

Alvin C Ruppert
P O Box 249
Santa Ysabel, CA 92070

Aug. 23, 2006

06 AUG 23 PM 3:18

California Public Utilities Commission
Docket Office
Room 2001
505 Van Ness Ave
San Francisco, CA 94102

cc:E. Gregory Barnes
Kevin O' Beirne
Director Energy Division PUC

Subject: Sunrise Powerlink Transmission Project, Application Number: A. 05-12-014

Dear Sir/Madam:

I would like to protest the Sunrise Powerlink. I recognize the power grid needs strengthening. I also agree that San Diego and all of Southern California needs more electricity. We do need to make use of solar power generated in the desert. My objections to the proposed transmission line are as follows:

- There are two existing high voltage power lines which could be expanded, almost certainly, at lower cost than building a third one. The fast growing areas of San Diego County, South Bay and North County Coastal, are each served by one of these power lines. Cost is important. We are told that rate payers in the state as a whole will pay most of the bill because the new line is part of the California grid. But, I'm sure the other operators are saying the same thing to their rate payers.
- Expanding a power line would cause much less ecological damage than a third one.
- If the mid county coastal and inland areas need more electricity, small, local power plants would be the answer.
- Although the precise route of the Sunrise Powerlink is not clear because SDG &E has changed it several times, it will certainly pass through scenic areas, especially Borrego State Park and rural San Diego, much enjoyed by visitors from the city.
- The route will also pass through some densely populated towns causing enormous disruption.
- The California Solar Initiative will expand the power supply, without transmission lines—two birds with one stone.
- As the price of electricity rises people will increasingly switch to more efficient fluorescent lighting. The price will rise because the cost of natural gas, which powers generators, can only go up. As a personal note, I have cut my electricity usage to two thirds of base line with fluorescent lights.

Thank you for allowing me to voice my opinion.

Sincerely,


Alvin C Ruppert



Jo Mihalovich

Dir. Marketing
jmihalovich@san.rr.com
www.execreservices.com
14027 Midland Rd. • Poway, CA 92064

858-204-3728

Fax: 858-679-0298

PEOPLE YOU CAN TRUST MAKE A DIFFERENCE

August 24, 2006

Commissioner Dian Grueneich
California Public Utilities Commission
505 Van Ness Ave.
San Francisco, CA 94102

Dear Commissioner Grueneich:

I am writing today regarding San Diego Gas & Electric's (SDG&E) proposed Sunrise Powerlink transmission line project.

As a Scripps Ranch homeowner who lives adjacent to SDG&E's easement that is the preferred route for the new transmission line, I am concerned about visual impact this project will create. This heavily used easement already has two sets transmission towers installed directly outside my backyard. While I understand that SDG&E has proposed to remove one of the towers, it is to be replaced with a much taller structure that will further impact my home.

In its recent application filed with the California Public Utilities Commission, SDG&E has proposed to underground certain segments of the transmission line through the communities of Rancho Penasquitos and Ramona. It is unclear why SDG&E has proposed to underground the transmission line in these areas, but not through Scripps Ranch.

On behalf of the community of Scripps Ranch, I urge the California Public Utilities Commission, in its review of the project and preparation of the Environmental Impact Report, to strongly consider an option to underground the transmission line through Scripps Ranch in an effort to mitigate the significant visual impacts caused by the project.

Thank you in advance for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joetta Mihalovich', written over a large, stylized flourish.

Joetta Mihalovich
11705 Aldercrest Point
San Diego, CA. 92131

Cc: Jerry Sanders, Mayor San Diego
Brian Maienschein, City of San Diego, Councilmember, Firth District
Scott Crider, Public Relations Manager
Marc Sorensen, President, Scripps Ranch Civic Association
Bob Dingeman, Secretary, Scripps Ranch Civic Association
Bob Ilko, Scripps Planning Group
David Berry, Chair of Miramar Ranch North Planning Group

Copies to:

California Public Utilities Commission
Docket Office
Room 2001
505 Van Ness Avenue
San Francisco, CA. 94102

E. Gregory Barnes
Attorney
SDG&E – HQ13D
101 Ash Street
San Diego, CA 92101

Kevin O'Beirne
Regulatory Case Management
SDG&E – CP32D
8330 Century Park Court
San Diego, CA. 92123

Director, Energy Division
Public Utilities Commission
Energy Division
505 Van Ness Ave,
San Francisco, CA. 94102

12917 MUSSEY GRADE RD
RAMONA, CA 92065
AUGUST 24, 2004

CPUC
DOCKET OFFICE
ROOM 2001
505 VAN NESS AVENUE
SAN FRANCISCO, CA
94102

Dear Commission,

The main reasons I am against the Sunrise Powerlink are the impact it will have on the Anza-Borrego State Park, the destruction of San Diego County back country habitat and views, health and danger to migrating birds.

I also believe that there are other alternatives that should be looked into.

Sincerely,

Carol Levin

CAROL LEVIN
CAROL LEVIN TRUST A 08-15-77
CAROL LEVIN
MUSSEY GRADE ROAD ALLIANCE
12917 MUSSEY GRADE RD
RAMONA, CA 92065-7701

COPY

08/24/06

06 AUG 28 2006

California Public Utilities Commission
Docket Office
Room 2001
505 Van Ness Ave.
San Francisco, CA. 92101

Dear Cpuc:

I would like this letter to serve as a formal protest to the proposed power line going through the San Diego back country, (Project Name – Sunrise Powerlink Transmission Project – Application # - A.05-12-014.

I am protesting the proposed Powerlink because even though you feel it necessary to put these monstrous power lines through the back country this will ruin the entire reason people go to the back country, live in it and raise our children here. Anza Borrego is one of the least spoiled places on this earth that I have seen and to run these power lines through this is nothing less than an absolute travesty.

I firmly believe this can be done without these powerlines but if you absolutely had to my Lord why wouldn't you run it along the 8 freeway instead of the most beautiful part of San Diego. Tourists and residents of San Diego County flock to the backcountry – Anza Borrego, Cuyamaca, Warner Springs, Julian etc. to find a little bit of peace in this world. I don't understand why you are Hell bent on contaminating every mile of it inch by inch. You must seriously think on this.

If evidentiary hearings imply that the public and all concerned are part of this process then yes, I think they are necessary.

Sincerely:



Glenn Smith
P.O. Box 1841
Julian, CA. 92036 - Daytime(760)789-4600

cc: E. Gregory Barnes
Kevin O'Beirne
Director, Energy Division, PUC, San Francisco

August 24, 2006

65 SEP 10 11:06

California Public Utilities Commission
Docket Office
Room 2001
505 Van Ness Avenue
San Francisco CA 94102

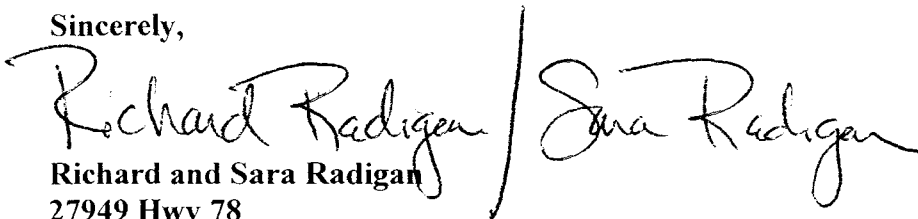
Re: Sunrise Power Link
Application # A.05-12-014

Dear Sirs:

We would like to protest the Sunrise Power Link and the measures SDG&E is taking to have it installed on our property rather than going through the existing utility corridor.

