

Draft National Interest Electric Transmission Corridor (NIETC)
Designations;
Comments Received in Public Meeting,
San Diego, CA, Thursday 17 May 2007

BOB FILNER
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CONGRESS OF THE UNITED STATES
HOUSE OF REPRESENTATIVES

May 15, 2007

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The Honorable Samuel W. Bodman
Secretary of Energy
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, DC 20585

Dear Secretary Bodman:

Thank you for the opportunity to express my views on the Department of Energy's (DOE) recent designation of National Interest Electric Transmission Corridors (NIETC), specifically the designation made for all of Southern California.

I have joined with my colleagues, Congressman Frank Wolf and Congressman Maurice Hinchey, on bi-partisan legislation that would block the DOE's proposal. I am opposed to these designations because they allow the Federal government to exert their authority to push through transmission lines in an entire region, instead of selecting and justifying specific corridors. In addition, these designations allow private utilities to condemn private land through the use of eminent domain, even if State authorities have determined the transmission line is unnecessary.

On a local basis, this designation would allow San Diego Gas and Electric to push the proposed Sunrise Powerlink project through, despite community opposition and the need for the transmission line to traverse through designated wilderness lands in the Anza-Borrego State Park. Thus far, the DOE has ignored the California Public Utilities Commission, which has publicly stated that the NIETC is unnecessary and that claims of transmission congestion in Southern California are exaggerated.

The designation of NIETCs look more like a partisan favor to friends than a coherent strategy for assuring the reliable flow of power in Southern California, and throughout the nation. I am strongly opposed to this designation and I will continue to fight it in Congress.

Samuel W. Bodman
May 15, 2007
Page 2

Sincerely,


BOB FILNER
Member of Congress

BF/zs
2447066

California State Senate

SENATOR
DENISE MORENO DUCHENY
FORTIETH SENATE DISTRICT



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May 17, 2007

Samuel W. Bodman,
Office of the Secretary
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Dear Secretary Bodman:

I am writing to express my opposition to the US Energy Department's proposals for two national interest electric transmission corridor designations. Specifically, I am concerned about allowing the Federal Energy Regulatory Commission (FERC) to overturn California's decisions regarding the designation of new transportation lines and corridors, thus allowing FERC additional powers of eminent domain.

It is imperative that the State of California maintain full sovereignty over planning for our energy needs and for pathways for distribution of those needs. The State of California's environmental rules and regulations are among the most protective in the nation. Allowing FERC to overrule California's decision-making process would be detrimental not only to our environment, but also to the public participation process.

In addition, allowing FERC to usurp California's decision process would set a negative precedent for the federal government to further infringe on our state's rights. I am fully aware of how energy resources and energy planning are essential to the sustainability of our state and country. However, infringement on California's regulatory and review process should not be an option.

I am also concerned with the potential conflict of interest that the transmission corridor designations could create. It is important to avoid situations that permit private utilities interested in developing energy projects within California to join together with federal agencies to bypass state regulatory requirements.

Secretary Bodman

5/17/07

Page 2 of 2

Granting the Federal Energy Regulatory Commission nearly limitless powers of eminent domain, exempting them from state environmental laws, is a step in the wrong direction, jeopardizing our already limited natural resources. It should be avoided at all cost.

I would like to thank you for allowing me the opportunity to share my views with you. Please feel free to contact me should you have questions.

Sincerely,

A handwritten signature in cursive script that reads "Denise Moreno Ducheny". The signature is written in black ink and is positioned above the printed name.

DENISE MORENO DUCHENY

State Senator, 40th District

DMD/jmh/ja

April 7, 2006

(619) 429-7946

The Energy/Global Warming Solutions
by William E. Claycomb

Sam Sadler (July 17, 2000) said Tom McCall, Oregon Governor from Jan. 9, 1967, to Jan. 13, 1975, was a visionary. He was surely that for he oversaw the final printing of "Transition" which was first called just the "energy study". It was a stupendous work of 497 pages.

Unfortunately, "Transition" was sent to the Governor with a letter dated Jan. 1, 1975, just twelve days before the end of McCall's terms.

And again, unfortunately, McCall was not succeeded by a visionary because all that changed as a result of "Transition" was that the "Office of Energy Research and Planning" became just the Energy Office.

What should have changed, had McCall's visions been fulfilled, as outlined in the 36 page, unnumbered Chapter 3:

1. By 2000, in Oregon, natural gas and fuel oil would no longer have been used for space heating, thus saving them for use as chemical feed stocks [page (p)151],

2. By 2025, 80% of Oregon's energy needs would be supplied by electricity with solar electricity being over half the supply. Geothermal plants, using a non renewable source, would have been phased out (p. 153),

3. By 2000, coal plants would have been phased out, again saving the concentrated source of carbon as a chemical feedstock supply,

The forecast cost for 1990 was \$100 to \$300 per kilowatt (kW) for solar panel arrays with commercial production at 1,000,000 kW's per year (p. 156). By 1999, the KPMG/Nederlands study estimated a cost of \$1,063 per kW (more about this study later).

The December, 1973 "The Mitre Corporation" report to the National Science Foundation said that the cost per kilowatt hour (kWh) could be 1 - 1½ cents (p. 160) (What are you paying in 2006?)

"Transition" contained all kinds of interesting information. A "solar farm of 143 square miles (a 12 mile square)" could have, in 1973, produced all 102.4 trillion British Thermal Unit(s) (BTU) used in Oregon. That area was less than one sixth of one percent of the state's land area. (p. 147, 148) The Mitre Corporation, December 1973, report also mentioned that hydrogen produced by photovoltaic (pv) - powered electrolysis could be used as "a storage medium, a fuel gas or an industrial feedstock (p. 159).

The last paragraph of the Jan. 1, 1975, letter sending "Transition" to Governor McCall, worth repeating, is "If the people of Oregon are to establish the conditions for a truly stable future, in a world of mounting stress and uncertainty, an unprecedented application of honesty, intelligence, and responsibility will be required."

The energy and related global warning problems could have been solved in 1975, but with the end of the OPEC crisis, following Secretary of State Henry Kissinger's warning to the Arabs that we would invade and take their oil if the embargo began hurting our economy, people lost interest.

A few people continued efforts to solve our energy crisis.

In 1997, the "MUSIC FM" study was published after being completed by a team of experts from six European countries led by Co-ordinators Dr. T. M. Bruton/Dr. J. M. Woodstock. Team members were from Britain, Germany, Spain, Belgium, Portugal and the Netherlands. Dr. Bruton was Executive Director, Crystalline Silicon Technology at the European Technology Center, BP (British Petroleum) Solar.

The MUSIC FM study concluded that a 500 megawatt (MW) factory, with an MW equaling 1,000 kws, could produce silicon panels for \$1,240 per kilowatt. In an email dated March 26, 2001, Dr. Bruton predicted further cost reductions and raised efficiency predictions.

In August, 1999, "Solar Energy: from perennial promise to competitive alternative - final report." was published by KPMG Bureau voor Economische Argumentatie, Steins Bisschop Meijbur & Co Advocaten. The report hereafter will be referred to as the KPMG/Nederland report (KPMG/N).

The KPMG/N worked with the MUSIC FM study to enlarge upon it and cost various items necessary in the construction of the 500 MW plant.

The KPMG/N stated that:

1. The exchange rate: Euros for dollars was \$1 = .8597 Euros (p. 26)
2. Photovoltaic solar energy provides almost 20 times more energy per hectare than biomass (p. 15).
3. A 500 MW plant produces enough panels to supply 100,000 houses with a year's supply of solar energy (p. 20).
4. Panels would cost \$1,063/kW (p. 27). Installation would cost another \$911 (p. 25) for a TOTAL of \$1,974.

5. kW hours would cost 7.8 cents (p. 26) at the latitude of San Diego.

6. The 500 MW capacity factory would cost \$735 million including a plant for the production of solar grade silicon (p. 24),

7. The investment would return 13% in the first year increasing to 15% in the 5th year (p. 25).

8. The factory would employ approximately 2,000 people (p. 24).

PV electricity at 7.8¢ per kwh is cheaper, for houses with panels on their roof tops, than any other source, because no transmission and distribution charges are necessary.

According to "Transition", Jerold Noel, with Mobil Oil/Tyco, said the roof top of an average Philadelphia house could satisfy the energy needs of the home with enough energy excess to charge an electric car (p. 161). Assuming that the extra for the car could also electrolyze enough hydrogen for a fuel cell car, panels with a 5 kw capacity in San Diego would do the same job. General Motors can start producing fuel cell cars modeled after its "AUTOnomy" according to their Jan. 7, 2002 press Release found at the GM web site. Various foreign automakers plan to produce fuel cell automobiles.

In a Christian society, with the means at hand to solve our energy and global warming crises, it is inconceivable why we have not done so.

It could be that the \$8,000,000 that Exxon Mobile has contributed to more than 40 "think tanks" the "preach skepticism about the oncoming (global) warning climate catastrophe" could have overcome our Christianity. (Mother Jones/May/June 2005, p. 40).

ExxonMobile had driven to remove Robert Watson from his post of chairman of the United Nation's Intergovernmental Panel on Climate Change because Watson was doing too good a job and recommending a shift away from fossil fuels (Pittsburgh Post-Gazette, April 25, 2002).

If we can find somebody with an "unprecedented application of honesty, intelligence and responsibility", maybe we can, for starters, get that 500 MW photovoltaic factory, with its side by side silicon factory, built.

For comparative purposes, Ken Zweibel, manager of the Thin Film PV Partnership at the Golden, Colorado, National Renewable Energy Laboratory was contacted. Zweibel said,

1. A square meter of thin film PV could produce 100-150 watts (about the same as found by the MUSIC FM and KPMG/N studies for conventional panels.

