

Appendix A

Schwarzenegger pressing state regulators to allow power line proposed through Anza-Borrego Desert State Park

The governor says it is needed to transfer clean energy, but opponents say it's a new threat to California's natural resources.

By Michael Rothfeld, Los Angeles Times Staff Writer
April 27, 2008

SACRAMENTO -- Gov. Arnold Schwarzenegger is pushing state regulators to sign off on a high-voltage power line that a San Diego utility wants to build through the middle of California's largest state park.

Proposed for Anza-Borrego Desert State Park, the project puts Schwarzenegger again at odds with environmentalists -- and some state officials -- who believe he is allowing California's unrivaled collection of public preserves to be threatened.



Photos: Anza-Borrego Desert State Park

The latest controversy follows the governor's proposal to close 48 parks to save money, his

backing of a six-lane toll road through San Onofre State Beach and his decision not to reappoint two foes of that project -- his brother-in-law Bobby Shriver and actor-director Clint Eastwood -- to the state parks commission.

Schwarzenegger, who says the power line is needed to transport clean energy, was concerned that Shriver and Eastwood might fight it too, said some officials and others familiar with the situation. The governor's aides have said he removed the pair to give others a chance to serve.

The battle highlights the tension between California's demand for infrastructure and its desire to protect natural resources.

East of San Diego in the Colorado Desert, [Anza-Borrego](#) is among the largest state parks in the United States and runs 70 miles south from Riverside County nearly to Mexico. It shelters a variety of wildlife and contains structures thought to be ancient human dwellings. Nearly a million people visit each year.

The 150-mile transmission line would run through the park for more than 20 miles, replacing wooden poles that carry lower-voltage lines with industrial-style towers up to 160 feet tall.

Sunrise A.06-08-010

San Diego Gas & Electric and its parent corporation, Sempra Energy, promise that the proposed line, known as Sunrise Powerlink, would carry renewable power from the sun, wind and ground, mostly via yet-undeveloped plants in the bright, hot Imperial Valley.

State law requires utilities to supply 20% of their energy from renewable sources by 2010 -- a benchmark SDG&E has said it cannot meet. The San Diego utility supplies 6% today.

"The project's significance lies not only in its supplying additional power for a thriving and growing region but in doing so in a way that truly moves California into the future," Schwarzenegger wrote to Dian Grueneich, the California public utility commissioner overseeing the project's application, in a letter last December that came to light last month.

But the project would mar sweeping vistas of mountains, desert and scenic roads on 90,000 of Anza-Borrego's 600,000 acres, spoil the solitude of campgrounds with loud buzzing and jeopardize species such as the endangered bighorn sheep, according to parks officials and a draft state and federal environmental [review](#) completed in January. That report found five preferable alternatives, including a route south of the park along Interstate 8 through the Cleveland National Forest.

"The idea that we're going to sacrifice critical pieces of our environment to protect other pieces of our environment seems a little ironic," said Elizabeth Goldstein, president of the nonprofit California Parks Foundation. "That's an irony I cannot accept. We have to find a way to do both."

Schwarzenegger, in turn, called environmentalists and Democrats hypocrites for trying to block clean-energy projects.

"It's a kind of schizophrenic behavior," the Republican governor said recently at a Yale University conference on climate change. "They

say that we want renewable energy, but we don't want you to put it anywhere."

He cited opposition to SDG&E's plan for "150 miles of transmission lines" -- the precise distance of the company's proposed route through Anza-Borrego. The alternative southern route is 40 miles shorter.

The governor's parks director, Ruth Coleman, objects to SDG&E's plans and told Grueneich in February that she prefers a route that avoids the park. But in deference to Schwarzenegger, she has remained otherwise silent on the matter in recent months -- as she eventually did on the toll road plan -- since issuing a blistering statement to the Public Utilities Commission in 2006.

Coleman, who declined an interview request, wrote then that the power line "would forever change the character of this pristine park and wilderness area."

Some environmentalists question how much renewable energy the line would carry, because production is still scant in the Imperial Valley. Development is uncertain, they say, and the utility could use the line to import electricity from Sempra's natural gas-fired plants in Mexico and Arizona.

The Public Utilities Commission is expected to reach a decision on whether the line should be built, and where, by late summer. "I believe very strongly that the public needs to have confidence this process has been fair," said Grueneich, who has arranged [public hearings](#) in Borrego Springs, near the park, on May 12.

SDG&E executives argue that building through Anza-Borrego would allow northward expansion connecting with Southern California Edison's system in Riverside and Orange counties, increasing the reliability of the state's electrical grid.

In addition, they say, the southern route would come too close to another power line the

Sunrise A.06-08-010

company has, creating a fire hazard; would bisect tribal territory; and would be more disruptive to communities than building in the park along the easement for the smaller line, which pre-dated by nine years the park's establishment in 1933.

"If we took the southern corridor we would probably have four times as many miles of newly disturbed lands as we would through the northern corridor," Michael Niggli, SDG&E's chief operating officer, said in an interview. "There are some considerations here that suggest this may be a very appropriate way to meet the goals of the state of California."

Mark Jorgensen, the Anza-Borrego superintendent, said the park has been targeted before for power lines, water tunnels and fuel lines heading to San Diego from the east.

"We realize that life goes on outside of Anza-Borrego," said Jorgensen, who has worked in the park for 32 years. But "we feel it is important to stand up for the park values and why people set this site apart 75 years ago."

A spokeswoman for the governor, Lisa Page, said that Schwarzenegger "doesn't want to go through the park if it can be avoided" and that he has not backed a specific route.

But in his December letter to the Public Utilities Commission, the governor said he wanted "to offer my support for the Sunrise Powerlink project before you for consideration."

Schwarzenegger sent a copy of his letter to commission President Michael Peevey, a former energy company executive who has taken an interest in the project, though he is not assigned to oversee it.

On March 20, Peevey's chief of staff flew by

helicopter over the proposed routes with Niggli, the utility's chief operating officer, who described the advantages of the Anza-Borrego route, according to a PUC filing.

"In the 25 years I've been doing this, I've never seen this kind of hands-on intervention by the commissioners and the governor this early in a case," said Michael Shames, executive director of the Utility Consumers' Action Network, a San Diego nonprofit advocacy group fighting the power line.

Sempra donated \$25,000 to Schwarzenegger's 2007 inaugural committee, state records show. In 2004, the company gave the governor a \$50,000 political contribution, which he returned due to a pending lawsuit between Sempra and the state.

There is a dispute between SDG&E and parks officials over whether the Parks and Recreation Commission would need to vote on a new power line. Shriver and Eastwood would have been in a position to exert influence over the project had it come before them for a vote, although they had not taken a position on it.

michael.rothfeld@latimes.com

<http://www.latimes.com/news/science/environment/la-me-park27apr27,1,3488731,full.story>

Energy Funds Swell Governor's Post-Election Accounts

Since being elected in October, governor Schwarzenegger has raked in nearly \$11 million in contributions, with PG&E and Sempra throwing in tens of thousands of dollars.

February 20, 2004

<http://www.californiaenergycircuit.net/displaykeywordstories.php?keid=33&task=show&un=&ut=&pd=&seid=1211835990>



GOVERNOR ARNOLD SCHWARZENEGGER

December 3, 2007

Ms. Dian Grueneich
 California Public Utilities Commissioner
 505 Van Ness Avenue
 San Francisco, California 94102



Dear Commissioner Grueneich,

I write to offer my support for the Sunrise Powerlink project before you for consideration. The project's significance lies not only in its supplying additional power for a thriving and growing region, but in doing so in a way that truly moves California into the future. We have already established ourselves as a world leader in renewable resources, propelled in part by our recognition that environmental innovation and economic prosperity really can go hand in hand.

The Sunrise Powerlink stands to take that relationship one step further by providing direct access to clean, renewable energy sources ranging from wind to geothermal, plus connecting the San Diego region to what could become the largest solar energy facility in the world. Only about six percent of the electricity currently delivered by San Diego Gas & Electric is from renewable or green energy – the state now requires 20 percent. With the Sunrise Powerlink, SDG&E will be able to meet that demand and, if projections hold true, do so in a way that will help save ratepayers \$100 million per year by reducing transmission congestion, expanding access to power sources and updating generating infrastructure.

I appreciate your consideration of a project that can hold tremendous value for our fellow Californians. If my office or administration can be of any assistance as we move forward, please do not hesitate to let us know.

Sincerely,

Arnold Schwarzenegger

/la

cc: Mr. Michael R. Peevey, California Public Utilities Commission President

STATE CAPITOL • SACRAMENTO, CALIFORNIA 95814 • (916) 445-2841



Appendix B

CEQA

The California Environmental Quality Act

PUBLIC RESOURCES CODE

SECTION 21000-21106

Chapter 1: Policy

§ 21000. Legislative intent

The Legislature finds and declares as follows:

(a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern.

(b) It is necessary to provide a high-quality environment that at all times is healthful and pleasing to the senses and intellect of man.

(c) There is a need to understand the relationship between the maintenance of high-quality ecological systems and the general welfare of the people of the state, including their enjoyment of the natural resources of the state.

(d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.

(e) Every citizen has a responsibility to contribute to the preservation and enhancement of the environment.

(f) The interrelationship of policies and practices in the management of natural resources and waste disposal requires systematic and concerted efforts by public and private interests to enhance environmental quality and to control environmental pollution.

(g) It is the intent of the Legislature that all agencies of the state government which regulate activities of private individuals, corporations, and public agencies which are found to affect the quality of the environment, shall regulate such activities so that major consideration is given to preventing environmental damage, while providing a decent home and satisfying living environment for every Californian.

§ 21001. Additional legislative intent

The Legislature further finds and declares that it is the policy of the state to:

(a) Develop and maintain a high-quality environment now and in the future, and take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state.

(b) Take all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and

historic environmental qualities, and freedom from excessive noise.

(c) Prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history.

(d) Ensure that the long-term protection of the environment, consistent with the provision of a decent home and suitable living environment for every Californian, shall be the guiding criterion in public decisions.

(e) Create and maintain conditions under which man and nature can exist in productive harmony to fulfill the social and economic requirements of present and future generations.

(f) Require governmental agencies at all levels to develop standards and procedures necessary to protect environmental quality.

(g) Require governmental agencies at all levels to consider qualitative factors as well as economic and technical factors and long-term benefits and costs, in addition to short-term benefits and costs and to consider alternatives to proposed actions affecting the environment.

§ 21001.1. Review of public agency projects

The Legislature further finds and declares that it is the policy of the state that projects to be carried out by public agencies be subject to the same level of review and consideration under this division as that of private projects required to be approved by public agencies.

§ 21002. Approval of projects; feasible alternative or mitigation measures

The Legislature finds and declares that it is the policy of the state that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects, and that the procedures required by this division are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. The Legislature further finds and declares that in the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof.

§ 21002.1. Use of environmental impact reports; policy

In order to achieve the objectives set forth in Section

21002, the Legislature hereby finds and declares that the following policy shall apply to the use of environmental impact reports prepared pursuant to this division:

(a) The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

(b) Each public agency shall mitigate or avoid the significant effects on the

environment of projects that it carries out or approves whenever it is feasible to do so.

(c) If economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency if the project is otherwise permissible under applicable laws and regulations.

(d) In applying the policies of subdivisions (b) and (c) to individual projects, the responsibility of the lead agency shall differ from that of a responsible agency. The lead agency shall be responsible for considering the effects, both individual and collective, of all activities involved in a project. A responsible agency shall be responsible for considering only the effects of those activities involved in a project which it is required by law to carry out or approve. This subdivision applies only to decisions by a public agency to carry out or approve a project and does not otherwise affect the scope of the comments that the public agency may wish to make pursuant to Section 21104 or 21153.

(e) To provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a proposed project, lead agencies shall, in accordance with Section 21100, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other

effects to a brief explanation as to why those effects are not potentially significant.

§ 21003. Planning and environmental review procedures; documents; reports; data base; administration of process

The Legislature further finds and declares that it is the policy of the state that:

(a) Local agencies integrate the requirements of this division with planning and environmental review procedures otherwise required by law or by local practice so that all those procedures, to the maximum feasible extent, run concurrently, rather than consecutively.

(b) Documents prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decision makers and to the public.

(c) Environmental impact reports omit unnecessary descriptions of projects and emphasize feasible mitigation measures and feasible alternatives to projects.

(d) Information developed in individual environmental impact reports be incorporated into a data base which can be used to reduce delay and duplication in preparation of subsequent environmental impact reports.

(e) Information developed in environmental impact reports and negative declarations be incorporated into a data base which may be used to make subsequent or supplemental environmental determinations.

(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in

order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment.

§ 21003.1. Environmental effects of projects; comments from public and public agencies to lead agencies; availability of information

The Legislature further finds and declares it is the policy of the state that:

(a) Comments from the public and public agencies on the environmental effects of a project shall be made to lead agencies as soon as possible in the review of environmental documents, including, but not limited to, draft environmental impact reports and negative declarations, in order to allow the lead agencies to identify, at the earliest possible time in the environmental review process, potential significant effects of a project, alternatives, and mitigation measures which would substantially reduce the effects.

(b) Information relevant to the significant effects of a project, alternatives, and mitigation measures which substantially reduce the effects shall be made available as soon as possible by lead agencies, other public agencies, and interested persons and organizations.

(c) Nothing in subdivisions (a) or (b) reduces or otherwise limits public review or comment periods currently prescribed either by statute or in guidelines prepared and adopted pursuant to Section 21083 for environmental documents, including, but not limited to, draft environmental impact reports and negative declarations.

§ 21004. Mitigating or avoiding a significant effect; powers of public agency

In mitigating or avoiding a significant effect of a project on the environment, a public agency may exercise only those express or implied powers provided by law other than this division. However, a public agency may use discretionary powers provided by such other law for the purpose of mitigating or avoiding a significant effect on the environment subject to the express or implied constraints or limitations that may be provided by law.

§ 21005. Information disclosure provisions; noncompliance; presumption; findings

(a) The Legislature finds and declares that it is the policy of the state that noncompliance with the information disclosure provisions of this division which precludes relevant information from being presented to the public agency, or noncompliance with substantive requirements of this division, may constitute a prejudicial abuse of discretion within the meaning of Sections 21168 and 21168.5, regardless of whether a different outcome would have resulted if the public agency had complied with those provisions.

(b) It is the intent of the Legislature that, in undertaking judicial review pursuant to Sections 21168 and 21168.5, courts shall continue to follow the established principle that there is no presumption that error is prejudicial.

(c) It is further the intent of the Legislature that any court, which finds, or, in the process of reviewing a previous court

finding, finds, that a public agency has taken an action without compliance with this division, shall specifically address each of the alleged grounds for noncompliance.

§ 21006. Issuance of permits, licenses, certificates or other entitlements; waivers of sovereign

The Legislature finds and declares that this division is an integral part of any public agency's decision making process, including, but not limited to, the issuance of permits, licenses, certificates, or other entitlements required for activities undertaken pursuant to federal statutes containing specific waivers of sovereign immunity.

§ 21060.5. Environment

"Environment" means the physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance.

§ 21083. Office of Planning and Research; preparation, development and review of Guidelines

(a) The Office of Planning and Research shall prepare and develop proposed guidelines for the implementation of this division by public agencies. The guidelines shall include objectives and criteria for the orderly evaluation of projects and the preparation of environmental impact reports and negative declarations in a manner consistent with this division.

(b) The guidelines shall specifically include criteria for public agencies to follow in determining whether or not a proposed project may have a "significant effect on the environment." The criteria shall require a

finding that a project may have a "significant effect on the environment" if one or more of the following conditions exist:

(1) A proposed project has the potential to degrade the quality of the environment, curtail the range of the environment, or to achieve short-term, to the disadvantage of long-term, environmental goals.

(2) The possible effects of a project are individually limited but cumulatively considerable. As used in this paragraph, "cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

(3) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

(c) The guidelines shall include procedures for determining the lead agency pursuant to Section 21165.

(d) The guidelines shall include criteria for public agencies to use in determining when a proposed project is of sufficient statewide, regional, or area wide environmental significance that a draft environmental impact report, a proposed negative declaration, or a proposed mitigated negative declaration shall be submitted to appropriate state agencies, through the State Clearinghouse, for review and comment prior to completion of the environmental impact report, negative declaration, or mitigated negative declaration.

(e) The Office of Planning and Research shall develop and prepare the proposed guidelines

as soon as possible and shall transmit them immediately to the Secretary of the Resources Agency. The Secretary of the Resources Agency shall certify and adopt the guidelines pursuant to Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code, which shall become effective upon the filing thereof. However, the guidelines shall not be adopted without compliance with Sections 11346.4, 11346.5, and 11346.8 of the Government Code.

(f) The Office of Planning and Research shall, at least once every two years, review the guidelines adopted pursuant to this section and shall recommend proposed changes or amendments to the Secretary of the Resources Agency. The Secretary of the Resources Agency shall certify and adopt guidelines, and any amendments thereto, at least once every two years, pursuant to Chapter 3.5 (commencing with Section 11340) of Part 1 of Division 3 of Title 2 of the Government Code, which shall become effective upon the filing thereof. However, guidelines may not be adopted or amended without compliance with Sections 11346.4, 11346.5, and 11346.8 of the Government Code.

§ 21083.1. Legislative intent; interpretation by courts

It is the intent of the Legislature that courts, consistent with generally accepted rules of statutory interpretation, shall not interpret this division or the state guidelines adopted pursuant to Section 21083 in a manner which imposes procedural or substantive requirements beyond those explicitly stated in this division or in the state guidelines.

§ 21083.2. Archaeological resources; determination of effect of project; EIR or negative declaration; mitigation measures

(a) As part of the determination made pursuant to Section 21080.1, the lead agency shall determine whether the project may have a significant effect on archaeological resources. If the lead agency determines that the project may have a significant effect on unique archaeological resources, the environmental impact report shall address the issue of those resources. An environmental impact report, if otherwise necessary, shall not address the issue of nonunique archaeological resources. A negative declaration shall be issued with respect to a project if, but for the issue of nonunique archaeological resources, the negative declaration would be otherwise issued.

(b) If it can be demonstrated that a project will cause damage to a unique archaeological resource, the lead agency may require reasonable efforts to be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. Examples of that treatment, in no order of preference, may include, but are not limited to, any of the following:

(1) Planning construction to avoid archaeological sites.

(2) Deeding archaeological sites into permanent conservation easements.

(3) Capping or covering archaeological sites with a layer of soil before building on the sites.

(4) Planning parks, greenspace, or other open space to incorporate archaeological sites.

(c) To the extent that unique archaeological resources are not preserved in place or not left in an undisturbed state, mitigation measures shall be required as provided in this subdivision. The project applicant shall provide a guarantee to the lead agency to pay one-half the estimated cost of mitigating the significant effects of the project on unique archaeological resources. In determining payment, the lead agency shall give due consideration to the in-kind value of project design or expenditures that are intended to permit any or all archaeological resources or California Native American culturally significant sites to be preserved in place or left in an undisturbed state. When a final decision is made to carry out or approve the project, the lead agency shall, if necessary, reduce the specified mitigation measures to those which can be funded with the money guaranteed by the project applicant plus the money voluntarily guaranteed by any other person or persons for those mitigation purposes. In order to allow time for interested persons to provide the funding guarantee referred to in this subdivision, a final decision to carry out or approve a project shall not occur sooner than 60 days after completion of the recommended special environmental impact report required by this section.

(d) Excavation as mitigation shall be restricted to those parts of the unique archaeological resource that would be damaged or destroyed by the project. Excavation as mitigation shall not be required for a unique archaeological resource

if the lead agency determines that testing or studies already completed have adequately recovered the scientifically consequential information from and about the resource, if this determination is documented in the environmental impact report.

(e) In no event shall the amount paid by a project applicant for mitigation measures required pursuant to subdivision (c) exceed the following amounts:

(1) An amount equal to one-half of 1 percent of the projected cost of the project for mitigation measures undertaken within the site boundaries of a commercial or industrial project.

(2) An amount equal to three-fourths of 1 percent of the projected cost of the project for mitigation measures undertaken within the site boundaries of a housing project consisting of a single unit.

(3) If a housing project consists of more than a single unit, an amount equal to three-fourths of 1 percent of the projected cost of the project for mitigation measures undertaken within the site boundaries of the project for the first unit plus the sum of the following:

(A) Two hundred dollars (\$200) per unit for any of the next 99 units.

(B) One hundred fifty dollars (\$150) per unit for any of the next 400 units.

(C) One hundred dollars (\$100) per unit in excess of 500 units.

(f) Unless special or unusual circumstances warrant an exception, the field excavation phase of an approved mitigation plan shall be completed within 90 days after final approval necessary to implement the

physical development of the project or, if a phased project, in connection with the phased portion to which the specific mitigation measures are applicable. However, the project applicant may extend that period if he or she so elects. Nothing in this section shall nullify protections for Indian cemeteries under any other provision of law.

(g) As used in this section, "unique archaeological resource" means an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- (1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
- (2) Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- (3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.

(h) As used in this section, "nonunique archaeological resource" means an archaeological artifact, object, or site which does not meet the criteria in subdivision (g). A nonunique archaeological resource need be given no further consideration, other than the simple recording of its existence by the lead agency if it so elects.

(i) As part of the objectives, criteria, and procedures required by Section 21082 or as part of conditions imposed for mitigation, a lead agency may make provisions for archaeological sites accidentally discovered

during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place.

(j) This section does not apply to any project described in subdivision (a) or (b) of Section 21065 if the lead agency elects to comply with all other applicable provisions of this division. This section does not apply to any project described in subdivision (c) of Section 21065 if the applicant and the lead agency jointly elect to comply with all other applicable provisions of this division.

(k) Any additional costs to any local agency as a result of complying with this section with respect to a project of other than a public agency shall be borne by the project applicant.

(l) Nothing in this section is intended to affect or modify the requirements of Section 21084 or 21084.1.

§ 21106. Request of funds to protect environment

All state agencies, boards, and commissions shall request in their budgets the funds necessary to protect the environment in relation to problems caused by their activities.

<http://www.ceres.ca.gov/ceqa/stat/>

http://www.ceres.ca.gov/ceqa/stat/Ch_1.html

Appendix C

Public Utilities Code

CALIFORNIA CODES PUBLIC UTILITIES CODE SECTION 1801-1812

1801. The purpose of this article is to provide compensation for reasonable advocate's fees, reasonable expert witness fees, and other reasonable costs to public utility customers of participation or intervention in any proceeding of the commission.

1801.3. It is the intent of the Legislature that:

(a) The provisions of this article shall apply to all formal proceedings of the commission involving electric, gas, water, and telephone utilities.

(b) The provisions of this article shall be administered in a manner that encourages the effective and efficient participation of all groups that have a stake in the public utility regulation process.

(c) The process for finding eligibility for intervenor compensation be streamlined, by simplifying the preliminary showing by an intervenor of issues, budget, and costs.

(d) Intervenors be compensated for making a substantial contribution to proceedings of the commission, as determined by the commission in its orders and decisions.

(e) Intervenor compensation be awarded to eligible intervenors in a timely manner, within a reasonable period after the intervenor has made

the substantial contribution to a proceeding that is the basis for the compensation award.

(f) This article shall be administered in a manner that avoids unproductive or unnecessary participation that duplicates the participation of similar interests otherwise adequately represented or participation that is not necessary for a fair determination of the proceeding.

