, the environmental impacts associated with the proposed power line should also be examined for the reliability of the Imperial Valley Substation, through which all major transmission lines converge. The reliability issues are identical for the substation as they are for the proposed power line and the Commission must take into account all threats to the line are equally potentially threats to the single substation from which the lines travel.

3. SOLAR ENERGY PREMISE: Solar energy has great potential for distributed energy generation, but access to centralized solar energy in Imperial Valley is not a reasonable premise for erecting the Sunrise power link.

- A key premise of the application is that the Sunrise power link is needed to transmit solar and other renewable energy from the Imperial Valley to San Diego, but this premise is unrealistic.

Comment: There is little reason to accept the premise that the Sunrise power link is justified primarily as a means for transmitting solar energy from the Imperial Valley to San Diego. The proposed technology for centralized solar energy generation is in the prototype stage despite 200 years of existence of the Stirling engine and 30 years of attempted development. Only 8 prototype Stirling solar engines exist. The technology has never been commercialized. Stirling solar engines are not in commercial production anywhere in the world. A previous attempt at commercial generation of solar energy in Southern California by an Israeli-based corporation, Luz LLC, went bankrupt in California in the 1990s. The Stirling technology is not in use in areas such as Israel, where solar radiation is abundant and there are important reasons to develop solar energy. The problems with the Sterling engine are both technical and inherent. Leakage of hydrogen has been impossible to overcome in many years despite 30 years of development, and results in system failure. An inherent problem is that the technology uses only the heat (infrared) portion of the solar spectrum. Distributed solar technologies are able to use a broader portion of the solar spectrum, are usually financed by owners of the systems, and, since they are at the site of use, do not have transmission power losses. They generate direct current (DC) a type of electricity that is well-suited to storage without losses due to conversion. The next generation of distributed solar photovoltaic cells will derive energy from the nearly the entire solar spectrum rather than merely the heat. References include Hayden HC. The solar fraud. Vales Lake, 2004. , And news

releases in 2006 from the Lawrence Berkeley laboratory describing discovery of broad-spectrum photovoltaic mixes that include indium sulfide and other compounds that convert parts of the visible energy in sunlight to electricity. The trajectory of efficiency of photovoltaic development will soon make it clear that the proposed use of centralized sterling engines in the IV is not competitive. Energy from centralized sterling solar technology, if available, is estimated to cost 5x that of competitive sources. Economies of scale from the new "One Million Solar Roofs" law will further advance distributed solar as opposed to centralized solar energy generation.

4. WIND PREMISE: Access to wind energy in Imperial Valley is not a reasonable premise for Sunrise power link.

- Access to wind energy has been mentioned by the proponents as one premise for Sunrise power link. This is not a reasonable premise.
-

The potential for wind energy in Imperial county is low, and certainly not beyond local needs. Current models for wind energy generation exploit mainly winds channeled by topography into mountain passes such as Altamont Pass or locally the Tecate Divide. Imperial county has few mountain passes, and it potential for wind generation overall is among the lowest in the state. Any reasonable site for wind generation in Imperial Valley are near the existing SWPL, as is the Tecate divide.

5. GEOTHERMAL PREMISE: Access to geothermal energy in Imperial Valley is not a reasonable premise for Sunrise power link.

- Geothermal energy has great promise in the world, but development has been stalled in the Imperial Valley. Geothermal development in the largest US plant, Geysers, has been stalled by depletion of the aquifer of water by exploitation there. This has resulted in the closing of a plant in the region and pumping of millions of gallons per day of treated sewage from Santa Rosa CA and makeup water from Clear Lake. Part of the problem at Geysers is that rainfall is needed to replenish aquifers depleted by geothermal development. Average annual rainfall at Geysers is 43 inches. Average annual rainfall in Imperial County is 3 inches. While some water is recycled into the aquifer, much is lost by existing plants. One geothermal complex in the Imperial Valley releases 20 tons/year of benzene, a class I carcinogen. There have been problems with securing capital to drill new geothermal wells in the Imperial Valley. New wells will probably need to be drilled about 1.5 miles deep, and are considered somewhat uncertain investments. Another unresolved issue is induced seismicity. Geothermal development at Cerro Prieto, a field south of Mexicali, has been blamed for earthquakes in the region. Imperial Valley straddles the San Andreas Fault, which allows access to geothermal energy but earthquakes induced by geothermal activities could result in high levels of liability if they occur in inhabited areas. Inevitable geothermal development would require water, which is in short supply in the Imperial Valley, with many competitors for its use. These factors would not necessarily prohibit further geothermal development in the Valley, but are making it a less than attractive investment. The potential for development of large amounts of energy at competitive costs and levels beyond local need is not large enough to justify a 150-mile transmission. Moreover these sources are already served by the SWPL and two existing 230 Kava circuits to the Los Angeles area.

6. FOSSIL FUELS: If solar and geothermal resources in the Imperial Valley do not justify transmission, what does?

- Two companies with fossil fuel power plants located in Mexico applied and were granted Presidential approval to build inter-ties to the Imperial Valley substation in 2004. These plants are not regulated by the US EPA or any California Air Pollution Control District or Federal and California laws regulating air pollution. The largest of these plants was built and began operation in 2004 without a selective catalytic converter for control of nitrogen oxide emissions, which was added later under pressure while continuing operations. Such a converter is required on new plants as best available technology in California. These plants are cheaper to operate in Mexico than the US since they do not need to meet EPA or California regulations or perform mitigation activities such as reducing other point sources of air pollution in the region. One of the plants has a 1,100 Mw capacity, half of which is under contrast to a Mexican government agency. The other has an approximately 600 Mw capacity. It is reasonable to assume that the Sunrise power link will be used in the short run (and probably in the long run, considering the lack of serious potential for substantial wind, solar and geothermal energy, to transport unregulated power generated in Mexico to the US. Existence of the Sunrise power link would encourage burning far more fossil fuel in the Sunrise power link than is currently being burned. Even with selective catalytic reduction, approximately 400 tons of nitrogen oxides, a component of photochemical smog, would be added to the area assuming all capacity was used. This is the equivalent of approximately one quarter million 2005-year automobiles. The additional combustion encouraged by the availability of the Sunrise power link would add roughly 900 tons of carbon dioxide to the atmosphere, an amount that would require planting approximately 150,000,000 trees to convert back to oxygen. This is ill-0timeSan Diego when California has just passed historic and sweeping new laws to reduce carbon dioxide emissions, such as the California Climate Act of 2006 (AB 32). It is also inconsistent with the new law based on California SB 1368 (Perata) which is further designed to discourage burning of fossils fuel outside California for sale in California. NOx release in the Imperial Valley is of concern since NOx is a precursor of ozone, whose concentration according to EPA Internet reports exceeds Federal standards at sites in the Imperial Valley on 53 days per year.