We would like to request a hearing, or a notice of a public hearing. The reason for this hearing would be to dispute SDG&E putting the power lines through our property. We find it unreasonable to not use the route that existing power lines are already on.

Sincerely,



Richard and Sara Radigan
27949 Hwy 78
Ramona CA 92075

Cc: E. Gregory Barnes
Kevin O'Beirne
~~Director, Energy Division~~
Public Utilities Commission

Copies to:

E. Gregory Barnes
Attorney
SDG&E - HQ13D
101 Ash Street
San Diego CA 92101

Kevin O'Beirne
Regulatory Case Mangement
SDG&E - CP32D
8330 Century Park Court
San Diego CA 92123

Director, Energy Division
Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, CA 94102

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**RETURN RECEIPT
REQUESTED**

Public Utilities Commission
505 Van Ness Avenue Room 2000
San Francisco, Ca 94102

94102+3214



Billie -
Could you please
handle this?
Thanks,
Steve W.

Please return this portion with payment. Favor de devolver esta parte con su pago.

Service Address: 37559 CRUCES DR WA

0 6

Account Number	Cycle	Date Mailed	Due Date	Please Pay This Amount
8411 230 252 6	11	Aug 16 2006	Sep 04 2006	\$21.00

Bill Becomes Past Due
After Above Date

Make Payment To



5286.6.173.38628 1 AC 0.290

** H001 oz 0.910

STACEY A LANDFIELD
37559 CRUCES DR
WARNER SPGS CA 92086-9206

San Diego Gas & Electric
PO Box 25111
Santa Ana, CA 92799-5111



Stacey Landfield
37559 Cruces Drive
Warner Springs, CA 92086
951 767 0315

06 AUG 20 11 38 19

SUNRISE POWERLINK 05-12-014

Dear Sir,

Living in the beautiful back country, surrounded by the pristine works of nature, is a privilege. Why should we who moved here for this purpose have to pay the price of city people who cannot control their appetite for power? I feel I have room to talk as my power bill is extremely low. (See photocopy)

This "Sunrise Power link" (the name I find amusing in a dark way) will devastate our beautiful land and parks. It is so self evident to me, I find it hard to believe anyone would initiate such a vile thing. Cement and wires have encroached upon us so much already. Can we not have one little area to call our own? Free from the ugliness so many seem immune to?

I strongly, oppose this monstrosity. Please don't corrupt the innocent. I speak poetically knowing this may fall on ears of concrete. That is the difference between you and me, and the difference between what you and I do, is that I am not pushing my views into your life and you are certainly pushing yours into mine.

Put a cap on how much electricity a person can use, and then charge them exorbitant amounts if they exceed that standard. Let's REALLY solve the problem.

Sincerely,

Stacey Landfield



August 28, 2006

Director, Energy Division
Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, CA 94102

08 SEP - 1 11:25

Re: Sunrise Powerlink Transmission Project.

This is a letter of protest against the Sunrise Powerlink Transmission Project.

The biggest threat in the back country is fire. Being caught up in the Pines Fire, showed us we have to do a better job next time.

My properties numbers are 1971602300 and 1971602700, in Ranchita. About two miles east of my property we have a potential inferno of dead and dried brush, as far as you can see.

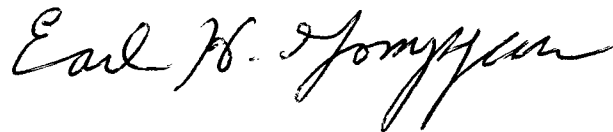
I offer 6,000 gal. of water at the ready, and my well can pump seven gallons a minute with self power and a heli-pad. With power lines in the way, I can no longer help fight fires. With the smoke hiding the power lines this becomes another problem.

I feel we have to do with less. We use too much power, too much gas and we are getting further in debt to foreign countries every day.

The next thing is the money the power line is taking to build. We will not have money to even use the power.

It is inappropriate for the power lines to go through my property because it will affect property values of myself and neighbors, wild life and vegetation, serenity and aesthetics, not to even mention health and safety issues.

Earl H. Gompper



AUGUST 30, 2006

DIRECTOR, ENERGY DIVISION
PUBLIC UTILITIES COMMISSION
ENERGY DIVISION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

06 SEP - 6 11 14 01

REFERENCE: SAN DIEGO GAS AND ELECTRIC COMPANY
PROPOSED PROJECT: SUNRISE POWERLINK
TRANSMISSION PROJECT
APPLICATION NUMBER: A. 05-12-014

TO WHOM IT MAY CONCERN:

PLEASE ACCEPT THIS LETTER AS A PROTEST REGARDING THE PROPOSED
INSTALLATION OF THE SUNRISE POWERLINK ELECTRIC TRANSMISSION
LINES TO BE CONSTRUCTED BETWEEN IMPERIAL VALLEY SUBSTATION
AND SAN DIEGO.

I HAVE REVIEWED THE PROPOSED PLAN AND APPLICATION FILED BY SAN
DIEGO GAS AND ELECTRIC. AS A CONCERNED LAND OWNER, I AM
CONCERNED REGARDING THE ENVIRONMENTAL IMPACT, AS WELL AS THE
HEALTH AND SAFETY ISSUES RELATED TO HIGH VOLTAGE EMISSIONS.

I BELIEVE THE PROJECT WILL:

1. INFRINGE ON PRIVATELY OWNED PROPERTY AND BE HIGHLY
CONTESTED BY OWNERS AND FAMILIES.
2. LOWER PROPERTY VALUES BY CONSTRUCTING HIGH VOLTAGE
TOWERS AND ELECTRICAL TRANSMISSION LINES.
3. ENDANGER AND/OR NEGATIVELY IMPACT THE WILD LIFE AND
HABITAT INDIGINOUS TO THE AREA.
4. SEVERELY LIMIT AND/OR IMPACT RECREATIONAL OPPORTUNITIES
ENJOYED BY THOUSANDS OF FAMILIES.
5. RUIN THE SCENIC BEAUTY OF THE DESERT AREA.

I BELIEVE THAT IN THIS PARTICULAR SITUATION, A MORE SUITABLE
ROUTING OF THIS PROJECT SHOULD BE CREATED THAT WOULD HAVE
LESS IMPACT ON THE AREA AND ITS INHABITANTS.

SINCERELY,

TELE. NO.

Note from the EIR/EIS Team: This page is a sample of the petition signed by 27
residents of the cities below. Only one page is included as a sample to reduce printing
cost, redundancy, and use of space. While not all signatures are shown, all signees
are included in the project mailing list.