1802. As used in this article:

(a) "Compensation" means payment for all or part, as determined by the commission, of reasonable advocate's fees, reasonable expert witness fees, and other reasonable costs of preparation for and participation in a proceeding, and includes the fees and costs of obtaining an award under this article and of obtaining judicial review, if any.

(b) (1) "Customer" means any of the following:

(A) A participant representing consumers, customers, or subscribers of any electrical, gas, telephone, telegraph, or water corporation that is subject to the jurisdiction of the commission.

(B) A representative who has been authorized by a customer.

(C) A representative of a group or organization authorized pursuant to its articles of incorporation or bylaws to represent the interests of residential customers, or to represent small commercial customers who receive bundled electric service from an electrical corporation.

(2) "Customer" does not include any state, federal, or local government agency, any publicly owned public utility, or any entity that, in the commission's opinion, was established or formed by a local government entity for the purpose of participating in a commission proceeding.

(c) "Expert witness fees" means recorded or billed costs incurred by a customer for an expert witness.

(d) "Other reasonable costs" means reasonable out-of-pocket expenses directly incurred by a customer that are directly related to the contentions or recommendations made by the customer that resulted in a substantial contribution.

(e) "Party" means any interested party, respondent public utility, or commission staff in a hearing or proceeding.

(f) "Proceeding" means an application, complaint, or investigation, rulemaking, alternative dispute resolution procedures in lieu of formal proceedings as may be sponsored or endorsed by the commission, or other formal proceeding before the commission.

(g) "Significant financial hardship" means either that the customer cannot afford, without undue hardship, to pay the costs of effective participation, including advocate's fees, expert witness fees, and other reasonable costs of participation, or that, in the case of a group or organization, the economic interest of the individual members of the group or organization is small in

comparison to the costs of effective participation in the proceeding.

(h) "Small commercial customer" means any nonresidential customer with a maximum peak demand of less than 50 kilowatts. The commission may establish rules to modify or change the definition of "small commercial customer," including use of criteria other than a peak demand threshold, if the commission determines that the modification or change will promote participation in proceedings at the commission by organizations representing small businesses, without incorporating large commercial and industrial customers.

(i) "Substantial contribution" means that, in the judgment of the commission, the customer's presentation has substantially assisted the commission in the making of its order or decision

because the order or decision has adopted in whole or in part one or more factual contentions, legal contentions, or specific policy or procedural recommendations presented by the customer. Where the customer's participation has resulted in a substantial contribution, even if the decision adopts that customer's contention or recommendations only in part, the commission may award the customer compensation for all reasonable advocate's fees, reasonable expert fees, and other reasonable costs incurred by the customer in preparing or presenting that contention or recommendation.

1802.3. A representative of a group representing the interests of small commercial customers who receive bundled electric service from an electrical corporation shall not be eligible for an award of compensation pursuant to this article if the representative has a conflict arising from prior representation before the commission. This conflict may not be waived.

1802.5. Participation by a customer that materially supplements, complements, or contributes to the presentation of another party, including the commission staff, may be fully eligible for compensation if the participation makes a substantial contribution to a commission order or decision, consistent with Section 1801.3.

1803. The commission shall award reasonable advocate's fees, reasonable expert witness fees, and other reasonable costs of preparation for and participation in a hearing or proceeding to any customer who complies with Section 1804 and satisfies both of the following requirements:

(a) The customer's presentation makes a substantial contribution to the adoption, in whole or in part, of the commission's order or decision.

(b) Participation or intervention without an award of fees or costs imposes a significant financial hardship.

1804. (a) (1) A customer who intends to seek an award under this article shall, within 30 days after the prehearing conference is held, file and serve on all parties to the proceeding a notice of intent to claim compensation. In cases where no prehearing conference is scheduled or where the commission anticipates that the proceeding will take less than 30 days, the commission may determine the procedure to be used in filing these requests. In cases where the schedule would not reasonably allow parties to identify issues within the timeframe set forth above, or where new issues emerge subsequent to the time set for filing, the commission may determine an appropriate procedure for accepting new or revised notices of intent.

(2) (A) The notice of intent to claim compensation shall include both of the following:

(i) A statement of the nature and extent of the customer's planned participation in the proceeding as far as it is possible to set it out when the notice of intent is filed.

(ii) An itemized estimate of the compensation that the customer expects to request, given the likely duration of the proceeding as it appears at the time.

(B) The notice of intent may also include a showing by the customer that participation in the hearing or proceeding would pose a significant financial hardship. Alternatively, such a showing shall be included in the request submitted pursuant to subdivision (c).

(C) Within 15 days after service of the notice of intent to claim compensation, the administrative law judge may direct the staff, and may permit any other interested party, to file a statement responding to the notice.

(b) (1) If the customer's showing of significant financial hardship was included in the notice filed pursuant to subdivision (a), the administrative law judge, in consultation with the assigned commissioner, shall issue within 30 days thereafter a preliminary ruling addressing whether the customer will be eligible for an award of compensation. The ruling shall address whether a showing of significant financial hardship has been made. A finding of significant financial hardship shall create a rebuttable presumption of eligibility for compensation in other commission proceedings commencing within one year of the date of that finding.

(2) The administrative law judge may, in any event, issue a ruling addressing issues raised by the notice of intent to claim compensation. The ruling may point out similar positions, areas of potential duplication in showings, unrealistic expectation for compensation, and any other matter that may affect the customer's ultimate claim for compensation. Failure of the ruling to point out similar positions or potential duplication or any other potential impact on the ultimate claim for compensation shall not imply approval of any claim for compensation. A finding of significant financial hardship in no way ensures compensation. Similarly, the failure of the customer to identify a specific issue in the notice of intent or to precisely estimate potential compensation shall not preclude an award of reasonable compensation if a substantial contribution is made.

(c) Following issuance of a final order or decision by the commission in the hearing or proceeding, a customer who has been found, pursuant to subdivision (b), to be eligible for an award of compensation may file within 60 days a request for an award. The request shall include at a minimum a detailed description of services and expenditures and a description of the customer's substantial contribution to the hearing or proceeding. Within 30 days after service of the request, the commission staff may file, and

any other party may file, a response to the request.

(d) The commission may audit the records and books of the customer to the extent necessary to verify the basis for the award. The commission shall preserve the confidentiality of the customer's records in making its audit. Within 20 days after completion of the audit, if any, the commission shall direct that an audit report shall be prepared and filed. Any other party may file a response to the audit report within 20 days thereafter.

(e) Within 75 days after the filing of a request for compensation pursuant to subdivision (c), or within 50 days after the filing of an audit report, whichever occurs later, the commission shall issue a decision that determines whether or not the customer has made a substantial contribution to the final order or decision in the hearing or proceeding. If the commission finds that the customer requesting compensation has made a substantial contribution, the commission shall describe this substantial contribution and shall determine the amount of compensation to be paid pursuant to Section 1806.

1806. The computation of compensation awarded pursuant to Section 1804 shall take into consideration the market rates paid to persons of comparable training and experience who offer similar services. The compensation awarded may not, in any case, exceed the comparable market rate for services paid by the commission or the public utility, whichever is greater, to persons of comparable training and experience who are offering similar services.

1807. Any award made under this article shall be paid by the public utility which is the subject of the hearing, investigation, or proceeding, as determined by the commission, within 30 days. Notwithstanding any other provision of law, any

award paid by a public utility pursuant to this article shall be allowed by the commission as an expense for the purpose of establishing rates of the public utility by way of a dollar-for-dollar adjustment to rates imposed by the commission immediately on the determination of the amount of the award, so that the amount of the award shall be fully recovered within one year from the date of the award.

1808. The commission shall deny any award to any customer who attempts to delay or obstruct the orderly and timely fulfillment of the commission's responsibilities.

1812. A group or association that represents the interests of small agricultural customers in a proceeding and that would otherwise be eligible for an award of compensation pursuant to Section 1804 without the presence of large agricultural customers, as determined by the commission, shall not be deemed ineligible solely because that group or organization also has members who are large agricultural customers.

<http://www.leginfo.ca.gov/cgi-bin/waisgate?WAISdocID=98482222728+1+0+0&WAISaction=retrieve>

CEQA Rules of Practice:

http://docs.cpuc.ca.gov/published/RULES_PRAC_PROC/70731.htm

17.3. (Rule 17.3) Request for Award

Requests for an award of compensation shall be filed within 60 days of the issuance of the decision that resolves an issue on which the intervenor believes it made a substantial contribution or the decision closing the

proceeding. If an application for rehearing challenges a decision on an issue on which the intervenor believes it made a substantial contribution, the request for an award of compensation may be filed within 60 days of the issuance of the decision denying rehearing on that issue, the order or decision that resolves that issue after rehearing, or the decision closing the proceeding.

Note: Authority cited: Section 1701, Public Utilities Code. Reference: Section 1804, Public Utilities Code.

17.4. (Rule 17.4) Request for Compensation; Reply to Responses

(a) The request for compensation shall identify each issue resolved by the Commission for which the intervenor claims compensation, and shall specify the pages, findings, conclusions and/or ordering paragraphs in the Commission decision which resolve the issue.

(b) The request for compensation shall include time records of hours worked that identify:

(1) the name of the person performing the task;

(2) the specific task performed;

(3) the issue that the task addresses, as identified by the intervenor; and

(4) the issue that the task addresses, as identified by the scoping memo, if any.

(c) The request for compensation shall itemize each expense for which compensation is claimed.

(d) The request for compensation may include reasonable costs of participation in the proceeding that were incurred prior to the start of the proceeding.

(e) The request for compensation may include reasonable advocate's fees, reasonable expert witness fees, and other reasonable costs incurred as a result of an application for rehearing.

(f) If the proceeding involved multiple intervenors, the request for compensation shall include a showing that the participation materially supplemented, complemented, or contributed to the presentation of any other party with similar interests, or that the participation did not overlap the presentation of other intervenors.

(g) The party may file a reply to responses to its request for compensation within 15 days after service of the response.

Note: Authority cited: Sections 1701, Public Utilities Code. Reference: Section 1804, Public Utilities Code.

http://docs.cpuc.ca.gov/published/RULES_PRAC_PROC/70731.htm

Article 4. Complaints 4.1. (Rule 4.1) Who May Complain

(a) A complaint may be filed by:

(1) any corporation or person, chamber of commerce, board of trade, labor organization, or any civic, commercial, mercantile, traffic, agricultural or manufacturing association or organization, or any body politic or municipal corporation, setting forth any act or thing done or omitted to be done by any public utility including any rule or charge heretofore established or fixed by or for any public utility, in violation, or claimed to be in violation, of any provision of law or of any order or rule of the Commission; or

(2) any local government, alleging that a holder of a state franchise to construct and operate video service pursuant to Public Utilities Code Section 5800 et seq. is in violation of Section 5890.

(b) No complaint shall be entertained by the Commission, except upon its own motion, as to the reasonableness of any rates or charges of any gas, electrical, water, or telephone corporation, unless it be signed by the mayor or the president or chairman of the board of trustees or a majority of the council, commission, or other legislative body of the city or city and county within which the alleged violation occurred, or by not less than 25 actual or prospective consumers or purchasers of such gas, electric, water, or telephone service.

Note: Authority cited: Section 1702, Public Utilities Code. Reference: Section 1702, and Section 5890(g), Public Utilities Code.

4.2. (Rule 4.2) Form and Contents of Complaint

(a) Complaints shall state the full name, address and telephone number of each complainant and his attorney, if any, and of each defendant. The specific act complained of shall be set forth in ordinary and concise language. The complaint shall be so drawn as to completely advise the defendant and the Commission of the facts constituting the grounds of the complaint, the injury complained of, and the exact relief which is desired. At least one complainant must verify the complaint and any amendments thereto. (See Rule 1.11.) The complaint shall state the proposed category for the proceeding, the need for hearing, the issues to be considered, and a proposed schedule. The proposed schedule shall be consistent with the categorization of the proceeding, including a deadline for resolving the proceeding within 12 months or less (adjudicatory proceeding) or 18 months or less (ratesetting or quasi-legislative proceeding). (See Article 7.)

(b) An original plus six exact copies of a complaint or amendment thereto, plus one additional copy for each named defendant, shall be tendered to the Commission for filing.

(c) A complaint which does not allege that the matter has first been brought to the staff for informal resolution may be referred to the staff to attempt to resolve the matter informally.

Note: Authority cited: Section 1702, Public Utilities Code. Reference: Sections 1702 and 1707, Public Utilities Code.

4.3. (Rule 4.3) Service of Complaints and Instructions to Answer

When a complaint or amendment is accepted for filing (see Rule 1.13), the Docket Office shall serve on each defendant (a) a copy of the complaint or amendment and (b) instructions to answer, with a copy to the complainant, indicating (1) the date when the defendant's answer shall be filed and served, and (2) the Administrative Law Judge assigned to the proceeding. The instructions to answer shall also indicate the category of the proceeding and the preliminary determination of need for hearing, as determined by the Chief Administrative Law Judge in consultation with the President of the Commission.

Note: Authority Section 1701, Public Utilities Code. Reference: Section 1701.1, Public Utilities Code.

4.4. (Rule 4.4) Answers

The answer must admit or deny each material allegation in the complaint and shall set forth any new matter constituting a defense. Its purpose is to fully advise the complainant and the Commission of the nature of the defense. At least one of the defendants filing an answer must verify it, but if more than one answer is filed in response to a complaint against multiple defendants, each answer must be separately verified. (See Rule 1.11.)

The answer should also set forth any defects in the complaint which require amendment or clarification. Failure to indicate jurisdictional defects does not waive these defects and shall not prevent a motion to dismiss made thereafter.

The answer must state any comments or objections regarding the complainant's statement on the need for hearing, issues to be considered, and proposed schedule. The proposed schedule shall be consistent with the categorization of the proceeding, including a deadline for resolving the proceeding within 12 months or less (adjudicatory proceeding) or 18 months or less (ratesetting or quasi-legislative proceeding). (See Article 7.)

Answers must include the full name, address, and telephone number of defendant and the defendant's attorney, if any, and indicate service on all complainants.

Note: Authority cited: Section 1701, Public Utilities Code. Reference: Section 1701.1, Public Utilities Code.

4.5. (Rule 4.5) Expedited Complaint Procedure

(a) This procedure is applicable to complaints against any electric, gas, water, heat, or telephone company where the amount of money claimed does not exceed the jurisdictional limit of the small claims court referenced in Pub. Util. Code § 1702.1.

(b) No attorney at law shall represent any party other than himself or herself under the Expedited Complaint Procedure.

(c) No pleading other than a complaint and answer is necessary.

(d) A hearing without a reporter shall be held within 30 days after the answer is filed.

(e) Separately stated findings of fact and conclusions of law will not be made, but the decision may set forth a brief summary of the facts.

(f) Complaints calendared under the Expedited Complaint Procedure are exempt from the categorizing and scoping requirements of Article 7 and the requirements of Article 8 regarding communications with decisionmakers and Commissioners' advisors.

(g) The Commission or the presiding officer, when the public interest so requires, may at any time prior to the filing of a decision terminate the Expedited Complaint Procedure and recalendar the matter for hearing under the Commission's regular procedure.

(h) The parties shall have the right to file applications for rehearing pursuant to Section 1731 of the Public Utilities Code. If the Commission grants an application for rehearing, the rehearing shall be conducted under the Commission's regular hearing procedure.

(i) Decisions rendered pursuant to the Expedited Complaint Procedure shall not be considered as precedent or binding on the Commission or the courts of this state.

Note: Authority cited: Section 1701, Public Utilities Code. Reference: Section 1702.1, Public Utilities Code.

http://docs.cpuc.ca.gov/published/RULES_PRAC_PROC/70731.htm

Appendix D, SDGE's Southern Route Impediments

A. No American Indian Lands Or Backcountry Non-Motorized Zones Would Be Crossed By The Modified Southern Route

SDG&E developed the Modified Southern Route to respond to the Campo Indian Tribe's letter stating it will not allow any route across its Reservation, rendering Aspen's Southern Route infeasible. The BCD Alternative and the Backcountry Non-Motorized Zone work-around proposed by SDG&E is a necessary mitigation re-route to avoid these Indian Reservations and land use conflicts in CNF. (See also March 12, 2008 letter from Forest Service (requiring reroute of BCD Alternative "between milepost 12 and 14 to avoid the conflict with the Forest Plan".))

SDG&E has also recently learned that this route (which is a portion of the BCD Alternative) would cross a Section 16 parcel of land, located in Township 16 South, Range 6 East, currently under California State Lands Commission (SLC) jurisdiction, raising some uncertainty with the feasibility of crossing this Section 16. SDG&E understands that SLC has received an application from a developer, PPM Energy, Inc., to use the entirety of the land for a wind energy project and, at this time, it is unclear whether Sunrise could be constructed over that land should the wind energy project be pursued. While SDG&E believes that an appropriate work-around could be achieved to minimize any potential impacts and conflicts, this situation represents another example of the delays and uncertainty applicable to any of the southern routes proposed for Sunrise and would involve yet another permitting agency (SLC).

In any event, assuming SDG&E's proposed mitigation re-route is feasible, after avoiding the Back Country Non-Motorized Zone area in the vicinity of the BCD Alternative, SDG&E's Modified Southern Route would then, for the most part, follow the BCD South Option to the Modified Route D Alternative and then rejoin Aspen's Southern Route. However, SDG&E has proposed another necessary mitigation re-route in this area – siting the BCD South Option further west at a location crossing I-8 to avoid impacts to the highway ROW by eliminating the need to put a structure in the middle of that ROW.

To avoid the Campo, Manzanita and La Posta Reservations and to locate Sunrise a safe distance from the Southwest Powerlink, SDG&E's Modified Southern Route, like Aspen's Southern Route, must cross many miles of the CNF. As such, any southern route implicates Forest Service requirements, which could delay construction and the projected in-service date for Sunrise. For these reasons, SDG&E continues to believe that either its Enhanced Northern Route or the Proposed Route are superior to any southern route.

Sempra Energy Final Comments to the CPUC and the BLM by Jill Larson, April 11, 2008, page 36
http://www.cpuc.ca.gov/Environment/info/aspensunrise/deir_cmts/E0004%20SDGE.pdf

E. Aspen's Southern Route Is In Close Proximity To Multiple Culturally Important Sites

Aspen's Southern Route presents at least as great a potential for impacts to cultural resources as either the Proposed Route or SDG&E's Enhanced Northern Route. For example, there is a highly sensitive area located along the eastern 3.4 miles of the I-8 Overhead Alternative in the Jacumba Valley, which is included as part of Aspen's Southern Route. Approximately 125 archaeological sites are recorded within the one-mile-wide record search area, and twenty of these sites – some of which are quite large – are mapped wholly or partially within the 300-foot-wide proposed Aspen Southern Route corridor.

Additionally, less than a quarter mile to the north of this corridor is the Table Mountain Archaeological District (TMAD), which is listed on the National Register. The district is within a BLM Area of Critical Environmental Concern, is comprised of 183 sites ranging in complexity from base camps to isolated roasting pits, and represents an intensive Late Period Native American presence. (SDG&E Phase 2 Direct Testimony at 10.19.) Although Aspen's Southern Route does not directly cross what is currently designated as the TMAD, the route's presence near this important area suggests a likelihood that there may be other significant sites within the corridor potentially eligible for listing on the National Register.

For instance, ethnographic data collected in 1920 by Leslie Spier from an elder Indian informant from the Campo area describes the territory of the Southern Diegueno as east of Cuyamaca Mountain and Rio del Tia Juana to the hills on the eastern side of Imperial Valley, from San Felipe River on the north to an undetermined point in Mexico not far south of the border. In addition, Spier lists 21 gentes or patrilineal groups who occupied places in southeastern San Diego County, southwestern Imperial County, and into Mexico throughout the 19th century. Given this data, it is likely that there may be additional significant sites, aside from the TMAD alone, within the corridor crossed by Aspen's Southern Route. Not only will Aspen's Southern Route pass near the TMAD; it

will pass right through the Jacumba Discontiguous Archaeological District, which has been recommended as eligible for the National Register. Several of the previously recorded sites mapped in this corridor are quite large, which may make it challenging to site even an overhead transmission line through this area in such a manner as to avoid culturally significant resources.

Aspen's Southern Route also has the potential to significantly impact several other important cultural areas in the Alpine area. A large habitation site has been mapped in the Alpine area that could be significantly impacted by the undergrounding proposed by Aspen's Southern Route. The site (CA-SDI-4798) was recorded in 1969, prior to the construction of I-8, and information about this site has not been updated since that time. As a result, its size and current status are unknown. Given its mapped location and significance, however, trenching for an underground transmission line through this area could represent a significant adverse impact.

Given that Aspen's Southern Route proposes substantial undergrounding in the Alpine area, the potential for impacts to important subsurface cultural resources is significant, as recognized by the DEIR/EIS (at E.1.7-4) and will be difficult to mitigate against ahead of time. Unlike overhead transmission lines, which can often be sited appropriately to span culturally significant areas and can be adjusted once new cultural resources are discovered, undergrounding a transmission line presents the potential for greater impacts – once cultural resources are discovered through underground operations, the impact to the resource may have already occurred, and it is difficult to simply re-route the line.²⁴

In sum, Aspen's Southern Route does not reduce the overall environmental impacts associated with the Sunrise Powerlink and instead merely moves those impacts to a different geographic location.

F. Aspen's Southern Route Presents Operation And Maintenance Challenges

Aspen's Southern Route presents substantial challenges for operation and maintenance of the Sunrise Powerlink. There will be areas where the Forest Service will restrict installation of permanent access roads, making future transmission maintenance very difficult. The terrain is more challenging along this route so it will involve more construction by helicopter. Helicopter construction will be dependent on wind conditions and weather, which may delay the schedule. Landing zones will be more complicated due to the terrain and weather. All of these constraints make operation and maintenance more burdensome and time-consuming.

All of the above-referenced infeasibilities and challenges should be reflected in the FEIR/EIS.

²⁴ It should also be noted that the I-8 Alternative located just south of the Viejas Indian Reservation appears to cross a Tribally important area with known human remains.

Appendix E, Fulfilling the CPUC's Obligations



Response by Donald Felsing (February 10, 2007):

The path of that power line (Sunrise Powerlink) has obviously opened the company up to criticism. Why build it through Anza-Borrego Desert State Park? Why not go around the park and avoid that line of attack from environmentalists?

I will assure you that if there was any way not to build this through the park, we would not build it through the park.

There's no other way to get here. There is no other way that makes any sense whatsoever. From a cost standpoint and an environmental standpoint. I have been in meetings with our people and keep pounding this over and over again: Is there any other way to get the power from Point A to Point B without going through the park ... and it just doesn't make any sense. I think at the end of the day, the hearing process will demonstrate that.

Anytime we build stuff, whether a power plant or a receipt terminal or a gas pipeline or power line, they all have controversy around them. Power lines tend to have more controversy

"If there is a better route it will come out of the regulatory process."

"Well there is, it's underground and it costs less."

because of their nature. They pass by more homes and different areas of the service territory. And so they get more visibility. They come with a whole host of issues in terms of perceived impacts on property value, perceived impacts on health, perceived impacts on just the view. **But the process we go through in every one of our projects is so open and so many people get to weigh in with their point of view, that at the end of the day when a route is selected, I have extreme confidence that was the best route.**

This route ends up getting changed many, many times with input from residents, from community groups, from state and federal agencies and regulators. It's never a perfect route because somebody is always going to be affected, but it's the nature of infrastructure that somebody doesn't like the outcome. And they're usually the loudest voice at the end. **If there were a better route, an easier route, we would have found it. And if there is a better route it will come out of the regulatory process.**

http://voiceofsandiego.org/articles/2007/07/23/environment/featured_stories/97felsinger021007.t

Appendix F, Overhead power lines & health effects

Testimony by: Magda Havas, Ph.D.