PARTIAL SUMMARY

1. Reliability issues regarding El Centro Substation.

2. Stirling engines: potential environmental effects of thousands of acres of Stirling installation, including effects on wildlife corridors, impacts to species living within the installation area; earthquake and fire issues; long term effects of unproven prototype technology; Stirling installation should be reviewed at the same level of scrutiny as the proposed power line corridor.

3. EIR/EIS should consider potential for air pollution impacts if Stirling Energy System installation is not constructed and power was taken from Mexico. The argument could be made that even though the application contains no information regarding the taking of power from Mexico, SEMPRA/SDG&E already ships power across the international boundary and that the Baja LNG facilities point to more energy generation in Mexico, not less. (Reference earlier SDG&E plans to ship power across border; subsequently dropped.)

4. Cumulative impacts of line and new substation construction should be fully analyzed as a whole across the entire project, including Stirling installation, new substation construction, impacts to neighborhoods and neighborhood open space preserve, as well as the Anza Borrego Desert State Park. The noticeable emphasis on routes by the CPUC/BLM presenters is inappropriate. The line impacts are huge, regardless of route. The CPUC should be reminded that the "No Alternative" is the only alternative that does not inherently lead to impacts of the type to be considered under CEQA and NEPA.

5. Development of alternatives must be held to a high standard of a range of alternatives to be considered by SDG&E, from in-basin generation to most recent technology and advanced conservation measures, including innovative programs for conservation that view future electrical use as conserved and intelligently planned use that incorporates conservation not as some "private virtue" but as a public good. (Economists need to learn to subtract.) Note recent conservation efforts of Naval Base Coronado (See Attachment). Additionally, San Diego Regional Energy Plan does not rank transmission as highly as other generation modalities.

6. No project alternative should include be fully explored based on alternatives and the myriad of unmitigable environmental impacts that cannot be satisfied by overriding considerations as the impacts are likely to become permanent and result in a drastic degradation of the biological diversity and richness present in San Diego County. 7. Wild fire impacts along the entire length of the line (See Attachment).

8. Discussion of impacts should include land use planning elements. Construction of the proposed project will likely lead to extending sprawl across the back country, dragging present sprawl patterns of the coastal areas to the doorstep of the ABDSP. This project should be viewed within the context of the county's biological importance, which was one of the reasons advanced for the pilot implementation of the Multiple Species Conservation Program (MSCP) in San Diego County. Open space preserves throughout the county are part of the MSCP plan. If the plan is weakened by the dual use of

preserved land for both species and industrial corridors, the MSCP may need to be revised to reflect that reality. Impact discussion should include the impact not only to specific land areas but to the entire structure to the MSCP plan itself.

9. The EIR/EIS should also include an analysis of the costs of solar installations as compared to the costs of: the acquisition of line easements over the years; the acquisition of new easements for construction; construction of the line and associated infrastructure; interest paid by ratepayers on the financing of the line; and other relevant costs.

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)

PREHEARING CONFERENCE STATEMENT OF THE MUSSEY GRADE ROAD ALLIANCE

Diane Conklin, Spokesperson
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
Telephone: (760) 787-0794
Facsimile: (760) 788- 5479
Email: dj0conklin@earthlink.net

Dated: September 7, 2006

INTRODUCTION

The Mussey Grade Road Alliance ("Alliance") is a grassroots citizen organization dedicated to the preservation and protection of Mussey Grade Road and environs in Ramona, California. Mussey Grade was the main road from the coast to the Julian gold mines in the 19th century. Bisected in 1943 by the San Vicente Reservoir, the some five miles of remaining stagecoach route was recognized by the California State Historic Preservation Commission as a historical "Point of Interest" in 2003.

This historic road, which is located at approximately the mid-point of San Diego County, is also part of the unincorporated area of Fernbrook, a small village established in the late 19th century and which paralleled the development of the unincorporated town of Ramona itself. Mussey Grade is lined by ancient oaks and winds through a richly forested riparian area, which is surrounded by mountains. The road dead ends into the San Vicente Reservoir, and thus the Mussey Grade Road valley is its own unique and natural cul-de-sac. The valley is made up in the main of large rural ranch holdings, with the exception of Fernbrook and some recent housing built within the last decade.

The Alliance was formed in 1999 to preserve and protect this special area. To date the Alliance has engaged in a number of activities in furtherance of this goal, including intervening with the County of San Diego for the purpose of preserving some 2,200 acres of ranchland eventually purchased by the County as open space and known to locals as Boulder Oaks Ranch. The SDG&E proposed power line would run through this preserve, along with other open space preserves in San Diego County.

The Alliance was not planning to enter a prehearing conference statement pursuant to the August 25, 2006, Administrative Law Judge's Ruling Setting Date for Prehearing Conference Statements and Extended Time for Filing Protests. The Alliance has not entered any filings to date. As the process is restarting with this new SDG&E

application, the Alliance planned to attend the conference and subsequently submit a protest to establish the issues specific to the concerns of the Alliance. Following that submittal, the Alliance planned to submit a Notice of Intent within the required 30 days following the scheduled Prehearing Conference in order to comply with requirements. However, due to new developments regarding the application of San Diego Gas & Electric (SDG&E), the Alliance feels that it is necessary to enter this statement.

SDG&E DELAYED PROVIDING INFOMRATION REQUESTED BY THE COMMISSION IN THIS MATTER

In response to the Commission's Energy Division CEQA Unit, SDG&E filed on Friday, September 1, 2006, prior to the extended Labor Day Weekend, some 2,000 pages of required supplemental material.[1] According to the August 16th letter by Billie C. Blanchard, AICP, Project Manager for Sunrise Powerlink in the Energy Division CEQA Unit, some of the information had been requested earlier of the company:

"As part of an effort to streamline the review of the PEA, during May, June, and July 2006 SDG&E submitted portions of the PEA to the CPUC for preliminary review. The CPUC's EIR/EIS Team reviewed all documents received, and provided detailed comments in a series of seven letters to SDG&E between May 22 and July 21, 2006. The final PEA, submitted on August 4, 2006, incorporated most of the changes requested by the CPUC's EIR/EIS Team. **However, certain critical information items that were clearly presented to SDG&E as being required for completeness were not provided to the Energy Division.** In addition, the PEA included several new sections that had not been provided to the CPUC's EIR/EIS Team for review (the most important being the section on Biological Resources)."[2] (Emphasis Added)

The letter states that, "After completing our review of SDG&E's Application and PEA for the Project, the Energy Division concludes that the PEA is incomplete." Consequently, the company has submitted thousands of pages of documentation less than two weeks before the scheduled Prehearing Conference and Public Participation Conference, set for Wednesday, September 13, 2006 in Ramona.