ADDRESS:

Capistrano Beach, Encinitas, Irvine, Oceanside, Riverside, and Vista


06 SEP -1 PM 1:46

Scott Flinn
15945 Shalom Road
Ramona, CA 92065
760-788-2883

To Whom It May Concern:

I am writing this letter in protest of the San Diego Gas and Electric Company's (SDG&E) application **A. 05-12-014, the Sunrise Powerlink Transmission Project**. I am writing this protest because SDG &E is not being honest with their proposal. SDG&E proposes the 91.3 mile 500kV transmission line, known as the sunrise powerlink, to "maintain reliability to customers, provide more economical access to renewable resources, and reduce energy costs." (executive summary). While the additional link may improve reliability and reduce energy costs, it is not providing more access to renewable resources. Renewable energy sources would include wind and solar production. There is no commercially viable solar or wind generated power in the Imperial Valley. Nor are there any proposals or plans to do so. This is merely a cover to import cheap electricity form Mexico that does not have our pollution standards. So rather than upgrading current facilities in San Diego County, or including a real plan for a commercially viable renewable energy, SDG&E is using this as a smoke screen to buy cheap power form Mexico, hope the pollutants don't blow our way, and make enormous profits from non renewable sources. This is disingenuous at best, classic political hypocrisy and public thievery at worst. If SDG&E is serious about meeting the three tenets set out in the executive summary, then evidentiary hearings should be held to prove how they plan to "provide more economical access to renewable resources..."

Sincerely,



Scott Flinn, MD

Cc: E Gregory Barnes, Kevin O'Beirne, and Director, Energy Division

To California Public Utilities Commission Docket Office, Room 2001 505 Van Ness Ave, San Francisco, CA 94102	To: Kevin O'Beirne Regulatory Case Management, SDG&E-CP32D 8330 Century Park Court, San Diego, CA 92123
To: E. Gregory Barnes, Attorney SDG&E-HQ13D, 101 Ash Street, San Diego, CA 92101	To: Director, Energy Division Public Utilities Commission, Energy Division 505 Van Ness Ave, San Francisco, CA 94102

From:

Grazyna Krajewska
4657 Calle Mar de Armonia
San Diego, CA 92130
(phone: 858-509-0590)

Date: Sept 1, 2006

Protest against project named: Sunrise Powerlink Transmission Project
Application Number: A. 05-12-014

Please deny SDG&E request. It is neither convenient for Californians nor necessary, for the following reasons:

1. With recent passage of **SB1**-million solar roofs program there will be **strong incentive for home buyers to choose the solar roof** options provided by the builders. This distributed, local energy, not requiring extra power lines, will be generated in the same peak time as the proposed Stirling generator energy from the desert for which SDG&E wants the power lines.
2. **Unjustified use of public money for private company benefit.** Would the project be beneficial for SDG&E if it itself had to pay \$1.4 bln for power lines, or would it then look harder for places nearby for developing solar and wind farms to avoid the new power line cost?
3. SDG&E got easements for power lines and installed them in several areas. In Torrey Hills they are 69V power lines. Several **housing projects has been built very close to those lines.** Adding more lines with voltage of 230 kV will **dramatically increase electromagnetic field exposure** to people living below the lines. (see chart, other side of this page). The lines will run over parks where children play. Although most of these areas were originally just fine for placing power lines in the past when no one lived there they are not suitable for placing additional power lines now.

Please deny the request for adding very high voltage, unnecessary power lines and save California the expense. Let SDG&E to work some more to come up with a better project that would truly benefit all of us.

Thank you
Grazyna Krajewska



September 2, 2006

05 SEP 10 10:41 AM '06

California Public Utilities Commission
Docket Office
Room 2001
505 Van Ness Avenue
San Francisco, CA 94102

RE: Sunrise Powerlink Transmission Project, Application Number A.05-12-014

Dear Commission Members,

I am writing in response to SDG&E's application for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Project. I am opposed to the size of the Project and to the chosen route for the Project.

I own property very near the proposed route in east Ramona, where the line is proposed at 529 kV, and I am concerned with the harmful physical effects that constant exposure will have on people living in close proximity to the power lines.

When asked why not go along the existing 69 kV route, SDG&E employee Lynn Trexel said her company will not try to place the Project along the existing route since it goes through a parcel of Federally owned land. She said it was not prohibited, just more costly, as the Federal government has rigorous requirements for such a large line. Why is avoiding the Federal governments' requirements an option for SDG&E? And why is cost savings justification not to do the right thing? By locating the Project along privately owned property, SDG&E is seeking cost savings on the backs of citizens through increased health risks and the devaluation of private property. There is no adequate compensation for this imposition and SDG&E should be required to make every effort to locate the Project along the existing route before resorting to private property usage.

Thank you for your time. I would appreciate a response to my questions if possible. Please feel free to contact me for further discussion.

Debra Oestreich

Debra Oestreich
26924 Deer Canyon Drive
Ramona, CA 92065
(858) 337 - 7886

Cc: E. Gregory Barnes, Attorney, SDG&E
Kevin O'Beirne, Regulatory Case Management, SDG&E
Director, Energy Division, Public Utilities Commission

September 2, 2006

California Public Utilities Commission
Docket Office
Room 2001
505 Van Ness Avenue
San Francisco, CA 94102

05 SEP -5 PM 4:11

Subject: Application A.05-12-014 for the Sunrise Powerlink

References:

- (1) Letter, Eisenberg to The Honorable Kim Macolm, *Application 05-12-014 for the Sunrise Powerlink*, February 16, 2006, (copy enclosed)
- (2) Utility Consumers Action Network, Border Power Plant Working Group, *Comments on Draft 2005 IEPR Transmission Chapter – The Sunrise Powerlink and Alternatives for Moving Renewable-Generated Electricity, Relieving Congestion, and Assuring Reliability in the Service Territory of the San Diego Gas & Electric Company*, October 14, 2005 (copy enclosed)

In the matter of application A.05-12-014 of the San Diego Gas & Electric Company (SDGE) for Certificate of Public Convenience and Necessity (CPNC) for the Sunrise Powerlink transmission project, I am filing the following protest and comments.

I ask that you carefully consider these written comments, as well as those in the attached "Comments on Draft 2005 IEPR Transmission Chapter – The Sunrise Powerlink and Alternatives for Moving Renewable-Generated Electricity, Relieving Congestion, and Assuring Reliability in the Service Territory of the San Diego Gas & Electric Company", as a part of your review of application A.05-12-014.

I also request that you reject application A.05-12-14, and deny SDGE's request for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink transmission project.

I am writing to you as a concerned SDGE electricity ratepayer, and a member of the general public that is both frustrated and disappointed with our the State of California political process. I continue to be amazed that the CPUC apparently considers the proposed Sunrise Powerlink to be viable, and implore you protect the general public from this potential economic and environmental abuse, and stop the Sunrise Powerlink project immediately. In my view, the Sunrise Powerlink transmission project is a potential \$1.0+ billion dollar mistake that is both wasteful and unnecessary. It does not appear that it will reduce energy costs to San Diego county residents, nor does it appear that it will allow SDG&E to meet its obligations to purchase certain amounts of energy from renewable generation resources.

