LAW OFFICES

PALMIERI, TYLER, WIENER, WILHELM & WALDRON LLP

2603 MAIN STREET

ANGELO J. PALMIERI (1926-1996) ROBERT F. WALDRON (1927-1998)

ALAN H. WIENER* ROBERT C. IHRKE* JAMES E. WILHELM* DENNIS G. TYLER* MICHAEL J. GREENE* DENNIS W. GHAN* DAVID D. PARR* CHARLES H. KANTER* PATRICK A. HENNESSEY DON FISHER GREGORY N. WEILER WARREN A. WILLIAMS JOHN R. LISTER CYNTHIA M. WOLCOTT GARY C. WEISBERG MICHAEL H. LEIFER SCOTT R. CARPENTER RICHARD A. SALUS NORMAN J. RODICH RONALD M. COLE MICHAEL L. D'ANGELO STEPHEN A. SCHECK

DONNA S. WOLF HEATHER C. WHITMORE ELISE L. ENOMOTO RYAN M FASTER ELIZABETH VALADEZ MELISA R. PEREZ ANISH J. BANKER RENETTA A. CAYA MICHAEL I. KEHOE ROBERT H. GARRETSON JASON E. BURNETT RYAN M. PRAGER JOSEPH W. HANEY III JAMIE LEE JULIA A. GOWIN CHADWICK C. BUNCH ANNIE C. CHU AMBERLYNN K. DEATON

JERAD BELTZ

ERIN BALSARA BRETT HORVATH

HEATHER H. WHITEHEAD

EAST TOWER - SUITE 1300
IRVINE, CALIFORNIA 92614-4281
(949) 851-9400
www.ptwww.com

February 23, 2007

P.O. BOX 19712 IRVINE, CA 92623-9712

WRITER'S DIRECT

(949) 851-7294 mleifer@ptwww.com FACSIMILE (949) 851-1554 (949) 851-3844 (949) 757-1225

REFER TO FILE NO.

35148-000

VIA EMAIL, FACSIMILE & U.S. MAIL

Billie C. Blanchard California Public Utilities Commission Sunrise Powerlink Transmission Project c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, California 94104 Lynda Kastoll Bureau of Land Management Sunrise Powerlink Transmission Project c/o Aspen Environmental Group 235 Montgomery Street, Suite 935 San Francisco, California 94104

Re: Revised Comments on the Proposed Sunrise Powerlink Transmission Project (the "Project")

Dear Ms. Blanchard and Ms. Kastoll:

This letter is a follow-up to this office's February 9th and February 13, 2007 correspondence and comments made by Gregory N. Weiler (the "Comments") at the Scoping Meeting held February 9, all as they pertain to the Project. Again, on behalf of our clients, Castle Eurasia Corp., Zen Media Corporation and related partners, we strongly oppose the Project alignment running through our client's property as described in our earlier Comments.

However, we have had numerous discussions and meetings with the Applicant with respect to our clients' concerns. The Applicant was responsive to the concerns. As a result of the meetings and discussions, the Applicant and our clients have agreed to support a modified alignment as described on Exhibit A to this letter. The proposed modification aligns the Project to the west of the Property. The modified alignment is west of Dunaway Road as the Project intersects with Interstate 8. Dunaway Road is a major arterial as shown on the Transportation Element to the County of Imperial's General Plan. The modification avoids the previously described major impacts on our

Billie C. Blanchard Lynda Kastoll February 23, 2007 Page 2

clients' Master Planned Community and minimizes the adverse aesthetic impact of the Project on the "Gateway to Imperial County." Moreover, we have a understanding that the modified alignment maintains a number of positive aspects for the Applicant in that the transmission line alignment and structures would be as linear as possible.

We oppose any modification to the alignment which would align to the east of Dunaway Road for a battery of the same reasons previously expressed. To the extent that such an alignment is still a consideration, we incorporate our prior objections herein. In short, an alignment to the east of Dunaway would have numerous adverse impacts on the Property and the County.

Although clearly inferior to the modified alignment set forth in Exhibit A to this letter, our client could also support the Imperial Valley FTHL modification to the alignment to the north of our clients' proposed Master Planned Community as submitted by the Applicant and more specifically described on Exhibit B attached hereto. We would request that this Alternative be adopted only if the alternative west of Dunaway Road described above is not adopted.

