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October 6, 2007

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

**SUBJECT:** Opposition to the SRPL Modified Route D Alternate

We have prepared this letter of opposition to the proposed Sempra/San Diego Gas & Electric (Sempra) Sunrise Power Link (SRPL) MODIFIED ROUTE D ALTERNATIVE and to the SRPL in general for the following reasons:

**Summary**

1. This is a Sempra project to promote Sempra goals of generating power in Mexico and is not a "hometown" San Diego Gas & Electric project as it is being portrayed.
2. There is only a marginal benefit (if any) to San Diego County residents.
3. The Power Link is being built to deliver electrical power from Sempra owned Mexican power plants to Los Angeles.
4. Renewable power is increasingly available and is a better choice for San Diego.
5. There are significant security problems with the proposed alternate routes.
6. Sensitive lands will be permanently affected by the use of the proposed alternate routes.
7. Local property values adversely affected by multiple proposed routes
8. There are technical problems with the installation of some of the proposed alternate routes.
9. Sempra is pitting communities against each other to accomplish their primary goals of getting their power to their new market in Los Angeles.

**Detailed Discussion**

1. Sempra Project to Promote Sempra Goals not local San Diego goals
  - a. Sempra Energy would like you to believe that the SRPL is a local San Diego effort generated by the "hometown" electric company, S.D.G.&E.
  - b. In reality, the SRPL is one element in a Sempra plan to generate power in Mexico and distribute this power to Los Angeles.

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- c. Sempra has built power plants in Mexicali, Mexico, which are not regulated by either California or United States regulations.
- d. The Sempra financed Mexicali power plants are right across the border from the beginning of the proposed SRPL.
- e. Sempra has also financed and constructed a LNG manufacturing facility near Ensenada with a natural gas pipeline from that plant to the power plants in Mexicali.
- f. In a North County Times news article dated June 6, 2007, Mr. Simones, vice president of SEMPRA, stated that all of the power being generated by the Mexicali power plants has already been sold to Southern California Edison for distribution in the Los Angeles region.
- g. The only way for SEMPRA to move power from Mexicali power plants to Los Angeles is using a distribution line that runs through San Diego county.

2. No Real Benefit to San Diego County Residents

- a. There is no direct benefit to San Diego power customers because, by Sempra's own information, San Diego is not in need of the amount of power the SRPL is being planned to provide.
- b. SDG&E has three new power plants in San Diego located in Miramar, Escondido, and soon to be completed in Otay Mesa.
- c. Two of the power plants generate 550 megawatts or more each.
- d. The SDG&E website states that with these power plants San Diego will only have a shortage of approximately 300 megawatts by 2010. This shortfall can easily be accommodated by the construction of one additional regional power plant.
- e. As evidenced by SDG&E's own website, San Diego does not have the power shortage that would require construction of the SRPL.

3. Delivering Non-Regulated Mexican Power to Los Angeles

- a. As detailed in paragraph 1 above, conventional wisdom shows that the primary reason for the Sempra SRPL is to deliver nonregulated Mexican-generated electrical power to the Los Angeles market.
- b. Sempra is a large company that does not currently have a sizable stake in providing power for the Los Angeles area. It is easy to see that Sempra can get into that market using its power plants and its LNG plant in Mexico only if there is a distribution line. That distribution line would be the SRPL.
- c. The article in the North County Times dated June 6, 2007, states without reservation that the Sempra-financed Mexicali power plants have been pumping out power exclusively for the United States market and specifically all power has already been sold to the Los Angeles region.

4. Renewable Power from Distributed Sources is Better for San Diego

- a. It is a fact that, if power plants are distributed within a region, then there is only minimal or no requirement for high power distribution lines.

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- b. SDG&E has utilized this principle with the construction of regional power plants in Miramar, Escondido, and Otay Mesa.
  - c. In addition, San Diego has two existing power plants that are easily capable of being upgraded and utilized for local power. These are the South Bay power plant and the Encina power plant near Carlsbad.
  - d. These power plants distributed throughout San Diego county can be further enhanced through the use of distributed renewable energy generation such as solar and wind power.
  - e. There are other distributed sources that could be investigated including trash-to-energy and sea-motion power generation.
5. Significant Security Problems Exist with Proposed San Diego Alternates
- a. Sempra has recommended several SRPL installation alternatives running through eastern San Diego county.
  - b. San Diego is unique in that it is a major port of entry plus a major military hub. Therefore, San Diego could be a prime target for terror operations.
  - c. San Diego also only has one major east-west transportation corridor, which is Hwy. 8.
  - d. The SRPL alternates cross Hwy. 8 as many as five times in eastern San Diego county.
  - e. If a terror activity, or a natural disaster, caused the power link to collapse across the freeway, both power distribution and the use of the only east-west transportation corridor would be destroyed.
  - f. Additionally, due to the close proximity of a major highway, a terrorist could quickly access the towers from the freeway and easily compromise one or more electrical distribution towers, unnoticed, which in turn would destroy the only east-west transportation corridor.
6. Sensitive Lands will be Permanently Affected
- a. Power Link distribution will affect sensitive lands in all parts of San Diego county.
  - b. In our example, we and our neighbors have labored for over ten years to restore sensitive wetlands and a major animal migratory path.
  - c. Over these past ten years, we have been able to restore wetlands, encourage natural growth, which has in turn brought back deer, raccoons, possums and many species of birds.
  - d. Several pathways of the proposed east county alternates will directly affect this area and reverse all of the positive activities that the neighborhood has taken so many years to develop.
7. Local Property Values Adversely Affected
- a. Sempra has proposed many power link alternatives throughout San Diego county.
  - b. Once a power link alternative is proposed, we have observed that the related property values have been immediately reduced.

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- c. In our specific example, we have appraisals and market information that show our lands have been adversely affected just by the information published by Sempra.
    - d. It is a reality that these properties will be held hostage and unable to be sold or transferred while Sempra continues to evaluate this large number of proposed alternatives.
  
8. Significant Technical Problems Exist with Proposed San Diego Alternates
  - a. One of the SRPL alternates calls for the undergrounding of a 500KV distribution line.
  - b. We have been told by Sempra engineers that undergrounding of a 500KV power line is questionable.
  - c. We were told that this is the reason the power line cannot be undergrounded in the Anza Borrego desert area.
  - d. If you cannot underground the 500Kv line in one area, how can you underground the same power line in another area?
  - e. We have also observed power line damage due to high wind activity in the very area where one SRPL alternate is recommended. This area is of extreme concern because we know of at least two cases where power lines have separated and SDG&E could not tell us why.
  
9. Sempra is Pitting San Diego Communities Against Each Other
  - a. Reading through the SRPL project information and viewing the huge number of alternates that have been proposed by Sempra energy it is apparent that Sempra is trying to pit one community against another over the location of the SRPL.
  - b. We can see no other reason for the large number of alternatives, that touch so many areas of eastern San Diego county.