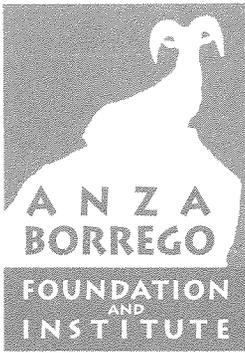
2. Presently, installation in Europe has been done at a cost of \$4,500 per kw.

3. Ultimately the cost might be reduced to \$1,500 - \$2,000, installed, per kilowatt approximately the same as for the KPMG/N cost of \$2,080 (\$1,974 inflated from 1999 to 2006).

With the proper persuasion will Governor Schwarzenegger be the man to build the 500 MW factory NOW not waiting for the uncertain future of thin film ??

NOTE: On April 6, 2006, the San Diego Union-Tribune (p. C7) Foreign Exchange showed \$1 equaling .8136 Euros, a 5.36% decrease in the value of \$1 since 1999. Costs previously listed in dollars above for the KPMG/N study would therefore have to be increased by 5.36%.

William E. Claycomb



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CONSERVATION · EDUCATION · RESEARCH

My name is Diana Lindsay, and I am Vice-President of Environmental Affairs for the Anza-Borrego Foundation and Institute. Anza-Borrego Foundation, a non-profit public benefit corporation now in its 40th year of operation, acquires private lands within or adjacent to the Anza-Borrego Desert State Park, clears title, and transfers those lands to the State Park. We currently hold 7,037 acres awaiting transfer to the State.

The Anza-Borrego Foundation feels strongly that the Federal Government should not make the proposed designation of a NIETC corridor in southwestern California. The wide swath of this designation would include San Diego Gas & Electric's proposed Sunrise Powerlink which would cross the Anza-Borrego Desert State Park.

The route of the proposed Sunrise Powerlink would also directly impact property that ABF owns – property that was acquired through donations made to ABF. The intent of those donors was to protect those lands – lands that are now threatened by a possibility of a federal energy corridor and loss of that protection through eminent domain.

Designation as a NIETC corridor will allow Sempra/SDG&E yet another opportunity to force de-designation of State Wilderness lands for construction of the Sunrise Powerlink—something never done before that sets a bad precedent for all wilderness lands, both state and federal.

The California Public Utilities Commission is currently considering Sunrise, and this line can be evaluated at the state level.

Finally, federal designation would allow Sempra/SDG&E to move forward on a bad plan—bringing yesterday's solution (electricity imports from dirty power plants) to the need for increased energy. Southern California needs a smart energy solution that will not pollute our air quality and damage our environment.

We ask you to not approve this request for designation of a NIETC corridor.

Diana Lindsay
May 17, 2007



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LORI SALDAÑA
ASSEMBLY MEMBER, SEVENTY-SIXTH DISTRICT
CHAIR, HOUSING AND COMMUNITY DEVELOPMENT

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CHAIR, BASE CLOSURE AND
REDEVELOPMENT

May 17, 2007

Honorable Samuel Bodman
Secretary, Department of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

Dear Secretary Bodman:

Thank you for this opportunity to speak on the April 26th designation by DOE of all of Southern California, parts of southern Nevada, and parts of western Arizona as a National Interest Electric Transmission Corridor (NIETC).

My primary concern with this designation is that the federal government would be granting private utilities authority to condemn private property via eminent domain - regardless of whether state authorities determined this transmission line is unnecessary.

As a member of the Assembly Committee on natural resources, I am especially concerned about the proposed route for Sunrise Powerlink through Anza Borrego Desert State Park. I believe that overturning a authorized body's decision about state resources is an unnecessary and heavy-handed use of federal power for the benefit of purely private interests.

None of the preferred route proposed by SDG&E in San Diego County is on federal land, so it is unclear why the federal government is interjecting itself when Section 368 of the enabling 2005 Energy Policy Act legislation states "*to designate corridors for . . . electricity transmission and distribution facilities on Federal land in the eleven contiguous Western States.*"

The San Diego area has its own Regional Energy Strategy (RES) approved by the San Diego Association of Governments. The Sunrise Powerlink conflicts with a fundamental objective of the RES, which is to increase the amount of in-region power production.

(more)

Designation/2

The Sunrise Powerlink will result in less in-region generation, not more. This is clearly understood in San Diego County. This understanding was reflected in the recent unanimous vote by the SANDAG Board of Directors, which includes the mayors of all San Diego County cities as voting members, to take no position on the Sunrise Powerlink.

The NIETC designation seems more like federal overreach than a strategy for assuring the reliable flow of power in Southern California. I am strongly opposed to this designation.

Respectfully,

A handwritten signature in cursive script that reads "Lori Saldaña". The signature is written in black ink and is positioned below the word "Respectfully,".

Lori Saldaña
Assembly Member, 76th District

LS: jk

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California Legislature Senate Energy, Utilities and Communications Committee

CHRISTINE KEHOE, Chairwoman

Statement of Senator Christine Kehoe on the National Interest Electric Transmission Corridors and Congestion Study – Draft Southwest Area National Corridor Designation – before the Department of Energy

**Docket No. 2007-OE-02
 Thursday, May 17, 2007**

In my capacity as Chair of the Senate's Committee on Energy, Utilities and Communications I am keenly aware of how important a well-planned and efficient transmission grid is to this state. We have experienced, first-hand, the transmission bottlenecks created by increased demand and the disruption of power transmission as a result of natural and man-made disasters. As a leader in this state's energy policy, I see no need or justification for the federal government designating congestion corridors anywhere in this state.

The State of California is unique in its energy infrastructure. Long before the Energy Policy Act of 2005 and the release of the Department of Energy's National Electric Transmission Congestion Study, this state developed and implemented a proactive and comprehensive transmission expansion planning process which is spear-headed by the California Independent System Operator Corporation. This process involves the California Energy Commission which forecasts loading, the Cal-ISO which develops an annual, detailed plan that includes necessary enhancements and additions to the grid, the California Public Utilities Commission which reviews and approves new transmission projects which are part of the grid charge, and investor and publicly-owned utilities. Most recently, the Legislature has further enhanced the process by permitting the Energy Commission to identify feasible transmission corridors where one or more future high-voltage electric transmission lines can be built that are consistent with the state's infrastructure and environmental quality needs. These entities work thoughtfully and collaboratively to develop a coordinated planning process to streamline the development of energy resources for the State of California.

This process provides for the development, approval, and implementation of key transmission projects to assure reliable electric service that supports California's resource preference policies. In short, we have the capacity to meet our capacity.

This state has tremendous population growth and an aging infrastructure in many areas. We are challenged to build and improve our freeways, housing, mass transit, schools, universities and recreational opportunities while protecting sensitive habitat and pristine wilderness which is a priority for me and for the citizens of California. This state and its governing structure understand those needs and are best situated to address them. Specifically, as it relates to transmission planning and the corridors for infrastructure siting, we have, and are perfectly capable of, meeting our needs.

I urge you to reject the inclusion of any California counties in the Southwest corridor.

B. Powers comments – May 17, 2007 DOE NIETC hearing in San Diego

Bill Powers, professional engineer, Border Power Plant Working Group

The May 7th Federal Register notice quotes SDG&E extensively. The company is owned by Sempra Energy. Sempra also sent a letter to DOE in November 2005 requesting critical corridor status for the Sunrise Powerlink.¹

Sempra asks for a very specific favor in that letter. The favor is DOE's help in passing the line through Indian lands on Highway 76 in northern San Diego County. These Indian lands are north of the current proposed terminus of Sunrise, and would be needed only if the line is going to the Los Angeles area. SDG&E does show the line going to Los Angeles in its 2006 letter to DOE.²

It is unfortunate that there is no mention by DOE of the relationship between Sempra and SDG&E, nor of Sempra's request for DOE assistance to pass through Indian lands. This would be useful information to the La Jolla and Rincon Indian tribes, since it is their land.

There was no congestion on the existing Southwest Powerlink, outside of the market manipulated 2000-2001 period, until Sempra and another firm started-up export power plants in Mexicali in 2003. The ISO immediately ordered an export power limit to avoid overloading the line. These export plants were located with no thought to the effect of adding nearly 1,200 MW of power overnight to a line designed to handle only 1,300 MW. Sempra seems to have presumed that either the Utilities Commission or DOE would bail it out down the road with a new transmission line.

¹ W.A. Zobel, Sempra Energy, Comments on the DOE/DOI Programmatic EIS associated with designation of energy corridors on federal lands, letter to DOE Office of Electricity Delivery/Energy Reliability, Nov. 28, 2005.

² J. Avery, SDG&E, *Considerations for Transmission Congestion Study and Designation of National Interest Electric Transmission Corridors*, letter to DOE Office of Electricity Delivery/Energy Reliability, March 6, 2006.

B. Powers comments – May 17, 2007 DOE NIETC hearing in San Diego

That is exactly what DOE will make happen with this designation. Build a \$1.3 billion transmission line to enhance an investment that cost, in Sempra's case, \$350 million. This will be little more than a federal bail-out program for private power developers who put their projects in the wrong the place.

Sunrise would allow an additional 1,000 MW of power imports. It would be much more cost-effective, as DOE documents, to build 1,000 MW of combined-cycle capacity locally.³ That is the stated preference of the San Diego Area Governments. This approach would also free-up existing transmission lines to import renewable power.

The Southwest Corridor designation is unnecessary, and in San Diego's case, will be an obstacle to smart and efficient solutions to our energy needs.

³ Western Congestion Assessment Study, prepared by the Western Congestion Analysis Task Force, May 8, 2006, p. 74. 750 MW of combined-cycle plant would cost \$683 million. Extrapolating gives a cost of approximately \$900 million for 1,000 MW of combined-cycle capacity.

DOE
May 17, 2007

After reviewing the draft Southwest Corridor, I have come to speak against its designation and to argue that local generation is superior to long distance transmission.