I fundamentally question the need for the Sunrise Powerlink. In my view, the stated need is contrived. The application assumes (1) that existing generation capacity that is located within San Diego county will be retired, (2) that there is congestion within existing transmission lines, and (3) that there will continue to be significant population growth in San Diego county. I challenge the validity of all three assumptions.

First, I question why SDGE assumes that existing generation capacity that is located within San Diego County will be retired. It seems to me that continuing to use those plants, and spending some smaller amount on upgrades, must be more cost effective and more environmentally responsible than building an entirely new transmission line and remote generation facilities. It appears that proposed Sunrise Powerlink is simply a way for SDGE to change from using fossil-fuel generation plants that they currently don't own, but that are located in San Diego county, to fossil-fuel generation plants that they do own, but that are located in Arizona and Mexico. The problem is that the proposed switch, while apparently good for SDGE and its shareholders, is very bad for the general public in San Diego County.

I can find no projection or explanation of the impact on electricity rates of the cost for the new transmission line, the new renewable generation facilities in Imperial County, and whatever other upgrades are needed to the end of the line that is within San Diego County. What I do find is that these costs will be recovered via a "Transmission Access Charge", which, since these are new costs, I can only assume means that the rates will go up. In my view, that is bad for the general public. As a minimum, I would expect that the CPUC would demand a projection or explanation of the impact of this project on rates. If there is one, please point me to it. If there isn't one, then how can SDGE's application for this project be considered?

Second, SDGE claims that there is a need due to congestion. I questioned this in my previous letter (reference [1]) but to-date have received no feedback. My only conclusion is that there has been no action on this issue.

Third, SDGE claims that there is a need due to capacity. I also questioned this in my previous letter (reference [1]), but have received to feed back to date. According to an article published in the January 29, 2006 San Diego Union-Tribune, SDG&E now has 4750 MW of generating capacity, which will increase to 5300 MW when the Palomar plant opens later this year. The claimed existing 4750 MW capacity has confirmed been this summer, where the existing capacity was able to meet a peak demand of 4600 MW. According to Table III-2 in chapter III of SDGE's application, 5300 MW of capacity is sufficient to meet the forecasted 90/10 load between now and 2013. Thus, there certainly is no urgency to this project, with respect to the year 2010.

SDGE claims a need to due future population growth. I challenge that assumption, simply because San Diego county is continuing to become increasingly unaffordable. There may not be an increased need. In one month this year, for the first time in probably more than 20 years, there was net decrease in the population of San Diego County. In my view, this is an early indication of things to come. There are many baby boomers that not only are approaching retirement age, but also have substantial equity in their San Diego County home. What happen when more than a few boomers will take their equity, and retire to a more affordable retirement location out of state? On the other end of the age demographic, young people currently have little or no chance of home ownership in San Diego County. So what is the basis of the forecasted population growth? I fear that that the cost of this project may ultimately have to be recovered across a less large (or even possibly smaller) population base, which means that the rates must go up even more, which makes living in San Diego county even more unaffordable, which encourages more to move away. The cycle is not sustainable, long term.

Lastly, there is the issue that the Sunrise Powerlink is being promoted (deceptively, in my view) by as SDGE as an environmentally "green" project, which it is not. It is clear is that the proposed Powerlink will connect to existing fossil fuel plants located in Mexico. Those plants are unregulated with respect to emissions, and are gross polluters. This makes the Sunrise Powerlink an "ugly" project that is environmentally irresponsible, in that it not only enables and expands the use gross polluting fossil-fuel plants, but also permanently damages pristine San Diego county parks and back country. On top of that, there is the unresolved issue of the long-term heath effects of electromagnetic fields associated with high power transmission lines. How can any of this be good for general public of San Diego County?

What is not clear is to what, if any, renewal sources will ultimately be available in the Imperial Valley. My previous letter (reference [1]), as well as the UCAN Border Power Plant Working Group (reference [2]), questioned the availability of renewal resources the in Imperial Valley. Has this availability been confirmed?

Additionally, I question what the economic impact to San Diego County of closing the local generation plants is. If those plants get closed, don't the associated jobs go away? I find no evidence that this impact has been considered, but I would expect that it would be negative.

Lastly, SDGE has apparently appeased some strong public opposition by showing route maps that include underground implementations for some portions of the line, which is a good thing. Yet, SDGE is very careful to say that those underground implementations are only "being considered". Should the project go forward, please ensure that underground implementation shown on the proposed route maps is a commitment - better yet a contract, with severe penalties, including substantial fines and jail time for those personally

responsible, and compensation to the general public for their loss in property values, should the line actually be implemented above ground, rather than underground. Without that, what could happen is that SDGE could claim that since the actual cost of the underground implementation is unaffordable, unfortunately, the line will have to be implemented using the lower cost aboveground wires and towers. This would be a classic case of bait-and-switch. Please make certain that this doesn't happen.

The mission of the California Public Utilities Commission is to ensure that customers have safe, reliable utility service at reasonable rates, to protect against fraud, and to promote the health of California's economy. In my view, the Sunrise Powerlink transmission project does none of the above. The transmission line is potentially unsafe for those who may be forced to reside near it, and may actually increase rates, due to other costs not disclosed in application A.05-12-014. It appears to me to be a billion-dollar wire with no renewable assets at one end, and a bottleneck at the other end. We already have some of the highest electricity rates in the country. Please don't make them worse, while simultaneously permanently destroying San Diego County's backcountry for future generations of San Diego county residents, and devaluing the property of residences near the transmission line, for no reason. There are better alternatives, which include the upgrade of existing San Diego county power plants, the establishment of regional energy credits that would allow SDGE to avoid building a potentially redundant transmission line while still getting credit for renewables, and the placement of photovoltaic panels on the roofs of new homes in San Diego county.

As an SDGE ratepayer, and a member of the general public, I find nothing good about the Sunrise Powerlink, and implore you to stop this project. Since the practical reality is that I, as a ratepayer, have very few (if any) choices when it comes to an electricity provider, if this project is approved, I will be forced to pay for it. That would be the pinnacle of adding insult to injury.

I look forward to hearing that you have rejected application A.05-12-014, and denied the Certificate of Public Convenience and Necessity for the Sunrise Powerlink transmission project.

Sincerely,



Todd Eisenberg
17346 Rising Dale Way
Ramona, CA 92065
(760) 788-5635

Enclosures

- (1) Letter, Eisenberg to The Honorable Kim Macolm, *Application 05-12-014 for the Sunrise Powerlink*, February 16, 2006
- (2) Utility Consumers Action Network, Border Power Plant Working Group, *Comments on Draft 2005 IEPR Transmission Chapter – The Sunrise Powerlink and Alternatives for Moving Renewable-Generated Electricity, Relieving Congestion, and Assuring Reliability in the Service Territory of the San Diego Gas & Electric Company*, October 14, 2005

Cc.

E. Gregory Barnes
Attorney
SDG&E – HQ13D
101 Ash Street
San Diego, CA 92101

Kevin O'Beirne
Regulatory Case Management
SDG&E – CP32D
8330 Century Park Court
San Diego, CA 92123

Director, Energy Division
Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, CA 94102

Comments to San Diego Gas & Electric Company (SDG&E) application A.05-12-014 for the Sunrise Powerlink Transmission Project.