---

[1] Notice of Availability of Supplement to Application of San Diego Gas & Electric Company (U902-E), September 1, 2006. See also, http://sdge.com/sunrisepowerlink/CPUC.shtml The estimated number of pages of the Supplement is calculated by adding together the links on the above-reference website where the Supplement has been posted by SDG&E.

[2] See August 16, 2006 Letter to Mr. Kevin O'Beirne, Regulatory Affairs, San Diego Gas & Electric Company, p.1.

It is important to note that earlier this summer SDG&E was asked by the Commission to provide in its new application issued August 4th some of the information released in its Supplement, dated September 1st. However, the company evidently chose not to do so and thereby delayed the release of the information by almost a month.

THE MUSSEY GRADE ROAD ALLIANCE HAS NOT HAD ADEQUATE TIME TO REVIEW THE SUPPLEMENTAL MATERIALS SUBMITTED BY SDG&E

It is obvious that there are severe time pressures on members of the public, including members of the Alliance, who desire to participate in the public participation portion of the proceedings in Ramona on September 13th. These time pressures are, in the main, due to the immense size of SDG&E's new application.[3] To complicate matters, the application is not easily downloaded on computers without high speed band width, an expensive cost for rural residents of San Diego County when broadband service is even available.

The PEA alone, the topic of the Commission's letter, runs into the hundreds of pages (close to 1,000 or more in total). While placed by SDG&E in public libraries for the public, the PEA presents a huge undertaking to read in such a short period of time -- the traditional vacation month of August. There may be no expectation that all of this documentation will be read and understood in such a short period of time. Nevertheless, the Alliance objects to the tactic of filing huge amounts of paper (totaling some 2,000 more pages) just prior to the Labor Day Weekend and less than two weeks before the planned Prehearing Conference (PHC) and the Public Participation Hearing (PPH). We believe that this additional material, arriving as it does so late in the day, requires that scheduling be changed to allow for adequate time to digest the supplemental material and to comment to the Commission regarding what that material may mean in light of the entire PEA and proposed transmission line project.

[3] The Application runs to some 300 pages, according to the hard copies provided by SDG&E and excluding the Appendices and the PEA. The PEA runs close to 1,000 pages or more.

THE COMMISSION SHOULD ADOPT A PROCEEDING SCHEDULE THAT WILL ALLOW FOR ADEQUATE TIME FOR PARTIES AND THE PUBLIC TO MEANINGFULLY COMMENT ON THE SUPPLEMENTAL PEA MATERIALS

SDG&E originally filed its application for this proposed power line project during the approaching Christmas holiday time. The company has filed its second application for this proposed power line project during the traditional vacation season. While there has been some talk of the need to efficiently review the project within a reasonable period of time, SDG&E has caused itself some months of delay, while evidently benefiting from that delay for its own purposes.

While there is, obviously, a need for efficiency and smooth operation regarding the proceedings concerning this proposed project, an adequate amount of time should be allotted by the Commission within the scheduling process to allow the public time to understand the issues presented by SDG&E in their application. If supplements occur that would require more time for the public to access and read, then the Commission should allow time for that to occur within the framework of the overall estimated year of deliberations concerning the proposed project.

We believe that it is reasonable for the Commission to extend the protest deadline by two weeks to October 6, 2006 to allow more time for the parties and the public to comment on this proposed application, as it has been supplemented. While supplements to applications may not be unheard of, thousands of pages of supplements to applications are probably not the general rule, and especially for materials that have been previously requested by the Commission. Not allowing more time would be unfair because of the potential serious impacts to communities, such as the Mussey Grade Road community, if not given sufficient time to develop issues. Additionally, comments received on the supplemented PEA as issues should be fully included as topics to be taken up in the future proceedings in this matter.

CONCLUSION

The Mussey Grade Road Alliance respectfully requests that the Commission extend the time for protests by parties and comments by the public on the supplemental materials of the SDG&E application to October 6, 2006 and that issues raised in protests be fully incorporated into the proceedings.

The Alliance is grateful to the Commission for its thoroughness and makes this request in order to take advantage of the newly filed supplemental materials to more comprehensively understand the issues raised in the PEA.

Respectfully submitted,

Dated: September 7, 2006

MUSSEY GRADE ROAD ALLIANCE

Diane Conklin, Spokesperson
P.O. Box 683
Ramona, CA 92065
Telephone: (760) 787-0794
Facsimile: (760) 788-5479
Email:dj0conklin@earthlink.net

By */s/ Diane Conklin*
Diane Conklin

CERTIFICATE OF SERVICE BY ELECTRONIC MAIL

I, Diane Conklin, hereby declare under penalty of perjury, that on the 7th day of September 2006 I served a true copy of:

PREHEARING CONFERENCE STATEMENT OF THE MUSSEY GRADE ROAD ALLIANCE

on all known parties with an email address on the service list in proceeding A.06-08-010/ A.05-12-014 by electronic mail.

Executed this 7th day of September 2006, at Ramona, California.

/s/ Diane Conklin

Diane Conklin
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065

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 THE MUSSEY GRADE ROAD ALLIANCE

Diane Conklin, Spokesperson
Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
Telephone: (760) 787-0794
Facsimile: (760) 788- 5479
Email: dj0conklin@earthlink.net

Dated: September 22, 2006

PROTEST OF THE MUSSEY GRADE ROAD ALLIANCE

1. INTRODUCTION

Pursuant to Rule 44 of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the Mussey Grade Road Alliance ("Alliance") submits this Protest in opposition to the Application of the San Diego Gas & Electric Company ("SDG&E") for a Certificate of Public Convenience and Necessity ("CPCN") for the Sunrise Powerlink Transmission Project ("Application"). The Application was filed on December 14, 2005; and subsequently re-filed on August 4, 2006. The period for submitting protests was extended to September 22, 2006; therefore this Protest is timely pursuant to the Commission's Rules of Practice and Procedure, Rule 44.1 and G.O. 131-D, Section XII.

The Alliance is a grassroots citizen organization dedicated to the preservation and protection of Mussey Grade Road and environs in Ramona, California. The Alliance maintains a website on Mussey Grade Road at www.musseygraderoad.org.

The Alliance enters this Protest in opposition to the proposed transmission line project of SDG&E because of the massive effects this project would have on Mussey Grade Road and environs. However, the Alliance is acutely aware that not only the Mussey Grade Road area, but vast portions of San Diego County, from the coastal regions and inter-coastal mountain areas to the Anza-Borrego Desert State Park, would also be extremely negatively impacted by this power line, should the Commission approve the application for a CPCN.

This project is not only destructive to the natural world, including Mussey Grade Road and environs; it is destructive as to its effects on discrete human communities. As no man is an island, so too no community is completely cut off from its surroundings – be they unspoiled natural wild lands or neighboring human communities with which they

share geographic space. And while communities are not completely separate from one another, it is also true that each community is special and can be distinguished from others based on its own unique characteristics.