Testimony by: Magda Havas, Ph.D.

Concerning: Health Effects Associated with Power Lines

Presented to: Steering Committee, Public Hearing on the SE Metro Transmission Line

Date: March 22, 2001

Location: Minnesota, USA.

Q: *Please introduce yourself.*

A: My name is Magda Havas. I'm an Associate Professor of Environmental & Resource Studies at Trent University (Peterborough, Ontario, Canada). I received my Ph.D. at the University of Toronto in 1980 where I trained as a biologist, ecologist and environmental toxicologist. I completed two years Post Doctoral Research at Cornell University with Professor Gene Likens and then returned to Canada and worked as an Assistant Professor at the University of Toronto and later as an Associate Professor at Trent University. I have served as a member of the Mayor's Committee on Sustainable Development; as a science advisor to CBC; as a member of the Emerging Issues Subcommittee of the International Joint Commission (Canada/US); as a member of the Environmental Appeal Board of Ontario (Ministry of the Environment); and as an advisor to Tribhuvan University in Nepal on their Environmental Sciences Program. At Trent University I have served on the Board of Governors and on Senate (the two key bodies responsible for university governance). I am a member of the Health Research Group and am founder and past Chair of the Energy Working Group which consists of physicians, alternative health care practitioners,

environmental scientists, biologists, physicists, and electricians who are interested in the biological effects of energy fields from natural and man-made sources.

My expertise is on the biological and environmental effects of environmental contaminants. I have worked on acid rain, metal pollution, drinking water quality and more recently electromagnetic fields. For the past 15 years I have taught a course on Pollution Ecology which deals with the environmental and health effects of chemical pollutants (asbestos, metals, chlorinated organics, hydrocarbons, air pollution, water pollution, among others) and for the past 4 years I have taught a course on the Biological Effects of Electromagnetic Fields.

Q: Why are you here today?

A: I'm here because I'm concerned about the adverse health effects of electromagnetic fields generated during the production, distribution, and consumption of electricity. For the past 8 years I've been studying this with growing intensity and growing concern.

Based on the literature and my own research I am convince that power frequency electromagnetic fields can and do cause biological effects; that these effects can be both beneficial and harmful; that we know some of the mechanisms involved and are close to understanding others but that more research in this area of mechanisms and in the area of exposure remains to be done.

Regarding Public Policy and Scientific Evidence: I do not think that it is necessary for public policy makers to wait until ALL the scientific facts about electromagnetic fields are in before they act to protect the public by minimizing exposure. We already have considerable information. What remains to be known in terms of mechanisms is unlikely to significantly change what we already know, and we know enough to act.

1. We know that high **electric** fields and high **magnetic** field have **adverse health effects** based on studies of residential exposure and childhood leukemia, on studies of occupational exposure, and on laboratory experiments.

2. We know that **magnetic fields** above 2.5 milli Gauss (mG) (the range being debated is between 2 and 4 mG) are critical for children under the age of 14 and that magnetic fields at 12 mG (value is between 2 and 12 mG) are critical for adults with estrogen-sensitive breast cancer.
3. We have yet to determine what levels of the **electric fields** are harmful. Values of several thousand volts per meter (V/m) have been suggested for adults but children are likely to be more sensitive as they are to most environmental pollutants. Electric fields below 100 V/m are common in residential settings and we do not know if these cause biological or health effects.
4. We know that the home environment, particularly the **bedroom** is critical for children and that **night-time exposure** may be more important than day-time exposure.
5. We know that disruption of the natural production of **melatonin** is one of the mechanisms involved in the adverse health effects. There is evidence that electromagnetic fields have been implicated in **depression, disturbed sleep**, and higher rates of **suicide**.
6. We know that electromagnetic fields have been linked with **leukemia, lymphomas, nervous system tumors** and **breast cancer** as well as with various **reproductive abnormalities**.
7. We know that electromagnetic fields do not **initiate** cancer (at the levels found in residential and most occupational settings) but seem to **promote** cancer by changes in the rate at which cells divide and differentiate.
8. There is emerging evidence that the **electric field may be interacting with air pollutants**. More research is needed in this area, but if the results from future studies support this relationship then limits may need to be set on high voltage power lines in residential communities.

Knowledge of the specific mechanisms involved is not going to significantly change the harmful exposures (2.5 and 12 mG) mentioned above, unless history repeats itself as it has

with lead, asbestos, and DDT. Blood lead levels, deemed safe in the early 1970s, were lowered as more scientific evidence became available.

A prudent avoidance public policy regarding the location of both above and below ground power lines would be to limit the magnetic field to 2 mG or less during peak energy consumption in the residents nearest the power line. This would not be precedent setting since several multinational companies (including the World Bank) have been specifying low levels of power frequency magnetic fields of less than 2 mG for their new building designs. Sweden has guidelines of 3 mG for areas where children play.

Full Cost Accounting and Decision Making: Decisions are often made (or not made) based on short-term accounting to minimize economic costs. If full cost and long-term accounting is considered then hospital stays and sick leave have to be factored into the equation and in the long-term this is likely to be costly.

Legitimate Debate and the Scientific Process: I'm also concerned that as scientists we do a poor job explaining how science is done and how it should be interpreted. Consequently the public is confused by scientific disagreement presented by the press. They are unable to judge whether the disagreement is motivated by a legitimate desire to understand some aspect of the world or if it is motivated by other concerns.

The current scientific debate about electromagnetic fields is tainted. It is motivated by concerns other than a desire to better understand the biological effects of electromagnetic fields. While there is some legitimate debate and disagreement about the harmful effects, the mechanisms involved, and the specific exposure characteristics there is also an element of deception and bias.

Sadly this type of activity is not unusual and is certainly not restricted to EMF issues. Manipulation of scientists; attempts to discredit individuals and to cut off their funding; publication of red herrings and other attempts to mislead the public have occurred time and again with asbestos, DDT, tobacco, lead, acid rain, endocrine disrupters. When industry

feels threatened it reacts and not always in the most honorable way. Few scientists are comfortable and willing to speak out when this is the case.

The statements below were published in the National Research Council (1997) document entitled "Possible Health Effects of Exposure to Residential Electric and Magnetic Fields" in a section devoted to occupational exposure.

Across a wide range of geographic settings . . . and diverse study designs . . . workers engaged in electrical occupations have often been found to have slightly increased risks of leukemia and brain cancer (Savitz and Ahlbom 1994, NRC p. 179).

Matanoski et al. (1993) . . . found little support for increased risk due to increased average fields, but increasing field levels at peak exposure were associated with increased leukemia risk (NRC, p. 180).

Floderus et al. (1993) . . . the most highly exposed workers were estimated to have a 3-fold increased risk of chronic lymphocytic leukemia and a 1.6-fold increased risk of total leukemia. Brain-tumor was increased by a factor of 1.5 in the highest category (NRC, p. 180).

. . . a large well-designed study of utility workers in Canada and France provided evidence of a 2- to 3-fold increased risk of acute myeloid leukemia among men with increased magnetic field exposure (Theriault et al. 1994). Brain cancer showed much more modest increases (relative risk of 1.5-2.8) with increased magnetic field exposure (NRC, p. 180).

Savitz and Loomis (1995) . . . Leukemia mortality was not found to be associated with indices of magnetic-field exposure, whereas brain-cancer mortality was associated. Brain cancer mortality generally was found to increase in relation to accumulative exposure, reaching a relative risk of 2.3-2.5 in the most highly exposed workers (NRC, p. 180).

All three studies found no evidence of confounding by the presence of workplace chemicals (NRC p. 180).

A series of three studies reported an association between electrical occupations and male breast cancer (Tynes and Andersen 1990; Matanoski et al. 1991; Demers et al. 1991) . . . (NRC, p. 181).

Female breast cancer in relation to electrical occupations was evaluated by Loomis et al. 1994 . . . a modest increase in risk was found for women in electrical occupations, particularly telephone workers . . . (NRC p. 181).

The relative risks in the upper categories of 2-3 reported in the high quality studies of Floderus et al. 1993 and Theriault et al. 1994 cannot be ignored (NRC, p. 181).

Yet this is exactly what NRC did. It ignored some vital information in its executive summary on the health effects of electromagnetic fields where it states that:

. . . the current body of evidence does not show that exposure to these fields presents a human health hazard.” (NRC, p. 2).

How they can make that statement based on the previous references they also cite is not something I can comprehend.

Q: How can scientists examine the same data and come up with different interpretations?

A: First we must differential between a deliberately biased attempt to defend a particularly view and between a legitimate disagreement with a genuine desire to understand what is happening. I’m going to assume the later for my answer.

Scientists who study electromagnetic fields fall into one of three categories. They can be theoreticians, lab scientists, or field scientists.

Theoreticians approach a problem from the perspective of the basic underlying theory. Einstein is a prime example. He predicted results based on his theories and others tested them once the tools became available. If the theory is wrong so are the predictions. When data contradict theory we have to revisit the theory rather than discard the data. Physicists have disregarded the data because it doesn’t fit their theory of ionization and thermal effects that occur and are readily explained at high electromagnetic frequencies. They don’t have a

theoretical mechanism that explains the effect at power frequencies (60 Hertz) so they disregard the data.

Laboratory scientists are accustomed to controlling all of the essential factors that might affect the results of a particular experiment and often work on systems that have minimal variability. They work on systems that have a high signal to noise ratio. This is true for cellular biologists and experimental physicists. Provided they expose their test “organisms” to realistic conditions, they have some of the most powerful tools to determine the underlying mechanisms involved in a particular response.

Field scientists are unable to control many of the external variables although they have techniques to determine their relative contribution to an end result. They work on systems that have a low signal to noise ratio. Epidemiologists and ecologists fit into this category. They are often the first to determine associations between environmental stresses and biological response but are not able to ascertain the underlying mechanisms.

Q: How do we interpret the textual products of scientific investigation?

A: Just as law has its “legalese” and requires interpretation by experienced lawyers, science also needs to be interpreted. A simple statement made with great care by a scientist is not always interpreted properly by the public. For example, in 1994, Ontario Hydro released a document based on a recently completed study on cancer rates among their electric utility workers.

They stated, and I quote:

1. *No association was observed between occupational exposure to EMF and cancer overall among electric utility workers.*
2. *The study results indicated no association between most cancers, including lymphoma, male breast cancer and melanoma, and exposure to magnetic fields.*
3. *The Analysis did show a statistically significant association between cumulative exposure to magnetic fields and a rare form of adult leukemia: acute non-lymphoid leukemia and a sub-type acute myeloid leukemia.*

4. *According to the study authors, this did not provide definitive evidence of a causal association.*
5. *These results are compatible with the findings of previous studies that demonstrated associations between EMF exposure and leukemia, and as such cannot be ignored.*
6. *Further research will be required, however, to determine causal association.*

Interpretation:

The first statement is generic. It includes smokers with lung cancers (for example) and this can skew the results. No respectable scientist has stated that EMF are associated with ALL forms of cancer. Hence this statement is true but is somewhat misleading as though it is refuting a scientifically held view, which it is not.

The second statement begins to focus on the cancers that have been associated in other studies with EMF exposure. It found no statistically significant association for the cancers listed.

The third statement focuses on one type of cancer that has been associated with cumulative exposure to magnetic fields. Now we have a specific cancer (a rare form of adult leukemia) and a specific type of exposure (cumulative magnetic fields).

The fourth statement is misleading. Epidemiological studies are **not intended** to provide “definitive evidence of a causal association”. Someone who doesn’t understand that distinction will think that “yes while there is an association it is NOT causal” and this is an **incorrect interpretation** of that statement.

The fifth and sixth statements are straight forward. Laboratory studies are needed to address the final statement dealing with causality.

Q: What is the evidence that childhood cancers are linked with power frequency magnetic fields in the home?

A: The first person to examine this question was Nancy Wertheimer. Wertheimer noticed that many of the children who had died of cancer in Denver Colorado lived in homes that

were located near power lines and transformers. At that time studies from the former Soviet Union began to appear reporting that men exposed to high voltages in switch yards were experiencing health problems. She wondered if there was a link between the cancers she was observing and the electromagnetic fields generated by power lines. Ed Leeper provided her with a surrogate measurement, the wire code that was based on the distance from power lines and on the thickness and number of conductors (wires) distributing electricity. Their results, which appeared in the American Journal of Epidemiology (1979), reported an increased incidence of childhood leukemia, lymphomas, and nervous system tumors for children exposed to very high current configuration (VHCC) corresponding to 2.5 mG.

This was a revolutionary study. Up to that point power frequency (60 Hertz) electromagnetic fields were assumed to be benign.

More than a dozen studies have been conducted in different countries to test the Wertheimer and Leeper hypothesis. About half of them found a statistically significant association between childhood cancers and exposure to magnetic fields.

The key findings from these studies are as follows:

1. Of the three childhood cancers (leukemia's, lymphomas, nervous system tumors), leukemia's are the ones found to be most often associated with magnetic field exposure. [Note that the same cancers as well as breast cancer are frequently reported in the occupational epidemiological studies of EMF exposure.]
2. Children under the age of 14 and especially children under the age of 6 are the most sensitive presumably due to their rapid growth (Green et al. 1999).
3. Critical distances appear to be approximately 50 m (150 feet) from a power line
4. Critical magnetic fields are at or above 2 mG.
5. Daytime spot measurements give the lowest odds ratios (ratio of observed to expected number of cases) while median night measurements give the highest. Hence the bedroom is deemed to be the most important environment in terms of electromagnetic hygiene for children.

Two studies concerned with the health effects of electromagnetic fields have just been released this month (March 2001). One of the studies, conducted by the eminent

epidemiologist Sir Richard Doll, who was the epidemiologist linking lung cancer with cigarette smoking in the 1960s and who has been critical of the findings of power line studies, now **admits** an association of increased risk of childhood leukemia with elevated magnetic fields. This study is important because it is the first **official** statement from a major health organization in the UK, the National Radiation Protection Board, associating childhood cancer and power frequency (50 Hertz) magnetic fields. The report is carefully worded and is intended to minimize concern. It down plays the number of children who are likely to die from leukemia because of their exposure to power lines.

The second study, from Germany by Joachim Schuz and colleagues (2001), has gone even further. In this study they report a statistically significant association, with an odds ratio of 3.2, (3.2 fold increased risk) between childhood leukemia and magnetic field exposure **during the night**. Since children spend 8 or more hours each day sleeping, the bedroom becomes a very important environment in terms of electromagnetic hygiene. Reducing electromagnetic fields in the bedroom reduces the overall exposure and thus the risk of leukemia.

Q: How do you interpret the studies that do not show a statistically significant association with electromagnetic fields and childhood cancers?

A: There are several reasons why this might be the case.

1. Laboratory studies have shown that electromagnetic fields at power frequencies (60 Hertz) do not initiate cancer but rather promote cancer or the growth of cancerous cells already in the body. Therefore, electromagnetic fields from power lines will not induce leukemia but will promote the growth of leukemia (and presumably other forms of cancer) that already exists in the body.

If these electromagnetic fields promote cancer then the cancerous cells have to be present before they can be promoted. Hence some studies show an increased incidence of leukemia, others of lymphomas, others of brain tumors and still others of breast cancer. These results are not inconsistent if electromagnetic fields are acting as cancer promoters.

2. Furthermore, in some epidemiological studies the average exposure did not reach 2 mG which has been identified as a critical limit for children (e.g. Fulton et al. 1980, mean high current value was 1.8 mG). In these studies you would not expect to find an increased incidents since the magnetic field level was not sufficiently high.
3. Also, in some studies very few children were exposed to the high fields (above 2 mG). For statistical significance of a cancer that has a low frequency we often need a large sample size. If the sample size is too small, the results will not be statistically significant because of a lack of statistical power. One way to overcome the small sample size is to combine several studies in a meta-analysis. This has been done and those studies show a small (in terms of population) but statistically significant increase in the risk of childhood cancers. I might add that this risk is small from a population perspective but it is not small for the parents who lose a child to leukemia.
4. Also, we lack information on “real” exposure. All of our measurements are based on a short sampling time or surrogate measurements such as wire codes. The longest time most individuals are measured for their magnetic field exposure is 24 hours. Can you image determining your likelihood of getting skin cancer from the sun based on your exposure to the sun during a 24-hour period taken at random? The fact that so many studies are showing a statistically significant association is remarkable and disturbing.
5. And finally, we have no “zero” exposure, no true controls because everyone who uses electricity is exposed to electromagnetic fields. Using cigarettes as an analogy what we are comparing in these studies is the 2-pack-a-day cigarette smoker with the 2-cigarette-a-day smoker. We do not have non-smokers who are not exposed to second hand smoke for our controls.

Q: What are the sources of electromagnetic fields within the home?

A: Within the home there are three potentially important sources of electromagnetic fields. They include appliances, indoor wiring and outdoor wiring. Individuals can do much to reduce their exposure from appliances and indoor wiring but can do little if the primary source of the magnetic field is the outdoor wiring.

Based on childhood epidemiological studies the bedroom is a particularly important environment. Bedroom electromagnetic fields can be reduced in a number of ways and can go far in promoting electromagnetic hygiene. Electric alarm clocks, radios and baby monitors can be moved away from the bed. Electric blankets can be unplugged once they warm up a bed. Beds can be moved away from panel or fuse boxes and electric heaters. Electric heating coils in ceilings and floors generate high magnetic fields. These fields can be reduced by turning down the night-time thermostat. Some older homes have knob and tube wiring that can also generate high magnetic fields and in other homes an improperly balanced return current can produce high magnetic fields. Although costly, an electrician can update the wiring to current wire codes and can balance the return current and thus reduce magnetic fields associated with indoor wiring. Hence, there is much that individuals can do to reduce their exposure.

The problem is that individuals have no way of reducing electromagnetic fields in a home if the primary source is from power lines run by public utilities.

Q: Do you have any final comments you would like to make?

A: Yes.

To protect the most vulnerable individuals in our population, namely children under the age of 14, magnetic fields need to be kept below 2 mG, especially in the bedroom (but also in other environments where children spend their time, schools for example). This recommendation is specific and enforceable. We have similar standards for drinking water that are set to protect the most vulnerable individuals in the population. Since individuals cannot alter their electromagnetic environment if the primary source is from power lines, it is up to public policy makers to minimize this type of exposure. If this recommendation of 2 mG or less became part of public policy and was enforced, it would significantly improve the electromagnetic environment in which we all live.

Thank you for listening.

<http://www.powerlinefacts.com/Steering%20Committee%20Informaton%20Hearing/Expert%20Testimony/Havas.htm>

Biological effects of non-ionizing electromagnetic energy: A critical review of the reports by the US National Research Council and the US National Institute of Environmental Health Sciences as they relate to the broad realm of EMF bioeffects

By Magda Havas (See the following link for a review of numerous scientific research studies:)

<http://www.powerlinefacts.com/Canadian%20Review%20of%20NCR%20and%20NIEHS%20studies.pdf>

If the link doesn't work a Google search using the following keywords should retrieve this 2 megabyte 89 page research paper: powerlinefacts havas pdf

Appendix G, Unaddressed Damages 6-08

There are a number of essential issues that have been excluded from the CPUC's review process for the Sunrise Powerlink related to damages and restitution:

1. Protective alternative routes have not been provided for the Southeast quarter of San Diego County.
2. Underground DC which could protect the entire 150 mile course has not been reviewed or considered as an option, although it has been implemented between New Jersey and Manhattan, in the UK, Sweden, Netherlands, Norway, Poland, Italy, Australia, Tasmania and in many other regions.
3. Criticisms of underground DC alternatives have been based on inaccurate, incomplete or obsolete information, including inaccuracies related to: issues of cost, scale, safety, EMF and ionization, capacity, environmental impact, transmission efficiency, grid reliability and security.
4. A review of damages created by 500kv overhead lines including restoration and replacement costs has not been provided and has avoided cost and damage evaluations of: pylon excavation and anchoring, work clearings and roadways, fire clearings, cable installation, cable maintenance and replacement, pylon replacement, fire department requirements and capacity expansion, off road vehicle road extensions and damages, total of damages for each pylon including all access roads, total of damages for the entire Powerlink including property losses, full and equivalent replacement values for approximately 250,000 acres, viewshed losses for approximately 500,000 acres, medical and health losses where EMF extends to the 2 milligauss level and the ionization of pollutants, fire losses due to carbon smoke high voltage discharges, etc.

5. Restoration of all damages with independent monitoring and requirements for full and advanced cost payments, including restitution for unneeded clearings, roads and peripheral damages, whether on private or public lands, based on the on-site propagation of local indigenous species, trees sustaining diversity, and full geologic restoration including local rock formations and subsoil stability.
6. Full restitution for all property affected by power lines, under or adjacent to property crossed, or within noticeable visual range of power lines, or where property values have been adversely affected, and based on the full and equivalent replacement value of actual property with equivalent access, views, wilderness, habitat diversity, aesthetics, geologic monuments, paleontological values, energy generation capacity, architectural capabilities and other qualities as identified and acknowledged by the property owner, not from an arbitrary or uniformed outside entity.
7. Requirements for SDG&E and decedents to reimburse each party for their damages, losses and interest (at not less than one percent per month above inflation compounded), including ongoing and future habitat restoration costs upon completion of power line uses at \$25 to \$75 per square foot based on geologic damages and botanical species, including all personal, legal and collection expenses based on secured real property resources sufficient to cover all restitution costs.
8. Reimbursement of medical damages and losses related to overhead power lines including: EMF, ionization of pollutants, cancers, loss of time, labor, career, life, business, legal costs and the collection of expenses.
9. California residents and businesses that represent a portion of California's \$90 billion per year recreation and tourism industry need to be reimbursed for their losses when a wilderness, park or recreational area is damaged through full and equivalent replacement of the wilderness and scenic resource and assistance to provide access or

relocation for property uses and businesses closer to the new replacement recreational or environmental resource.

10. When eminent domain is allowed to inflict damages without just compensation, which avoids full and equivalent replacement, restitution and restoration of the environment, property, effort and lives taken or damaged, then each party, person, official or government agency allowing or participating with the infliction of damages or losses, is in accepting full responsibility for all damages and losses incurred, without legal or judicial insulation as a result of circumventing laws, fully indemnified by the assets and property of each entity, official and person participating or causing damages.
11. When eminent domain is used to needlessly confiscate and severely impact property, while vastly lower impact routes and alternatives are available, but not considered, reviewed or compared in terms of environmental damages, health, business, property loss, restoration and replacement costs, along with the full economic impacts, then the use of eminent domain to cause unnecessary damages and avoid low to no impact alternatives is challengeable and requires full restitution.
12. Property owners are entitled to reimbursement for all business relocation costs, which could exceed the maximum amounts specified under law, in addition to their attorney costs.
13. Under SB 177, the CPUC has not shown that SDGE is the "Provider of Last Resort" since other companies capable of delivering the same or higher capacities with considerably lower environmental, property, business and personal damages have not been included in the application or review process, even though they have proven capabilities and have an interest in providing their services, nor have solicitations been made.