First, the August 2006 Congestion Study inappropriately refers to the existing Southwest Power Link. Sempra Energy has collected congestion payments by using this link to send energy to Southern California Edison customers to the north at the same time it is supplying San Diego. This congestion goes away when the contract expires in 2011. An arbitration panel ruled that Sempra has acted in bad faith by delivering electricity to congested points on the power grid. We should not now use this Sempra-caused congestion as a reason for designating a Southwest Corridor.

Second, Energy trading companies, like Sempra, want transmission infrastructure to move electricity to distant markets for arbitrage trading. But transmission lines waste electricity as heat. It is best to generate power near the area of use. Sempra's new 550 MW Palomar generating plant serves its surrounding communities more efficiently, reliably and with vastly less environmental damage than would a new 150 mile transmission line from Mexico or Arizona. The cost of the proposed Sunrise Power Link alone could pay for three local Palomar-type power plants.

I urge you to withdraw the Draft Southwest Corridor. Please encourage local and diverse power generation alternatives which use a minimum of lossy, vulnerable and damaging long distance transmission.

Donald Larson
19803 Vista Del Otero
Ramona, CA 92065

r.4

May 17, 2007

Dear Ms. Agrawal,

I vehemently oppose the request for DOE designation of SDG&E's mis-named proposal, the "Sunrise Powerlink" (SRPL), as an NIETC. I implore that you carefully examine factual background to this proposed connector as it is carefully documented in the letter submitted on this topic from the BPPWG, which I feel reveals misguided motivations of SDG&E, to request such a designation for the SRPL, with the blessings of its parent company, SEMPRA Energies.

I am a member of CASE (Community Alliance for Sensible Energy) and CUSP (Communities United for Sensible Power), community groups formed in San Diego more than a year ago from all reaches of the county, and with allies beyond, who support a modern energy solution to our regional energy needs but feel the destructive Sunrise Powerlink proposal of SDG&E is not it. Through our work together, we have found many viable alternatives to the SRPL which are not only cheaper, but more efficient and less polluting. Indeed, as we discuss this matter today, there are countries around the world that not only believe that humans are responsible for Global Warming, but believe that the United States is a key figure in the issue, for not having taken action earlier. At this time, there are over 500 mayors around the country trying to figure out how to overcome this image, while the DOE continues to endorse programs that use outdated infrastructure and power supply, such as the SRPL.

As stated in the BPPWG letter, we do not believe that the SRPL even falls within the true jurisdiction of the DOE, and that the guidelines for NIETCs, as stated in the letter from BPPWG, indicate this fact.

Perhaps the interest of the Federal Government in this issue may have to do with the possible role of the SRPL in increasing National Security, as in the case of an emergency. Conversely, I believe that the proposed SRPL and designated substations could be easily seen as an actual terrorist target, as well as any part of its multi-national energy delivery structure.

Perhaps the Federal Government's interest for the SRPL is a concern for keeping the energy freely flowing in the United States-- this may be perhaps linked to Federal Department of Defense's high dependence on energy to maintain and expand it's operations. In fact, I have heard that the Federal DOD is the highest energy consumer in the Nation! There are many who would like to see the DOD drastically reduce its energy consumption, and become more of a role model and leader for America as we enter into the 21st Century energy scene, through conservation and innovation. I am one of these people.

There are many better alternatives, which are spelled out in the letter you will receive, from another CUSP member, Bonnie Gendron, and the statement from one of San Diego's leading alternative energy researchers, Jim Bell. Indeed, Debra Reed, herself, the president of SDG&E, was quoted in the local newspaper as saying, "Customers using smart meters should save enough electricity through conservatoin and new demand-reductoin programs to reduce the need to build more power plants

in the region." Surely, she is not thinking of eliminating the plans for her own parent company's money-making LNG powerplants in Mexico!

Alternative clean energy systems are also associated with a hidden benefit; a significant conservation of community health care costs, as community illnesses resulting from the pollution of air and water will be diminished or eliminated by converting to a cleaner form of energy.

Clinging to outdated, expensive, destructive modes of energy will not help any of us in the end, and we are fast reaching the point when present and future Americans are broke from paying for all of this, and we still do not have a self-sufficient energy cycle, leading us to imagine -- or clearly see-- that we did not pay for homeland security at all, but a corrupted system of guaranteed income for private businesses at the expense of the ever less-independent People. This is not the legacy we would like to leave our children!

Additionally, I know that the SRPL will be bringing us energy directly borne of LNG mining and burning operations in other countries which are already so destructive that some of those government officials are calling Sempra Energies "not good neighbors" as the infrastructure pushes its way across protected parklands and pristine indigenous lands of other Nations, while protesters revolt and feel revolted.

I feel that the ill-conceived SRPL promises to similarly destroy the quality of life in our region and county as well, by destroying the sanctity of dozens of highly sensitive, tax-payer protected State and County Parks, at the dismay of its thousands of supporters. In many instances, these places are the last remnants of habitat for endangered plants and animals, and yet, the utility pretends to know how to mitigate these destructive ideas (though it has no previous experience with these special living things and will not be able to "redo" any first-timers' mistakes!)

Worse yet, the SRPL will cost rate-payers an unreasonably high amount to build, and yet, will not be able to guarantee the elimination of another high-cost energy crisis in the future, if and when the price of LNG soars, for whatever reason.

Additionally, the type of LNG being imported to fuel these powerplants is of a new lower standard, promising to further raise the danger of accident and destruction for residents of these operations.

Meanwhile, the profits of this utility rise higher and higher, and employees and officers are reported to take junkets around the world just to have meetings, and in addition, furnish lavish "learning" vacations for elected officials, experiences (and lobbying) that they really have no business "supplying". Perhaps this could explain all the deaf ears that meet the many voiced concerns and oppositions which have been repeated over the last year, documented in practically daily news stories, in addition to the signed petitions and letters to elected representatives. Indeed, the elected official presiding over the county district which is proposed to hold the "heart" of the transmission plan, the new 80-acre "Central San Diego Substation", (zoned in the middle of a small rural community complete with children and historical houses), actually recused himself of his public representation duties on account of the fact that he is an SDG&E stockholder! And to this date, he has not

designated an alternative public representative to hear "his" constituents, either.

Is the government ever truly able to step in to say, and indeed, to enforce, that it is not right for this private company to side-step all normal processes of decision making, all the while planning to use and abuse its own rate-payers and the lands of American San Diego, the Beautiful?? If so, when??? Soon, I hope!!

Sincerely,

Mary Aldern

Kathleen Beck

Mary Aldern

kb:ma

FEDERAL ENERGY REGULATORY COMMISSION
ATTN: DOCKET NO. 2007-0E-02
SOUTHWEST NATIONAL CORRIDOR DRAFT

We citizens are well aware that Dick Cheney held secret and private meetings with energy and industry leaders and refused to reveal the content of those meetings to the public. Remember Enron and the devastating effect on so many Americans? That veil of secrecy is now coming to roost in Anza-Borrego State Park and open space areas of east San Diego County.

SDG&E is now threatening to pander to the FERC to allow the unnecessary, dangerous and wrongful behemoth transmission lines to go over this land if the PUC turns their application down. Both open space and the democratic process are at risk here.

Respectfully,

Laurel Granquist

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May 17, 2007

A handwritten signature in black ink that reads "Laurel Granquist". The signature is written in a cursive, flowing style.

Back Country Coalition

Post Office Box 70 • Santa Ysabel, CA 92070 • 760-765-2132

May 7, 2007

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**SUBJECT: Sempra/San Diego Gas & Electric's Proposed Sunrise Powerlink
Request for Designation of a National Interest Electric
Transmission Corridor - OPPOSITION**

The Back Country Coalition (**BCC**) is an organization of concerned citizens dedicated to the protection of natural, cultural and scenic resources, promotion of responsible land use planning and the enhancement of quality of life throughout San Diego County. We have joined with other concerned citizens and active organizations to help ensure that decisions made for our communities regarding future energy supplies provide for modern, diverse, economical, sustainable and renewable energy generation and transmission and that those decisions are made in the best interests of all residents and environmental resources. The proposed Sunrise Powerlink is not in the best interests of the nation, the state of California or the County of San Diego. We have carefully and thoroughly reviewed the project as proposed and are opposed to it in all its phases.

We have reviewed the Border Power Plant Working Group's (BPPWG) letter written by Bill Powers and addressed to your office dated April 15, 2007 regarding the subject project. This letter is to communicate our concurrence with the BPPWG letter in its entirety. It is also our belief that to grant the project proponent's request for NIETC designation for the Sunrise Powerlink would reveal a blatant dearth of investigation on the part of the DOE to determine the best energy transmission and generation scenarios for Southern California and San Diego ratepayers. Such a decision would reveal a disinterest in responsible and intelligent energy planning for our future energy needs in favor of outright advocacy for a project that proposes outdated, polluting energy sources and a transmission system that would create not only a visual blight to the entire county, but pose significant and inescapable dangers to human populations throughout San Diego and Imperial counties, and those in the L.A. area, because of the many insurmountable health risks and hazards it would impose.

SDG&E/Sempra's data provided to justify NIETC designation has proven to be at best

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unreliable, self-serving, false and exaggerated to the point of being worthless. It is the DOE's responsibility to challenge, verify and make exacting, professional and critical examinations of SDG&E/Sempra's claims. The Sunrise Powerlink proposal must undergo every scrutiny, analysis and accounting with an **objective**, cold-eyed evaluation not only because it would be extracting hundreds of billions of dollars from the residents, businesses and governments of Southern California, but also because of the social and environmental devastation that would occur with its implementation.