The project also has larger effects with regard to the global energy business. Community concerns also involve the larger issues such as the nature of business competition and the desire on the part of businesses to reduce it, the broader consequences of the concentration of energy decisions in smaller numbers of hands and the direct effects on citizen ratepayers, and the tremendous profits to be earned and the overall effects of energy use on the planet.

That big picture is important. The power line project application can obscure the view of what is at stake concerning vital issues of energy production, energy provision and the future of energy in California. Therefore, the Alliance would like to put this project in perspective – look at it from a longer view before looking at it close up.

II. ISSUE # 1: THERE SHOULD BE CONSEQUENCES IF SDG&E IMPORTS ENERGY FROM MEXICO THROUGH "SUNRISE POWERLINK"

It is widely acknowledged today that global warming exists. It is even acknowledged that California has already been affected by global warming. Recently, the California Climate Action Team, initiated by Governor Arnold Schwarzenegger last year, released a summary report of 17 scientific studies examining the potential impacts of climate change in California.[1] The report, "Our Changing Climate: Assessing the Risks to California" was a collaborative effort of the California Center for Climate Change, the only state-funded climate research center in the nation, a virtual center established by the California Energy Commission. The Summary report is a compilation of the science included in the Climate Action Team report that was released in April. The report warns that as the effects of global warming continue, California's 1,100 miles

[1] See "California Climate Action Team releases summary report," August 16, 2006, Capitol Reports, http://www.caprep.com/0806020.htm

of coastline will face increased threats of rising sea levels, aggravating impacts of coastal storms and runoff from upstream flooding.

This is the backdrop of this power line application: the first of the biennial studies of the potential impact on the state of continued global warming tells us that there will be more effects in the future. Yet, while SDG&E denies that any power that will flow through its proposed power line would be generated in Mexico, and has repeatedly stated this in public and other forums, the Alliance believes that this remains a possibility.[2] And if power were generated from new plants across the border, emissions from those plants could amount to the same annual emissions from 400,000 cars.[3]

The issue here is if the project were approved and SDG&E eventually does import electricity on this line from generation plants built in Mexico by its parent company Sempra (rather than solar produced energy from Stirling Energy Systems facilities to be built in the Imperial County desert, as it claims) would there be any consequences? While there would assuredly be environmental consequences connected to this type of change in plans,[4] would there be any penalties imposed on SDG&E for taking a different direction from that which it told the world it was going to take?

There are, in fact, no assurances to the public who will eventually pay for this more than $1.2 billion project, should it be approved, that it will only transmit renewables and that those renewables will be domestically produced. In fact, the SDG&E August 4th application is much thinner on the renewables issue and much thicker on the reliability

---

[2] Others also doubt SDG&E's assertions that it will not transmit power from Mexico. See, September 13, 2006 letter from Congressman Bob Filner to CPUC Commissioner Dian Grueneich, where he states: "The project creates the real possibility for an increase in air emissions from new export power plants in the Mexicali region of Baja California, which do not meet the same stringent air quality stands in California, specifically the purchase of emission offset credits."

[3] The Sempra plant in Mexicali is 600 MW net and the EIS for the plant states max. NOx emissions of 187 tpy. Assuming 200 tpy as a reasonable number, one 600 MW plant would equal the NOx emissions of 200,000 typical 2005 model year autos, based on emissions of 2.05 pounds of NOx per year, according to authoritative sources. Two 600 MW plants would release NOx emissions of 400,000.

[4] There are no projections of the impact on Imperial County residents of releasing as much as 200 tons per year of NOx per 600 Mw combined-cycle plant equipped with catalytic converter, as well as substantial quantities of other harmful air pollutants into a troubled air basin that currently is in violation of Federal and state clean air standards for healthy air several days a year.

issues.[5] Even SDG&E admits in its chapter on renewables that they are not required by law to produce 20% of their energy from renewables until 2017.[6] If the rush to renewables, ostensibly to save the state from the effects of global warming, is of paramount importance to SDG&E,[7] then it would be unconscionable if the public and the Commission were to find out later – after approval of the CPCN – that the line would carry imported electricity generated in Mexico.[8] The sole remedy to prevent this would be for the Commission to establish a rule now that would prevent any kind of "bait and switch" on the project from occurring.

---

[5] Chapter III, Renewable Energy, is a mere 16 pages; Chapter II, Reliability, is 34 pages of text and a total of 70 pages, including Tables. See, Public, Sunrise Powerlink Transmission Project Purpose and Need, Volume 2 Part 1, August 4, 2006, San Diego Gas & Electric Company. Despite the emphasis on reliability in the application, the issue of the potential vulnerability of the Imperial County Substation does not seem as important to the applicant. This substation is the place from which, as the Alliance understands it, all power lines travel through the area. The substation presents, obviously, its own target; so reliability is not only a matter of power lines alone.

[6] SB 1078 signed into law September 12, 2002 requires California to procure 20% of its electrical retail sales from renewable resources by December 31, 1017. However, SDG&E points to the Energy Action Plan, which it says "strives to attain the 20% goal by 2010 rather than 2017." See, Chapter III, Renewable Energy, p. III-7.

[7] Even the name "Sunrise Powerlink" emphasizes SDG&E's arguments that the proposed line is meant, above all else, for renewable solar energy. SDG&E's new arrangement with the Imperial Irrigation District and Citizens Energy Corporation, encapsulated in a March 16, 2006 Memorandum of Agreement, was the subject of Joseph Kennedy's presentation at the August 24th CAISO meeting. At the meeting Mr. Kennedy told the Board of Governors that global warming conditions mean that "searing heat" caused "the poor to die"and said that the proposed power line is designed to bring "green power to the people of San Diego."

This is despite the opinion of Sempra Chairman and Chief Executive Donald Felsinger, who told a reporter he doesn't believe in global warming: "And although SDG&E says it will comply with state mandates on renewable energy, Felsinger says he no interest in pursuing renewable energy projects elsewhere in the company. In fact, he expresses no interest in dealing with the issue of global warming, although environmentalists generally target the energy industry as among the biggest contributors to the problem. But Felsinger said he is unconvinced that the phenomenon of global warming exists. 'There is definitely a debate about global warming, and when you look at the opposing views, neither one has prevailed,' Felsinger said. For example, he said, 'The coal industry says there is no evidence of global warming.' Later he added: 'I don't think the science supports either side. So you ought to take a position of moderation. It's difficult to take sides between smart people.' His lack of conviction about global warming puts him at odds with the majority of climate scientists, as well as with views embraced by Gov. Arnold Schwarzenegger and California Public Utilities Commission President Michael Peevey, both of whom have been pressing for caps on the emissions from the energy industry." See, "Sempra generating new energy," by Craig Rose, San Diego Union Tribune, June 18, 2006
http://www.signonsandiego.com/news/business/20060618-9999-lz1b18sempra.html

[8] Obviously power generation in Mexico would also lead to more greenhouse gas emissions, in addition to emission contributing to overall air pollution.