14. No known effort has been provided by the applicant (SDGE) nor the CPUC to locate or offer a “competitive service” for the proposed Powerlink, as is required by Senate Bill 117 (effective January 1, 2000) and the CPUC review of Eminent Domain.
15. Under SB 177, the Sunrise Powerline project fails the CPUC “Four Part Test” (part d) since the application and the review process has not shown that: “The proposed project is located in a manner most compatible with the greatest public good and the least private injury.” In fact we have provided documentation to the CPUC proving the opposite and showing the avoidance of fulfilling this requirement, in our paper titled The Southern Route, where lower impact alternatives have not been offered by SDGE or the CPUC.
16. Under SB 177, the Sunrise Powerline project fails the CPUC “Four Part Test” (part c) since the application and the review process has not shown that: “The public benefit of condemning the property outweighs the hardship to the property owner(s).” In fact we have provided documentation to the CPUC proving the opposite and showing avoidance of fulfilling this requirement, in our paper titled The Southern Route, where lower impact alternatives have not been offered by SDGE or the CPUC, to address and resolve the hardship issue.
17. Under SB 177, the Sunrise Powerline project fails the CPUC “Four Part Test” (part b) since the application and the review process has not shown that: “The property to be condemned by the public utility is necessary for the proposed project.” In fact we have provided documentation to the CPUC proving the opposite and showing avoidance of fulfilling this requirement, in our paper titled The Southern Route, where lower impact beneficial alternatives that avoid the anthropological reserve have not been offered by SDGE or the CPUC, to address and resolve the issue of “necessity” relative to the specific property, although 7 alternatives were proven to be available, full described and illustrated in our earlier documentation.

18. Under SB 177, the Sunrise Powerline project fails the CPUC's "Four Part Test" since there is "a reasonable way for the public utility to provide competitive service without condemning the property (such as using existing facilities, selecting another site, etc.)." The existing SDGE 500kv overhead power line route passing through southern San Diego County can be replaced to provide transmission up to 10,000 megawatts on a single 800 kV high-voltage DC power line, which would considerably exceed LADWP's 3,100 megawatt DC Pacific Intertie begun in 1965, where the high voltage DC technology was provided by ABB. An ABB video introduction to the higher capacity 10 gigawatt transmission technology is available at the following link:
[http://library.abb.com/GLOBAL/SCOT/scot221.nsf/VerityDisplay/211AB1A947C8308FC12573B10057F15F/\\$File/800%20kV%20large%20version.wmv](http://library.abb.com/GLOBAL/SCOT/scot221.nsf/VerityDisplay/211AB1A947C8308FC12573B10057F15F/$File/800%20kV%20large%20version.wmv)
19. Another issue addressed under SB 177, "Could the public utility condemn less property and still provide the competitive services?" Again the answer is demonstrably yes, based on evidence we provided to the CPUC, SDGE and all parties in our document The Southern Route, which is available as document number 11, at the web site we provided to convey related information: www.undergroundpower.us
20. A question of major concern to hundreds of property owners, residents and parks which is raised by SB 177 is: "What problems (if any) would the property owner face if the property were condemned?" In our case the overhead power lines would bisect our most useful areas resulting in the destruction of our anthropological reserve, many decades of labor and planned facilities in various stages of development, that would require the full and equivalent replacement of almost 1.5 square miles of accessible habitat with equivalent paleontological values, research and recreational capabilities, security, viewshed, aesthetics, access, native plant health, habitat diversity and geologic monuments.¹⁹

¹⁹ Our wilderness and anthropological reserve is adjacent to the Anza-Borrego State Park to our north and east, with our project site extending contiguously east and west a distance of approximately 2 miles and north and south 1.5 miles, providing visibility of over 3.25 miles of

21. To assist with legal compliance if overhead high power lines are supported by a Presiding Officer's Decision (POD), excepting the replacement of existing 500 kv lines with 10,000 megawatt DC lines, then we wish to now confirm a request for written appeal to identify for the Commission avoidable damages to many communities, including an irreplaceable environment, as well as business and property losses in excess of \$20 billion, plus hundreds to thousands of cancer deaths and disabilities, fire and medical liabilities, based on scientific research provided at major university medical universities. Details required to substantiate essential issues are provided herein, with reference to materials we previously provided to the CPUC, or at our URL, or through a public review process. As required these details herein are being provided to the CPUC Docket Office in San Francisco.

22. The result of severe impacts proposed by the Powerlink to our environment, including geologic damages, serious health or cancer risks, property losses which are not of a commercial nature would all inflict irrecoverable damages to our anthropological reserve and related projects. Consequently, the following two questions posed by SB 177: "Would the public utility's condemnation and use of part of the property interfere with the property owner's use and enjoyment of the rest of the property?" and second, "Would the public utility's condemnation of the property require the property owner to relocate a home or business located on the property?" Both questions are being answered affirmatively, indicating that our losses would be catastrophic and require full and equivalent replacement, including artifacts, geology and habitat, with equivalent accessibility, research, facility and recreational capabilities.

our boundaries and wilderness viewshed along Interstate 8, and over 4.25 miles of visibility of our boundaries and wilderness viewshed along Old Highway 80. The extraordinary geological formations of this nature preserve are visible by millions of visitors to this area every year. Over 6 million drivers and passengers on the two highways can see this nature preserve for approximately 30 million minutes per year or about 500,000 hours, which amounts to a considerably greater viewership than all the museums in San Diego County combined, which is one component of the reserve.

23. The condemnation of this region and this anthropological reserve in particular, is not in the public interest, since this region and this reserve serve the public interest in several ways, including the provision of wilderness restoration, research, maintenance and protection, the provision of viewshed that is visible by over 6 million people per year, the provision of protection for watershed and threatened species, research and engineering to address low impact architectures and caretaking. Further, physiological disruptions by overhead high power lines have been shown to significantly increase cancer rates at considerable distances based both on EMF and the ionization of pollutants, which significantly increases cancer fatality rates. Significantly, far lower impact alternatives, including underground DC power lines have not been reviewed or evaluated by the CPUC or its consultants, even though these alternatives could be implemented at a lower cost than the proposed overhead AC Powerlink, while saving the community and the region over \$20 billion in near term damages. This apparently is a failure of the proposed Powerlink, that has been addressed through our research and documentation, which has been provided to the CPUC, and not considered in other Powerlink reviews accommodated by the CPUC nor by SDGE.

Appendix H, Unresolved review issues 7-08

1. On what legal basis does SDG&E and its participants plan to cause massive environmental, paleontological, property and personal damages, without considering nondamaging alternatives which are more economical, and without providing full and just compensation for all losses based on equivalent replacement costs, based on equivalent wilderness, viewshed, facilities, opportunities and access?
2. Why have underground options for the southern route which passes through southeastern San Diego County been completely ignored, whether AC or DC, while they have been carefully considered for the northern route?
3. Why have large scale environmental damages been ignored, when lower cost, environmentally considerate alternatives exist (?) which would not be in violation of the California Environmental Quality Act.
4. If the objection to underground power is about money, then why does SDG&E care if the people want underground power lines? The people are paying for the entire project, anyway you look at it. SDG&E is just making a huge profit for organizing the work, which turns out to be organized in an amazingly horrible way. In any case 1300 megawatt underground power lines cost less to install in the UK than SDG&E's old AC overhead lines, with its massive environmental damages.
5. SDG&E has indicated that there are at least 7,000 megawatts of renewable power resources being scheduled for delivery from Imperial County into San Diego County. How does SDGE plan to transmit 7,000 or perhaps 15,000 MW of power on the 1,000 megawatt power line being proposed?

6. Since EMF deaths are not immediately fatal and are typically the result of promoting cancer, and since minimizing EMF risks are said to be inconvenient for the power companies, then the CPUC only requires that up to 4% of the power line budget be used to reduce EMF exposures. Then where is any of the 4% of the Sunrise Powerlink budget being used to reduce EMF exposure for the community? That would be \$56,000,000. More significantly if it costs less to install DC power lines underground than to build almost 700 huge pylons on our mountain tops and destroy over 9,000 acres (with off-road extensions perhaps over 20,000 acres) of habitat and private property, to build 700 access roads, with accompanying clearing and work areas, then why is the mandate to reduce EMF being ignored?
7. Why are billions of dollars in damages to wilderness, watershed, paleontological resources and private property being ignored in every plan being provided by the CPUC and its consultants, particularly for the Southern Route, while proven low to no impact approaches are blatantly being ignored?
8. When do we take the time to read the medical research, particularly from Europe where significant statistical data has been collected to identify cancer promoters based on electromagnetic fields and the ionization of pollutants, or study the organelles and molecular mechanism that are readily disrupted by oscillating microcurrents?
9. While we appreciate that the CPUC has listened to thousands of public comments which were overwhelmingly directed to support the full protection of the environment, as well as private property by utilizing nondestructive alternatives, which are available both in terms of local sustainable generation and through underground power lines, without increasing costs. Then why does the CPUC's consulting company continue to provide only high impact and destructive power line alternatives while ignoring all nondamaging, lower cost and lower impact alternatives, unless it understands that its survival as the consulting firm is tied to pleasing both the CPUC and Sempra Energy who donates money to the governor or the governor's favored charity, while SDG&E then obtains the public support of the governor, who then communicates to his

appointees what his intentions are for the CPUC decision making process, all of which has been researched and fully reported on in California's largest newspapers, including the Los Angeles Times and the San Diego Union Tribune.

10. We would appreciate knowing how all of the needless damages being proposed are anything other than intentional, particularly since there are no benign or nondamaging examples of high power lines being offered through the review process, such as underground power lines, although the technology has been widely available for about 40 years.
11. Since the more damaging approaches to overhead power line construction cost more than the underground alternatives that have been repeatedly used in Europe and Australia, then why has the CPUC and its consultants refused to evaluate the cost of all environmental, viewshed, property, business and health related damages? Utilizing comments such as it's too complicated or too costly, doesn't address any issue, and would not be true. Is this done to intentionally avoid proving that nondamaging underground DC power lines will cost less than overhead power lines and save billions in property damages? Which our research has repeatedly shown.
12. Why have the proposed large scale property and environmental damages not been offered any form of equivalent replacement value or full restitution for all damages and losses? Because the Powerlink is a proposed economic transfer and devaluation of property, and so any evaluation of the actual and proposed losses would interfere with the perpetration of an enormously costly fraud?
13. Why would Sempra Energy, SDG&E, the CPUC and Aspen Environmental choose to avoid less damaging alternatives that could protect the environment, viewsheds, business and property values? Is there a specific intention to increase environmental and property damages? By intentionally avoiding the research, *plausible deniability* has been created to justify maximizing environmental and personal damages. How could avoiding consideration of extremely costly consequences be a defense to allow

the causing of damages, when it in fact shows an intention to cause harm and perpetuate damages against large numbers of people and the state through the complicity of many participants.

14. Many who have worked for the utility companies and observed the actions of organizations who have spent decades developing their political connections and influences with regulatory agencies, have understood the flexible or deceptive potential within the regulatory process, which may tolerate and defend the violation of California's laws, causes serious damages to the environment and the people in the region. On what basis are large scale damages to the environment, property and the people being perpetuated, when lower cost, nondamaging alternatives are being ignored, which amounts to being opposed.
15. We have seen no effort or intention by the CPUC or any state agency to protect anyone from environmental, property or economic damages that would unfairly violate full and *just compensation* requirements, which SDG&E indicates that it does not feel obliged to support nor to provide for the replacement value of losses that will be incurred, nor provide for the restoration of environmental damages they cause, all of which is in violation of federal and state laws, yet ignored by the CPUC. If one of the purposes of the CPUC is to protect the interests of the people, then how does allowing the infliction of severe damages and economic losses offer any protection?
16. Thousands of people and property owners have made it clear, that they would like to know, on what legal basis the state would allow for inflicting billions of dollars in environmental and property damages, without requiring full restoration and just compensation.
17. Please explain why underground power lines which avoid environmental and property damages, at a lower cost, have been excluded from the CPUC review process nor offered as an environmental alternative.

18. Please explain why false criticisms of nondamaging power line alternatives, including underground DC, have become a part of the CPUC record and documentation, as a statement of fact as provided by Aspen Environmental without any form of technical research or review being offered by the CPUC, and without allowing for the review of related technical, economic or environmental information.
19. Please explain why the data available from underground power line projects throughout Europe and Australia, which have been documented to cost less than the proposed Sunrise Powerlink, have not been offered consideration, particularly in environmentally sensitive habitats.
20. If there is no environmental, economic or legal justification for causing massive environmental and property damages, as proposed, then how would the proposed power line avoid prosecution or liability for damages, that are clearly intentionally being planned and promoted, without offering consideration to lower cost and nondamaging alternatives, as is required by law.
21. After a massive review process involving thousands of technical and environmental criticisms, how could the same issues that have been addressed by thousands of people, involving environmental, home and property protection be completely ignored, and how could the well known nondamaging alternatives including underground DC power lines and distributed solar systems also be repeatedly ignored? We can't see how this is possible, unless the avoidance of low impact alternatives is completely intentional and the infliction of environmental, property and economic damages are also intentional, which we also understand would also be denied. Nevertheless the avoidance of low to no impact alternatives has been asserted through the review process, even by avoiding all such options after listening to and reading thousands of requests to reconsider damages, all of which are well documented, which demonstrates an intention to cause massive damages, without regard or liability.

22. After providing thousands of hours of engineering, economic and botanical research to describe ways of avoiding environmental, property and health damages, naturally we noticed that the CPUC and its consultants had no actual interest in considering a lower cost strategy that avoided all environmental and property damages, even though SDG&E, the CPUC and its consultants all admitted that the solutions we offered could resolve the engineering requirements and environmental needs of the region.

23. After providing proven engineering and environmental solutions that could provide SDGE both higher transmission capacities and lower overall costs, we became aware of overriding political influences, which were being reported in the Los Angeles Times and the San Diego Union Tribune that explained how financial payments were influencing the governor, along with the outcome and the CPUC decision process while ignoring safer and lower cost engineering options, and opposing environmental protection, apparently in violation of California's laws as written.

24. While there may be interests to make the law and the government no longer any concern of the people, the managers of utility services should notice that they regularly overlook matters relevant to their own economics, which is depleting the state economic capacity and resulting in extraordinarily debt, high priced energy and severely diminished manufacturing capacity, which is ultimately not beneficial for business, the environment or the people of the region. Unfortunately, those damaging managerial influences can be in opposition to the laws of California, which should be extremely easy to notice, however with administrative decisions that override the laws and the interests of the people, we may be observing the convoluted failure of a state agency. Instead of leading the way with a process of analysis that can develop creative and efficient decisions, we have avoidance of the most significant technical issues, opposition to environmental laws and the denial of constitutional obligations, which were all intended to offer universal protections. Undoubtedly, both the business interests and the people are confident that there is insufficient government confidence to enforce the laws and requirements of the state, except on a selective basis, where influences dictate.

25. After reviewing the latest high power line proposal and alternatives, and noticing that little to no significant environmental or property protections have been offered, nor analyzed, when vastly lower impact and lower cost options are available, as we have also described in great detail, and as others have requested and encouraged through public hearings, we can also see that not offering alternatives such as high capacity underground DC cables or renewable options, such as widely distributed solar and wind generation, is providing a conclusion for the public review process which is deceptive and apparently fraudulent, since it no doubt would inflict many billions of dollars in damages along with schemes to avoid paying for those damages and losses which are also fraudulent and will stand as a permanent liability against the assets of Sempra Energy, San Diego Gas and Electric, their management, subsequent owners or parties of interest and their participants, including government entities.

26. While we have many pages of technical questions that could help examine the engineering, economic, legal and environmental review process, which has so far never addressed these issues, and can present questions that have never been addressed by SDG&E, the CPUC nor Aspen Environmental, we also understand that we have never been provided any opportunity to ask those questions, although we have expended great effort trying to openly or publicly address the issues, without any form of interest or acknowledgement by the CPUC, which has been noted here. The fact is that several engineers also mentioned similar observations at public hearings, including Borrego Springs on May 12th of 2008, with extraordinarily similar conclusions, again with no consideration by SDGE, the CPUC, or Aspen. We gather that the public review process may well have been sabotaged, misguided and ill informed, and that the process itself should be reviewed by the state, in order to allow for the review that is required by law, for the protection of the people, the environment and the economy, in order to assert requirements for personal responsibility and the full restitution for all economic, medical and environmental damages.

27. After traveling to and participating in many hearings and having numerous conversations, it is clear that while the CPUC provides a sense of openness, which is admirable and completely respectable. However, the result of the review process and the analysis provided by the CPUC's consultants, does not show openness or consideration of either the economic, environmental or technical issues, nor any thoughtfulness regarding the interests of the people, nor much regard for the laws that were intended to allow for a review process based on openness, full consideration of the issues and a beneficial conclusion. The actual results of the process now appear to be much more highly controlled and designed to provide a specific result, with little to no regard for the needless and massive damages that would be caused, without even considering lower cost alternatives for underground power lines that would not inflict any significant environmental damages, all of which is contrary to the purpose of the public review process, as well as economically disadvantageous even to SDG&E, who apparently has not so far shown any comparative analysis work which was essential to simply review and consider the alternatives that are in their own interest. None of that critically important review work had been either done or provided by SDGE, nor the state's review process.
28. The problem facing the environment and the people of California is not the technology needed to avoid damages, that's already there, nor the availability of labor, nor the availability of capital, since the least damaging solution doesn't cost more. The problem is in the review process or how the review process is regulated. The review process has avoided consideration of the nondamaging alternatives that are available, which is why this dilemma needs to be carefully evaluated.
29. When SDG&E and the CPUC have power line alternatives such as underground DC, which costs less, provide higher capacity and causes no environmental or property damages, then why does SDGE and the CPUC persist in causing many square miles of environmental, property and personal damages? Is this strictly malicious behavior with the intention of causing massive environmental damages for no rational or beneficial purpose? What other interpretation could anybody have? So far we have

been offered no other explanation by SDGE, the CPUC or Aspen Environmental, which is clearly in opposition to the expressed interests of thousands of people who appeared and spoke at meetings and wrote letters. The people who favored a power line would still have their power line if it were underground, so they would be denied nothing, except perhaps causing damages to others. So their interests are not actually being denied, nor are the interests of SDGE, nor do costs increase by installing nondamaging underground power lines, nor does capacity go down. So what are the objections to underground power lines? These issues have never been addressed by SDGE, the CPUC or Aspen Environmental, who have provided false criticisms regarding underground power lines, which in fact provides evidence of a seriously flawed review process, which was intended to lead to a needless and extraordinarily destructive overhead power line route, with almost 700 pylons 170 feet in height on top of our mountains impacting over 9,000 acres with access roads, work areas and clearings that will devastate the most extraordinary wilderness regions in all of southern California. Since the CPUC review process has avoided consideration of this lower cost, low to no impact environmental alternative which is required by the CEQA, then the review process is not complete, or it's intentionally destructive or alternatively fraudulent in nature. In each case it would be in violation of the needs and requirements it was intended to serve, along with the laws of the State of California.

30. A considerable number of educated, working people with good careers who attended the CPUC hearings, believed that the big corporations and the government had the intention of degrading the environment and burdening their lives. While I thought that was an extreme view, however I couldn't find any statements being made by the commissioners, nor the CPUC review documents that ever openly supported the interests of the people or offered any defense for the environment, as required by California law. Then I thought how relieved I and others could be if any Commissioners or CPUC managers would actually struggle to sustain the defense of the people's interests, their survival and the protection of the environment. But most people learned that such a dream didn't occur in reality very often.

31. The full restoration cost of botanical and geological environmental damages, including threatened species restoration can easily exceed \$75 per square foot over an area of approximately 34 million square feet can be significant (over \$2.5 billion), and could take well over a half century to accomplish with skilled botanists and biologist to guide the efforts. Naturally, a commercial assessment of the region which has absolutely no regard for the natural landscape, that has gradually emerged over 10's of millions of years, that no team of experts could hope to fully restore in even a preliminary way in less than half a century, would be assessed as having little intrinsic value. No doubt because the commercial value of nature and life is for some bizarre reason considered close to zero. In fact most developers will completely obliterate and reshape a 100 million year old landscape with bulldozers and plant completely out of place water hungry trees and shrubs that they studied in landscaper's college to create an artificial looking, labor intensive, water hungry landscape that doesn't support California's birds and wildlife. The expectation is that the subdivision will eventually be bulldozed by another developer with another alien scheme, until their nonfunctional schemes eventually bankrupt the people and wipe out the most extraordinary works of creation, and somehow we're supposed to all get behind the developer's financial schemes and destructive process. California's and Arizona's largest tourist attractions, such as Yosemite Valley or the Grand Canyon could each be devastated with dams or desecrated with power lines, all with very little money. However these national monuments could not be replaced for \$200 trillion, and the huge "I" beams that would support such a vain effort would probably deteriorate and collapse in ruins within in a couple of centuries, after consuming 1 century's worth of the world's steel production. But somehow we're supposed to believe that arrogant developers and power companies have a right sanctioned by god to destroy everything they choose to destroy, even if they have nondestructive alternatives available, such as local sustainable power generation or underground power lines which cost less, and still we're supposed to believe that the CPUC has no obligation to consider these benign alternatives, even though it's required by California law.

32. 100% of all resources we obtain for our efforts is dedicated to our habitat and long term threatened species preservation efforts, including land acquisition and biological research. Unfortunately such efforts are underfunded at the state and federal levels and so depend on the efforts of individuals and nonprofit participants. If our research efforts were allowed to help save money for SDGE; then simply obtaining 20% of what we could help SDGE save on the Sunrise Powerlink could be an extraordinary assistance to care for the California environment and the needlessly threatened species, as well as economically benefit the power industry. Unfortunately, the power industry and its state agencies apparently believe there's some kind of natural animosity between technology and the environment, and they proceed to make the destructive expectation a fact; so apparently there has been no hope, to date, to consider any form of mutually beneficial efforts, even though we have spent hundreds of pages describing how it could be beneficial.

33. So far, based on the plans and alternatives that are being provided by SDGE and the CPUC for the Sunrise Powerlink, it's clearly documented that neither SDGE or the CPUC are adverse to causing large scale environmental damages, that are completely unnecessary to the installation of a power line. Naturally, gestures have been offered to provide the appearance of environmental concern, and provide the appearance that the environmental studies would significantly influence the power line route or technology. Unfortunately, the beneficial influences, particularly along the Southern Route, so far appear to be imaginary, while nondamaging environmental alternatives have been opposed and rejected by SDGE, the CPUC and its consultants, even when the implementation costs have been less. Reducing power line cancer hazards have also been opposed, even when the costs have been lower. The devastation of San Diego County's most extraordinary wilderness regions, in the southeast, have been planned by the CPUC's reviewers, Aspen Environmental, even when safer, lower cost underground routes and local sustainable generation were available options that have been described in considerable detail.