Comment 1: With respect to generating capacity vs. load, there is (by SDGE's own projections) apparently no need for the Sunrise Powerlink.

Table III-1 from chapter III of SDGE's application (copy below) shows that, with no retirements of existing generating capacity and with Otay Mesa, there is excess generating capacity in San Diego County from now through 2014. In 2015, which is at the far edge of the current 10-year planning window, a shortfall of 35 MW is projected. This is less than 1% of the 5513 MW 90/10 load forecast for 2015. Certainly one would think that that is within the error tolerance of the forecast, and that between now and 2015, a way to overcome that projected shortfall would be found.

Table III-1
Without the Sunrise Powerlink
Surplus/(Deficiency) Outcomes (MW)

Year	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
No Retirements (with Otay Mesa)	261	155	629	531	440	349	255	162	65	(35)
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A second alternative is to work with SDGE to establish regional energy credits. Those credits allow individual utilities to avoid building potentially redundant

transmission lines (as the Sunrise Powerlink appears to be), while still getting credit for generation of energy from renewable sources.

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February 16, 2006

The Honorable Kim Malcolm
California Public Utilities Commission
505 Van Ness Avenue, Room 5118
San Francisco, CA 94102
kim@cpuc.ca.gov

Subject: Application 05-12-014 for the Sunrise Powerlink

Dear Administrative Law Judge Malcolm:

In the matter of application 05-12-014 of the San Diego Gas & Electric Company (SDGE) for Certificate of Public Convenience and Necessity (CPNC) for the Sunrise Powerlink transmission project, I have the following written comments.

I ask that you carefully consider these written comments, as well as those in the attached "Comments on Draft 2005 IEPR Transmission Chapter – The Sunrise Powerlink and Alternatives for Moving Renewable-Generated Electricity, Relieving Congestion, and Assuring Reliability in the Service Territory of the San Diego Gas & Electric Company", as a part of your review of application 05-12-014.

I also request that you reject application 05-12-14, and deny SDGE's request for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink transmission project.

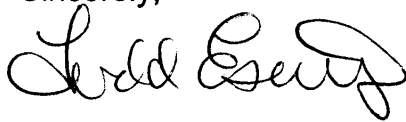
In my view, the Sunrise Powerlink transmission project is a potential \$1.0+ billion dollar mistake that is both wasteful and unnecessary. It does not appear that it will reduce energy costs to San Diego county residents, nor does it appear that it will allow SDG&E to meet its obligations to purchase certain amounts of energy from renewable generation resources. SDGE's application is based on flawed assumptions, and is incomplete, and the project must be stopped immediately. I am both outraged and stunned to find out that the application has gotten as far as it has, and see no way that the Sunrise Powerlink transmission project can be in the public's best interest.

The mission of the California Public Utilities Commission is to ensure that customers have safe, reliable utility service at reasonable rates, to protect against fraud, and to promote the health of California's economy. In my view, the Sunrise Powerlink transmission project does none of the above. The transmission line is potentially unsafe for those who may be forced to reside near it, and may actually increase rates, due to other costs not disclosed in application A.05-12-014. It appears to me to be a billion-dollar wire with no renewable assets at one end, and a bottleneck at the other end. We already have some of the highest electricity rates in the country. Please don't make them worse, while

simultaneously permanently destroying San Diego County's backcountry for future generations of San Diego county residents, and devaluing the property of residences near the transmission line, for no reason. There are better alternatives, which include the upgrade of existing San Diego county power plants, the establishment of regional energy credits that would allow SDGE to avoid building a potentially redundant transmission line while still getting credit for renewables, and the placement of photovoltaic panels on the roofs of new homes in San Diego county.

I look forward to hearing that you have rejected application 05-12-014, and denied the Certificate of Public Convenience and Necessity for the Sunrise Powerlink transmission project.

Sincerely,



Todd Eisenberg
17346 Rising Dale Way
Ramona, CA 92065
(760) 788-5635

Enclosure:

“Comments on Draft 2005 IEPR Transmission Chapter – The Sunrise Powerlink and Alternatives for Moving Renewable-Generated Electricity, Relieving Congestion, and Assuring Reliability in the Service Territory of the San Diego Gas & Electric Company”, prepared by the Utility Consumers' Action Network Border Power Plant Working Group, October 14, 20005



BPPWG Comments

Comments to San Diego Gas & Electric Company (SDG&E) application A.05-12-014 for the Sunrise Powerlink Transmission Project.

Comment 1: With respect to generating capacity vs. load, there is (by SDGE's own projections) apparently no need for the Sunrise Powerlink.

Table III-1 from chapter III of SDGE's application (copy below) shows that, with no retirements of existing generating capacity and with Otay Mesa, there is excess generating capacity in San Diego County from now through 2014. In 2015, which is at the far edge of the current 10-year planning window, a shortfall of 35 MW is projected. This is less than 1% of the 5513 MW 90/10 load forecast for 2015. Certainly one would think that that is within the error tolerance of the forecast, and that between now and 2015, a way to overcome that projected shortfall would be found.

Table III-1
Without the Sunrise Powerlink
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BORDER
POWER PLANT
WORKING GROUP



GRUPO DE TRABAJO DE
TERMoeLECTRICAS
FRONTERIZAS

**Comments on Draft 2005 IEPR Transmission Chapter –
The Sunrise Powerlink and Alternatives for
Moving Renewable-Generated Electricity, Relieving
Congestion, and Assuring Reliability in
the Service Territory of the
San Diego Gas & Electric Company**

Prepared by

**Utility Consumers' Action Network
Border Power Plant Working Group**

October 14, 2005

Summary

The strong endorsement by the California Energy Commission (CEC) of the Sunrise Powerlink in the draft 2005 Integrated Energy Policy Report (IEPR) and associated Strategic Transmission Investment Plan, with no discussion or assessment of alternatives to achieve the same objectives, is surprising and unjustified. The San Diego public would expect that an analysis by the CEC would be comprehensive and considered. But the draft report is anything but on the specific issue of the Sunrise Powerlink.

The glaring problems with the CEC findings include:

1. A clear misunderstanding of near-term Imperial Irrigation District (IID) transmission plans;
2. The questionable availability of geothermal power in the timeframe suggested;
3. The weakness of SDG&E's congestion cost arguments;
4. The existence of reasonable and lower-cost alternatives;
5. The many flawed assumptions as to when this transmission line is needed by SDG&E.

As will be discussed in greater depth below, much of the so-called congestion cost justification for the Sunrise line is the result of Sempra's own efforts to create artificial congestion on SDGE's 500 kV Southwest Power Link (SWPL) instead of routing power to client SCE from Sempra power plants that are more favorably located from a transmission perspective.

Also, the CEC did not consider the fact that SDG&E has previously stated that the Path 45 230 kV upgrade alternative just over the border in Mexico "*..... meets most of SDGE's technical requirements.*" SDGE has refused to seriously consider anything but Sunrise in the forums the authors of this document have participated in over the last year.