It is also crucial for the DOE to examine the SDG&E/Sempra application for NIETC designation in light of the 2005 Bush Administration energy policy and the national failure of being "addicted to oil" and fossil fuels in general. The glaring absurdity of importing Malaysian natural gas in such enormous quantities that can supply electrical generating gas turbines with fuel for the western United States must be addressed with complete candor at this time by the DOE. Having the largest electrical energy supplier in the U.S. dependent on foreign fuels is horribly ironic and highly destructive to establishing domestic renewable and alternative fuel sources that SDG&E/Sempra CLAIM as a major objective of the Sunrise Powerlink portion of their whole transmission scheme that plans to run towers from Mexico to L.A. Approval of the NIETC designation for San Diego would reveal that inadequate consideration has been placed on known superior alternatives and would expose the falseness behind the Bush administration's claims that it is doing anything real to secure reliable domestic supplies, which are the true requirement for securing our national energy sources.

The BPPWG letter cited above explicitly and completely describes excellent reasons for denying the NIETC designation to the Sunrise Powerlink, however, we have additional comments that we believe will underscore the indisputable facts in that letter. We will discuss in subsequent paragraphs the project's failure to meet its stated objectives, the legal requirement to provide a Master or Programmatic EIR/EIS for all phases of the proposed project, the significant hazards that would be created, the significant adverse social and environmental impacts, superior alternatives to the proposed project, and a discussion as to why the Sunrise Powerlink project would be an economic disaster for California ratepayers by creating an energy monopoly throughout Southern California.

Project Objectives

The Sunrise Powerlink proposed project fails to meet its own stated objectives.

Basic Project Objective 1: to maintain reliability in the delivery of power to the San Diego region.

As expertly demonstrated in the BPPWG's letter cited above, the proposed Sunrise Powerlink project IS NOT NECESSARY to meet this objective. There are better ways to provide and maintain reliable power in the San Diego and Southern California region: upgrading existing facilities; upgrading and authorizing new local power generating facilities and generation of renewable energy resources, which do not require the Sunrise Powerlink to facilitate them. The claim that the project would create energy "reliability" is obviated by the inherent hazards in the very terrain planned for the power line, which will be discussed in subsequent paragraphs. The claim by Sempra/SDG&E is simply false and a ruse; simply stating it does not make it true.

Basic Project Objective 2: to reduce the cost of energy in the region.

Also expertly revealed in Mr. Powers/BPPWG's above cited letter, the cost of energy in the region has been kept artificially high by Sempra's refusal to renegotiate a lucrative contract whereby rate payers buy fuel for that corporation, Sempra is compensated for artificial congestion and rate payers are now expected to pay \$1.4 billion for the proposed project to relieve problems Sempra has artificially caused. That false economy has been exposed and the project proponent's claim for cost reduction has been revealed as far less than was "computed."

Basic Project Objective 3: to accommodate the delivery of renewable energy from geothermal and solar resources in the Imperial Valley and wind and other sources in or outside San Diego county.

As discussed in BPPWG's April 15, 2007 letter to your office, the San Diego 2030 Regional Energy Strategy's vision for "Local Control, Local Benefits" is at odds with Sempra's plan for outside of San Diego County renewable energy sources. The proposed project is not needed to deliver those renewables to greater San Diego County. The Green Path North project of the Los Angeles Department of Water and Power and the Imperial Irrigation District has been ignored by the proposed Sunrise Powerlink proponents in describing the accessibility of renewables for San Diego County's future energy needs. The Green Path North is scheduled for completion in 2010 and would also negate the "need" for the Sunrise Powerlink to transmit renewables and would be far less costly in terms of both dollars and environmental destruction.

It is our belief, which is shared by many other project opponents, that the proposed project would actually guarantee that renewables are never implemented in San Diego County, because they would not enhance Sempra/SDG&E's financial bottom line. The continuation of importing cheap, dirty energy from Mexico, as described in the BPPWG's above cited letter, would preclude the development of renewable energy sources that would be more expensive than Sempra's, but would be environmentally friendly. That, in our opinion, explains why the project applicant has been less than forthcoming regarding its role in developing renewable resources for our region: there is no intention to develop them in the first place.

The Sunrise Powerlink's ostensible objectives as described in the project's Scoping Report II published in January 2007, are based on clearly faulty premises, present inherently unsubstantiated or false claims and lack factual validation. The project fails to meet its own objectives.

Legal Considerations

San Diego Gas and Electric's letter dated March 6, 2006 to the Department of Energy requesting NIETC designation for the Sunrise Powerlink project, describes and illustrates on a map on page 10 that the proposed Sunrise Powerlink project is simply the first phase of a larger project. That larger project is described by SDG&E to continue the 500 kV transmission line from the Central East Substation in northern San Diego County into Riverside, Los Angeles and Orange counties, thereby creating a "master project" that must be reviewed with the Sunrise Powerlink as a single project, according to NEPA and CEQA statutes. Moreover, the fact that SDG&E intends to link into its Mexican energy sources for that transmission line, as described in BPPWG's above-cited letter, creates an additional third phase to the master project.

The environmental documents being prepared for the proposed Sunrise Powerlink portion of the project will not analyze all environmental impacts at the earliest point in the COMPLETE OR WHOLE project, as required by law. The actual result is to avoid an assessment of all the impacts at the earliest and most effective stage, to deny the public the opportunity to review and comment on the entire, larger project, as well as prevent an opportunity for the utility to mitigate the significant adverse project impacts in an enforceable, comprehensive, and cost-effective way. This is a "textbook" case of chopping up a larger project in blatant violation of CEQA and NEPA.

We believe that the preparation of a Master or Programmatic EIR/EIS must be done rather than segmenting portions of the larger project into smaller pieces, such as is being proposed with the Sunrise Powerlink segment of Sempra/SDG&E's energy transmission project, obviously to avoid the larger scope of environmental impacts that would be caused by approval and implementation of the entire project at the same time as required by California and federal laws. Overall scrutiny of every impact of every project phase AT THE SAME TIME, and evaluation of their total effects as a whole to California - is a bedrock standard of CEQA and NEPA review.

Risks and Hazards

The entire length of the Sunrise Powerlink project is proposed to be constructed along an active fault and its linears, the Elsinore Fault. The latest temblor occurred on April 28, 2007 at 7:55 a.m. as reported in the April 29, 2007 Union-Tribune article: "3.5 magnitude quake jolts

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remote section of county.” It occurred 5 1/2 miles east of Julian, along the Banner Grade, that reveals the Elsinore Fault is alive and well and possibly awakening from a long period of quiescence. Attachment A from the *“Final Report - Application of Skylab and ERTS Imagery to fault Tectonics and Earthquake Hazards of Peninsular Ranges, Southwestern California”* dated July 1975, prepared by California Earth Science Corporation, clearly shows that the entire eastern alignment from Santa Ysabel to the Mexican border in Imperial County is underlain by this active fault and its linears.

Moreover, the project is sited within areas of both frequent wildfire history and high fire potential. There is much documentation to support the contention that the proposed project should not traverse areas near San Felipe Valley, Ranchita, Julian, Warner Springs, Mesa Grande, Santa Ysabel or Ramona, where the “preferred alternative” is planned, because of the numerous massive, well documented, devastating fires that have occurred in those communities in recent years. The extensive 2002 Pines Fire in Julian was due to a fallen electric line, clipped by a helicopter blade.

As recently as last November, a fire burned many acres in Mesa Grande, Santa Ysabel and Ramona. That fire, as well, was caused by a downed electric line in strong Santa Ana winds. Indeed, the writers have noted that the low-flying fire planes could not have been used with the existence of 150-foot electric towers running through the Santa Ysabel Valley, or anywhere in the area. Fire planes are crucial to early containment of wildfires in San Diego’s mountains because of the inaccessibility of many areas to other effective fire fighting methods. Without the fire planes to drop fire retardants on rapidly-advancing flames, we could easily have another devastating scenario such as the Cedar Fire of 2003, the largest wildfire in California’s recorded history.

The Cedar Fire of 2003 burned 280,000 acres in San Diego County, cost 17 human lives, destroyed 2400 homes, countless lives of domestic stock and wildlife and destroyed many important recreation areas such as in Cuyamaca Rancho State Park. The importance of maintaining every fire-fighting option available cannot be overemphasized nor can it be discounted in project planning: fire planes are paramount among those options. The mountains and valleys of San Diego County are no place for 150-foot towers that would impede the most important wildfire-fighting efforts. Indeed, fire fighters will not approach within 1,000 feet of high voltage electric lines, which also inhibits fire fighting and rescue efforts. Along with the strong Santa Ana winds, the Cedar Fire’s flames had no trouble leaping across 10 lanes of Highway 15 and the inferno was finally contained on its western front by fire fighters and a concrete wall before it could spread through the densely populated suburban community of Clairemont and rage uncontrolled to the coast.

It is the height of irresponsibility to consider placing 150-foot electric towers carrying 500 kV along an active fault. Coupled with frequent, extremely strong (often exceeding 100 mph gusts) Santa Ana winds throughout the preferred alignment area, the extreme fire hazard in back country communities and located along an active fault in San Diego County amplify the magnitude of risk of another devastating wildfire because of fallen wires from the 150-foot power lines of the proposed project. Consider that flailing and downed electric wires, even from an airplane or ground vehicle crash into a tower, would throw sparks into dry brush in all directions. Electricity from such a fire would produce arcing in smoke as the carbon emanating from burning organic material would provide electrical conduction, and create a nightmarish firestorm scenario that would have the potential to spread through rural to urban areas and all the way to the Pacific Ocean.

Wild fire would results from lightning strikes to the power lines. Thunderstorms often occur in San Diego's mountains, further reducing the specious claim of "reliability."

It is not unreasonable to conclude that the federal Department of Energy and Sempra/SDG&E, herewith apprised of the hazards and risks posed to human life by the unnecessary placement of the Sunrise Powerlink so far north through lands with high fire, wind and earthquake risks, would assume financial liability for future fire disasters to life and property caused by the highly likely failure of a power line along the proposed alignment if the proposed project is granted NIETC designation in spite of knowledge of these risks.