34. Individual, corporate and state responsibility for the entire value of all the economic, business, property, health and environmental damages caused, that are sanctioned or implemented, including full restitution for all property losses, personal and legal costs, compounded interest and collection costs can be secured by the personal, corporate, government assets and property of each party or family participating in or promoting the destructive above ground power line efforts against others and the wilderness of the region. Deception or malicious intent has been demonstrated by the environmental plans provided and the review offered, both of which have repeatedly rejected nondamaging alternatives, all in opposition to the laws of the state and the expressed interests of the people, which we have reviewed and which is available for public review.
35. The fact that individuals and organizations would willingly plan or cause damages, which are completely unnecessary is particularly unusual and irresponsible, even if they knew that they would never have to pay for those damages. Because damaging strategies are invariably uneconomical, although repeatedly promoted without any reasonable economic, engineering or environmental defense. In consideration of the massive damages that are being proposed for the region, the hundreds of people who offered their comments in Borrego Springs on May 12th 2008 realized that they could only beg that the state park and their lands along the northern and southern routes would not be devastated, and that the CPUC would not turn against them and avoid considering the nondamaging alternatives. The hundreds of people who spoke recognized that the CPUC could be much more of a threat if the review process was not going to consider their environmental concerns or the nondamaging options that are clearly available, which could be completely eliminated, even though the nondamaging alternatives could provide SDGE everything that is needed to establish lower cost, safer, higher capacity cables, completely underground. So in this case the project's review process, which was supposed to be the safeguard, now appears as the threat to the people and the environment, perhaps because the government has become transparent. So instead of seeing the CPUC as a defense, most people see the hand of SDGE influencing the review process, no doubt through the governor's

offices, which has been well documented by news reporters. So it's expected that the lack of analysis of the economic, environmental and health issues is only a part of the process of government complicity, perhaps now used as a weapon, intended to cause damages and eliminate nondamaging alternatives, with false information and through the avoidance of data or the evaluation of the information that was provided. If only the people and the reporters were wrong, there would be an opportunity for the CPUC to carefully review and consider the nondamaging alternatives, and respect for the governor and the CPUC would be reestablished. Unfortunately, no matter what combination of avoidance and deception strategies were used in the review process the result was to deny consideration of nondamaging alternatives for the Powerlink. So when a government agency willingly alters the fairness and diligence in their review process, appeasing the applicant or the governor, and rejecting nondamaging alternatives early or throughout the review process, in order to exclude consideration of beneficial alternatives, both the applicant and the reviewing agency, through their consulting firm, have then clearly avoided consideration of the nondamaging and significantly less damaging alternatives as required by law, and thereby moved in the direction of allowing large scale destructive impacts which are completely unnecessary, and serve no public interest, all of which has been overwhelmingly opposed by thousands of participants to public hearings, whose voice has so far not affected the review process in any functional or beneficial way, since the issues have not been considered in any of the major power line alternatives that are being made available to the commissioners through the review process.

36. It's obvious that governor Schwarzenegger communicates with Donald Felsing of Sempra Energy and has pledged his support for Felsing's company, and communicated this very clearly to the Public Utility Commissioners. It's also clear that such communications with the power industry are also common at the Whitehouse when the chief executives of Enron were the very first people to be invited to the George Bush II Whitehouse. So how could anyone be surprised that deals are going on, and that big energy does regulate the government, even if they are dishonest and inept, and willing to get us into a worthless war over oil; or in Sempra's case are

willing to devastate San Diego County for no purpose whatsoever, since there are lower cost underground alternatives, that based on my conversations, SDG&E doesn't understand and doesn't care about.

37. When the environmental review process provides 2 major power line routes which are both extremely damaging, that is not an alternative that offers any notable environmental protection under the California Environmental Quality Act. When the review offers SDGE no power line as a substitute for a power line that is not an alternative either, and undoubtedly would be rejected by the commissioners as a viable option, even though local renewable and conventional power plants could undoubtedly work, and are conventionally used around the world. The obvious problem that is presented when multiple dangerous or damaging choices are presented, with no safe and nondamaging power line alternative, is that you force the commissioners into a difficult position, which very likely will result in the selection of an extremely damaging northern or more likely an extremely damaging southern route. This really looks like an intentional choice by the BLM, the CPUC and Aspen to literally sabotage the review process and cause the maximum damages possible. I don't want to have to deal with such a catastrophe; however what other conclusion can any reasonable person have, the facts overwhelmingly point to this observation. If this isn't a factual conclusion, then please explain why the only nondamaging power line choices that are available have been refused for review or consideration, in spite of numerous requests by the people and a huge quantity of factual information that is available and provided to the CPUC and their consultants.
38. After spending thousands of hours describing proven ways to avoiding environmental damages, and seeing no consideration of these or related solutions, which incidentally had been requested by others and have been shown to actually cost less to implement. So naturally we noticed that such environmentally benign solutions were not being considered, even when environmental impacts and alternatives were being reviewed. Then after reading the discussion of influence, in the Los Angeles Times and the San Diego Union Tribune, between Sempra Energy and Governor

Schwarzenegger, who is obviously the person who appoints the CPUC commissioners and who wrote the letter to commissioner Grueneich, it became obvious that the behind the scene influences could easily influence, control and derail the CPUC's public review process. This was born out through thousands of hours of our efforts that was being diligently ignored, although our work was directly relevant to addressing the engineering, environmental, property and economic issues, with numerous references to substantiate concrete alternatives that could be implemented, all of which have been proven on a worldwide basis, while providing significant economic and environmental advantages. Apparently the CPUC court process only invites, encourages or rewards efforts and comments which support conclusions that have been predetermined to be within the range of acceptability and convention, and in this case it is being shown in the press to be as is generally acceptable to Sempra Energy, even if it should violate numerous California laws. Having shown and proven that a far less damaging power line could provide greater capacity, greater safety and reliability, all at a lower total cost, unfortunately it's also apparent that this would be irrelevant to the CPUC, the governor and Sempra Energy. Further, we would be willing to provide any details that anyone believes that we overlooked, that would be necessary to prove the information that we obtained from the largest electrical equipment and cable manufacturers in the world is accurate, and we would invite the presence of CPUC and SDGE personnel, to openly observe such a public fact finding effort. This kind of effort incidentally has been openly done by the People's Republic of China, who have decided on many of the same engineering, cost savings and more environmentally considerate alternatives that we have been suggesting, by concentrating their power to fewer 800 kV DC, 6400 megawatt lines, about 15 instead of 96 conventional 500 kV lines as proposed by SDG&E, which amounts to an 85% reduction in power line construction, and a major economic savings for China. If you examine the engineering, environmental and planning advances that are now pervasive throughout China and the rate of implementation of innovations, which are being drawn from the world, it's clear that California has succumbed to a far more oppressive thought regime, that primarily supports the growth of subservience, ignorance and poverty. These are tragedies that were far less evident 1/2 a century

ago when people felt a personal obligation to work hard and help create a better future for everyone, which was a time when innovations were created and implemented, a place **where the first modern highways were created (Pasadena Freeway, 1938), where the first long distance power lines were first implemented utilizing AC transformers (Redlands California, 1893), the first feature motion picture (Hollywood, 1915), the first laser (Malibu, Hughes Research Laboratories, 1960), the space shuttle (LA/Palmdale, 1973-1981), human stem cells used to grow spinal neurons (Weissman at Stanford, 2004) and thousands of other significant inventions.** So now California stands in opposition to the benefits of its creativity and technology and is willing to pay billions of dollars extra to destroy its extraordinary and irreplaceable environment, violate its laws, and give 1000's of people cancer. And we're supposed to submit to the destruction of our lives because incompetent billionaires have decided they want to destroy our country!

39. Anyone might think, that with the sheer volume of documentation assembled by the CPUC that all significant issues have been carefully reviewed. Well we might notice the lack of a work site specific biological review, the lack of an economic analysis of the habitat, property, household, business, paleontological, medical and personal damages, the cost of restoration of all damaged habitat, the lack of a legal review to identify how SDG&E would pay for 10's of billions of dollars in damages and property replacement costs. The very technology that could avoid environmental devastation, as well as avoid EMF, the ionization of pollutants and the deaths of thousands in San Diego County, has been specifically avoided in the review process, although such issues have received careful consideration by medical researchers, which has resulted in the implementation of completely underground power lines, at a lower cost than the Sunrise Powerlink, all without causing billions of dollars in property damages. **While**

we believed in the potential of the CPUC review process, however since we have seen an extraordinarily consistent stand taken by the SDGE, the CPUC and it's consultants, over an 18 month period, which is in opposition the interests of the people, the environment, the laws, the property owners, medical data, and electrical transmission technology, particularly since SDG&E and the CPUC are willing to justify spending 100's of millions of additional dollars in order to cause large scale environmental and human damages, just so the power line wouldn't be placed underground, where it is safer and operates more relievable, and even allows for considerably higher capacity. Perhaps the power and regulatory industries know that they can patiently listen to the people, to provide an impression of openness and then continue to implement a needlessly destructive power line and ignore any nondamaging alternatives requested by thousands of people who would be impacted, because they could be quietly eliminated later by a legal system owned by the state, that doesn't need to follow California law. Historically, this is known as tyranny or an oligarchy. And so the human, economic and environmental treasures of California are being plundered and wasted, which undermines California's ability to survive. We expect that the long term loss to California's environment, viewshed, private property, homes, business, health and recreation will be in excess \$30 billion, if an alternative to the overhead Sunrise Powerlink is not allowed to be considered and implemented.

40. No one could do a better job of severely damaging California than some of our own business and government leaders. So, simply saying nothing in the face of malicious behavior is all that is needed to irrevocably destroy our region, economically and environmentally. The power industry and the state each spend millions of dollars on public relations explaining how they are now environmentally considerate, while actuality using the force of their organizations to insure the needless destruction of

some of the world's most extraordinary wilderness. Even when we create an anthropological nature reserve, away from most business activities, to help protect what remains of an extraordinarily beautiful wilderness with an ancient paleoanthropological history, we are somehow subject to absolute power and the force of destruction, for no purpose whatsoever, while lower cost nondamaging alternatives are intentionally ignored. I could have never imagined a more bizarre, illegal, completely needless and tragic fate for our region

41. In our efforts to help find a nondamaging power line alternative for: Sempra Energy, SDG&E and the CPUC, which provided for the implementation of a 2 cable 1,000 to 3,000 power line, or a 4 cable 3,000 to 6,000 megawatt power line, or a 10,000 megawatt Gas Insulated Line, which Sempra Energy, SDG&E, the CPUC and its consultants, including Aspen Environmental could review in detail independently or with assistance, we could help with the evaluation of the technology, the habitat restoration efforts, restitution and property replacement requirements, and are willing to initiate an economic review of the engineering alternatives, evaluate the costs of materials and provide for excavation and installation contracting for underground power systems.
42. Any understanding of human nature should inform me that trying to be helpful will be rewarded with retaliation, vengeance and damages. Unfortunately that decision has already been made by Sempra/SDGE/CPUC, and the losses for the people have most likely already been decided on a long time ago, so there is probably nothing more that could be lost. Consequently, an honest effort to pursue an improved decision making context may be the only survival hope for thousands of people, and 10's of thousands of acres of nature that should never have to be destroyed. If we don't mention the desperate economic motivations to deceive and the damaging incentives behind those efforts there undoubtedly will be no possibility for change. The carcinogenic hazards

that are currently sufficient to expect thousands of deaths in the region due to electromagnetic fields and the ionization of pollutants will make someone reflect on their life purpose, but perhaps too late to do anything. Since we are being targeted our risks will be translated to a total personal, environmental and economic loss, with no possibility of even a small fraction of one percent recovery, according to SDG&E's disclosed plan. Most people already understand that the laws have already been disposed of in California and the state has been transformed into a weapon to be selectively used against the people and against nature. None of this is news to the corporate or political decision makers and certainly not the people. If the decision makers want to shock the people, simply do the correct and beneficial thing, be fully considerate of nature and humanity, and you will surprise everybody, and perhaps help Sempra make billions of additional dollars. While deceptions and conflicts may be real problems for everybody, they are delusional if anyone adapts their life to such beliefs, and naturally communication and understanding will become impossible in that situation. Which is no doubt why the issue of environmental or human damages are not about to be considered by Sempra or the CPUC; unfortunately a lifetime of habits are not going to be reevaluated by anyone's comments, perhaps restitution for all damages and losses inflicted would be the more effective approach to assist the understanding process.

Appendix I, San Diego County Department of Planning and Land Use

Among numerous government agencies and elected officials who are responsible for the wellbeing and survival of the region, there has been extraordinary opposition to the proposed damages proposed by the Sunrise Powerlink, as well as the lack of a CPUC review of the available alternatives, including local sustainable generation and underground power lines, also the lack of consideration of the interests of the people which have been extremely clearly articulated at numerous hearings and in writing, and the lack of evaluation of full restoration requirements of environmental damages, the lack of restitution to businesses and wilderness parks, the avoidance of property replacement for seriously damaged properties, the offer of *plausible deniability* statements by the power industry to address cancer hazards related to EMF and the ionization of pollutants, medical expenses or the loss of lives, and the avoidance of over \$4 billion in damages that occurred during 2007 in San Diego when thousands of homes burned, including uninsured property and possessions, due to fire ignitions started by high power lines, all of which has been studied, proven and well documented, yet overlooked in the CPUC review process. Obviously, many people and government officials have had to spend 10's of thousands of hours to ask why, and then be ignored by the CPUC and its consultants, all without seeing these issues being addressed and included in the official review process that apparently will be the justification for the decision made by the CPUC commissioners.



County of San Diego

ERIC GIBSON
INTERIM DIRECTOR

DEPARTMENT OF PLANNING AND LAND USE

5201 RUFFIN ROAD, SUITE B, SAN DIEGO, CALIFORNIA 92123-1666
INFORMATION (858) 694-2960
TOLL FREE (800) 411-0017

April 9, 2008

CPUC/ BLM
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

RE: PROPOSED SUNRISE POWERLINK DRAFT ENVIRONMENTAL IMPACT REPORT/ ENVIRONMENTAL IMPACT STUDY

To Whom It May Concern:

The County of San Diego (County) has received and reviewed the Draft Environmental Impact Report/ Environmental Impact Study (DEIR/EIS) for the Sunrise Powerlink dated January 3, 2008. The County appreciates Aspen Environmental Group's efforts to communicate with and obtain information from the County in order to provide a thorough analysis of the project impacts in the Unincorporated area. Enclosed are the County's comments in response to this document.

The County is the land use authority for the Unincorporated area of San Diego County. The public looks to the County to establish regulations that guide reasonable and environmentally sensitive growth, especially in rural communities. The County is also responsible for maintaining the quality of County road right-of-ways and public facilities, and the recreational and biological value of the parks, preserve areas, and trail systems.

Staff from the County of San Diego Department of Planning and Land Use (DPLU), Department of Public Works (DPW) and the Department of Parks and Recreation (DPR) have reviewed and commented on the content of the DEIR/EIS. Overall, the DEIR/EIS does not establish the need for the Proposed Project. The analysis also demonstrates that the Proposed Project will degrade the quality of the environment in the Unincorporated area, particularly in terms of visual, biological, and agriculture resources, air quality, noise, traffic and numerous other elements of importance to the quality of life in the Unincorporated County of San Diego. The Proposed Project will also have extensive significant negative affects on lands purchased by the County for conservation and recreational purposes.

The enclosed comments focus on a number of general issues identified in the DEIR/EIS, including the need for the Proposed Project and the potential growth-inducing effect of the Proposed Project. Also enclosed are more detailed comments specific to the

recreational, biological, air quality and circulation or road-related impacts analyzed in this document.

Please feel free to contact Thomas Oberbauer at (858) 694-3701 with additional questions.

Sincerely,



ERIC GIBSON
Interim Director, Department of Planning and Land Use

CC: Vince Nicoletti, Staff Officer, County of San Diego Land Use and Environment
Group Executive Office, MS-A6
Jeff Murphy, Deputy Director, County of San Diego Department of Planning and
Land Use, MS-0650
Thomas Oberbauer, Chief, County of San Diego Department of Planning and Land
Use, MS-0650
Trish Boaz, Chief, County of San Diego Department of Parks and Recreation,
MS-029
Nick Ortiz, Project Manager, County of San Diego Department of Public Works,
MS-0383

Sunrise Powerlink Project DEIR/EIS
County of San Diego Comments

2

April 9, 2008

County of San Diego General Comments regarding the Sunrise Powerlink Transmission Line Project DEIR/EIS:

1. Need for the Proposed Project

The DEIS/EIR does not support the need for the Proposed Project. It is unclear why this alternative was selected for analysis as the Proposed Project considering its relatively low ranking among the transmission projects and alternatives identified and the ability of the Overall Environmentally Superior Alternative (New In-Area All-Source Generation Alternative) to meet most of the project objectives. In the analysis of the "No Project/ No Action Alternative", this document explicitly states "...the No Project/ No Action Alternative would have fewer impacts than those of the Proposed Project [and several other alternatives]...and impacts equivalent to [several other alternatives]... Only about 1,000 MW of in-basin generation or transmission import capacity would be required to replace the Proposed Project, so any one of the three top ranked alternatives would provide adequate resources" (ES-4). The DEIS/EIR states that this alternative may not meet all major project objectives, including the requirement for access to renewable energy resources. However, a combination of other alternatives with fewer significant, unmitigable impacts, including New In-Area All-Source Generation, would achieve this objective.

In addition, the Proposed Project has a greater number of significant, unmitigable impacts than all other alternatives. Of particular concern to the County of San Diego are the magnitude of the significant, unmitigable impacts to visual resources (including the Santa Ysabel valley and other County communities), biological resources, air quality and County lands utilized for recreational and conservation purposes. The future expansion that is anticipated as a result of the Proposed Project will most likely result in additional significant impacts in these areas.

The DEIR/EIS also does not establish need for the following alternatives; LEAPS Transmission-Only Alternative (3), Environmentally Superior Southern Route (SWPL) Alternative (4), Environmentally Superior Northern Route Alternative (5), LEAPS Generation and Transmission Alternative (7).

Based on the DEIS/EIR (ES-66), the least impactful alternatives that still meet all or most of the project objectives include the (1) New In-Area All-Source Generation Alternative, (2) New In-Area Renewable Generation and the No Project/ No Action Alternative. Any of these three alternatives eliminate or substantially reduce significant impacts of concern to the County of San Diego.

A0018

In addition, the (1) New In-Area All-Source Generation Alternative and the No Project/ No Action Alternative would imply that planning to meet regional energy needs would continue primarily through existing venues such as local jurisdictions and established, successful regional energy partnerships. The County recognizes the need to establish long-term energy capacity, reliability, and access to renewable energy sources. The County has been involved in local and regional energy planning through these mediums and supports these ongoing efforts.

Additionally, existing state programs encourage the development of local renewable energy through the Million Solar Roofs Plan. This plan is in process, the associated technology has been proven to be effective, and the project will not result in significant biological impacts because it would be constructed on existing development. The Stirling Energy Systems solar facility and the La Rumorosa wind project from which the Proposed Project would obtain renewable energy would have a range of significant biological impacts affecting thousands of acres of land containing ecosystems and recreational areas connected to those in the Unincorporated area (B.6.1).

2. F.2 Growth-Inducing Effects

The County concurs and is concerned with the conclusion that the Proposed Project "...would facilitate growth indirectly by removing obstacles to population growth through the additional increased capacity of electric power that it would make available..." (F.2.2). Growth-inducing impacts could affect Unincorporated San Diego County particularly along the Central Link and Inland Valley Link. Planned growth in these areas is minimal and population capacity is currently constrained by physical, geographical and other factors including limited access to infrastructure and services. Development of the Proposed Project would extend the capacity for electrical power in these areas and, more significantly, could facilitate the expansion of other infrastructure into these locations, such as water and sewer facilities.

The statement that "...Growth in the Proposed Project areas is expected to occur with or without implementation of the Proposed Project..." (F.2.2) does not adequately convey the very limited scope of the growth expected in some areas of the Proposed Project located within Unincorporated San Diego County. The County of San Diego General Plan provides limited growth capacity in this area. In addition, the General Plan Update that is currently in process proposes very low density in the rural communities potentially affected by the Proposed Project.

3. Impacts to Visual Resources/ Community Character

Impacts to visual resources within the County are of great concern to the County. As noted in previous comments pertaining to the scoping phase of this project, the community character of rural communities would be

A0018

significantly impacted by the Proposed Project and all of the transmission-only alternatives. Should the need for the Proposed Project or another transmission-based alternative be established, complete undergrounding of visually impactful lines should be incorporated into all alternatives. Permanent visual impacts within the Unincorporated area would be eliminated by undergrounding all lines within the County's jurisdiction. Of particular importance would be undergrounding of transmission lines proposed within or visible from rural communities, and proposed within other notable vistas such as the Santa Ysabel valley. Undergrounding of these lines should only occur solely along existing transmission line easements and/ or in road Right-Of-Way (ROW) (in coordination with the respective jurisdiction) to avoid additional temporary or permanent impacts to biology and community character.

4. Impacts to Biological Resources

The Proposed Project will have a range of significant, unmitigable biological impacts to lands within the jurisdiction of the County of San Diego, including lands within the adopted Multiple Species Conservation Program (MSCP) South County Subarea Plan and within the North and East County MSCP Plan currently under development. This includes impacts to biological resources planned primarily for conservation through the County of San Diego Multiple Species Conservation Program (MSCP) as further described in the detailed comments below regarding biological resources.

5. Reliability

"Maintain Reliability" is stated as one of the primary goals of the Proposed Project (ES-19). The DEIS/EIR does not demonstrate how the Proposed Project satisfies the reliability mandate with respect to 1) the reliance on other connected actions outside of the United States and 2) the high fire-risk associated with proposed powerlines through the backcountry of San Diego County.

International Power Generation Sources:

The DEIS/EIR indicates that renewable wind energy from this source will be distributed via the SWPL based on the ability of the Proposed Project to transmit some of the power now carried by the Southwest Powerlink (SWPL).

Fire:

The location of the Proposed Project within high fire risk areas raises concerns regarding the potential for these lines to be impacted during the event of one or more simultaneous fires throughout the region. Fire hazard is significant in the eastern portion of San Diego County in much of the Proposed Project location. This could have serious impacts with regard to the reliability of this powerline. In addition, the DEIS/EIR

A0018

indicates that Fire Prevention and Response Plans (FPRPs) will be created for the Proposed Project. This does not address the fundamental issue of fire hazard from downed powerlines. Also, the fact that two power lines into the County in widely separate locations had simultaneous fires in October would seem to negate or reduce their claim about the problems with lines that are close together. It now seems that it is just as likely that two separate lines would be threatened by burning as two lines with close proximity.

6. Air Quality

The DEIR/EIS states that "...because total construction GHG [Greenhouse gas emissions] emissions exceed the GHG reductions achieved due to avoided power plant emissions over 40 years of transmission line operation, the Proposed Project would cause an overall net increase in GHG emissions and a significant climate change impact..." (ES-25). The County is involved with ongoing programs and efforts to improve air quality and is concerned that the increase in GHGs from the Proposed Project would be higher than the continued operation of in-basin power plants even though one of the basic concepts of the project was that it would provide for renewable energy with reduced greenhouse gases.

7. Agriculture

Agriculture is the fifth largest industry in San Diego County. The County Board of Supervisors has adopted Board Policy I-133, "Support and Encouragement of Farming in San Diego County" (<http://www.sdcounty.ca.gov/cob/policy/I-133.pdf>). The Proposed Project would have significant, unmitigable impacts to hundreds of acres of Department Of Conservation mapped Farmland, Active Agricultural Operations, and Williamson Act Lands (D.6-46). Negative impacts to farmland via the Proposed Project conflict with Board Policy I-133. No significant, unmitigable impacts to farmland should be allowed to occur.