III. ISSUE # 2: COMPENSATION SHOULD BE PAID TO THE PUBLIC FOR DESTRUCTION OF PUBLICLY HELD LAND OCCURING AS A RESULT OF THE CREATION OF INDUSTRIAL CORRIDORS THAT DEGRADE AND DEVALUE OPEN SPACE PRESERVES

As stated previously in this Protest, each community is unique. Mussey Grade Road is no exception. As described in the Prehearing Conference Statement submitted by the Alliance, Mussey Grade was the main road from the coast to the Julian gold mines in the 19th century. Bisected in 1943 by the San Vicente Reservoir, the some five miles of remaining stagecoach route was recognized by the California State Historic Preservation Commission as a historical "Point of Interest" in 2003.

This historic road, which is located at approximately the mid-point of San Diego County, is also part of the unincorporated area of Fernbrook, a small village established in the late 19th century and which paralleled the development of the unincorporated town of Ramona itself. Mussey Grade is lined by ancient oaks and winds through a richly forested riparian area, which is surrounded by mountains. The road dead ends into the San Vicente Reservoir, and thus the Mussey Grade Road valley is its own unique and natural cul-de-sac. The valley is made up in the main of large rural ranch holdings, with the exception of Fernbrook and some recent housing built within the last decade.

The Alliance was formed in 1999 to preserve and protect this special area. To date the Alliance has engaged in a number of activities in furtherance of this goal, including intervening with the County of San Diego for the purpose of preserving some 2,200 acres of ranchland eventually purchased by the County as open space and known to locals as Boulder Oaks Ranch. The SDG&E proposed power line would run through this preserve, along with five other open space preserves in San Diego County.[9]

[9] The preserves include Sycamore Canyon, Goodan Ranch, Barnett Ranch, San Vicente Highlands Open Space, and Boulder Oaks preserves. See, Proposed Project Inland Valley Link (page 4.9.9)

According to SDG&E, Mussey Grade Road falls within their Inland Valley Link area, an extensive area. Two of the largest county owned and maintained open space preserves are located in the Inland Valley Link: Sycamore Canyon and Boulder Oaks. SDG&E's application recognizes the importance of the open spaces in the vicinity of Ramona. The application states:

> Open space is a primary factor contributing to the rural character of Inland Valley Link landscapes. Outside of urban and residential areas, the study area contains open spaces that provide high-quality scenic settings characterized by the varied topography and vegetation of the ecoregion.[10]

The fact that the proposed preferred route travels through so many county open space preserves is itself a matter of grave concern, especially because by doing so the project avoids people in favor of burdening preserved open space. Another discouraging aspect of running a power line through open space preserves is the extraordinary precedent this activity would set. While easements may exist in the open spaces of San Diego County, those easements are generally now occupied by a 69kV line. This existing line, while noticeable and unattractive in the wild spaces preserved by taxpayer money, is hardly comparable to the industrialized corridor SDG&E plans for the five county open space preserves. This corridor would contain both the existing 69kV line, possibly improved and enlarged, along with a 230kV line, as far as the Alliance can determine.

The application describes the area this way:

> The alignment between N27 and N28 follows the existing SDG&E 69 kV transmission corridor that crosses through agricultural lands and open space. The existing transmission corridor is viewed by isolated rural residences on privately owned lands and by the public within the five open space preserves that are crossed by the alignment. **The preserves include Sycamore Canyon, Goodan Ranch, Barnett Ranch, San Vicente Highlands Open Space, and Boulder Oaks preserves. The preserves <u>provide solitude</u> and recreation in a variety of settings that include the**

[10] See, 4.9.2.1.1 Landscape Visual Quality, Inland Valley Link

> **most scenic within the Southern California Mountains and Valleys ecoregion and range from grand vistas, oak woodlands, grassy meadows, and abundant wildlife**.[11] (Emphasis Added)

Solitude or not, SDG&E plans to run a 230kV line through these five preserves. Even if the 69kV line were to disappear, the much larger and more obvious 230kV line planned by SDG&E would not only impact view sheds, it would slice through these precious open spaces in a completely incongruous way – alerting the taxpayers whose dollars ultimately paid to preserve the land for generations to come that the preservation was only partial promise.[12]

In the case Boulder Oaks, a 2,200 acre preserve of mountains, meadows, valleys and hills, lying in the shadow of Iron Mountain and overlooking the San Vicente Reservoir, the upgraded power line would indeed be unattractive, unappealing, unwelcome and unnatural. While it is true that the Boulder Oaks open space was established by the county following the acquisition of the power line easement, the fact that SDG&E wants to enlarge their infrastructure within the existing easement many years later after purchasing the easement leaves little comfort that this will be the last and final "improvement".

In fact, common sense tells us that where an easement has been established, it will be used again and again. Arguments will be made that it pre-exists and therefore can legitimately be used for the purposes for which it was acquired. This logic is already in operation in other parts of the county in other easements, such as Torrey Hills, where SDG&E proposes to add yet more lines to already existing lines and infrastructure within their easement because they assume they can.

---

[11] Proposed Project Inland Valley Link (page 4.9.9)

[12] A portion of these lands were purchased to fulfill the promise of the County of San Diego Multiple Species Conservation Program ("MSCP") and are mitigation for present or future development in the county. The industrialization of these lands obviously lowers their mitigation value not only the in the power line corridor itself, but in any direction in which the corridor is viewed from either inside or outside of the open space preserves.

The fact that in the Boulder Oaks example the easement occurs in publicly financed preserved open space is of no comfort when SDG&E has boldly planned the same treatment of enlarged infrastructure within their easement located in the preserve. The message is sent in this choice of route by SDG&E that nothing is sacred and the company's plans trump the county's plans for preservation.

This means that we can expect that Boulder Oaks open space and all the other county open spaces through which this proposed line runs on the preferred route will not have seen the last of this issue. We can expect that bit by bit more enlargement will occur; the same arguments being presented now will be presented again in the future, including threats of brownouts and blackouts should SDG&E not get its way.

For the residents of the Mussey Grade Road valley who worked on preservation of the 2,200 acres of Boulder Oaks, including in cooperation with Supervisor Dianne Jacob and supporting her efforts to preserve the land through purchase, the industrialization of this open space preserve is a bitter pill indeed. It also serves as a reminder to all taxpayers that nothing is what it seems in terms of preserving open space for future generations of San Diego County residents to enjoy.

