

Offered for the Public Record by Curtis M. Dowds, Ph.D. (Speaker #45)

I rise in opposition to the Sunrise Powerlink.

1. ***Please scrutinize closely and skeptically all SDG&E claims concerning net benefits from the Sunrise Powerlink.*** SDG&E has claimed at different times significantly different levelized annual savings over the four decades established as the project's life cycle. In one presentation to the San Diego Association of Government's Economic Working Group (SANDAG-EWG), SDG&E pegged those savings at \$142 million levelized annually. Independent analysts, the Utility Consumers' Action Network (UCAN) among others, view these claims as wildly exaggerated. An example of these exaggerations would be that the savings claimed could be achieved ***by not building in-basin peaker plants and, instead, importing peaking energy from out-of-basin.*** Owing to the presentation's ambiguous wording and SDG&E's insistent (but largely unsubstantiated) claim that the new transmission line will be bringing predominantly renewable energy to San Diego, the impression is left, without actually saying so, that these saving will be achieved by importing renewables.  
  
***However, today one cannot cost-effectively use out-of-basin renewable energy to not build peaker plants in-basin. At the state of the art, renewable energy everywhere, to the east or in-basin, cannot reliably meet peak loads for lack of a cost-effective storage technology. Nowhere in the public record are such costs transparently accounted.*** One can only conclude that one of two outcomes will follow from this contradiction. SDG&E will be forced to contract for in-basin peaking capacity, saving absolutely nothing. Or SDG&E plans to import environmentally unsustainable energy from out-of-basin to obviate the need to invest in in-basin peaker plants (possibly even distant baseload with uncoded externalities from coal-fired sources in the "desert Southwest" or from increasingly contaminated LNG-fired energy from plants in Baja California).
2. ***Please examine whether SDG&E's application contributes to a trend that amounts to an inversion of the historically accepted paradigm for energy generation.*** Typically in the past, baseload and peaking capacity have been built in-basin. The grid would serve as a redundant back-up to cover improbable and unpredictable emergencies (e.g., the CAISO G-1/N-1 condition). What seems to be emerging ***without a transparent public policy debate*** is "off-shoring" generation, namely, placing it out-of-basin. This amounts to NIMBY writ large and is being done in the questionable name of accessing renewables that today do not exist. It would seem important that before we move baseload and even peaking capacity to regions other than those consuming the power, the commission and CAISO should first articulate unambiguously what public policy is in this matter. ***Is in-basin generation still a regional priority as a matter of public policy? We have a right to know.*** Please remember, everyone's "off-shore" (out-of-basin) is someone else's backyard. Why won't the "desert Southwest" want to build its power generation in San Diego if we build ours there? And why shouldn't they?
3. Please examine the ***efficiency impacts*** on electricity demand before you assess the need for the line. Also, please consider how ***a reasonable projection of load matches with much cheaper upgrades to existing transmission*** per the UCAN CPUC submissions and the Powers Report.<sup>1</sup>
4. Given the "ring of fire" scenario and seismic threats from the San Andreas, ***please remember that the most secure transmission is actually the least transmission. Distributed generation is the foundation of long-term of security.*** We need more, not less, in-basin capacity where generation is decentralized to the extent feasible. It should not go unnoticed that these are EIR/EIS alternatives #1 and #2. Lastly, global warming is a significantly greater threat to our collective future than a temporary electrical outage. In-basin generation should be from renewable energy to the extent feasible technologically and economically. In-basin renewable energy is feasible if financial mechanisms are created to spread out the costs of a twenty year life cycle.

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<sup>1</sup> Powers, Bill, P.E. "San Diego Smart Energy 2020, The 21<sup>st</sup> Century Alternative," E-Tech International, Santa Fe, New Mexico, October, 2007