8. Need for Additional Inter-Agency Coordination

The County appreciates SDG&E's ongoing communication with the County and SDG&E's efforts to meet with County staff at key junctures of the project. This has provided County staff with the opportunity to ask basic questions regarding the project and the structure of the environmental analyses. However, elements of the stated project impacts require further description, analysis and coordination with the County in order to establish an adequate assessment of impacts (particularly stated "significant unmitigable" impacts) and/ or mitigation measures. These elements are described further in the detailed comments below.

In addition, the DEIS/EIR states that the Bureau of Land Management (BLM) "...has not yet defined its Agency Preferred Alternative, so the

A0018

determinations presented in the Draft DEIR/EIS represent the overall Environmentally Superior Alternative as determined by the CPUC only..." (ES-38). The County would like information regarding the BLM's Agency Preferred Alternative when this information is determined. The County would also like information regarding the effect that it would have on the analysis or the ranking or evaluation of alternatives in the analysis should the BLM's Agency Preferred Alternative differ from that of the CPUC. This information should be provided prior to the publication of the Final EIS/EIR if it has bearing on the overall project analysis in order to ensure that stakeholders such as the County have adequate opportunity to evaluate the project with this new information.

County of San Diego Detailed Comments regarding the Sunrise Powerlink Transmission Line Project DEIR/EIS

BIOLOGY

1. D.5-23 Local Regulations, Plans and Standards. As was stated in County comments provided on the Notice of Preparation/Intent (NOP) dated October 20, 2006, the County has enrolled in the Natural Community Conservation Planning (NCCP) process by adopting the Multiple Species Conservation (MSCP) South County Subarea Plan and has entered into a planning agreement with the United States Fish and Wildlife Service and the California Department of Fish and Game for the North County MSCP and East County MSCP. Discussion of the effects of the Proposed Project on the existing and planned MSCP plans should be included in this section. MSCP plans that are in place or in plan preparation will address several hundred species of plants and animals that have a high potential for being listed as endangered or threatened by either State or Federal wildlife agencies. This Proposed Project and its alternatives would result in a major disruption to the completion and implementation of these plans.

2. As was stated in County comments provided on the NOP dated October 20, 2006 the DEIR/EIS should examine impacts to areas designated as high biological value areas or Pre-Approved Mitigation Area within the existing and proposed MSCP plans. Consistency with the MSCP needs to be demonstrated. In particular, impacts to species covered under the South County Subarea Plan or proposed for coverage under the North or East County MSCP Plans must be adequately analyzed and mitigation must be identified sufficient to maintain or not to preclude the County's take authorization for these species under these plans. This includes significant, unmitigable impacts to a wide range of species to be impacted by the Proposed Project as outlined in the DEIR/EIS such as; various bird and bat species; flat-tailed horned lizard, Peninsular bighorn sheep, and the Quino checkerspot butterfly. The MSCP plans and/ or proposed

A0018

sensitive and covered species lists may be found online at:
<http://www.sdcounty.ca.gov/mscp/index.html>.

3. "Compensation for loss of critical habitat..." [B-7c(CA)]and "...implement appropriate compensation strategies..." [B-7i(CA)] do not adequately define mitigation measures for all species impacted by the Proposed Project. Compensation (preservation/ acquisition) as a mitigation measure must be further defined in the case of impacts to sensitive or listed species, including identification of the specific species and general locations where such compensation may satisfactorily occur and specific measures that may be taken to "...minimize impacts..." [B-7i(CA)]. The issue of the introduction of roads and tower platforms into preserve areas also needs to be addressed in a manner that there is compensation for the impact that is generated by the overall edge effects. The impacts of such physical modifications in preserve and undisturbed habitat lands are multiples greater than simply the acreage of surface that is disturbed.
4. Alternative Routes- All transmission alternatives would have significant, unmitigable biological impacts (D.2-269), particularly the Environmentally Superior Northern Route Alternative and the Environmentally Superior Southern Route Alternative. This includes direct or indirect loss of native vegetation, sensitive plants, and native bird species. These impacts would likely have a similar negative affect as the Proposed Project with regard to the County of San Diego adopted and proposed MSCP plans.
5. The Top of the World substation element of the Proposed Project would impact a total of approximately 115 acres. This disturbance would cause significant and, in some cases, unmitigable impacts to sensitive plant and wildlife species (D.2-493-508). This area is currently included in the Study Area for the East County MSCP. Impacts to species proposed for coverage under the East County MSCP should not be permitted to occur. Should the need be established for the Proposed Project or a similarly impactive alternative, these impacts should be mitigated to a level that does not preclude completion of the East County MSCP plan based on the proposed covered species list.

CULTURAL RESOURCES

1. The Proposed Project will have significant unmitigable impacts to cultural resources within the Unincorporated area (D.7-26). Significant unmitigable impacts to these resources should not be allowed to occur.

RECREATION

1. Impact WR-3. Presence of a transmission line would permanently preclude recreational activities. The mitigation measure WR-3a says: Co-

A0018

ordinate tower and road locations with the authorized officer for the recreation area. The proposed mitigation measure is not sufficient to mitigate for the permanent preclusion of recreational activities. Actual acreage of park/preserve loss needs to be calculated and an equal amount needs to be preserved so that there is a no-net-loss of park/preserve lands. Additionally, if the park/preserve were dedicated for mitigation for another project then a 1:1 ratio will not suffice to meet a no-net-loss and additional mitigation will be required. Acreage calculations will include tower locations and ROW, new access roads, widening of existing trail to access road widths or the relocation of trails.

2. It is not clear in Table D.5-2 what WR-2GT and WR-2LR mean. The impact description under both categories is the same.
3. D.5-49 Impact WR-3. The proposed mitigation measure, WR-3a, will not mitigate the preclusion of the use of recreational amenities within the Inland Valley Link to less than significant. Additional mitigation is required to meet a no-net-loss standard.
4. D.5-58 500 kV Future transmission System Expansion. Noise levels will be higher at the ROW resulting in additional acreage of permanent recreational preclusion. Mitigation measure N-3A will not be adequate to address the noise levels that will be higher at the edge of ROW.

TRAILS

General Trail Comments

The Proposed Project and Project Alternatives will have significant impacts to proposed and existing community and regional trails. Some impacts cannot be mitigated such as decommissioning a trail because of the presence of a transmission line. The Mitigation Measure WR-3a is not a workable solution because the mitigation measure still requires the trail to be closed. There will be cumulative affects to the regional or community trail systems connectivity if sections of regional trails are closed. Connectivity is very important for the success of any trails plan.

The County's Regional Trails Plan is contained in the County's General Plan. Any decommissioning or major reroutes of any regional trail will require a General Plan Amendment. As is already mentioned in the preceding comments, any alternative which includes transmission lines that would permanently preclude recreational activities requires the identification of a suitable reroute as well as mitigation for impacts to habitat.

Specific Trail Comments

1. **Page D.5-1 Wilderness and Recreation** – *A recreation area is any site or facility that is used for recreational activities, including but not limited to a*

A0018

national, State, county or city park or trails; refuge or preserve; open space; cultural center or museum; area of critical environmental concern (ACEC); campground; or a private recreational site such as a golf course. Include in the definition "trails".

The following are trails mentioned in Section D.5 and should also be identified as the County of San Diego Regional Trails:

- Jaun Bautista De Anza National Scenic Trail
- Trans County Trail
- Pacific Crest National Scenic Trail
- San Dieguito River Park

Add: California Riding and Hiking Trail

There is no mention of the 1945 Historic California Riding and Hiking Trail (CRHT), a state trail that is also a designated Millenium Trail. This trail is the most significant regional trail in the County connecting to 6 of the 9 County regional trails. This trail is not only significant to San Diego County but also regionally as it traverses Riverside and San Bernardino Counties. Sections of the CRHT are used by other regional trails including the Trans County Trails and Pacific Crest Trail. Those trail sections are not identified in the EIR/EIS.

2. **D.5-23 San Diego County General Plan**

The following statement is incorrect: *The Recreation Element of the general plan is directive of County officials and provides for the creation of a system of public parks and riding and hiking trails.*

The Recreation Element was amended January 12, 2005. The General Plan Amendment relocated the discussion of "trails", the County Trails Program and Community Trails Master Plan to the Public Facilities Element of the General Plan.

3. **Table D.5-2 Impacts Identified – Proposed Project – Wilderness and Recreation**

Decommissioning designated regional, historic or scenic trails is not an acceptable option. Other mitigation such as relocation and construction should be required.

4. **D.5-27 Mitigation Measures for Impact WR-1: Construction activities would temporarily reduce access and visitation to recreation or wilderness areas**

Include the California Riding and Hiking Trail in the list of trails.

5. **D.5-28 WR-1b Provide temporary detours for trail users**

Include the California Riding and Hiking Trail in the list of trails.

A0018

6. **WR-1c Coordinate with local agencies to identify alternative recreation areas.**
- Include the California Riding and Hiking Trail in the list of trails.
 - Include the County of San Diego Department of Parks and Recreation in any coordination and noticing of any work affecting regional or community trails, existing or proposed alignments.
7. **D.5-29 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**
The Juan Bautista de Anza is a National Historic Trail. A historic trail/route cannot be relocated. Other transmission line locations or mitigations measures need to be provided.
8. **D.5-30 Mitigation Measure for Impact WR-3: Presence of a transmission line would permanently preclude recreational activities. WR-3a Coordinate tower and road locations with the authorized officer for the recreation area.**
The California Riding and Hiking should be included as a potentially affected trail. Please note, placement of a transmission tower on any regional trail thus precluding its use is not considered acceptable and regional trails should be excluded from the placement of transmission towers. Additionally, it is unlikely that a sixty-day coordination notice prior to construction is adequate when involving multiple agency jurisdictions—the timing of the coordination notice should be increased potentially up to 6 months. Please include the County of San Diego Department of Parks and Recreation in any coordination and noticing of any work affecting regional or community trails, existing or proposed alignments.
9. **D.5-35 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities *The Proposed Project would be located along a 3-mile segment of the Trans-County Trail within Grapevine Canyon (near MP 80).***
This section of the Trans County Trail uses the California Riding and Hiking, a state trail. It should be noted that this is an existing state trail which is the backbone of the San Diego County Trails Program and regional trail system. No portions of it should be closed. Additionally, major rerouting of the trail will require a General Plan Amendment.
- Potential preclusion of the use of the Trans-County Trail, and other trails within ABDSP would be mitigated to a less than significant level through implementation of Mitigation Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area).***
Mitigation Measure WR-3a should be modified so that coordination with the "authorized officer" for the recreation area includes looking at the "big

A0018

picture", including any significant impacts on the connectivity of the trail as well as community trails.

10. **D.5-36 Impact WR-4: Presence of a transmission line in a designated wilderness or wilderness study area would result in loss of wilderness land**
The CRHT traverses this area and may be impacted by the expansion of the right of way.
11. **D.5-49 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**
If transmission support structures were sited on or immediately adjacent to the Trans-County Trail and trails within the San Dieguito River Park and Mt. Gower Open Space Preserve, recreationists would be precluded from these locations.

Suitable reroutes must be included in the mitigation as Mitigation Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area). It seems this mitigation measure still allows for the trail to be closed. Shutting down and disconnecting two popular County regional trails would not be acceptable. In addition to the regional trails, there is potential for a significant number of community trails both existing and proposed that connect or are planned to connect to the regional trails would also be affected. Community trails systems could be rendered useless due to disconnects and thus there would be cumulative impacts.

12. **D.5-58 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**
If future transmission system support structures were sited on or immediately adjacent to trails, recreationists would be precluded from these locations (e.g., Trans-County trail and San Dieguito River Park trails).

Mitigation Measure for Impact WR-3 is not viable if it results in the loss of the trail. Preclusion of the use of the Juan Bautista de Anza National Historic trail could be mitigated to a less than significant level through implementation of mitigation measures listed below. **(WR-1b; WR-1c; WR-3b)**

13. **D.5-64 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**
This impact analysis, however, conservatively assumes that structures would be sited on or adjacent to the Trail. Impacts to existing recreational resources that resulted from locating project facilities on or immediately adjacent to the trail would be significant (Class II). Preclusion of the use of the Juan Bautista de Anza National Historic trail could be mitigated to a

A0018

less than significant level through implementation of mitigation measures listed below. (WR-1b; WR-1c; WR-3b)

Mitigation Measure for Impact WR-3: Presence of a transmission line would permanently preclude recreational activities

WR-3a Coordinate tower and road locations with the authorized officer for the recreation area.

As stated previously this is not a mitigation measure if it results in the closure of the trail. This mitigation should include reroute and construction of any sections decommissioned.

14. **D.5-109 Table D.5-5. Mitigation Monitoring Program – Wilderness and Recreation**
Mitigation Measure : WR-1a: Coordinate construction schedule and activities with the authorized officer for the recreation area.
 Add the California Riding and Hiking Trail to the list of affected areas.
15. **D.5-110 Mitigation Monitoring Program – Wilderness and Recreation**
Mitigation Measure: WR-1b: Provide temporary detours for trail users.
 Add the California Riding and Hiking Trail to the list of affected areas.
16. **Mitigation Measure: WR-1c: Coordinate with local agencies to identify alternative recreation areas.**
 Add the California Riding and Hiking Trail to the list of affected areas.
17. **D.5-111 Mitigation Monitoring Program – Wilderness and Recreation**
Mitigation Measure: WR-3a: Coordinate tower and road locations with the authorized officer for the recreation area.
 Add the California Riding and Hiking Trail to the list of affected areas.
18. **Mitigation Measure WR-3b: Provide funding for planning and physically establishing replacement campsites and facilities.**
 Add the California Riding and Hiking Trail to the list of affected areas.

E.1 Interstate 8 Alternative

19. **E.1.5-1 Environmental Setting**
 The Juan Bautiste de Anza Nacional Historic Trail, Pacific Crest Trail, California Riding and Hiking Trail, and Trans County Trail are considered San Diego County Regional Trails and should be designated as such.
20. **E.1.5-6 Construction Impacts**
 Please include the California Riding and Hiking Trail. Construction would also impact this trail. Mitigation measures should be detailed.

A0018

21. **E.1.5-7 Operational Impacts**

The California Riding and Hiking Trail is not mentioned. Operations would also impact this trail. Mitigation measures should be detailed.

One of the access roads required for construction and continued maintenance of the overhead transmission line along the Interstate 8 route near MP 18-83 would be collocated with the Trans-County Trail for approximately 0.6 miles. Along this segment, the Trans-County Trail would be graded and widened for use as a 20-foot-wide access road.

The Trans County Trail is a non-motorized trail for hiking, horseback riding and mountain biking only. Security such as gates with sufficient access for equestrians to pass through will be necessary to protect the trail from unauthorized vehicles and should be included as a mitigation measure.

22. **E.1.5-8 Impact WR-3: Presence of a transmission line would permanently preclude recreational activities**

The Interstate 8 Alternative would cross the Juan Bautista de Anza National Historic Trail (MP 18-12), PCT (MP 18-55), Secret Canyon Trail (MP 18-63.5), and Trans-County Trail (MP 18-82.6 and MP18-91.3). If transmission support structures were sited on the trail, recreationists would be precluded from these locations. Preclusion of the use of trails would be mitigated to a less than significant level through implementation of Mitigation Measure WR-3a (Coordinate tower and road locations with the authorized officer for the recreation area).

As stated previously this is not a mitigation measure (WR-3a) if it results in closure of the trails. It will affect three (3) regional trails. Regional trails provide connections to communities and other regional trails. Any disconnect would greatly affect the entire San Diego County Trails System. Mitigation should include rerouting the trail and construction of new segments to any sections decommissioned. Mitigation Measure WR-1c: Coordinate with local agencies to identify alternative recreation areas and WR-3b: Provide funding for planning and physically establishing replacement campsites and facilities (i.e. trails) should be incorporated into the mitigation.

23. **Chocolate Canyon Option**

E.1.5-11...*the aboveground route would head northeast up Chocolate Canyon, roughly parallel to El Monte Road*

Note the San Diego River Regional Trail roughly runs parallel to El Monte Road. This should also be reviewed for mitigation measures.

Interstate 8 Alternative with Modified Route D alignment and west of Forest alignment

A0018

24. **E.1.5-14** *"Once outside the CNF, the route would traverse primarily open unincorporated communities. It would follow the Loveland Reservoir site of the reservoir is not used for recreational purposes."*

This statement is incorrect and should be revised. The California Riding and Hiking Trail is located to the west and north of Loveland Reservoir as indicated in Figure E.1.5-1, which also indicates the Loveland Substation on the trail. Please indicate mitigation measures for this Substation.

E.2 BCD Alternative

25. **E.2.5-3 Operational Impacts**
One of the access roads required for construction and continued maintenance of the overhead transmission line along the BCD route near MP BCD-16.5 would be collocated with the PCT for approximately 1.6 miles. Along this segment, the PCT would be graded and widened for use as a 20-foot-wide access road.

The PCT is a non-motorized trail for hiking and horseback riding only. A mitigation measure that includes security such as gates with sufficient access for equestrians to pass through will be necessary to protect the trail from unauthorized vehicles.

26. **E.2.5-4** *The BCD Alternative would cross the PCT at MP BCD-16.5. If transmission support structures were sited on the trail, recreationists would be precluded from these locations.*

Mitigation should include reroute and construction of any sections decommissioned. Mitigation Measure WR-1c: Coordinate with local agencies to identify alternative recreation areas and WR-3b: Provide funding for planning and physically establishing replacement campsites and facilities (**i.e. trails**) should be incorporated into the mitigation

E.3 Route D Alternative

27. **E.3.5-3** *The Route D Alternative would cross the California Riding and Hiking Trail near MP D-1.2 and the Trans-County Trail three times near MP D-9.4. If transmission support structures were sited on the trails, recreationists would be permanently precluded from these locations.*

As stated previously, additional mitigation will be required if Mitigation Measure WR-3a results in trail closure. Additional mitigation should include reroute and construction if any sections of trail decommissioned.

E.4 Modified Route D Alternative

A0018

28. **E.4.5-4** *The Modified Route D Alternative would intersect the PCT three times between MP MD-12 and -13 in new ROW. If transmission support structures were sited on the PCT, recreationists would be precluded from these locations.*

As stated previously, additional mitigation will be required if Mitigation Measure WR-3a results in trail closure. Additional mitigation should include reroute and construction of any sections decommissioned.

E.5 New In-Area Renewable Generation

29. **E.5-129** Options 1 and 2 may impact the following four regional trails:
- California Riding and Hiking Trail which crosses SR78 and runs North/South through San Felipe Valley on the north-east side of San Felipe Rd. (S2)
 - Coast to Crest Trail proposed West/East alignment crossing San Felipe Valley at San Felipe Rd. (S2).
 - Trans County Trail which crosses SR78 at Plum Canyon and continues up Grapevine Canyon
 - PCT which crosses SR78 just east of the S2 intersection

CIRCULATION & ROADS

The Proposed Project may potentially have significant impacts to County roads and intersections. These current comments are intended to augment and in some cases reiterate the County's general comments submitted previously for the project Notice of Preparation (NOP):

1. The DEIR/EIS indicates that the Proposed Project will result in temporary construction impacts to several County maintained roads. The temporary impacts include road and lane closures, disruption to pedestrian and bike circulation, elimination of parking spaces, road damage, added traffic to LOS E/F roads, and access restrictions to properties and businesses. It should be noted that road and lane closures along County Circulation Element roads should be avoided.
2. The DEIR/EIS indicates that the Proposed Project could result in temporary road and closures during construction. The DEIR/EIS should more clearly identify which County Circulation Element roads may be subject to a potential road and lane closure. For example, Table D.9.18 identifies several County Circulation Element roads such as Del Dios Highway and Wildcat Canyon Road that would be impacted by the future transmission system expansion and page 9.53 identifies impacts caused by temporary road and lane closures. It is not clear if road and lane closures could occur along to all County roads listed in Table D9-18. The DEIR/EIS should more clearly identify which County Circulation Element

A0018

roads could be subject to road and lane closures. Tables D.9-2, D9-3, D9-14, D9-15, D9-16, D9-18, and D9-19 all identify County Circulation Element roads that would be impacted by the Proposed Project

3. SDG&E should coordinate very closely with the County's DPW Traffic staff in the development of the following types of plans: 1) Construction Transportation Plans; 2) Transportation Management Plans; and 3) Traffic Control Plans. On a project-by project basis, the plans should attempt to ensure that all feasible measures are implemented to minimize the project's significant traffic impacts to the extent possible.
4. The construction impact plan should identify the length of the potential road and lane closures and feasible alternate routes.
5. For any overhead crossings, SDG&E must obtain the proper traffic control permits and encroachment permits for work conducted along County maintained roads.
6. For any underground running of transmission lines within the public right of way, SDG&E will have to provide detailed traffic control plans tied to encroachment permits that detail how the roads will stay in operation simultaneously with the installation of undergrounding work.
7. The DEIR/EIS mentions the construction of several miles of access roads. The DEIR/EIS should identify where the proposed access roads would traverse and/or connect to County maintained public roads.
8. The DEIR/EIS should clearly identify where Proposed Project's access roads would require a new driveway along County maintained public roads.
9. The DEIR/EIS should provide an operational assessment (e.g. sight distance) for any new driveways/access points created by the project along County maintained public roads.
10. For the Proposed Project and all future system expansions, SDG&E should consider impact thresholds for roads operating at LOS F. For example Wildcat Canyon Road and San Vicente Road (Pg.D9-39/52) currently operate at LOS E/F. The Proposed Project should avoid measures during construction that would potentially worsen traffic operations by adding traffic and/or restricting traffic flow along roads that currently experience substantial daily traffic congestion.
11. The DEIR/EIS should clearly identify where transmission lines would traverse existing and planned County roads. The construction of transmission lines should not preclude the planned future construction of the County Circulation Element roads.

A0018

12. SDG&E should follow all regional standards regarding construction within the County right of way and that the DPW road cut policy would be observed.

13. SDG&E should reference the County's Guidelines for Determining Significance adopted September 26, 2006 and revised December 5, 2007.

Sunrise Powerlink Project DEIR/EIS
County of San Diego Comments

18

April 9, 2008

Appendix J, Southern Alternatives

Delivering power without environmental damages at a lower cost, Underground AC segments and full DC

(see: cpucSunriseSouthernRoutes.pdf of May 9, 2008, a 114 page document, and 7.5 megabyte attachment Acrobat file, previously sent; also due to the email size restrictions of most mail servers, if this attachment was not included here or previously sent, then please reference: www.undergroundpower.us or CPUC documents for this case A.06-08-010 at: <http://www.cpuc.ca.gov/puc/>

Dr. Gauss Meter \$34.95



YOU CAN'T DETECT EMFs WITH YOUR FIVE SENSES

But You Can With The Dr. Gauss Meter!

The EMF (electro-magnetic field) Detective Featuring:

-Easy to Read Scale, -Built-in Audio Signal, -Auto Shut Off

Dr. Gauss is an accurate, easy-to-use, and affordable Gauss meter developed to allow you to perform your own EMF survey. It detects and measures EMFs (electromagnetic fields) produced by electrical currents found in and around the home, at school, in the workplace and other electrical transmission areas. Ranges: 0-1 mG and 0-10 mG. (Note: nothing can measure zero, although this is considered a sensitive meter, it will not handle high field strengths).



STRONG FIELD AC GAUSSMETER, Good up to 20,000 mG!

Range: .1 and 20,000 mG \$100.