We respectfully submit that the proposals set forth in this letter are superior to the Project as now constituted and would allow our clients to support the Project through the approval process. Again, we would note for the record that our support for the modified alignment west of Dunaway could not have occurred but for the recent responsiveness and professionalism of Applicant's staff pertaining to the agreed alignment west of Dunaway Road.

Please call me if you have any questions.

Very truly yours,

Michael H. Leifer

MHL Attachments

PALMIERI, TYLER, WIENER, WILHELM & WALDRON LLP

Billie C. Blanchard Lynda Kastoll February 23, 2007 Page 3

cc: Mr. Benjamin Kwon Mr. Joshua Hunter Gregory N. Weiler, Esq.

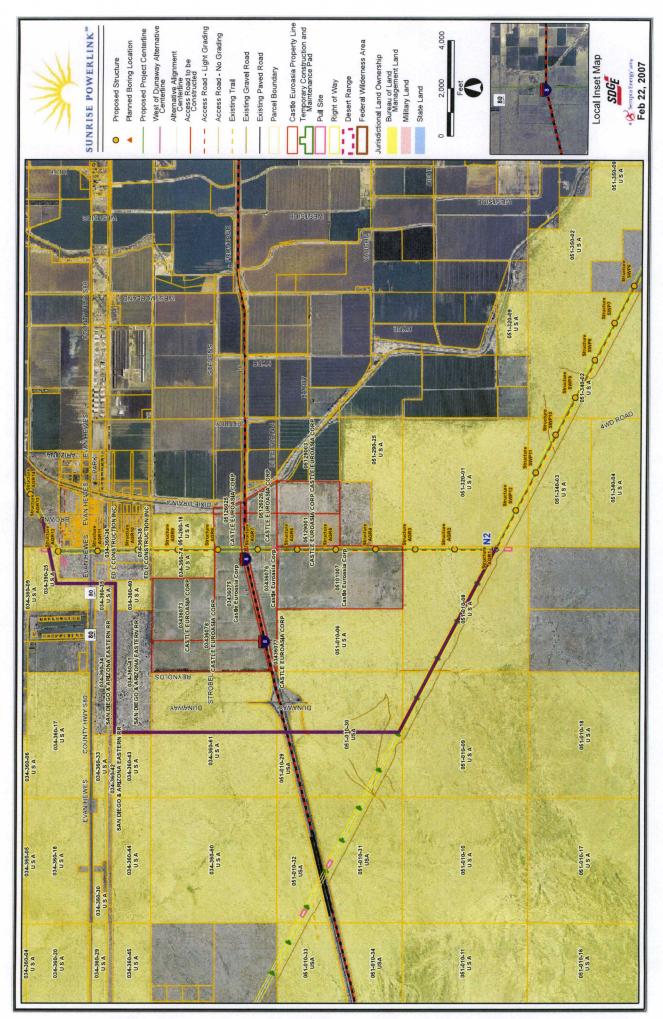


EXHIBIT A

EXHIBIT B

Imperial Valley FTHL Modification to the Alignment

SDG&E encourages the CPUC/BLM to consider an alternative to its Imperial Valley FTHL Alternative (D-1) that utilizes existing linear features (section/property lines and canal rights-of-way) and avoids a master plan development called Imperial Reserve, being proposed by the Castle Euroasia and Zen Media Corporations. SDG&E's preferred route, if unchanged at this location, could significantly impact this planned development consisting of up to 3,800 single family homes, a golf course, one or more lakes and commercial development. The alternative is as follows: Beginning at an angle point adjacent northeasterly to IID's Westside Main Canal in Section 29, T16S-R12E, SBM near the southeast corner of the NE1/4-SE1/4; proceed northwesterly adjoining the easterly side of the Westside Main Canal through Sections 29, 20, 19 and 18 to a crossing of Interstate Highway 8 near the northwest corner of the SW1/4-SE1/4 of Section 18; proceed northwesterly to an angle point easterly of the Westside Main Canal adjoining the northerly side of the East-West One-Quarter line of Section 18; proceed westerly along the One-Quarter line to intersect the preferred alternative northwesterly of the East One-Quarter corner of Section 13, T16S-R11E, SBM.