Electromagnetic Field Impacts

Additional impacts caused by the electromagnetic fields from the proposed power lines are another form of hazard to human health and well being. These impacts include, but are not limited to the effects of:

- increased noise to humans, domestic stock, pets, wildlife and flora in the vicinity of the power lines;
- the increased risk of electrocution of avian life, especially raptors;
- increase in temperatures around the electromagnetic fields for the entire length of the Sunrise Powerlink, especially in summer months;
- all forms and range of communication interference that could be caused by the power lines of the proposed project;
- increased health hazards to sensitive receptors such as heart patients and other relevant ailments such as increased risk of cancer must be disclosed;

Moreover, a recent article by Nicholas Cecil was published in the British Evening Standard on April 20, 2007, "Power lines link to cancer in new alert." The article references a recent significant health report and states, "The. . .group generally backed views highlighted by

the California Department of Health Services which suggested electromagnetic fields are 'possibly carcinogenic' in terms of childhood leukaemia and placed four other health effects in this risk category. They were adult leukaemia, adult brain tumours, miscarriages and a form of motor neurone disease, although some scientists believe there are links with more diseases."

The article concludes with, "The panel is set to recommend that the Health Protection Agency should issue more information about how to reduce the impact of exposure to electromagnetic fields. It will also call for a change to the working of overhead lines to reduce the radius of intense electromagnetic fields."

Approval of the proposed Sunrise Powerlink project would be ignoring recent scientific evidence that links electric magnetic overhead power lines to human cancer and other serious, life-threatening health problems. Clearly, significant adverse risks to human health can no longer be dismissed by electric power line proponents and the effects of electromagnetic fields must be taken seriously because it is information that can save human lives and prevent life threatening physical and fatal conditions.

Socioeconomic Impacts

The communities of Ramona, Santa Ysabel and Julian depend on tourism for much of their income. Most of the merchants in Santa Ysabel and Julian are very dependent on the many people who flock by the hundreds and thousands every weekend to these small, rural towns. Since the 2003 Cedar Fire and the decimation of the Cuyamaca Rancho State Park, more and more tourists travel through Ramona and Santa Ysabel Valley to enjoy the recreational driving, hiking, spiritual renewal, shopping, dining, camping, scenic wilderness areas and rural vistas unpolluted for the most part by scars of human habitation throughout the mountains and valleys. Manmade changes to date actually enhance the bucolic vistas in most cases, unlike the irreparable, extensive scars that would be caused by massive grading, road building, and 150-foot electric erector-set style towers involved with the Sunrise Powerlink footprint. The appeal of Santa Ysabel and Julian for many of these urban and suburban dwellers would be enormously diminished if they were confronted by huge, ugly steel towers marching across the landscape of San Diego's pristine back country.

The loss of business to the merchants in the above mentioned communities by the implementation of the proposed project cannot be overestimated. Would the Department of Energy and/or Sempra/SDG&E be willing to offer mitigation to the merchants to remedy the income losses to those individuals and communities over a reasonable period of time, such as ten years? Or would the loss of business be just more collateral damage?

Environmental Impacts

The impacts created by the Sunrise Powerlink would not be confined to the 300-foot "footprint" width of the 150-mile power line. The enormous direct destruction of habitat and indirect or secondary impacts to the adjacent Santa Ysabel Preserve, and all other wilderness habitats and preserves and natural resources along the proposed route, including construction and maintenance roads, construction of the towers and impacts caused by their maintenance and the use of herbicides for control of plant growth around the towers would be huge. We can assume that no precautions would be taken to prevent "over spray" from contaminating and decimating the natural habitats and ecosystems adjacent to the towers, including impacts to humans, crops, domestic animals and wildlife.

The "*Baseline Biodiversity Survey for the Santa Ysabel Ranch Open Space Preserve*" USGS Technical Report prepared by the U.S. Department of the Interior in 2004, for The Nature Conservancy and San Diego County Department of Parks and Recreation, details the incredibly rich and diverse natural resources that exist in the Santa Ysabel area, not only in the Preserve itself. The report is accessible on the internet and is incorporated herein in its entirety by reference. We strongly recommend that this report be reviewed by the DOE before making a decision on the Sunrise Powerlink's acceptability for NIETC designation.

BCC has hired Ecological Outreach Services, Virginia Moran, a well known and highly respected biology consultant, to gather and collect biological information for the proposed Santa Ysabel/Warner Springs alignment of the Sunrise Powerlink project, including information on sensitive species and sensitive habitats. The report covers a small area of the 150-mile portion of the Sunrise Powerlink project and yet there are more than twenty sensitive species and sensitive habitat types included in the report. The sensitive species and habitats listings throughout the entire preferred alignment would be staggering.

Moreover, the Center for Biological has recently released a listing of the protected areas that would be decimated by the proposed Sunrise Powerlink project. (attachment B) The degree of destruction for this outdated, polluting and unnecessary proposal is outrageous and completely unacceptable to any rational mind. No wonder SDG&E/Sempra is so desperate to remove California state oversight for the project. To receive a rubber-stamp approval by the DOE might bypass CEQA but it will not bypass NEPA. It is also highly unlikely that the NIETC designation for the Sunrise Powerlink could withstand judicial scrutiny.

Biological (as well as Cultural and Visual) impacts to the entire proposed preferred 150-mile alignment would be profound and irreversible. As has been noted above, San Diego County is one of the most biodiverse areas in the world with sensitive, rare, threatened and

endangered habitats including coastal, inland, mountain and desert ecosystems. The Sunrise Powerlink would create enormous irreparable damage and destruction to a huge swath 150-miles long across the entire county from the desert to the coast. **There is no benefit that can justify that extent of environmental devastation.**

Anza-Borrego Desert State Park

As documented in the BPPWG's above-referenced letter regarding the Sunrise Powerlink's application for NIETC designation, the proposed project would bisect the Anza-Borrego Desert State Park. The project proponents have requested the affected portion of California's largest park be de-designated from wilderness status to accommodate the huge, ugly steel towers required to cross it. That action would set an unacceptable precedent for industrialization of state and national parks everywhere, simply for the benefit of a utility corporation's financial bottom line.

In a hearing scheduled by the State Park and Recreation Committee on February 8, 2007 in Borrego Springs, over 500 people attended with 71 speakers overwhelmingly in opposition to the de-designation of the natural treasure that is the Anza-Borrego Desert State Park. The outcry against the desecration of the park was magnified by the fact that the project is not even necessary.

Alternatives

We defer to the eloquent expertise of Bill Powers' comments in the above-referenced BPPWG letter regarding the subject corridor designation and superior alternatives to it.

We agree that local power generation is the best solution for San Diego's future power needs, either new, small local plants and/or updated ones. SDG&E could upgrade its existing transmission lines and the Green Path North would deliver renewable resources through San Diego County from the desert to the coast. We believe it is worth repeating here the facts from page 5 of Mr. Powers' above-cited letter:

"Replacement of aging coastal boiler plants with modern combined-cycle power plants has been a long-time objective of the San Diego Association of Governments (SANDAG). A stated goal of the SANDAG San Diego Regional Energy Strategy 2030 is to increase in-area generation from 65 percent of peak summer demand in 2010 to 75 percent in 2020. This option, again citing SDG&E's own transmission modeling, would allow the delivery of a spectacular amount of renewable energy imports from Imperial County. SDG&E's modeling demonstrated

that 21,260 gigawatt-hours (gWh) of renewable energy could be delivered, more than 100 percent of SDG&E's projected total retail electricity sales of 19,076 gWh in 2015, without Sunrise and with no significant change in the market price of power in the San Diego area. In contrast, the construction of the Sunrise Powerlink and increased reliance on power imports as proposed by SDG&E would take the San Diego area in the opposite direction." (emphasis added)

Lack of Regulatory Oversight and Anti-Trust Activities

Once again citing Mr. Powers' and BPPWG's letter (page 2) to your office dated April 15, 2007 regarding the subject NIETC designation, Sempra Energy has been routing energy from its plant in Mexicali, Mexico into the U.S. That letter states on page 2: "Sempra owns power plants in Mexicali, Baja California, Mexico (600 MW), western Arizona (1,250 MW), Kern County, California (520 MW) and Boulder City, Nevada (500 MW)."

Page 4 of Mr. Powers' letter states: "Sempra Energy and SDG&E are working hard to convince regulators and the public that the fundamental objective of the Sunrise Powerlink is renewable energy transmission, and not to enhance the value and export capability of Sempra export power plant(s) located just over the border in Baja California. However, numerous contradictory public statements by SDG&E and Sempra have undermined this public relations effort. The fundamental objective of the proposed Sunrise Powerlink is to enhance the value of Sempra export power plant(s) in Baja California. This objective does not come close to meeting the standard defined in Section 368 for NIETC designation: *necessary to improve reliability; relieve congestion and enhance the capability of the national grid to deliver electricity.*"

Clearly, Sempra is creating a schematic for the entire energy industry to emulate and profit from. As the first on the ground with LNG plant capacity and a high capacity functioning re-gasified line to Mexicali, Sempra will hold a position unique to vertically integrated companies with market dominance power. It will have the ability to move natural gas in both directions on the border, supply north and south American competitors, fuel its own gas fired plants and transmit nearly unlimited electric power north at costs that have every potential to be the lowest wholesale prices in the continental US. But none of this can be accomplished without Sunrise Powerlink. The Mexican market does not have the advanced industrial/technical workplace required to utilize the power capacity generated by Sempra. There simply is not a single market for the enormous power generating capacity that Sempra can scale up to in Mexicali. Sunrise would allow this pivotal transfer of electrical energy to new American markets in California.