<http://www.lessemf.com/gauss.html> Albany NY, 888-LESS-EMF

Also available, shielding and active cancellation systems.

<http://silencingthefields.com/shielding.html>

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

http://docs.cpuc.ca.gov/PUBLISHED/SERVICE_LISTS/A0608010_71846.HTM

Proceeding: A0608010 - SDG&E - CPCN FOR THE
Filer: SAN DIEGO GAS & ELECTRIC COMPANY (U902E)
List Name: LIST
Last changed: June 11, 2008

Phase I. Service list extraction from *html* data, provided in conventional readable form via *cpuc* site:

Parties

ARNOLD B. PODGORSKY
 WRIGHT & TALISMAN, P.C.
 1200 G STREET, N.W., SUITE 600
 WASHINGTON, DC 20005
 FOR: THE NEVADA HYDRO COMPANY

MICHAEL J. THOMPSON
 ATTORNEY AT LAW
 WRIGHT & TALISMAN, PC
 1200 G STREET, N.W., STE 600
 WASHINGTON, DC 20005
 FOR: THE NEVADA HYDRO COMPANY

SARA FELDMAN
 CA STATE PARKS FOUNDATION
 714 W. OLYMPIC BLVD., SUITE 717
 LOS ANGELES, CA 90015
 FOR: CA STATE PARKS FOUNDATION

S. NANCY WHANG
 ATTORNEY AT LAW
 MANATT, PHELPS & PHILLIPS, LLP
 11355 WEST OLYMPIC BLVD.
 LOS ANGELES, CA 90064
 FOR: THE CITY OF SANTEE

ARTHUR FINE
 MITCHELL SILBERBERG & KNUPP LLP
 11377 W. OLYMPIC BLVD.
 LOS ANGELES, CA 90064-1683
 FOR: DAVID H. BATCHELDER

THOMAS A. BURHENN
 SOUTHERN CALIFORNIA EDISON
 2244 WALNUT GROVE AVENUE
 ROSEMEAD, CA 91770
 FOR: SOUTHERN CALIFORNIA EDISON

DON WOOD SR.
 PACIFIC ENERGY POLICY CENTER
 4539 LEE AVENUE
 LA MESA, CA 91941

DIANA LINSDAY
 ANZA-BORREGO FOUNDATION & INSTITUTE
 PO BOX 2001
 BORREGO SPRINGS, CA 92004
 FOR: ANZA-BORREGO FOUNDATION & INSTITUTE

LINDA A. CARSON
 EXECUTIVE DIRECTOR

MICHAEL L. WELLS
 CALIFORNIA DEPARTMENT OF PARKS & RECREATION

Sunrise A.06-08-010

ANZA-BORREGO FOUNDATION
 PO BOX 2001
 BORREGO SPRINGS, CA 92004
 FOR: ANZA-BORREGO FOUNDATION

200 PALM CANYON DRIVE
 BORREGO SPRINGS, CA 92004

SCOT MARTIN
 PO BOX 1549
 BORREGO SPRINGS, CA 92004

DAVID LLOYD
 ATTORNEY AT LAW
 CABRILLO POWER I, LLC
 4600 CARLSBAD BLVD.
 CARLSBAD, CA 92008
 FOR: CABRILLO POWER I, LLC

CONNIE BULL
 24572 RUTHERFORD ROAD
 RAMONA, CA 92065

DIANE J. CONKLIN
 SPOKESPERSON
 MUSSEY GRADE ROAD ALLIANCE
 PO BOX 683
 RAMONA, CA 92065
 FOR: MUSSEY GRADE ROAD ALLIANCE

ELIZABETH EDWARDS
 RAMONA VALLEY VINEYARD ASSOCIATION
 26502 HIGHWAY 78
 RAMONA, CA 92065
 FOR: RAMONA VALLEY VINEYARD ASSOC.

PAM WHALEN
 24444 RUTHERFORD ROAD
 RAMONA, CA 92065

MICHAEL PAGE
 17449 OAK HOLLOW ROAD
 RAMONA, CA 92065-6758
 FOR: STARLIGHT MOUNTAIN ESTATES OWNERS

HEIDI FARKASH
 JOHN & HEIDI FARKASH TRUST
 PO BOX 576
 RANCHO SANTA FE, CA 92067
 FOR: FARKASH RANCH IN SANTA YSABEL

DENIS TRAFECANTY
 COMMUNITY OF SANTA YSABEL & RELATED COMM
 PO BOX 305
 SANTA YSABEL, CA 92070
 FOR: SELF

MARY ALDERN
 COMMUNITY ALLIANCE FOR SENSIBLE ENERGY
 PO BOX 321
 WARNER SPRINGS, CA 92086

E. GREGORY BARNES
 ATTORNEY AT LAW
 SAN DIEGO GAS & ELECTRIC COMPANY
 101 ASH STREET, HQ 13D
 SAN DIEGO, CA 92101
 FOR: SAN DIEGO GAS & ELECTRIC

FREDERICK M. ORTLIEB
 OFFICE OF CITY ATTORNEY
 CITY OF SAN DIEGO
 1200 THIRD AVENUE, SUITE 1200
 SAN DIEGO, CA 92101
 FOR: CITY OF SAN DIEGO

JAMES F. WALSH
 SAN DIEGO GAS & ELECTRIC COMPANY
 101 ASH STREET
 SAN DIEGO, CA 92101
 FOR: SAN DIEGO GAS & ELECTRIC COMPANY

MICHAEL P. CALABRESE
 ATTORNEY AT LAW
 CITY ATTORNEY, CITY OF SAN DIEGO
 1200 THIRD AVENUE, SUITE 1100
 SAN DIEGO, CA 92101
 FOR: CITY OF SAN DIEGO

Sunrise A.06-08-010

SHAWN D. HAGERTY
 CITY OF ATTORNEY
 BEST BEST & KRIEGER LLP
 655 W. BROADWAY, 15TH FLOOR
 SAN DIEGO, CA 92101-3301
 FOR: THE CITY OF SANTEE

DONALD C. LIDDELL
 ATTORNEY AT LAW
 DOUGLASS & LIDDELL
 2928 2ND AVENUE
 SAN DIEGO, CA 92103
 FOR: STIRLING ENERGY SYSTEMS

MICHAEL SHAMES
 ATTORNEY AT LAW
 UTILITY CONSUMERS' ACTION NETWORK
 3100 FIFTH AVENUE, SUITE B
 SAN DIEGO, CA 92103
 FOR: UTILITY CONSUMERS' ACTION NETWORK

PAUL BLACKBURN
 SIERRA CLUB, SAN DIEGO CHAPTER
 3820 RAY STREET
 SAN DIEGO, CA 92104
 FOR: SIERRA CLUB, SAN DIEGO CHAPTER

EDWARD GORHAM
 WESTERNERS INCENSED BY WRECKLESS ELECTRI
 4219 LOMA RIVIERA LANE
 SAN DIEGO, CA 92110
 FOR: SELF

KEVIN O'BEIRNE
 SAN DIEGO GAS & ELECTRIC COMPANY
 8330 CENTURY PARK COURT, CP32D
 SAN DIEGO, CA 92123
 FOR: SAN DIEGO GAS & ELECTRIC

HARVEY PAYNE
 RANCHO PENASQUITOS CONCERNED CITIZENS
 13223 - 1 BLACK MOUNTAIN ROAD, 264
 SAN DIEGO, CA 92129
 FOR: RANCHO PENASQUITOS CONCERNED
 CITIZENS

KEITH RITCHEY
 POWERLINK ISSUES MANAGER
 8744 CREEKWOOD LANE
 SAN DIEGO, CA 92129
 FOR: WEST CHASE HOMEOWNER'S ASSOCIATION

JOHN W. LESLIE, ESQ.
 ATTORNEY AT LAW
 LUCE, FORWARD, HAMILTON & SCRIPPS, LLP
 11988 EL CAMINO REAL, SUITE 200
 SAN DIEGO, CA 92130
 FOR: CORAL POWER, LLC AND ENERGIA
 AZTECA/ENERGIA DE BAJA CALIFORNIA (LA
 ROSITA)

JOETTA MIHALOVICH
 11705 ALDERCREST POINT
 SAN DIEGO, CA 92131

DAVID HOGAN
 CENTER FOR BIOLOGICAL DIVERSITY
 PO BOX 7745
 SAN DIEGO, CA 92167

CARRIE DOWNEY
 LAW OFFICES OF CARRIE ANNE DOWNEY
 895 BROADWAY
 ELCENTRO, CA 92243
 FOR: IMPERIAL IRRIGATION DISTRICT

STEPHEN KEENE
 ATTORNEY AT LAW
 IMPERIAL IRRIGATION DISTRICT
 333 EAST BARIONI BLVD., PO BOX 937
 IMPERIAL, CA 92251
 FOR: IMPERIAL IRRIGATION DISTRICT

PATRICIA C. SCHNIER
 14575 FLATHEAD RD.
 APPLE VALLEY, CA 92307
 FOR: SELF

JACQUELINE AYER

BILLY BLATTNER

Sunrise A.06-08-010

2010 WEST AVENUE K, NO. 701
LANCASTER, CA 93536
FOR: JACQUELINE AYER

MANAGER REGULATORY RELATIONS
SAN DIEGO GAS & ELECTRIC COMPANY
601 VAN NESS AVENUE, SUITE 2060
SAN FRANCISCO, CA 94102
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

MICHEL PETER FLORIO
ATTORNEY AT LAW
THE UTILITY REFORM NETWORK (TURN)
711 VAN NESS AVENUE, SUITE 350
SAN FRANCISCO, CA 94102
FOR: TURN

OSA L. WOLFF
ATTORNEY AT LAW
SHUTE, MIHALY & WEINBERGER, LLC
396 HAYES STREET
SAN FRANCISCO, CA 94102
FOR: CITIES OF TEMECULA, MURRIETA &
HEMET

MARION PELEO
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4107
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214
FOR: DIVISION OF RATEPAYER ADVOCATES

NICHOLAS SHER
CALIF PUBLIC UTILITIES COMMISSION
LEGAL DIVISION
ROOM 4007
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3214

JUSTIN AUGUSTINE
THE CENTER FOR BIOLOGICAL DIVERSITY
1095 MARKET ST., SUITE 511
SAN FRANCISCO, CA 94103
FOR: THE CENTER FOR BIOLOGICAL DIVERSITY

NORMAN J. FURUTA
ATTORNEY AT LAW
FEDERAL EXECUTIVE AGENCIES
1455 MARKET ST., SUITE 1744
SAN FRANCISCO, CA 94103-1399
FOR: DEPARTMENT OF THE NAVY

RORY COX
RATEPAYERS FOR AFFORDABLE CLEAN ENERGY
311 CALIFORNIA STREET, SUITE 650
SAN FRANCISCO, CA 94104
FOR: C/O PACIFIC ENVIROMENT

BRIAN T. CRAGG
ATTORNEY AT LAW
GOODIN MACBRIDE SQUERI RITCHIE & DAY
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: LS POWER; SOUTH BAY REPLACEMENT
PROJECT, LLC

RICHARD W. RAUSHENBUSH
ATTORNEY AT LAW
LATHAM & WATKINS LLP
505 MONTGOMERY STREET, SUITE 2000
SAN FRANCISCO, CA 94111
FOR: SAN DIEGO GAS & ELECTRIC

VIDHYA PRABHAKARAN
GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP
505 SANSOME STREET, SUITE 900
SAN FRANCISCO, CA 94111
FOR: LS POWER; SOUTH BAY REPLACEMENT
PROJECT, LLC

JEFFREY P. GRAY
ATTORNEY AT LAW
DAVIS WRIGHT TREMAINE, LLP
505 MONTGOMERY STREET, SUITE 800
SAN FRANCISCO, CA 94111-6533
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR CORP.

WILLIAM F. DIETRICH
ATTORNEY AT LAW
DIETRICH CONSULTING
2977 YGNACIO VALLEY ROAD, NO. 613
WALNUT CREEK, CA 94598-3535
FOR: CALIFORNIA STATE PARKS FOUNDATION
AND ANZA-BORREGO FOUNDATION

Sunrise A.06-08-010

DAVID KATES
DAVID MARK AND COMPANY
3510 UNOCAL PLACE, SUITE 200
SANTA ROSA, CA 95403-5571
FOR: THE NEVADA HYDRO COMPANY

JUDITH B. SANDERS
ATTORNEY AT LAW
CALIFORNIA INDEPENDENT SYSTEM OPERATOR
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEPENDENT SYSTEM
OPERATOR

JEFFERY D. HARRIS
ATTORNEY AT LAW
ELLISON, SCHNEIDER & HARRIS LLP
2015 H STREET
SACRAMENTO, CA 95811-3109

BRADLY S. TORGAN
ATTORNEY AT LAW
CALIFORNIA DEPT. OF PARKS & RECREATION
1416 NINTH STREET, ROOM 1404-06
SACRAMENTO, CA 95814
FOR: CALIFORNIA DEPT. OF PARKS &
RECREATION

KATHRYN J. TOBIAS
ATTORNEY AT LAW
CA DEPT. OF PARKS AND RECREATION
1416 9TH STREET, 14TH FLOOR
SACRAMENTO, CA 95814
FOR: CA DEPARTMENT OF PARKS AND
RECREATION

KAREN NORENE MILLS
ATTORNEY AT LAW
CALIFORNIA FARM BUREAU FEDERATION
2300 RIVER PLAZA DRIVE
SACRAMENTO, CA 95833
FOR: CALIFORNIA FARM BUREAU FEDERATION

KEVIN LYNCH
IBERDROLA RENEWABLES INC
1125 NW COUCH ST., SUITE 700
PORTLAND, OR 97209

Information Only

ELIZABETH KLEIN
LATHAM & WATKINS, LLP
555 11TH STREET NW, STE. 1000
WASHINGTON, DC 20004

JANICE SCHNEIDER
LATHAM & WATKINS, LLP
555 11TH STREET NW, STE 1000
WASHINGTON, DC 20004

JULIE B. GREENISEN
LATHAM & WATKINS LLP
SUITE 1000
555 ELEVENTH STREET, NW
WASHINGTON, DC 20004-1304

MICHAEL J. GERGEN
LATHAM & WATKINS LLP
SUITE 1000
555 ELEVENTH STREET, NW
WASHINGTON, DC 20004-1304

ANDREW SWERS
WRIGHT & TALISMAN, P.C.
1200 G STREET, N.W., SUITE 600
WASHINGTON, DC 20005

KELLY FULLER
ENERGY AND NATURE
PO BOX 6732
MINNEAPOLIS, MN 55406

STEVEN SIEGEL
STAFF ATTORNEY

E. CRAIG SMAY
E. CRAIG SMAY PC

Sunrise A.06-08-010

CENTER FOR BIOLOGICAL DIVERSITY
3421 PARK PLACE
EVANSTON, IL 60201
FOR: CENTER FOR BIOLOGICAL DIVERSITY

174 EAST SOUTH TEMPLE
SALT LAKE CITY, UT 84111
FOR: WILLIAM AND SHANNON DAVIS

HENRY MARTINEZ
LADWP
111 N. HOPE ST., ROOM 921
LOS ANGELES, CA 90012

RANDY S. HOWARD
LOS ANGELES DEPT. OF WATER AND POWER
111 NORTH HOPE STREET, ROOM 921
LOS ANGELES, CA 90012

CLAY E. FABER
SOUTHERN CALIFORNIA GAS COMPANY
555 WEST FIFTH STREET, GT-14D6
LOS ANGELES, CA 90013
FOR: SAN DIEGO GAS & ELECTRIC COMPANY

DAVID L. HUARD
ATTORNEY AT LAW
MANATT, PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BOULEVARD
LOS ANGELES, CA 90064
FOR: CITY OF SANTEE

RANDALL W. KEEN
ATTORNEY AT LAW
MANATT PHELPS & PHILLIPS, LLP
11355 WEST OLYMPIC BLVD.
LOS ANGELES, CA 90064
FOR: CITY OF SANTEE

CASE ADMINISTRATION
SOUTHERN CALIFORNIA EDISON COMPANY
LAW DEPARTMENT, ROOM 370
2244 WALNUT GROVE AVENUE
ROSEMEAD, CA 91770

DARELL HOLMES
TRANSMISSION MANAGER
SOUTHERN CALIFORNIA EDISON
2244 WALNUT GROVE AVE, 238M, QUADB, G01
ROSEMEAD, CA 91770

MONICA ARGANDONA
DESERT PROGRAM DIRECTOR
CALIFORNIA WILDERNESS COALITION
167 NORTH THIRD AVENUE, STE M
UPLAND, CA 91786

DONNA TISDALE
BOULEVARD SPONSOR GROUP
PO BOX 1272
BOULEVARD, CA 91905

MATTHEW JUMPER
SAN DIEGO INTERFAITH HOUSING FOUNDATION
7956 LESTER AVE
LEMON GROVE, CA 91945
FOR: SAN DIEGO INTERFAITH HOUSING
FOUNDATION

REBECCA PEARL
POLICY ADVOCATE, CLEAN BAY CAMPAIGN
ENVIRONMENTAL HEALTH COALITION
401 MILE OF CARS WAY, STE. 310
NATIONAL CITY, CA 91950
FOR: ENVIRONMENTAL HEALTH COALITION

BOB & MARGARET BARELMANN
6510 FRANCISCAN ROAD
CARLSBAD, CA 92011

DAVE DOWNEY
NORTH COUNTY TIMES
207 E. PENNSYLVANIA AVENUE
ESCONDIDO, CA 92025

J. HARRY JONES
SAN DIEGO UNION TRIBUNE
800 WEST VALLEY PARKWAY, SUITE 114
ESCONDIDO, CA 92025

PAT/ALBERT BIANEZ

WALLY BESUDEN

Sunrise A.06-08-010

1223 ARMSTRONG CIRCLE
ESCONDIDO, CA 92027

PRESIDENT
SPANGLER PEAK RANCH, INC
PO BOX 1959
ESCONDIDO, CA 92033

DAVID W. CAREY
DAVID CAREY & ASSOCIATES, INC.
PO BOX 2481
JULIAN, CA 92036

LAUREL GRANQUIST
PO BOX 2486
JULIAN, CA 92036

MARTHA BAKER
VOLCAN MOUNTAIN PRESERVE FOUNDATION
PO BOX 1625
JULIAN, CA 92036

JOHN RAIFSNIDER
PO BOX 121
JULIAN, CA 92036-0121

BRIAN KRAMER
PO BOX 516
JULIAN, CA 92036-0516

NANCY PARINELLO
PO BOX 516
JULIAN, CA 92036-0516

PAUL RIDGWAY
3027 LAKEVIEW DR.
PO BOX 1435
JULIAN, CA 92036-1435

DAVID VOSS
502 SPRINGFIELD AVENUE
OCEANSIDE, CA 92057

SCOTT KARDEL
PALOMAR OBSERVATORY
PO BOX 200
PALOMAR MOUNTAIN, CA 92060

CAROLYN A. DORROH
RAMONA COMMUNITY PLANNING GROUP
17235 VOORHES LANE
RAMONA, CA 92065

CHRISTOPHER P. JEFFERS
24566 DEL AMO ROAD
RAMONA, CA 92065

JOSEPH W. MITCHELL, PH. D.
M-BAR TECHNOLOGIES AND CONSULTING
19412 KIMBALL VALLEY RD
RAMONA, CA 92065

JOSEPH W. MITCHELL, PHD
M-BAR TECHNOLOGIES AND CONSULTING
19412 KIMBALL VALLEY RD.
RAMONA, CA 92065
FOR: M-BAR TECHNOLOGIES AND CONSULTING

LARA LOPEZ
16828 OPEN VIEW RD
RAMONA, CA 92065

PETER SCHULTZ
OLD JULIAN CO.
PO BOX 2269
RAMONA, CA 92065

PHILLIP &ELIANE BREEDLOVE
1804 CEDAR STREET
RAMONA, CA 92065

WILLIAM TULLOCH
28223 HIGHWAY 78
RAMONA, CA 92065

CAROLYN MORROW
GOLIGHTLY FARMS
36255 GRAPEVINE CANYON ROAD
RANCHITA, CA 92066

Sunrise A.06-08-010

JOSEPH RAUH
RANCHITA REALTY
37554 MONTEZUMA VALLEY RD
RANCHITA, CA 92066
FOR: RANCHITA REALTY

STEVE/CAROLYN ESPOSITO
37784 MONTEZUMA VALLEY ROAD
RANCHITA, CA 92066

BONNIE GENDRON
4812 GLENSIDE ROAD
SANTA YSABEL, CA 92070

GLENDA KIMMERLY
PO BOX 305
SANTA YSABEL, CA 92070

GLENN E. DROWN
PO BOX 330
SANTA YSABEL, CA 92070

JOHN&PHYLLIS BREMER
PO BOX 510
SANTA YSABEL, CA 92070

RON WEBB
PO BOX 375
SANTA YSABEL, CA 92070

K. RENEE MARTIN
PO BOX 1276
POWAY, CA 92074

DAN PERKINS
WWW.ENERGYSMARTHOMES.NET
983 PHILLIPS ST.
VISTA, CA 92083

WILLIE M. GATERS
1295 EAST VISTA WAY
VISTA, CA 92084

DEANNA SPEHN
POLICY DIRECTOR
OFFICE OF SENATOR CHRISTINE KEHOE
39TH STATE SENATE DISTRICT
2445 5TH AVENUE, SUITE 200
SAN DIEGO, CA 92101

SUSAN FREEDMAN
SENIOR REGIONAL ENERGY PLANNER
SAN DIEGO ASSOCIATION OF GOVERNMENTS
401 B STREET, SUITE 800
SAN DIEGO, CA 92101

JASON M. OHTA
LATHAM & WATKINS LLP
600 WEST BROADWAY, SUITE 1800
SAN DIEGO, CA 92101-3375
FOR: SAN DIEGO GAS AND ELECTRIC COMPANY

PATRICIA GUERRERO
ATTORNEY AT LAW
LATHAM & WATKINS
600 WEST BROADWAY, SUITE 1800
SAN DIEGO, CA 92101-3375
FOR: SAN DIEGO GAS AND ELECTRIC COMPANY

KATHARINE WOLFROM
SIERRA CLUB OF SAN DIEGO
3802 RAY STREET
SAN DIEGO, CA 92104

MICAH MITROSKY
SIERRA CLUB
3820 RAY STREET
SAN DIEGO, CA 92104-3623

KIM KIENER
504 CATALINA BLVD
SAN DIEGO, CA 92106

JIM BELL
4862 VOLTAIRE ST.
SAN DIEGO, CA 92107

STEPHEN ROGERS

EPIC INTERN

Sunrise A.06-08-010

1340 OPAL STREET
SN DIEGO, CA 92109

EPIC/USD SCHOOL OF LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110

SCOTT J. ANDERS
RESEARCH/ADMINISTRATIVE CENTER
UNIVERSITY OF SAN DIEGO - LAW
5998 ALCALA PARK
SAN DIEGO, CA 92110

BRUCE V. BIEGELOW
STAFF WRITER
THE SAN DIEGO UNION TRIBUNE
PO BOX 120191S
SAN DIEGO, CA 92112-0191

GEORGE COURSER
3142 COURSER AVENUE
SAN DIEGO, CA 92117

CENTRAL FILES
SAN DIEGO GAS & ELECTRIC
8330 CENTURY PARK COURT, CP31E
SAN DIEGO, CA 92123

IRENE STILLINGS
EXECUTIVE DIRECTOR
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8520 TECH WAY, SUITE 110
SAN DIEGO, CA 92123

