



Green Power

ENEL RENEWABLE ENERGIES DIVISION
NORTH AMERICA AREA

Enel North America, Inc.

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February 28, 2011

Iain Fisher, CPUC
Greg Thomsen, BLM
c/o Dudek
605 Third Street,
Encinitas, CA 92024

Subject: Jewel Valley's Comments on the Joint DEIR/DEIS for the ECO Substation, Tule Wind,
and Energia Sierra Juarez Gen-Tie Projects

Dear Mr. Fisher:

EGP Jewel Valley, LLC ("Jewel Valley") submits the following comments on the Draft Environmental Impact Report/Draft Environmental Impact Statement ("DEIR/DEIS") for San Diego Gas & Electric Company's ECO Substation Project. As a developer, owner and operator of renewable energy projects, we strongly support this important project as a means of facilitating renewable energy development in eastern San Diego County.

The Jewel Valley Project is a potential wind and solar facility under development in eastern San Diego County. This project is included in the DEIR/DEIS as the Jordan Wind Project. The DEIR/DEIS currently states that the Jordan Wind Project is reasonably foreseeable and evaluates potential impacts on a programmatic level. As the developer for this proposed project, Jewel Valley hereby submits these comments to correct certain inaccuracies in the DEIR/DEIS.

- 1) Project Name and Developer – The correct name for the project is the "Jewel Valley Project" and the developer is Enel Green Power North America, Inc.¹
- 2) Project Description – Jewel Valley proposes to construct and operate up to 158 MW of wind generation and up to 10 MW of solar power generation – enough electricity to power the needs of more than 100,000 homes. The project site is located on private land north and south of Interstate

¹ Jewel Valley is an indirectly, wholly-owned subsidiary of Enel Green Power North America, Inc. ("EGPNA") which is a wholly-owned subsidiary of Enel Green Power S.p.A. ("EGP"), a world leader in renewable energy generation, with approximately 5,900 MW of installed capacity and 618 plants in operation worldwide. In North America, EGPNA owns and operates more than 70 plants generating approximately 800 MW using hydroelectric, wind, geothermal and biomass technologies.

8 near Boulevard, an unincorporated area in east San Diego County. Proposed plans for the northern property include up to 66 MW of wind and may utilize up to 28 wind turbines of 2.3 MW to 3.0 MW each. The northern portion of the project may also include up to 10 MW of solar. The southern portion of the project may include up to 92 MW of wind and may utilize up to 40 wind turbines of 2.3 MW to 3.0 MW each. Turbines are proposed to be approximately 450 feet tall from ground to the tip of the blade fully extended. The project is in the early development stage and meteorological facilities are planned to be installed in May 2011. Should the wind and solar resources prove viable, an Environmental Impact Report will be prepared under the jurisdiction of the County of San Diego Department of Planning and Land Use. Construction could be initiated in January 2014. The proposed point of interconnection for the Jewel Valley Project is the Boulevard Substation.

- 3) Reasonably Foreseeable and Suggested Potential Impacts – As noted above, the Jewel Valley Project is in an early-developmental stage and while Jewel Valley understands the CPUC's and BLM's desire to identify other potential projects that may interconnect in the vicinity of the proposed ECO substation and rebuild of the existing Boulevard Substation, we believe it is premature to identify potential impacts, mitigation measures and project vicinity consequences at this stage of our Project's development. The Jewel Valley Project will be subject to a comprehensive environmental evaluation of potential impacts after completing various environmental surveys and the project engineering design. The current evaluation (even on a programmatic basis) cannot accurately predict the impacts or necessary mitigation measures for the project. For these reasons and while it is understood that the CPUC and BLM want to inform agencies and the public about other potential projects in the area, the DEIR/DEIS should more fully acknowledge the uncertainty and speculative nature of the potential impacts associated with our project. While many of the proposed mitigation measures may ultimately be acceptable to the Jewel Valley Project, the identification of unmitigable project impacts should not be determined at this time.

Energy experts have identified eastern San Diego County as one of the best areas in the United States for developing renewable resources. A recent Renewable Energy Transmission Initiative (RETI) study found that just a small portion of this region could generate enough wind power to serve the needs of more 500,000 homes.² But clean energy projects also need infrastructure. Our region has a unique opportunity to build a cleaner, more sustainable future by tapping into renewable resources. But we can't realize these benefits without the ECO Substation Project. We strongly urge the California Public Utilities Commission to approve the environmentally superior alternative and allow the ECO Substation Project to be built and put into operation.

Thank you for your consideration of these comments. Should you have any questions, please do not hesitate to contact me at 858-731-5035.

Sincerely,



Jennifer Purczynski
Senior Manager, Project Development
Enel Green Power, North America, Inc.

cc. Joan Heredia, Permitting Manager, Enel Green Power North America, Inc.

² Renewable Energy Transmission Initiative Phase 2B Final Report, May 2010, page 12.