It is encouraging that the CEC is putting out an RFP to take a look at Path 45 and integrating more effectively with the Comisión Federal de Electricidad (CFE). However, there is not a word about this in the draft 2005 IEPR chapter on transmission or the Strategic Transmission Investment Plan. At a minimum there needs to be a brief discussion in both documents that notes that SDGE has identified potential alternatives to building a greenfield 500 kV line and that the CEC is letting a contract to study the potential for taking advantage of Path 45 in Mexico. Otherwise the Path 45 study, no matter how good and no matter how advantageous the Path 45 option may prove to be, will have no impact on 2005 IEPR transmission recommendations.

SDGE has announced a contract to build a 300 MW solar thermal project in Imperial County. This is a laudable step, especially given that most good solar thermal sites in the San Diego County and Imperial County area would appear to be less environmentally sensitive than good wind sites. However, this step is offset by SDGE's premature commitment to running a 500kV line through the 69 kV corridor in Anza Borrego State Park. Unless that solar thermal project will be located on or immediately next to the 500 kV line, the transmission interconnect costs could be so high as to kill the project. Ultimately solar thermal could be used to pass Sunrise off as a renewables line, just as it is now being promoted as a geothermal line, when in fact the true

role of this proposed line will be to move combined-cycle power from Sempra's power projects in Mexicali and Palo Verde, Arizona.

Why the CEC Recommendation Is Flawed

A. Misunderstanding of IID Transmission Plans

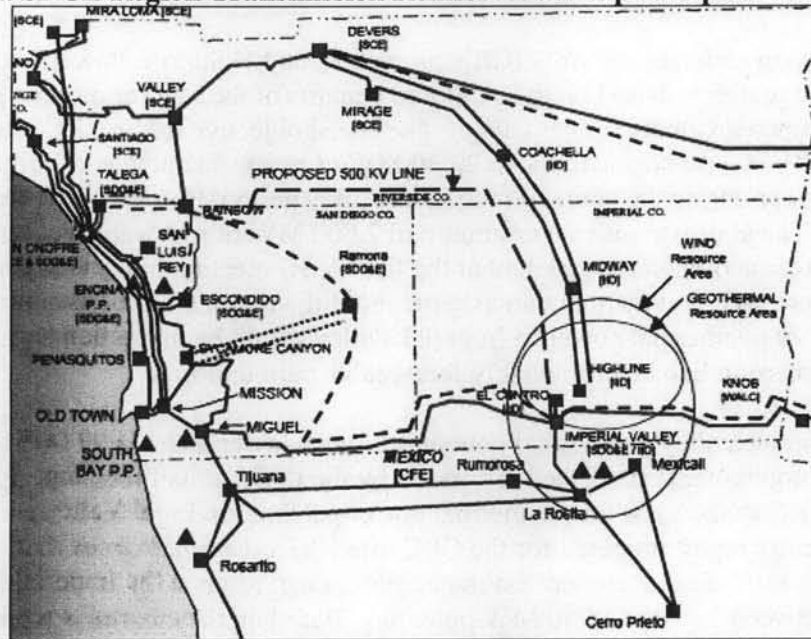
The CEC's strong endorsement of SDGE's proposed 500 kV Sunrise Powerlink in the draft 2005 IEPR is to a large degree based on the supposed benefits of the line for moving geothermal power from Imperial County to San Diego. The stated objective of the CEC's Imperial Valley Study Group (IVSG) process is to move 2,000 MW of renewable power, all of it presumed to be geothermal power during the course of the IVSG study period, from Imperial County to coastal load centers. The ability to move a minimum of 2,000 MW of renewable power was established as a minimum transmission requirement at the first IVSG meeting in November 2004. This minimum objective was set without an assessment of the reasonableness of assuming every potential MW of geothermal power in Imperial Valley would be in production and deliverable over the transmission line in a reasonably foreseeable period of time.

In reality, Imperial Valley geothermal potential is much lower than the 2,000 MW minimum transmission requirement established arbitrarily by the IVSG at its first meeting. The document cited by the CEC as the basis for geothermal power potential in Imperial Valley is the May 24, 2004 GeothermEx report prepared for the CEC titled "*Geothermal Resources Available to the California Market.*" This document estimates geothermal reserves in the Imperial Valley at somewhere between 1,350 to 1,950 MW potential. Based on the GeothermEx report it would be fair to identify 1,350 MW of incremental geothermal capacity as "proven," and 1,950 MW as "probable." Proven geothermal reserves in Imperial Valley are actually 70 percent of the 1,950 MW figure cited in the final IVSG report.

It is important to note that approximately half of the 1,350 to 1,950 MW of this geothermal potential cannot be accessed by current geothermal drilling technology as it is over water. Of the seven Salton Sea Ecosystem Restoration alternatives currently under consideration (as identified on the DWR's Salton Sea homepage at www.saltonsea.water.ca.gov) five alternatives would leave the south shoreline where it is now, meaning the over water geothermal assets would remain over water for the foreseeable future. The high selenium content of Salton Sea sediments and potential for negative health impacts that may result from windblown sediments make development of the over water geothermal assets problematic even if the Salton Sea is allowed to recede in the geothermal resource area. It would be unrealistic to assume that more than 600 to 800 MW of additional geothermal power will be available from Imperial County in the foreseeable future.

One 500 kV transmission proposal that was being promoted as optimum for the SDGE service territory in 2002 looks very similar to the route that will be followed (in part) by the proposed LADWP-IID 500 kV line. Shell Trading gave a presentation at the first Southwest Transmission Expansion Plan (STEP) meeting on November 1, 2002 that addressed transmission upgrade options under consideration in the Long Term Regional Study (LTRS) process. The graphic showing potential transmission reinforcement routes in the SDGE and SCE service territories is shown below as Figure 1.

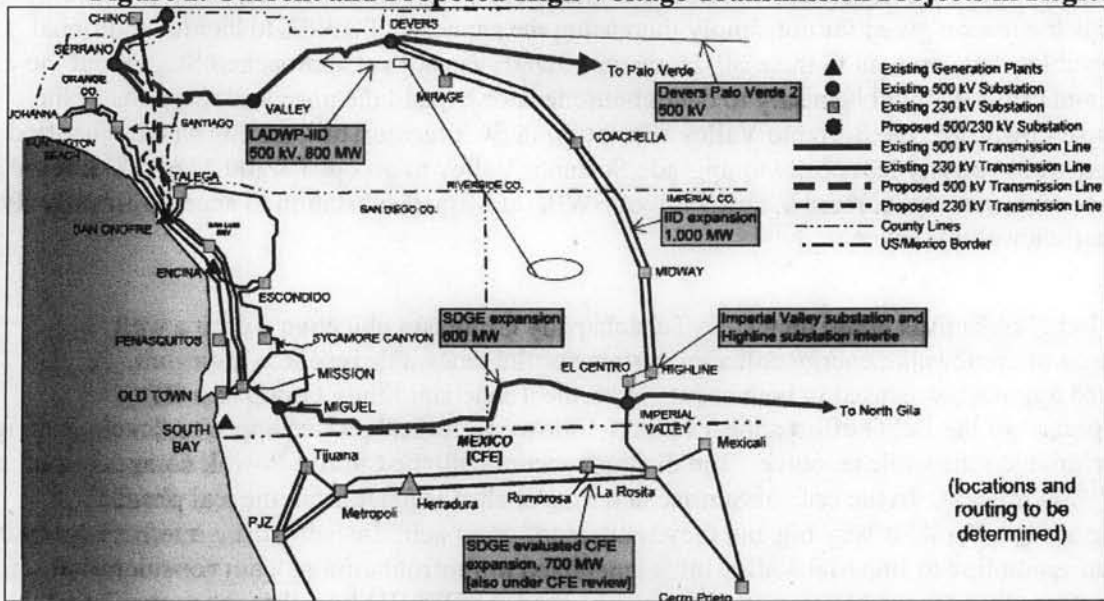
Figure 1. SDGE Region Transmission Reinforcement Options per LTRS Process



