



August 25, 2008

Via e-mail ([sunrise@aspeneg.com](mailto:sunrise@aspeneg.com)) only

Billie Blanchard, CPUC / Lynda Kastoll, BLM  
 c/o Aspen Environmental Group  
 235 Montgomery Street, Ste. 935  
 San Francisco, CA 94104

Re: A.06-08-010 (RPCC's Draft DEIR Comments)

Dear Ms. Blanchard and Ms. Kastoll:

Rancho Penasquitos Concerned Citizens (“RPCC”) hereby comments on the recirculated DEIR. As you know, the RDEIR evaluated a change to the coastal link transmission upgrades suggested by RPCC, namely a newly added re-conductor of the Sycamore – Scripps 69 kV line, as compared to the DEIR document. This change was necessitated solely by SDG&E changing their own plans concerning other upgrades in their system, between Phase I and Phase II in this matter (and after the release of the DEIR), and in keeping with CAISO reliability criteria. RPCC is glad to see that the CPUC still sees the Coastal link transmission upgrades as the environmentally superior option. However, RPCC writes to point out that the RDEIR failed to point out that another re-conductor that was analyzed within the DEIR (Poway – Pomerado 69 kV) was *deleted* in conjunction with the analysis that led to the addition of the Sycamore – Scripps re-conductor. This was an important distinguishing factor that should have been made clear within the RDEIR so that anyone reading the RDEIR concerning the coastal link could understand that the net difference was essentially zero – one 69 kV re-conductor was added and one was deleted, as compared to the original analysis.

So that the history of what happened in regards to SDG&E's unilateral changes between phase I and phase II is clear, the FEIR should point be clearer on what occurred and that there was not necessarily a net addition to the coastal link upgrade alternative. Specifically at page 21 of the RDEIR, the sentence, “This revision to the alternative is an addition to the Coastal Link System Upgrades Alternative that was analyzed in the Draft EIR/EIS and would not substitute for other parts of the alternative” is misleading. While the sentence is technically correct, without a sentence explaining that another re-conductor was removed, the reader is left with the impression that the changes were solely additions to the alternative, not an addition and a subtraction.

RPCC spent a considerable amount of time focusing its efforts on providing an alternative within the Coastal link that was not only cost effective and reliable, but was an alternative that impacted our communities and the environment the least. Once again, thank you for your continued analysis and the RDEIR's recognition of the fact that the Coastal link transmission alternative remains the environmentally superior alternative.

Should you have any questions, please contact me.

Very truly yours,

*/s/Harvey M. Payne*

Harvey M. Payne

HMP/hmp