Why through California? Because the costs of transmission planning, environmental review, construction and maintenance are essentially underwritten by the state of California:

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Free is the operative descriptor. This state-sanctioned form of corporate welfare is a cash cow vestige to an era of fully regulated utilities. And one that Sempra is fully exploiting. Please bear in mind that viewed simply as a line of power towers that Sunrise appears to be merely a long distance extension cord. Seen in its broadest form, Sunrise is the key example of global corporate market power domination - aided and abetted by its very regulators. The entire (and vast) resources of the numerous unregulated Sempra companies are working in unison to advance this project's feasibility. Every facet of the operation appears to have been geared to pull out costs, dodge effective regulation and compound the efficiencies of scale, market strength and political connections to regulatory agencies. In essence, Sunrise is the perfect project for Sempra Corporation; and the worst one conceivable for ratepayers and taxpayers in California. The immense market power that Sempra could derive from Sunrise has the ability to destabilize the electrical generation market throughout the southwest, if not the entire western half of the US.

The BPPWG's above-referenced letter to your office, page 5, states that "SDG&E has effectively blocked any study of transmission alternatives to the proposed Sunrise Powerlink, in contrast to claims made to DOE that the Sunrise Powerlink route has been thoroughly vetted in regional transmission planning forums.

One example of this is SDG&E's failure to consider the impact of the proposed Green Path North 500 kV line on the need for the Sunrise Powerlink to move renewable energy from Imperial County. Green Path North is proposed by two public utilities, Los Angeles Department of Water and Power (LADWP) and the Imperial Irrigation District. This line would pass to the north and west of Anza Borrego Desert State Park. Green Path North is on schedule to be online by 2010 according to David Nahai, president of the LADWP Board of Directors."

While anti-trust and non-competitive actions are complex topics, the symptoms and results are easy to recognize. Chief among the characteristics of a monopoly is a trait termed "Refusal to Deal".

A particularly egregious example surfaced recently in a public and widely reported event. The San Diego Union-Tribune published an article on January 19, 2007, stating: "...Avery [SDG&E representative] unequivocally told council members and port commissioners that SDG&E has no plans to buy power from a South Bay replacement. As the South Bay replacement is currently proposed, Avery said 'it does not meet our long-term resource needs. SDG&E does not need local plants that provide the region's base power loads,' Avery said." That statement was made even though espousing in-area generation had been SDG&E's public relations mantra for more than a year. Clearly, a lack of competition, especially in a partially de-regulated market, can be anticipated to harm the consumers.

This project is an absolute license for monopoly, cementing Sempra's already market dominant position as the nation's largest supplier of electrical power. All facets of anti-trust laws as they relate to regulated markets and the unique structure of SDG&E and its parent Sempra must be explored by the DOE prior to any federal designation for NIETC.

National Security

The disingenuous claim for needing the Sunrise Powerlink to receive the NIETC designation to ensure continued electrical supply for military installations for ensuring "national security" has been demonstrated to be fallacious by the project proponent's failure to meet its own project objectives, especially the "reliability" claim, as demonstrated in preceding paragraphs, its falsified claims of congestion and other disingenuous actions on behalf of its own interests and not those of the ratepayers. Moreover, known risks along the Powerlink's preferred alignment such as extremely high wind events, high risk of wildfire and being proposed along a well known very recently active earthquake fault remove any vestigial remnants of claims for "reliability" from the project. The alternatives discussed in this letter would also afford improved reliability of energy for San Diego's military installations. Moreover, all military bases in San Diego County are equipped with independent generating facilities of their own in the event of main grid disruption.

Conclusion

This letter has demonstrated the potential for the creation of a monopoly and possible anti-trust activities by the proponents of the Sunrise Powerlink. We believe it is within the purview, indeed, the responsibility of the Department of Energy to assure that the immense social and environmental harm that would be caused by approving the Sunrise Powerlink for NIETC designation will not occur by denying SDG&E/Sempra's application for such designation. The public trusts its government agencies to consider its well being first and foremost and not inflict on them any project or development that would result in more harm than benefit. We believe the Sunrise Powerlink is a corporate ploy to acquire, through the "back door," one piece at a time, and with rigged "statistics" and bogus "logic," energy power on a scale heretofore not considered possible.

It is BCC's view that the proposed Sunrise Powerlink represents the greatest threat and danger to the people of Southern California in general and San Diego County in particular. There is NO BENEFIT that justifies the enormous, permanent environmental and social devastation to San Diego County. It is our hope that these comments will trigger DOE review of the facts that refute the fallacious claims in SDG&E/Sempra's application for NIETC designation.

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We respectfully request the Department of Energy to seriously consider the facts and comments presented in this and other letters opposing the Sunrise Powerlink designation as part of the National Interest Energy Transmission Corridor and deny SDG&E's application.

Thank you.

Sincerely,



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BCC Director
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cc: U.S. Senator Barbara Boxer CEC Chair, Jacklyne Phannenstiel
U.S. Senator Dianne Feinstein CEC Commissioner John Geesman
U.S. Rep. Nancy Pelosi CEC Commissioner James Boyd
U.S. Rep. Henry Waxman CEC Commissioner Arthur Rosenfeld
U.S. Rep. Bob Filner CEC Commissioner Jeffrey Byron
U.S. Rep. Duncan Hunter CPUC Commissioners
S.D. County Supervisor Dianne Jacob, 2nd District
Interested Parties

TECHNICAL REPORT 75-2

FINAL REPORT

APPLICATION OF SKYLAB AND ERTS IMAGERY TO FAULT TECTONICS AND
EARTHQUAKE HAZARDS OF PENINSULAR RANGES, SOUTHWESTERN CALIFORNIA

July 1975

by

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Sponsored by NASA-Johnson Spacecraft Center Contract NAS 2-7698
and U.S. Geological Survey Contract No. 14-08-0001-13911

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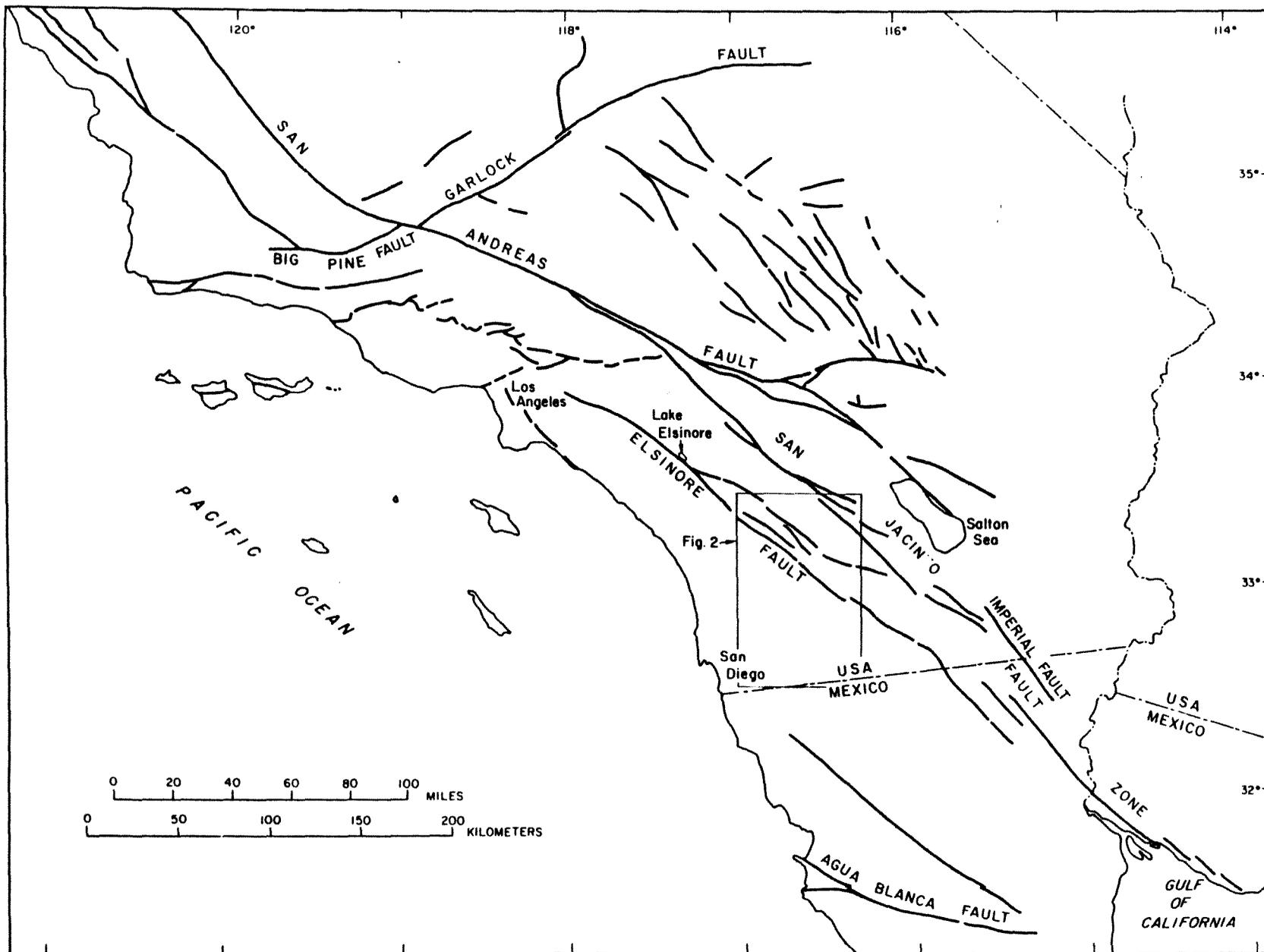


Fig. 1 - Index map showing major faults and area covered by generalized fault and linear map (Fig. 2). Redrawn from Proctor (1973).