The 500 kV LADWP-IID transmission line, which roughly follows the dashed blue line in Figure 1, is a superior alternative to the proposed Sunrise Powerlink for moving renewables out of Imperial Valley. It uses an existing 230 kV corridor that passes through lands of minimum environmental sensitivity, fully consistent with the Garamendi principle regarding transmission corridor selection. In contrast, the Sunrise Powerlink is effectively a greenfield 500 kV line that will traverse the Anza Borrego State Park and relatively undeveloped San Diego County backcountry.

It is also important to point out that the strip of land including the Mexican border up to the DVP1 transmission line will be quite saturated with high voltage transmission lines even without the Sunrise Powerlink. Current and proposed transmission projects, not including the Sunrise Powerlink, are shown in Figure 2.

Figure 2. Current and Proposed High Voltage Transmission Projects in Region



As shown in Figure 2, SDGE already has two transmission outlets from Imperial Valley to move renewables – the newly upgraded 500 kV SWPL (upgraded from 1,300 to 1,900 MW) and the two 230 kV transmission lines 10 to 15 miles south of SWPL in Mexico. SWPL will be available to move renewables from Imperial Valley as soon as the interconnection with IID Path 42 at the Imperial Valley substation is complete. This interconnection is a component of IID’s planned transmission upgrade project.

Two other high voltage paths move renewable power north and west from Imperial Valley. These are 1) the existing IID Path 42 interconnect with SCE at Devers, and 2) the proposed 500 kV LADWP-IID transmission link. The Sunrise Powerlink will be the fifth transmission link to the Imperial Valley renewables area in a distance of approximately 100 miles.

It is important to note that SDGE can move all the renewables they can access in Imperial Valley over SWPL and the Mexico 230 kV lines if SDGE chooses to do so. Also, the concept of renewable energy credits (RECs) is under consideration. RECs would allow individual utilities to avoid building potentially redundant transmission lines to access renewables while still getting credit for renewables generation. The CEC should require SDGE to explore the RECs concept as an element of the Certificate of Public Convenience and Necessity (CPCN) that SDGE indicates it will file with the California Public Utilities Commission (CPUC) for Sunrise Powerlink by the end of 2005.

The CEC’s misunderstanding of IID transmission plans leads to the likelihood of redundant renewables transmission capability. There is no point in LADWP and IID teaming to build a transmission network to access all foreseeable geothermal in Imperial Valley and have SDGE build what essentially will be a parallel line to get at the same resources. It is wasteful and unnecessary.

SDGE asserts that the Miguel substation in the southeastern outskirts of San Diego, the western terminus of the SWPL, cannot be further debottlenecked beyond its new capacity of 1,900 MW. This is the reason given for not simply increasing the capacity of SWPL to handle additional renewables development to the east. However, SDGE has not yet approached SCE about the cost and effort that will be necessary to debottleneck or expand the proposed terminus of the Sunrise Powerlink, the Sorrento Valley substation in SCE territory. The CEC has not justified why it would be any less costly to upgrade Sorrento Valley to accept a 2,200 MW 500 kV line than to significantly increase the capacity of SWPL at Miguel substation to accept significantly more (renewable) power.

The IVSG objective was based on the Tehachapi Study Group objective – develop a well thought-out renewable energy collector system for the renewable resource in the region. A phased approach was used in both cases. Both the Tehachapi Study Group and the IID component of the IVSG effort appear to have followed a logical phased approach to developing the available renewable resource. The disjunct occurs with the Sunrise Powerlink component of the IVSG process. In the case of Sunrise, a dramatic shift is made from the logical phased approach to a “build it very big and they will come” approach. Insisting that any interconnecting transmission line to Imperial Valley must be supersized upfront eliminates from consideration numerous other renewables export options, like the LADWP-IID line, that are more consistent with the phased approach.

There are in fact a few power plants that are already operational and ready to utilize the Sunrise Powerlink. However, none of these plants are renewable energy facilities. Immediate beneficiaries of the Sunrise Powerlink will be owners of merchant power plants in Palo Verde, Arizona and Mexicali, Mexico that export power to Southern California. The Sempra Energy plants in Palo Verde (Mesquite, 1,250 MW) and Mexicali (Termoeléctrica de Mexicali 650 MW) are obvious beneficiaries. Much of the output from these plants is generated to meet the long-term Department of Water Resources (DWR) contract signed in 2001 at the peak of the state’s energy crisis. The contract expires in 2011. The Intergen export plant in Mexicali (550 MW) will also benefit if that plant is not absorbed into the federal Mexican utility monopoly prior to 2010. Ultimately the Sunrise Powerlink may serve as little more than a ratepayer-financed 500 kV line that is essentially dedicated to moving power from SDGE’s unregulated parent Sempra Energy to markets in Southern California.

There are ample solar thermal resources in Imperial County and eastern San Diego County to augment the limited amount of geothermal power that will be available to supply the 2,000 MW capacity of the Sunrise Powerlink. However, we know where the geothermal assets are and IID is designing its staged transmission upgrade project around assets with an exact location. The location of the solar thermal project is not established. If the Sunrise Powerlink is not located within a few miles of the proposed solar thermal development area the project developer may be faced with transmission interconnect costs that are so high they kill the project.

Based on the reticence FERC has shown to approving the ratebasing of the Tehachapi renewables transmission collector system, there is no reason to assume that if the Sunrise Powerlink is out of position to access the most favorable sites for solar thermal development that SDGE can simply pass on to ratepayers the cost of feeder transmission lines from the solar thermal sites to the Sunrise Powerlink. As a result, siting of such a line should be deferred until:

1) it is reasonably certain where the solar thermal development will be located , or 2) do not presume the Sunrise Powerlink will be used to move solar thermal on a timeline that matters (next ten years). Otherwise solar thermal access will be used to promote the Sunrise Powerlink as a renewables line when in fact the line will be used primarily to move combined-cycle power out of Mexicali and Arizona

The statement about the Sunrise Powerlink being potentially out-of-position to access solar thermal is even more applicable to the regional wind resource. The May 2005 CEC report “*Energy Supply and Demand Assessment for the Border Region*” notes the export wind potential immediately across the border in Mexico and the fact that the two 230 kV Path 45 transmission lines pass through the heart of the wind resource area. As noted on p. 19 and p. 20 of the report:

“Despite its current limited use, wind power is probably the most promising renewable resource in northern Baja California after geothermal energy. . . . Figure 7 shows the wind power densities along the Juarez Mountains and in the area of La Rumorosa, located between Mexicali and Tijuana. The two double circuit 230-kV CFE transmission lines connecting the Rosita to La Herradura substations follow in proximity to the road that traverses the area and offers the highest wind potential. . . . early stages of development of a 300-MW wind power project for export initially proposed by Fuerza Eolica, a company now affiliated with Clipper Windpower. It is reported that the land use rights agreements for this project have been finalized with the local community land leaders (ejido).”