If this kind of degradation is allowed to occur without compensation to the public who paid for the land, it would be unfair to taxpayers and unfair to their government, which worked with them to preserve the various open spaces that would be adversely and permanently impacted if the project were approved by the Commission. It would also signal that open space is vulnerable to devaluation by industrial usage – precisely because no one lives there. The message would be sent to local officials that the land they worked to preserve has no inherent value that would be detrimentally affected by power lines crossing it on 150' towers – and that this should be completely acceptable to everyone involved.

In fact, the degradation of open space preserves through the establishment of industrial power line corridors hosting massive poles and infrastructure is not acceptable.

Such activity degrades the value of the open space generally while it destroys the open space at the industrial corridor specifically. There is no reason for this type of unauthorized and unanticipated action on the part of SDG&E to be permitted. And, in the worst case, if it is permitted and the project is approved by the Commission, SDG&E should be required to compensate the taxpayers for the loss of the value of these publicly owned and supported lands that would be detrimentally and permanently impacted by a power line project, if approved by the Commission.

A determination of the value lost and financial payment owed would be separate from mitigation issues to be considered in the California Environmental Quality Act ("CEQA") process of this application because no other mitigation is possible to compensate for the loss of use and the loss of the inherent value of the open space preserves that would result from placing huge power lines in the preserves. The preserves, like the nursery rhyme story of Humpty-Dumpty, are fragile and require greater efforts to be protected; otherwise they will share Humpty's fate where "All the King's horses and all the King's men couldn't put Humpty together again."

The Commission should establish a rule regarding open space preserves in California and this type of intrusion; such a rule should require analysis of the economic loss to the public flowing from the destruction of public property on taxpayer supported open space preserves for private industry use and should require payment by private industry for that use. That economic loss would, no doubt, be significant. In the instant case, if SDG&E continued to desire a preferred route that runs through open space after open space in San Diego County all along the line, SDG&E should be required by this rule to financially compensate the public for that action.

IV. CONCLUSION

In light of the foregoing, the Alliance urges the Commission to incorporate into their consideration of the SDG&E application the issues presented herein. Specifically, the Alliance respectfully requests the Commission answer the question

of whether there would, under the current requirements, be any penalties imposed upon the applicant if, providing the Commission approves this application for a CPCN, the line is used to import power from Mexico. If there is not a penalty mechanism is such a case, the Alliance requests that the Commission set up such a mechanism for this and all other applications in the future.

Secondly, the Alliance respectfully requests the Commission set up a rule to financially compensate the public for loss of use and of the inherent value of publicly supported and maintained open space preserves that would be impacted by this project and all other projects in the future.

Dated: September 22, 2006

Respectfully submitted,
Mussey Grade Road Alliance

By:_____

Diane Conklin

Mussey Grade Road Alliance
P.O. Box 683
Ramona, CA 92065
Telephone: 760-787-0794
Fax: 760-788-5479
Email:j0conklin@earthlink.net

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 THE MUSSEY GRADE ROAD ALLIANCE** to parties listed on the following pages.

Service was completed by email where available or, where email 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.

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

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

_____

Diane Conklin

CALIFORNIA PUBLIC UTILITIES COMMISSION
Service Lists

Proceeding: A0608010 - SDG&E - CPCN FOR THE
Filer: SAN DIEGO GAS & ELECTRIC COMPANY (U902E)
List Name: LIST
Last changed: September 20, 2006

Download the Comma-delimited File
About Comma-delimited Files

Back to Service Lists Index

Appearance

SARA FELDMAN
CA STATE PARKS FOUNDATION
714 W. OLYMPIC BLVD., SUITE 717
LOS ANGELES, CA 90015

THOMAS A. BURHENN
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

DON WOOD SR.
PACIFIC ENERGY POLICY CENTER
INSTITUTE
4539 LEE AVENUE
LA MESA, CA 91941

DIANA LINSDAY
ANZA-BORREGO FOUNDATION &

PO BOX 2001
BORREGO SPRINGS, CA 92004

SCOT MARTIN
PO BOX 1549
BORREGO SPRINGS, CA 92004

DAVID LLOYD
ATTORNEY AT LAW
CABRILLO POWER I, LLC
4600 CARLSBAD BLVD.
CARLSBAD, CA 92008

CONNIE BULL
24572 RUTHERFORD ROAD
RAMONA, CA 92065

DIANE CONKLIN
MUSSEY GRADE ROAD
RAMONA, CA 92065

DIANE J. CONKLIN
MUSSEY GRADE ROAD ALLIANCE
ASSOCIATION
PO BOX 683
RAMONA, CA 92065

ELIZABETH EDWARDS
RAMONA VALLEY VINEYARD

26502 HIGHWAY 78
RAMONA, CA 92065

PAM WHALEN
24444 RUTHERFORD ROAD
RAMONA, CA 92065

MICHAEL PAGE
17449 OAK HOLLOW ROAD
RAMONA, CA 92065-6758

HEIDI FARKASH
JOHN & HEIDI FARKASH TRUST
RELATED COMM
PO BOX 576
RANCHO SANTA FE, CA 92067

DENIS TRAFECANTY
COMMUNITY OF SANTA YSABEL &

PO BOX 305
SANTA YSABEL, CA 92070

MARY ALDERN
COMMUNITY ALLIANCE FOR SENSIBLE ENERGY
PO BOX 321
WARNER SPRINGS, CA 92086

FREDERICK M. ORTLIEB
OFFICE OF CITY ATTORNEY
CITY OF SAN DIEGO
1200 THIRD AVENUE, 11TH FLOOR
SAN DIEGO, CA 92101

HARVEY PAYNE
RANCHO PENASQUITOS CONCERNED CITIZENS
600 W. BROADWAY, STE. 400
SAN DIEGO, CA 92101

MICHAEL P. CALABRESE
CITY ATTORNEY'S OFFICE
1200 THIRD AVENUE, SUITE 1100
SAN DIEGO, CA 92101

DONALD C. LIDDELL
ATTORNEY AT LAW
DOUGLASS & LIDDELL
NETWORK
2928 2ND AVENUE
SAN DIEGO, CA 92103

MICHAEL SHAMES
ATTORNEY AT LAW
UTILITY CONSUMERS' ACTION

3100 FIFTH AVENUE, SUITE B
SAN DIEGO, CA 92103

PAUL BLACKBURN
SIERRA CLUB, SAN DIEGO CHAPTER
WRECKLESS ELECTRI

EDWARD GORHAM
WESTERNERS INCENSED BY

3820 RAY STREET
SAN DIEGO, CA 92104

4219 LOMA RIVIERA LANE
SAN DIEGO, CA 92110

KEVIN O'BEIRNE
SAN DIEGO GAS & ELECTRIC COMPANY
8330 CENTURY PARK COURT, CP32D
SAN DIEGO, CA 92123

JOHN W. LESLIE
ATTORNEY AT LAW
LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
11988 EL CAMINO REAL, SUITE 200
SAN DIEGO, CA 92130