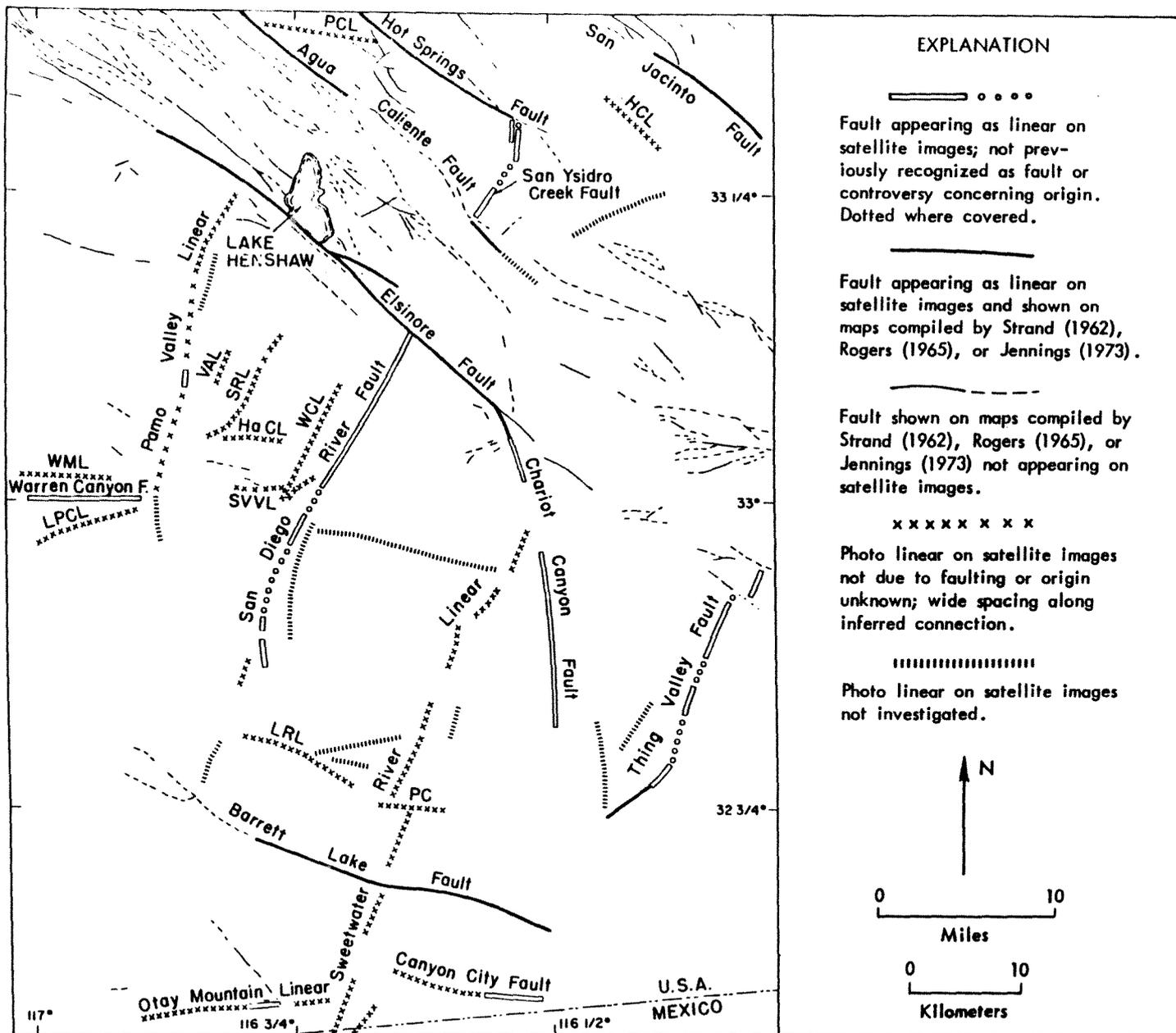


Fig. 2 - Faults and linears recognized on Skylab and ERTS images and previously mapped faults, southwestern California. Abbreviations: HaCL: Hatfield Creek linear; HCL: Henderson Canyon linear; LPCL: Los Penasquitos Canyon linear; LRL: Loveland Reservoir linear; PC: Pine Creek linear; PCL: Previtt Canyon linear; SRL: Sutherland Reservoir linear; SVVL: San Vicente Valley linear; VAL: Valle De Los Amigos linear, WCL: Witch Creek linear; WML: Woodson Mountain linear. See Fig. 1 for area covered.



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**Protected Natural Lands Impacted by the Sunrise Powerlink
Preferred and Alternative Routes
4/17/07**

Preferred Route Directly Impacted Areas

Anza-Borrego Desert State Park

- Vallecito Mountains Wilderness
- Pinyon Ridge Wilderness
- Grapevine Mountains Wilderness

U.S. Bureau of Land Management

- Yuha Basin Area of Critical Environmental Concern ("ACEC")
- San Sebastian Marsh/San Felipe Creek ACEC
- West Mesa ACEC

City of San Diego

- Los Penasquitos Canyon Preserve

County of San Diego

- Mt. Gower Open Space
- Barnett Ranch Open Space
- Boulder Oaks Open Space
- Sycamore Canyon Preserve
- Los Penasquitos Canyon Preserve

Preferred Route Indirectly Impacted Areas

U.S. Bureau of Land Management

- San Felipe Hills Wilderness Study Area
- San Ysidro Wilderness Study Area

Cleveland National Forest

County of San Diego

- Santa Ysabel Open Space Preserve East
- Santa Ysabel Open Space Preserve West

U.S. Fish and Wildlife Service

- San Diego National Wildlife Refuge (Del Mar Mesa)

Alternative Routes Directly and Indirectly Impacted Areas

Anza-Borrego Desert State Park

- Vallecito Mountains Wilderness
- Pinyon Ridge Wilderness
- Grapevine Mountains Wilderness
- Sin Nombre Wilderness

U.S. Bureau of Land Management

- Yuha Basin ACEC
- San Sebastian Marsh/San Felipe Creek ACEC
- West Mesa ACEC
- Fish Creek Wilderness
- Coyote Mountains Wilderness
- Jacumba Wilderness
- San Felipe Hills Wilderness Study Area
- Table Mountain ACEC
- In-Ko-Pah Mountainis ACEC
- Carrizo Gorge Wilderness

California Department of Fish and Game

- San Felipe Valley Wildlife Area
- Goodan Ranch
- Del Mar Mesa Preserve

Cleveland National Forest

- Eagle Peak Inventoried Roadless Area ("IRA")
- No-Name IRA
- Sill Hill IRA

- Cottonwood Creek eligible Wild and Scenic River
- Pine Creek Wilderness
- Guatay Mountain Research Natural Area

City of San Diego

- Del Mar Mesa Preserve
- Los Penasquitos Canyon Preserve

County of San Diego

- Volcan Mountain Open Space Preserve
- Santa Ysabel Open Space Preserve East
- Santa Ysabel Open Space Preserve West
- Mt. Gower Open Space
- Barnett Ranch Open Space
- Boulder Oaks Open Space
- Sycamore Canyon Preserve
- Los Penasquitos Canyon Preserve
- Oak Oasis Preserve

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ATTN: DOCKET No. 2007-OE-02

May 17, 2007
Department of Energy
Re: Draft Southwest Corridor

I am here today to urge you to act on behalf of all the citizens of San Diego City and County in opposition to the Draft Southwest Corridor.

San Diego already has its own energy plan, The San Diego Regional Energy 2030 plan that utilizes in-basin generation using new existing technologies and renewable energy generated locally.

We have a very different challenge today than we did even in 2005. Priorities have changed and it is becoming apparent that true energy independence is the only sensible alternative. It is predicted that in the 21st century the "less will be more" and "de-centralization" will become the new talking points. Energy should be generated and transmitted locally. San Diego's Energy Plan already implements this idea of de-centralization, which will ultimately put this city in a more secure position in direct contrast to the Draft Southwest Corridor plan. Localized Energy independence is a far more secure idea than giant transmission corridors that tramples over the rights of citizens and property owners and of States rights as well.

The Citizens of San Diego City and County have not forgotten the role that Sempra Energy played in the "so called" energy crisis that occurred here in this city. We now know that the transmission lines were artificially congested to drive up prices and that these contracts will expire in 2010. This will allow us to use new technology that allows existing transmission lines to be upgraded to carry more kilovolts. All this at a far less expense than the idea of the "Sunrise Powerlink" paid for by the tax and ratepayer. The Sunrise Powerlink will also trample over one of San Diego's most treasured scenic drives through the Wilderness of San Diego County, and through the world famous Anza Borrego State Park. We should not have to be asked to forfeit what cannot be replaced over what would be best for the shareholders of a "for profit" Corporation. There are so many more viable, modern and less expensive answers to our energy problems today.

It is unreasonable to keep asking citizens to make these kinds of sacrifices. Instead, ask these huge energy corporations to make to sacrifice for the good of all, and invest in a modern idea. For a good example, look at the current energy model used in the country of Germany today. Such good incentives exists for business and homeowners that rooftop solar is becoming as common as the home computer is today. Net Metering is becoming the norm. Citizens are contributing to the grid locally, not overtaxing it. Corporations like Sempra are resisting these ideas, as it requires them to think outside the box. This is precisely what our Great Country should start doing and stop wasting precious time with old ideas because powerful corporations say so. I strongly oppose the Draft Southwest Corridors for the reasons stated above.

Judith Withers 27150 San Felipe Road Warner Springs, CA. 92086

Docket #!

20007-OE-
02

Communities United
for Sensible Power

**P.O. Box 683
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**(760) 787 – 0794 T
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May 17, 2007

Ms. Poonum Agrawal
Office of Electricity Delivery and Energy Reliability, OE-20
U.S. Department of Energy
Forestall Building, Room 6H-050
1000 Independence Avenue, S.W.
Washington, D.C. 20585
Tel: (202) 586 – 1411

BY EMAIL

Re: Opposition to U.S. Department of Energy (DOE) Federal Designation of San Diego Gas & Electric/SEMPRA Energy's Proposed Sunrise Powerlink 500 kV Transmission Line as a National Interest Electric Transmission Corridor (NIETC) and Request that this Project Not Be So Designated

Dear Ms. Agrawal,

We are writing to inform you that we oppose the request for DOE designation of SDG&E's mis-named proposal, the "Sunrise Powerlink" (SRPL), as an NIETC. We ask that you carefully examine the factual background to this proposed corridor.