The two 230 kV lines in Mexico are equipped with 69 kV taps at each substation. This is an ideal transmission configuration for renewable energy projects. In contrast the Sunrise Powerlink is a 500 kV line that would require major investments in step-up transformer capacity by a renewable energy project developer, even if the renewables project was literally under the Sunrise Powerlink.

SDGE identified an upgraded Path 45 as a technically viable alternative to the Valley Rainbow 500 kV transmission project in the November 2003 application for a CPCN submitted to the CPUC. However, the Path 45 option was summarily dismissed in the IVSG process as being inadequate to meet the 2,000 MW renewable power export objective. The 2,000 MW target is so high that only a greenfield 500 kV line could meet it. That appears to have been the objective of establishing such a high MW transport threshold, given a realistic assessment of the non-problematic geothermal potential in Imperial Valley is well under one-half the 2,000 MW transmission objective.

B. The Unavailability of Geothermal Power to SDG&E

It is also unlikely that any developable geothermal power will be available to SDGE. It appears that virtually all reasonably foreseeable geothermal potential will be exported from IID territory via the proposed 500 kV LADWP line. The line will initially be capable of transporting up to 800 MW, of which 400 MW is expected to be geothermal power. The construction of this line will also unload 400 MW of LADWP demand that is currently moved over SCE’s 500 kV Devers to Palo Verde 1 (DPV1) transmission line. One of the assumptions in the IVSG report is that DPV1 is fully allocated and therefore moving renewable power out of IID through SCE at

DPV1 would require additional infrastructure. This argument no longer appears valid given the load on the SCE system west of Devers will be reduced by 400 MW when the 500 kV LADWP-IID line becomes operational.

C. SDG&E's Congestion Cost Justification is Caused by Parent Company Abuses of the Transmission System

It is our contention that SDGE parent Sempra is deliberately congesting SWPL to extract congestion mitigation payments and create the impression of need for Sunrise to relieve this congestion. The concern that congestion gaming may be ongoing was spurred by the comments filed by SCE relating to the allocation of certain DWR contracts on March 18, 2005 in CPUC proceeding R.04-04-003. SCE suggests that Sempra Energy Resources is artificially creating congestion in the SDGE service territory to generate congestion mitigation payments that are costing SDGE ratepayers tens of millions of dollars.

It appears that SCE actually makes very few discretionary purchases from Mexico and Arizona. SCE's scheduling of power from Arizona is largely related to baseload utility-owned generation that predates restructuring and deliveries from the Sempra contract, which SCE has no authority to revise. SCE's scheduling of power from Mexico is almost exclusively the result of deliveries from the Sempra contract that Sempra dictates, not SCE. If SDGE were reallocated the Sempra contract, it may be in a position to manage congestion and related costs better than SCE. In any case, SDGE would be better positioned to determine if (and what) transmission upgrades on its system might be effective in reducing congestion resulting from deliveries under the Sempra contract. For example the ISO has used the deliveries from Sempra's Mexicali plant to SDGE territory as one of the economic benefits justifying SDGE's transmission expansion under the Miguel-Mission Project No. 2.

Our concerns were reinforced by comments made in a presentation given by SDGE (Dave Geier, Vice President Electric Transmission and Distribution) at the CEC Workshop on California-Mexico Border Energy Issues (San Diego, December 14, 2004). Mr. Geier confirmed that *"Existing transmission lines are congested, driving up the cost of power,"* and *"SDGE's transmission import capacity is now fully utilized on peak day – a new 500 kV is needed for reliability as early as 2010."* Our concern is that the congested condition may serve three purposes: 1) it may generate inter-zonal congestion mitigation payments that produce revenue for SDGE, 2) that it costs SDGE ratepayers tens of millions, and 3) it reinforces the need for a greenfield 500 kV transmission project that may be difficult to justify without demonstrable congestion issues on San Diego's existing 500 kV import transmission line. This creates a situation in which Sempra reaps economic benefits and SDGE gets the transmission upgrades that it has sought for years.

It appears that up to 600 to 900 MW of renewables, solar thermal, wind, or geothermal, can be moved over SWPL once Sempra stops artificially congesting the line. This will occur in 2011 at the latest when the DWR contract expires. This reality changes the dynamics of the congestion justification for the Sunrise Powerlink.

D. SDGE's 2016 Reliability Import Deficit of 700 MW Based on Exceptionally Conservative Assumptions

The CEC's 2016 load forecast for the SDGE service area provided in the draft 2005 IEPR indicates SDGE may be overstating peak demand by 5.2 percent in 2016. This is nearly 260 MW of SDGE's 5,000 MW peak demand forecast for 2015. SDGE is currently claiming a 700 MW reliability deficit in 2015 with a G-1, N-1 event as a justification for the Sunrise Powerlink. The G-1 event is now loss of the Palomar Energy Project, all 550 MW, because there are no bypass stacks that would permit operation of the two gas turbines in simple cycle mode, which would produce nearly 350 MW in the event of some mishap with the single heat recovery steam generator. Using CEC's 2016 peak load projection for SDGE, combined with the ability to bypass the heat recovery steam generator at Palomar, essentially eliminates the reliability deficit of 700 MW that SDGE is claiming as the reliability rationale for the Sunrise Powerlink.

The 4,000 MW import requirement that SDGE has set as a minimum system G-1, N-1 design criteria has been challenged by regional transmission experts as being overly conservative in Southwest Transmission Expansion Planning meetings that the authors of this document have attended. Unfortunately no meeting notes are published for STEP functions and as a result the meetings are little more than informal information exchanges between parties working on their own dedicated projects. As a result, even though regional transmission experts participating in STEP meetings have publicly expressed doubts (to the extent that STEP meetings are public) about SDGE's overly conservative G-1, N-1 criteria, these doubts have not reached a wider audience.

E. Construction of Single Additional Power Plant in the San Diego Area Would Eliminate the Import Reliability Justification for Sunrise

The construction of a \$300 to \$400 million power plant in 600 to 800 MW range in the San Diego would eliminate the need for transmission on reliability grounds for at least the next 10 to 15 years even if SDGE's claimed reliability deficit of 700 MW in 2015 is assumed to be accurate. Sunrise is a \$1 billion project with no associated power assets.

Thank you for this opportunity to comment on the draft 2005 IEPR document. Please call Bill Powers, P.E. at (619) 295-2072 or Michael Shames at (619) 696-6966 if you have any questions about the contents of this comment letter.

Regards,

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