JOETTA MIHALOVICH
11705 ALDERCREST POINT
SAN DIEGO, CA 92131

DAVID HOGAN
CENTER FOR BIOLOGICAL DIVERSITY
PO BOX 7745
SAN DIEGO, CA 92167

CARRIE DOWNEY
HORTON KNOX CARTER & FOOTE
895 BROADWAY
ELCENTRO, CA 92243

PATRICIA C. SCHNIER
14575 FLATHEAD RD.
APPLE VALLEY, CA 92307

BILLY BLATTNER
SAN DIEGO GAS & ELECTRIC COMPANY
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102

MICHEL PETER FLORIO
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102

OSA L. WOLFF
ATTORNEY AT LAW
SHUTE, MIHALY & WEINBERGER, LLC
396 HAYES STREET
SAN FRANCISCO, CA 94102

NICHOLAS SHER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4007
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

REGINA DEANGELIS
CALIF PUBLIC UTILITIES COMMISSION
650
LEGAL DIVISION
ROOM 4107

RORY COX
311 CALIFORNIA STREET, SUITE 650
SAN FRANCISCO, CA 94104

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

NORMAN J. FURUTA
FEDERAL EXECUTIVE AGENCIES
10TH FLOOR, MS 1021A
RITCHIE & DAY LLP
333 MARKET STREET
SAN FRANCISCO, CA 94105-2195

BRIAN T. CRAGG
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI

505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111

DAVID KATES
DAVID MARK AND COMPANY
3510 UNOCAL PLACE, SUITE 200
SANTA ROSA, CA 95403-5571

JAMES H. CALDWELL JR.
PPM ENERGY, INC.
1650 E NAPA STREET
SONOMA, CA 95476

JUDITH B. SANDERS
ATTORNEY AT LAW
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

BRADLY S. TORGAN
ATTORNEY AT LAW
CALIFORNIA DEPT. OF PARKS & RECREATION

1416 NINTH STREET, ROOM 1404-06

SACRAMENTO, CA 95814

JEDEDIAH J. GIBSON
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95814

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION

2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833

Information Only

JUILE B. GREENISEN
LATHAM & WATKINS LLP
SUITE 1000
555 ELEVENTH STREET, NW
WASHINGTON, DC 20004-1304

MICHAEL J. GERGEN
LATHAM & WATKINS LLP
SUITE 1000
555 ELEVENTH STREET, NW
WASHINGTON, DC 20004-1304

CLAY E. FABER
SOUTHERN CALIFORNIA GAS COMPANY COMPANY
555 WEST FIFTH STREET, GT-14E7

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON

ROOM 370

LOS ANGELES, CA 90013

2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

KELLY FULLER
PO BOX 1993
FOUNDATION
ALPINE, CA 91903

MATTHEW JUMPER
SAN DIEGO INTERFAITH HOUSING

7956 LESTER AVE
LEMON GROVE, CA 91945

REBECCA PEARL
POLICY ADVOCATE, CLEAN BAY CAMPAIGN
ENVIRONMENTAL HEALTH COALITION
401 MILE OF CARS WAY, STE. 310
NATIONAL CITY, CA 91950

MICHAEL L. WELLS
CALIFORNIA DEPARTMENTOF
PARKS&RECREATION

200 PALM CANYON DRIVE
BORREGO SPRINGS, CA 92004

TOM GORTON
BORREGO SUN
PO BOX 249
BORREGO SPRINGS, CA 92004

BOB & MARGARET BARELMANN
6510 FRANCISCAN ROAD
CARLSBAD, CA 92011

DAVE DOWNEY
NORTH COUNTY TIMES
207 E. PENNSYLVANIA AVENUE
ESCONDIDO, CA 92025

PAT/ALBERT BIANEZ
1223 ARMSTRONG CIRCLE
ESCONDIDO, CA 92027

WALLY BESUDEN
PRESIDENT
SPANGLER PEAK RANCH, INC
PO BOX 1959
ESCONDIDO, CA 92033

GREG SCHUETT
PO BOX 1108
JULIAN, CA 92036

LAUREL GRANQUIST
PO BOX 2486
FOUNDATION
JULIAN, CA 92036

MARTHA BAKER
VOLCAN MOUNTAIN PRESERVE

PO BOX 1625
JULIAN, CA 92036

JOHN RAIFSNIDER

BRIAN KRAMER

PO BOX 121
JULIAN, CA 92036-0121

PO BOX 516
JULIAN, CA 92036-0516

NANCY PARINELLO
PO BOX 516
JULIAN, CA 92036-0516

PAUL RIDGWAY
3027 LAKEVIEW DR.
PO BOX 1435
JULIAN, CA 92036-1435

CAROLYN A. DORROH
RAMONA COMMUNITY PLANNING GROUP
17235 VOORHES LANE
RAMONA, CA 92065

CHRISTOPHER P. JEFFERS
24566 DEL AMO ROAD
RAMONA, CA 92065

LARA LOPEZ
16828 OPEN VIEW RD
RAMONA, CA 92065

MARY KAY FERWALT
24569 DEL AMO ROAD
RAMONA, CA 92065

MAUREEN ROBERTSON
EDITOR
RAMONA SENTINEL
611 MAIN STREET
RAMONA, CA 92065

PHILLIP &ELIANE BREEDLOVE
1804 CEDAR STREET
RAMONA, CA 92065

WILLIAM TULLOCH
28223 HIGHWAY 78
RAMONA, CA 92065

CAROLYN MORROW
GOLIGHTLY FARMS
36255 GRAPEVINE CANYON ROAD
RANCHITA, CA 92066

JOSEPH RAUH
RANCHITA REALTY
37554 MONTEZUMA VALLEY RD
RANCHITA, CA 92066

STEVE/CAROLYN ESPOSITO
37784 MONTEZUMA VALLEY ROAD
RANCHITA, CA 92066

GLENDA KIMMERLY
PO BOX 305

GLENN E. DROWN
PO BOX 330

SANTA YSABEL, CA 92070

SANTA YSABEL, CA 92070

DAN PERKINS
ENERGY SMART HOMES
983 PHILLIPS ST.
VISTA, CA 92083

KARL HIGGINS
PRESIDENT
HIGGINS & ASSOCIATES
1517 ROMA DRIVE
VISTA, CA 92083

WILLIE M. GATERS
1295 EAST VISTA WAY
VISTA, CA 92084
COMPANY

E. GREGORY BARNES
ATTORNEY AT LAW
SAN DIEGO GAS & ELECTRIC

101 ASH STREET, HQ 13D
SAN DIEGO, CA 92101

SUSAN FREEDMAN
SENIOR REGIONAL ENERGY PLANNER
SAN DIEGO ASSOCIATION OF GOVERNMENTS
401 B STREET, SUITE 800
SAN DIEGO, CA 92101