If the involvement of the federal government in this particular proposed transmission project involves national security questions it appears to us – the communities on the ground – that our national security would not be increased by this proposed line due to the fact that this line may be used to import electricity generated in a foreign country, Mexico, and therefore would increase national security risks rather than decrease them.

The ill-conceived transmission line promises to be a very bad idea. Beyond community and environmental issues, this line will cost rate-payers some \$1.3 billion, lock our region into an expensive (and for SEMPRA expensive) energy boondoggle that will work against new ideas and soak up ratepayer assets to implement new energy solutions in the bargain. The line will not guarantee the elimination of another high-cost energy crisis in the future because we understand that the California 2000-2001 "energy crisis" was not due to a lack of energy but manipulation of energy markets, including by SEMPRA, and could happen again.

Communities United for Sensible Power (CUSP) is a broad coalition of community groups spanning the County of San Diego from the Anza Borrego Desert to the Pacific Ocean organized to protect our communities and surrounding natural world from the destructive transmission line project proposed by San Diego Gas & Electric (SDG&E). We especially object to the federal government interference with the State of California process already in place to decide issues of transmission lines; we also object to the potential use of eminent domain on the part of the federal government in connection with a federalization of the proposed transmission line corridor. These issues hit hard on the people who live in San Diego County as we will suffer the consequences of having our voices and our objections silenced by a federalization of the process and project.

CUSP, formed in San Diego a year ago, is made up of community representatives from Ocotillo Wells, Canebrake, Borrego Springs, Ranchita, Julian, Wynola, Santa Ysabel, Ramona, Rancho Penasquitos, Torrey Hills and Carmel Valley. Our organization also includes community representatives who are intervening with the California Public Utilities Commission (CPUC) proceedings on this project. CUSP is also part of the Protect Our Communities initiative organized to protect communities and their collective environments from this destructive line, which would slice through dozens of communities and permanently mar the Anza Borrego Desert State Park as well as a dozen open space preserves in San Diego County

We collectively support modern energy solutions to our regional energy needs in line with the San Diego 2030 Regional Energy Strategy produced by the San Diego Association of Governments (SANDAG). We are concerned that the DOE would be overreaching its jurisdiction to designate the proposed line (or vast areas of Southern California counties) as federal corridors. It would be, in our eyes, unwise for the federal government to align itself with outdated, expensive, destructive modes of energy that will increase CO2 emissions and work against the need for new energy solutions for the balance of the 21st century.

We suspect that the DOE may be influenced by arguments to secure energy for military installations in the region. We understand that the Department of Defense is the highest energy consumer in the United States. We would encourage the federal government to reduce its energy consumption, thereby acting as a role model for every day Americans who no doubt will be called upon to do the same in this global warming era.

We know that the proposed line, the most massive infrastructure project ever envisioned for San Diego County, will be generating energy using the LNG gas imports of SDG&E's parent company SEMPRA, which is building the Ensenada LNG facility with Shell Oil in Mexico. The transmission line project is essentially a long distance cord to the LNG sites in Indonesia and around the Pacific rim and as such is directly connected to the community and environmental destruction associated with LNG mining operations in other countries. This does not seem to be the most prudent course to take when a worldwide movement is growing to decrease dependence on fossil fuels and to acknowledge and repair damage done in the production of these fuels

We are concerned that the profits of our local utility will increase while our energy security, community cohesion, environmental protection and innovative energy solutions decrease. This is not a good bargain for San Diego or the region.

Accordingly, we respectfully request that you reject the nomination and designation of the "Sunrise PowerLink" as a National Energy Corridor.

Sincerely,

/S/ Diane Conklin

Diane Conklin
CUSP Coordinator

CUSP Member Organizations:

Citizens United for Responsible Energy (CURE) – Borrego Springs
Canebrake Citizens Group (CCG) – Canebrake
Carmel Valley Concerned Citizens (CVCC) – San Diego
Peoples Powerlink (PPL) – Julian
Back Country Coalition – Wynola
Ocotillo Wells Citizens Alliance for Responsible Energy (OWCARE) – Ocotillo Wells
Mussey Grade Road Alliance – Ramona
Community Alliance for Sensible Energy (CASE) – Ranchita, San Felipe, Warner Springs, Mesa Grande, Santa Ysabel
Rancho Penasquitos Concerned Citizens (RPCC) – San Diego
Torrey Hills Concerned Citizens - San Diego

cc: San Diego County Congressional Delegation, State Delegation, California Electricity Commission, San Diego City Government, San Diego Board of Supervisors



SAN DIEGO COUNTY SUPERVISOR

DIANNE JACOB

PUBLIC COMMENTS

**Southwest Area National Energy Corridor Designation
Public Meeting
May 17, 2007**

I would like to thank the Department of Energy for holding today's hearing on its proposed Southwest National Energy Corridor. I know this public hearing is not mandated under the Federal Power Act. I appreciate the Department's diligence in seeking input from areas most impacted by the proposed corridor.

I am a member of the San Diego County Board of Supervisors. San Diego County is one of seven California counties included in the proposed corridor. At about 82,430 square miles, the corridor is more than half the size of entire State of California.

I represent the people of San Diego County's Second District, which encompasses the eastern portion of San Diego County. My district includes many communities affected by San Diego Gas and Electric's Sunrise Powerlink transmission line proposal.

In a document dated March 6, 2006, SDG&E argues that the preferred route of the Sunrise Powerlink be designated a National Interest Electric Transmission Corridor.

Like many others here today, I challenge the legitimacy of SDG&E's request and, in turn, question the need for the designation. I believe that SDG&E is attempting to pull an end-run around the existing permitting process.

The Department of Energy should not steal energy transmission planning from of the hands of California stakeholders and pile on yet another layer of costly, duplicative, bureaucratic review.

Instead, the Department should consider disturbing questions surrounding the case for the Sunrise Powerlink. These questions negate the need for the Corridor Designation for San Diego County.

The 2006 National Electric Transmission Congestion Study—the study upon which the proposed corridor is based—assumes as fact SDG&E's claims of congestion along the region's existing 500 kilovolt transmission line known as the Southwest Powerline.

Unfortunately, the study did not consider a finding by a three-judge arbitration panel in April of 2006. That panel determined that Sempra Energy—the parent company of SDG&E—created artificial congestion on the Southwest Powerline. Sempra, it should be noted, owns two Baja California generation plants that feed the Southwest line.

For these Enron-style shenanigans, Sempra paid 70 million in fines to the State of California.

By including San Diego County in the corridor designation, the Department of Energy may very well be basing unprecedented national energy policy on entirely phantom congestion. This situation merits, at the very least, additional information from Sempra Energy, the parent company of SDG&E.

In addition to SDG&E's assertion that Sunrise will alleviate transmission congestion in San Diego County, the utility claims Sunrise is needed to meet a State renewable energy mandate that calls for 20 percent of SDG&E's power to come from renewables by 2010.

In public relations materials, the utility attempts to portray Sunrise as a lifeline to a wealth of potential renewable energy in Imperial County. The utility says it has enthusiastic hopes for renewable potential in Imperial County, particularly the Stirling solar dish project, a technology which has never been commercially tested. Experts are now raising concerns about its viability.

As recently as October of 2006, SDG&E was asked by a group of local energy stakeholders if the utility would be willing to guarantee that a minimum percentage of the power imported via Sunrise would come from renewables like Stirling.

SDG&E responded in writing, "The physics of interconnected grid operation are incompatible with the notion of ascribing particular sources of generation to particular transmission lines." Simply put, SDG&E will offer no such guarantee.

Last month, the utility lobbied heavily against a bill in Sacramento that would have increased the State's renewable mandate to 33 percent by 2020, 13 years from now.

Such equivocating by the utility has caused many to speculate of a more sinister plot: That Sunrise is less a way to end transmission congestion, less a way to pioneer renewable energy and more a way for SEMPRAs to profit from cheap Baja power sold outside of SDG&E's service territory.

Numerous alternatives to Sunrise have been suggested to San Diego Gas and Electric and have gained little traction.

Experts say retooling two existing power plants already in-basin would end the region's future energy gap at a fraction of Sunrise's 1.3 billion price tag.

Experts also say that the so-called Green Path North, a proposed 500 kV line being proposed by Los Angeles Department of Power and Water and the Imperial Irrigation District would negate the need for Sunrise. This is a subject I hope will be addressed by SDG&E in its upcoming draft environmental documents for Sunrise.

Before the Department of Energy includes San Diego County as a congested corridor or accepts as gospel SDG&E's support for renewable energy, please consider the message the larger designation sends to Californians.

The designation makes the assumption that the process in place is broken. It's not.

The 2006 National Electric Transmission Congestion Study identifies four large Southern California energy projects needed to secure energy reliability in the near term.

The California Public Utilities Commission has permitted or is in the process of permitting all but one of these projects: Sunrise. All but one of these projects has been especially controversial: Sunrise.

The CPUC's system is not broken. It is a lengthy, deliberative, frustrating-by-nature, process that weeds out unworthy projects.

Let there be not mistake: the proposed corridor designation is only about jamming through the Sunrise project over the objections of local, State and Federal officials. If, in the future, the Department of Energy is able to brush aside the State of California and approve a failed Sunrise proposal, it will be giving special treatment to SDG&E.

Such favoritism toward one special interest sets a dangerous, dangerous precedent.

Thank you again for the opportunity to comment on the corridor. I appreciate your willingness to travel to San Diego County.