JIM BELL
4862 VOLTAIRE ST.
SAN DIEGO, CA 92107

EPIC INTERN
EPIC/USD SCHOOL OF LAW
CENTER
5998 ALCALA PARK
SAN DIEGO, CA 92110

SCOTT J. ANDERS
RESEARCH/ADMINISTRATIVE

UNIVERSITY OF SAN DIEGO - LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110

CRAIG ROSE
THE SAN DIEGO UNION TRIBUNE
PO BOX 120191S
SAN DIEGO, CA 92112-0191

ABBAS M. ABED
ELECTRIC AND GAS PROCUREMENT
SAN DIEGO GAS & ELECTRIC
8315 CENTURY PARK COURT,CP21D
SAN DIEGO, CA 92123

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP31E
SAN DIEGO, CA 92123

IRENE STILLINGS
EXECUTIVE DIRECTOR
SAN DIEGO REGINONAL ENERGY
8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123

JENNIFER PORTER

SEPHRA A. NINOW

POLICY ANALYST
DIEGO REGIONAL ENERGY OFFICE
OFFICE
8520 TECH WAY SUITE 110
SAN DIEGO, CA 92123

RESEARCH ASSISTANT
SAN DIEGO REGIONAL ENERGY

8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123

TOM BLAIR
ENERGY ADMINISTRATOR
CITY OF SAN DIEGO
9601 RIDGEHAVEN COURT, SUITE 120
SAN DIEGO, CA 92123-1636

EILEEN BIRD
12430 DORMOUSE ROAD
SAN DIEGO, CA 92129

DIANE I. FELLMAN
ATTORNEY AT LAW
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

SHERIDAN PAUKER
SHUTE,MIHALY & WEINBERGER LLP
396 HAYES STREET
SAN FRANCISCO, CA 94102

JUSTIN AUGUSTINE
THE CENTER FOR BIOLOGICAL DIVERSITY
CLEAN ENERGY
1095 MARKET ST., SUITE 511
SAN FRANCISCO, CA 94103

AARON QUINTANAR
RATE PAYERS FOR AFFORDABLE

311 CALIFORNIA STREET, STE
650
SAN FRANCISCO, CA 94104

JASON YAN
PACIFIC GAS AND ELECTRIC COMPANY
COMPANY
77 BEALE STREET, MAIL CODE B13L
RM 1318
SAN FRANCISCO, CA 94105

MICHAEL S. PORTER
PACIFIC GAS AND ELECTRIC

77 BEALE ST., MAIL CODE 13L

SAN FRANCISCO, CA 94105

CALIFORNIA ENERGY MARKETS
517 - B POTRERO AVENUE
SAN FRANCISCO, CA 94110
2000

RICHARD W. RAUSHENBUSH
ATTORNEY AT LAW
LATHAM & WATKINS LLP
505 MONTGOMERY STREET, SUITE

SAN FRANCISCO, CA 94111

DAVID T. KRASKA
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442

J.A. SAVAGE
CALIFORNIA ENERGY CIRCUIT
3006 SHEFFIELD AVE
OAKLAND, CA 94602

SAN FRANCISCO, CA 94120

MRW & ASSOCIATES, INC.
1999 HARRISON STREET, SUITE 1440
OAKLAND, CA 94612

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630

PAUL G. SCHEUERMAN
SHEUERMAN CONSULTING
3915 RAWHIDE RD.
ROCKLIN, CA 95677

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95814

AUDRA HARTMANN
REGIOINAL DIRECTOR, GOV'T AFFAIRS
INC.
LS POWER GENERATION
980 NINTH STREET, SUITE 1420
SACRAMENTO, CA 95814

KEVIN WOODRUFF
WOODRUFF EXPERT SERVICES,
1100 K STREET, SUITE 204
SACRAMENTO, CA 95814

RICHARD LAUCKHART
GLOBAL ENERGY
2379 GATEWAY OAKS DRIVE, SUITE 200
SACRAMENTO, CA 95833

G. ALAN COMNES
CABRILLO POWER I LLC
3934 SE ASH STREET
PORTLAND, OR 97214

State Service

MARCUS NIXON
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
PUBLIC ADVISOR OFFICE
320 WEST 4TH STREET SUITE 500
LOS ANGELES, CA 90013

AARON J. JOHNSON
CALIF PUBLIC UTILITIES
ORA - ADMINISTRATIVE BRANCH
ROOM 4202
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

BILLIE C. BLANCHARD
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
TRANSMISSION PERMITTING & RELIABILITY BR
AREA 4-A

KEITH D WHITE
CALIF PUBLIC UTILITIES
RATEMAKING BRANCH
AREA 4-A

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

ROBERT ELLIOTT
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
TRANSMISSION PERMITTING & RELIABILITY BR
AREA 4-A
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SCOTT CAUCHOIS
CALIF PUBLIC UTILITIES
COMMISSION
ELECTRICITY RESOURCES &
PRICING BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SCOTT LOGAN
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
ELECTRICITY RESOURCES & PRICING BRANCH
ROOM 4209
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

STEVEN A. WEISSMAN
CALIF PUBLIC UTILITIES
COMMISSION
DIVISION OF ADMINISTRATIVE
LAW JUDGES
ROOM 5107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TERRIE D. PROSPER
CALIF PUBLIC UTILITIES COMMISSION
COMMISSION
EXECUTIVE DIVISION
ROOM 5301
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

TRACI BONE
CALIF PUBLIC UTILITIES
COMMISSION
LEGAL DIVISION
ROOM 5206
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

SUSAN LEE
ASPEN ENVIRONMENTAL GROUP
235 MONTGOMERY STREET, SUITE 935
SAN FRANCISCO, CA 94104

CLARE LAUFENBERG
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET, MS 46
SACRAMENTO, CA 95814

MARC PRYOR
CALIFORNIA ENERGY COMMISSION
COMMISSION
1516 9TH ST, MS 20
SACRAMENTO, CA 95814

THOMAS FLYNN
CALIF PUBLIC UTILITIES
COMMISSION
ENERGY RESOURCES BRANCH
770 L STREET, SUITE 1050
SACRAMENTO, CA 95814

JUDY GRAU
CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET MS-46
SACRAMENTO, CA 95814-5512

TOM MURPHY
VP., SACRAMENTO OPERATIONS
ASPEN ENVIRONMENTAL GROUP
8801 FOLSOM BLVD., SUITE 290
SACRAMENTO, CA 95826