JENNIFER PORTER
POLICY ANALYST
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVENUE, SUITE 100
SAN DIEGO, CA 92123

SEPHRA A. NINOW
POLICY ANALYST
CALIFORNIA CENTER FOR SUSTAINABLE ENERGY
8690 BALBOA AVENUE, SUITE 100
SAN DIEGO, CA 92123

TOM BLAIR
ENERGY ADMINISTRATOR
CITY OF SAN DIEGO
9601 RIDGEHAVEN COURT, SUITE 120
SAN DIEGO, CA 92123-1636

DAHVIA LOCKE
ENVIROMENTAL RESOURCE MANAGER
COUNTY OF SAN DIEGO
5201 RUFFIN ROAD, SUITE B
SAN DIEGO, CA 92123-1666

JALEH (SHARON) FIROOZ, P.E.
ADVANCED ENERGY SOLUTIONS
17114 TALLOW TREE LANE
SAN DIEGO, CA 92127

EILEEN BIRD
12430 DORMOUSE ROAD
SAN DIEGO, CA 92129

KIMBELRY SCHULZ
10303 CANINITO ARALIA NO 96
SAN DIEGO, CA 92131

GREGORY T. LAMBRON
LAMBRON LAKESIDE RANCH, LLC
PO BOX 15453
SAN DIEGO, CA 92175-5453

LYNDA KASTOLL
REALTY SPECIALIST
BUREAU OF LAND MANAGEMENT
EL CENTRO FIELD OFFICE
1661 SOUTH 4TH STREET
EL CENTRO, CA 92243

THOMAS ZALE
BUREAU OF LAND MANAGEMENT
1661 SO. 4TH STREET
EL CENTRO, CA 92243

J. STHURA
UNDERGROUND POWER ASSOCIATION
PO BOX 1032
HEMET, CA 92546
FOR: UNDERGROUND POWER ASSOCIATION

Sunrise A.06-08-010

JOHN STHURA
CALIFORNIA BOTANICAL HABITAT
PO BOX 1032
HEMET, CA 92546
FOR: CALIFORNIA BOTANICAL HABITAT

SUZANNE WILSON
PO BOX 798
IDYLLWILD, CA 92549

LOUIS NASTRO
PO BOX 942896
SACRAMENTO, CA 92860-0001

BRUCE FOSTER
SENIOR VICE PRESIDENT
SOUTHERN CALIFORNIA EDISON COMPANY
601 VAN NESS AVENUE, STE. 2040
SAN FRANCISCO, CA 94102

DIANE I. FELLMAN
ATTORNEY AT LAW
FPL ENERGY, LLC
234 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

SHERIDAN PAUKER
SHUTE, MIHALY & WEINBERGER LLP
396 HAYES STREET
SAN FRANCISCO, CA 94102
FOR: CITIES OF TEMECULA, HEMET AND
MURRIETA

AARON QUINTANAR
RATE PAYERS FOR AFFORDABLE CLEAN ENERGY
311 CALIFORNIA STREET, STE 650
SAN FRANCISCO, CA 94104

BREWSTER BIRDSALL
ASPEN ENVIRONMENTAL GROUP
235 MONTGOMERY STREET, SUITE 935
SAN FRANCISCO, CA 94104

DAVID T. KRASKA
ATTORNEY AT LAW
PACIFIC GAS AND ELECTRIC COMPANY
PO BOX 7442, 77 BEALE ST, B30A
SAN FRANCISCO, CA 94105

JASON YAN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MAIL CODE B13L
SAN FRANCISCO, CA 94105

KATARZYNA M. SMOLEN
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE STREET, MC B9A
SAN FRANCISCO, CA 94105

MICHAEL S. PORTER
PACIFIC GAS AND ELECTRIC COMPANY
77 BEALE ST., MAIL CODE 13L RM 1318
SAN FRANCISCO, CA 94105

PAUL C. LACOURCIERE
THELEN REID BROWN RAYSMAN & STEINER
101 SECOND STREET, SUITE 1800
SAN FRANCISCO, CA 94105
FOR: THE NEVADA HYDRO COMPANY

JAMES B. WOODRUFF
VICE PRESIDENT REGULATORY AND GOVT AFFAI
NEXTLIGHT RENEWABLE POWER, LLC
101 CALIFORNIA STREET, STE 2450
SAN FRANCISCO, CA 94111

JULIE L. FIEBER
FOLGER LEVIN & KAHN LLP
275 BATTERY STREET, 23RD FLOOR
SAN FRANCISCO, CA 94111

CALIFORNIA ENERGY MARKETS
425 DIVISADERO ST.
SAN FRANCISCO, CA 94117

ROBIN HARRINGTON
CAL. DEPT OF FORESTRY AND FIRE PROTECTIO
PO BOX 944246

JOSEPH PAUL
SENIOR CORPORATE COUNSEL
DYNEGY, INC.

Sunrise A.06-08-010

SACRAMENTO, CA 94244-2460

4140 DUBLIN BLVD., STE. 100
DUBLIN, CA 94568

HENRY ZAININGER
ZAININGER ENGINEERING COMPANY, INC.
1718 NURSERY WAY
PLEASANTON, CA 94588

PHILIPPE AUCLAIR
11 RUSSELL COURT
WALNUT CREEK, CA 94598

J.A. SAVAGE
CALIFORNIA ENERGY CIRCUIT
3006 SHEFFIELD AVE
OAKLAND, CA 94602

MRW & ASSOCIATES, INC.
1814 FRANKLIN STREET, SUITE 720
OAKLAND, CA 94612

DAVID MARCUS
PO BOX 1287
BERKELEY, CA 94701

KEN BAGLEY
R.W. BECK
14635 N. KIERLAND BLVD., SUITE 130
SOCTTSDALE, AZ 95254

W. KENT PALMERTON
WK PALMERTON ASSOCIATES, LLC
2106 HOMEWOOD WAY, SUITE 100
CARMICHAEL, CA 95608

NANCY J. SARACINO
ATTORNEY
CALIFORNIA INDEP. SYSTEM OPERATOR CORP.
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA INDEP. SYSTEM OPERATOR
CORP.

ZIAD ALAYWAN
ZGLOBAL INC. ENGINEERING AND ENERGY
193 BLUE RAVINE RD, STE 120
FOLSOM, CA 95630
FOR: ZGLOBAL INC. ENGINEERING AND ENERGY

LEGAL & REGULATORY DEPARTMENT
CALIFORNIA ISO
151 BLUE RAVINE ROAD
FOLSOM, CA 95630
FOR: CALIFORNIA ISO

DAVID BRANCHCOMB
BRANCHCOMB ASSOCIATES, LLC
9360 OAKTREE LANE
ORANGEVILLE, CA 95662

PAUL G. SCHEUERMAN
SHEUERMAN CONSULTING
3915 RAWHIDE RD.
ROCKLIN, CA 95677

LON W. HOUSE
WATER & ENERGY CONSULTING
4901 FLYING C RD.
CAMERON PARK, CA 95682

DARRELL FREEMAN
1304 ANTRIM DR.
ROSEVILLE, CA 95747

ANDREW B. BROWN
ATTORNEY AT LAW
ELLISON SCHNEIDER & HARRIS, LLP
2015 H STREET
SACRAMENTO, CA 95811

AUDRA HARTMANN
DYNEGY, INC.
980 NINTH STREET, SUITE 2130
SACRAMENTO, CA 95814

JAMES W. REEDE JR. ED.D

KELLI MCDOWELL

Sunrise A.06-08-010

CALIFORNIA ENERGY COMMISSION
 1516 - 9TH STREET
 SACRAMENTO, CA 95814
 FOR: CALIFORNIA ENERGY COMMISSION

CA DEPT. OF PARKS AND RECREATION
 1416 NINTH STREET, ROOM 1404-06
 SACRAMENTO, CA 95814

KELLIE SMITH
 SENATE ENERGY/UTILITIES & COMMUNICATION
 STATE CAPITOL, ROOM 4038
 SACRAMENTO, CA 95814

KEVIN WOODRUFF
 WOODRUFF EXPERT SERVICES, INC.
 1100 K STREET, SUITE 204
 SACRAMENTO, CA 95814

RICHARD LAUCKHART
 GLOBAL ENERGY
 2379 GATEWAY OAKS DRIVE, SUITE 200
 SACRAMENTO, CA 95833

G. ALAN COMNES
 CABRILLO POWER I LLC
 3934 SE ASH STREET
 PORTLAND, OR 97214

DANIEL SUURKASK
 WILD ROSE ENERGY SOLUTIONS, INC.
 430 8170 50TH STREET
 EDMONTON, AB T6B 1E6
 CANADA

State Service

MARCUS NIXON
 CALIF PUBLIC UTILITIES COMMISSION
 PUBLIC ADVISOR OFFICE
 320 WEST 4TH STREET SUITE 500
 LOS ANGELES, CA 90013

BILLIE C. BLANCHARD
 CALIF PUBLIC UTILITIES COMMISSION
 ENERGY DIVISION
 AREA 4-A
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

DAVID NG
 CALIF PUBLIC UTILITIES COMMISSION
 EXECUTIVE DIVISION
 ROOM 5207
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

DONALD R. SMITH
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4209
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

KEITH D WHITE
 CALIF PUBLIC UTILITIES COMMISSION
 ENERGY DIVISION
 AREA 4-A
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

LAURENCE CHASET
 CALIF PUBLIC UTILITIES COMMISSION
 LEGAL DIVISION
 ROOM 5131
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

MATTHEW DEAL
 CALIF PUBLIC UTILITIES COMMISSION
 EXECUTIVE DIVISION
 ROOM 5215
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

ROBERT ELLIOTT
 CALIF PUBLIC UTILITIES COMMISSION
 ENERGY DIVISION
 AREA 4-A
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

Sunrise A.06-08-010

SCOTT CAUCHOIS
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4103
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214
 FOR: DRA

SCOTT LOGAN
 CALIF PUBLIC UTILITIES COMMISSION
 ELECTRICITY PLANNING & POLICY BRANCH
 ROOM 4209
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214
 FOR: DRA

STEVEN A. WEISSMAN
 CALIF PUBLIC UTILITIES COMMISSION
 DIVISION OF ADMINISTRATIVE LAW JUDGES
 ROOM 5107
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

TERRIE D. PROSPER
 CALIF PUBLIC UTILITIES COMMISSION
 EXECUTIVE DIVISION
 ROOM 5301
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

TRACI BONE
 CALIF PUBLIC UTILITIES COMMISSION
 LEGAL DIVISION
 ROOM 5206
 505 VAN NESS AVENUE
 SAN FRANCISCO, CA 94102-3214

SUSAN LEE
 ASPEN ENVIRONMENTAL GROUP
 235 MONTGOMERY STREET, SUITE 935
 SAN FRANCISCO, CA 94104

CLARE LAUFENBERG
 CALIFORNIA ENERGY COMMISSION
 1516 NINTH STREET, MS 46
 SACRAMENTO, CA 95814

MARC PRYOR
 CALIFORNIA ENERGY COMMISSION
 1516 9TH ST, MS 20
 SACRAMENTO, CA 95814

PAUL C. RICHINS JR.
 CALIFORNIA ENERGY COMMISSION
 1516 9TH STREET
 SACRAMENTO, CA 95814
 FOR: CALIFORNIA ENERGY COMMISSION

THOMAS FLYNN
 CALIF PUBLIC UTILITIES COMMISSION
 ENERGY DIVISION
 770 L STREET, SUITE 1050
 SACRAMENTO, CA 95814

JUDY GRAU
 CALIFORNIA ENERGY COMMISSION
 1516 NINTH STREET MS-46
 SACRAMENTO, CA 95814-5512

TOM MURPHY
 VP., SACRAMENTO OPERATIONS
 ASPEN ENVIRONMENTAL GROUP
 8801 FOLSOM BLVD., SUITE 290
 SACRAMENTO, CA 95826

Phase II. Spreadsheet Service List Data extracted to identify parties without email via:

http://docs.cpuc.ca.gov/published/service_lists/A0608010_71846.csv

Sunrise A.06-08-010

P.C.										
P	thompson@wrightlaw.com	MICHAEL J.	THOMPSON	ATTORNEY AT LAW	WRIGHT & TALISMAN, PC	The Nevada Hydro Company	1200 G STREET, N.W., STE 600	WASHINGTON	D 200	05
P	sara@calparks.org	SARA	FELDMAN		CA STATE PARKS FOUNDATION	CA State Parks Foundation	714 W. OLYMPIC BLVD., SUITE 717	LOS ANGELES	C 900	15
P	nwhang@manatt.com	S. NANCY	WHANG	ATTORNEY AT LAW	MANATT, PHELPS & PHILLIPS, LLP	The City of Santee	11355 WEST OLYMPIC BLVD.	LOS ANGELES	C 900	64
P	sptp@msk.com	ARTHUR	FINE		MITCHELL SILBERBERG & KNUPP LLP	David H. Batchelder	11377 W. OLYMPIC BLVD.	LOS ANGELES	C 168	3
P	thomas.burhenn@sce.com	THOMAS A.	BURHENN		SOUTHERN CALIFORNIA EDISON	Southern California Edison	2244 WALNUT GROVE AVENUE	ROSEMead	C 917	70
P	dwood8@cox.net	DON	WOOD SR.		PACIFIC ENERGY POLICY CENTER		4539 LEE AVENUE	LA MESA	C 919	41
P	dlindsay@sunbeltpub.com	DIANA	LINSDAY		ANZA-BORREGO FOUNDATION & INSTITUTE	Anza-Borrego Foundation & Institute	PO BOX 2001	BORREGO SPRINGS	C 920	04
P		LINDA A.	CARSON	EXECUTIVE DIRECTOR	ANZA-BORREGO FOUNDATION	ANZA-BORREGO FOUNDATION	PO BOX 2001	BORREGO SPRINGS	C 920	04
P	mwells@parks.ca.gov	MICHAEL L.	WELLS		CALIFORNIA DEPARTMENT OF PARKS&RECREATION		200 PALM CANYON DRIVE	BORREGO SPRINGS	C 920	04
P	scotmartin478@msn.com	SCOT	MARTIN				PO BOX 1549	BORREGO SPRINGS	C 920	04
P	david.lloyd@nrgenergy.com	DAVID	LLOYD	ATTORNEY AT LAW	CABRILLO POWER I, LLC	Cabrillo Power I, LLC	4600 CARLSBAD BLVD.	CARLSBAD	C 920	08
P	conniebull@cox.net	CONNIE	BULL				24572 RUTHERFORD ROAD	RAMONA	C 920	65
P	dj0conklin@earthlink.net	DIANE J.	CONKLIN	SPOKESPERSON	MUSSEY GRADE ROAD ALLIANCE	MUSSEY GRADE ROAD ALLIANCE	PO BOX 683	RAMONA	C 920	65
P	edwrdsgrfx@aol.com	ELIZABETH	EDWARDS		RAMONA VALLEY VINEYARD ASSOCIATION	Ramona Valley Vineyard Assoc.	26502 HIGHWAY 78	RAMONA	C 920	65
P	pwhalen2@cox.net	PAM	WHALEN				24444 RUTHERFORD ROAD	RAMONA	C 920	65
P	oakhollowranch@wildblue.net	MICHAEL	PAGE			Starlight Mountain Estates Owners	17449 OAK HOLLOW ROAD	RAMONA	C 920	65-8
P	jhfark@pacbell.net	HEIDI	FARKASH		JOHN & HEIDI FARKASH TRUST	Farkash Ranch in Santa Ysabel	PO BOX 576	RANCHO SANTA FE	C 920	67
P	denis@vitalityweb.com	DENIS	TRAFECANTY		COMMUNITY OF SANTA YSABEL & RELATED COMM	Self	PO BOX 305	SANTA YSABEL	C 920	70
P	hikermomma1@yahoo.com	MARY	ALDERN		COMMUNITY ALLIANCE FOR SENSIBLE ENERGY		PO BOX 321	WARNER SPRINGS	C 920	86
P	gbarnes@sempra.com	E. GREGORY	BARNES	ATTORNEY AT LAW	GAS & ELECTRIC COMPANY	San Diego Gas & Electric	101 ASH STREET, HQ 13D	SAN DIEGO	C 921	01
P	fortlieb@sandiego.gov	FREDERIC K M.	ORTLIEB	OFFICE OF CITY ATTORNEY	CITY OF SAN DIEGO	City of San Diego	1200 THIRD AVENUE, SUITE 1200	SAN DIEGO	C 921	01
P	jwalsh@sempra.com	JAMES F.	WALSH		GAS & ELECTRIC COMPANY CITY ATTORNEY,	San Diego Gas & Electric Company	101 ASH STREET	SAN DIEGO	C 921	01
P	mcalabrese@sandiego.gov	MICHAEL P.	CALABRESE	ATTORNEY AT LAW	CITY OF SAN DIEGO	City of San Diego	1200 THIRD AVENUE, SUITE 1100	SAN DIEGO	C 921	01
P	shawn.hagerty@bbklaw.com	SHAWN D.	HAGERTY	CITY OF ATTORNEY	BEST BEST & KRIEGER LLP	The City of Santee	655 W. BROADWAY, 15TH FLOOR	SAN DIEGO	C 921	01-1
P	liddell@energyattorney.com	DONALD C.	LIDDELL	ATTORNEY AT LAW	DOUGLASS & LIDDELL	Stirling Energy Systems	2928 2ND AVENUE	SAN DIEGO	C 921	03

Sunrise A.06-08-010

P	mshames@ucan.org	MICHAEL	SHAMES	ATTORNEY AT LAW	UTILITY CONSUMERS' ACTION NETWORK	UTILITY CONSUMERS' ACTION NETWORK	3100 FIFTH AVENUE, SUITE B	SAN DIEGO	C A	921 03
P	sdenery@sierraclubsandiego.org	PAUL	BLACKBURN		SIERRA CLUB, SAN DIEGO CHAPTER	Sierra Club, San Diego Chapter	3820 RAY STREET	SAN DIEGO	C A	921 04
P	gorhamedward@cox.net	EDWARD	GORHAM		WESTERNERS INCENSED BY WRECKLESS ELECTRI	Self	4219 LOMA RIVIERA LANE	SAN DIEGO	C A	921 10
P	ko'beirne@semprautilities.com	KEVIN	O'BEIRNE		GAS & ELECTRIC COMPANY RANCHO PENASQUITO S	San Diego Gas & Electric	8330 CENTURY PARK COURT, CP32D	SAN DIEGO	C A	921 23
P	hpayne3@gmail.com	HARVEY	PAYNE		CONCERNED CITIZENS	RANCHO PENASQUITOS CONCERNED CITIZENS	13223 - 1 BLACK MOUNTAIN ROAD, 264	SAN DIEGO	C A	921 29
P	kritchey@san.rr.com	KEITH	RITCHEY	POWERLINK ISSUES MANAGER		West Chase Homeowner's Association	8744 CREEKWOOD LANE	SAN DIEGO	C A	921 29
P	jleslie@luce.com	JOHN W.	LESLIE, ESQ.	ATTORNEY AT LAW	LUCE, FORWARD, HAMILTON & SCRIPPS, LLP	Azteca/Energia de Baja California (La Rosita)	11988 EL CAMINO REAL, SUITE 200	SAN DIEGO	C A	921 30
P	dhogan@biologicaldiversity.org	JOETTA	MIHALOVICH				11705 ALDERCREST EST POINT	SAN DIEGO	C A	921 31
P		DAVID	HOGAN		CENTER FOR BIOLOGICAL DIVERSITY LAW OFFICES OF CARRIE		PO BOX 7745	SAN DIEGO	C A	921 67
P	cadowney@san.rr.com	CARRIE	DOWNEY		ANNE DOWNEY IMPERIAL IRRIGATION DISTRICT	Imperial Irrigation District	895 BROADWAY	ELCENTRO	C A	922 43
P	skeene@iid.com	STEPHEN	KEENE	ATTORNEY AT LAW	IMPERIAL IRRIGATION DISTRICT	Imperial Irrigation District	333 EAST BARIONI BLVD., PO BOX 937 14575	IMPERIAL	C A	922 51
P	barbschnier@yahoo.com	PATRICIA C.	SCHNIER			Self	FLATHEAD RD.	APPLE VALLEY	C A	923 07
P	AirSpecial@aol.com	JACQUELINE	AYER			Jacqueline Ayer	2010 WEST AVENUE K, NO. 701	LANCASTER	C A	935 36
P	wblattner@semprautilities.com	BILLY	BLATTNER	MANAGER REGULATORY RELATIONS	SAN DIEGO GAS & ELECTRIC COMPANY	San Diego Gas & Electric Company	601 VAN NESS AVENUE, SUITE 2060	SAN FRANCISCO	C A	941 02
P	mflorio@turn.org	MICHEL PETER	FLORIO	ATTORNEY AT LAW	THE UTILITY REFORM NETWORK (TURN) SHUTE, MIHALY & WEINBERGER, LLC	TURN	711 VAN NESS AVENUE, SUITE 350	SAN FRANCISCO	C A	941 02
P	wolff@smwlaw.com	OSA L.	WOLFF	ATTORNEY AT LAW		Cities of Temecula, Murrieta & Hemet Division of Ratepayer Advocates	396 HAYES STREET	SAN FRANCISCO	C A	941 02
P	map@cpuc.ca.gov	Marion	Peleo		CALIF PUBLIC UTILITIES COMMISSION	LEGAL DIVISION	505 VAN NESS AVENUE	SAN FRANCISCO	C A	941 02-321 4
P	nms@cpuc.ca.gov	Nicholas	Sher		CALIF PUBLIC UTILITIES COMMISSION	LEGAL DIVISION	505 VAN NESS AVENUE	SAN FRANCISCO	C A	941 02-321 4
P	jagustine@biologicaldiversity.org	JUSTIN	AUGUSTINE		THE CENTER FOR BIOLOGICAL DIVERSITY	The Center for Biological Diversity	1095 MARKET ST., SUITE 511	SAN FRANCISCO	C A	941 03
P	norman.furuta@navy.mil	NORMAN J.	FURUTA	ATTORNEY AT LAW	FEDERAL EXECUTIVE AGENCIES RATEPAYERS FOR AFFORDABLE CLEAN ENERGY GOODIN MACBRIDE SQUERI RITCHEY & DAY	DEPARTMENT OF THE NAVY	1455 MARKET ST., SUITE 1744	SAN FRANCISCO	C A	941 03-139 9
P	rcox@pacificenvironment.org	RORY	COX			C/O Pacific Environment	311 CALIFORNIA STREET, SUITE 650	SAN FRANCISCO	C A	941 04
P	bcragg@goodinmacbride.com	BRIAN T.	CRAGG	ATTORNEY AT LAW		LS Power; South Bay Replacement Project, LLC	505 SANSOME STREET, SUITE 900	SAN FRANCISCO	C A	941 11

P	richard.raushenbush@lw.com	RICHARD W.	RAUSHEN BUSH	ATTORNEY AT LAW	LATHAM & WATKINS LLP GOODIN MACBRIDE SQUERI DAY & LAMPREY LLP DAVIS WRIGHT TREMINE, LLP	San Diego Gas & Electric	505 MONTGOMERY STREET, SUITE 2000	SAN FRANCISCO	C A	941 11
P	vprabhakaran@goodinmacbride.com	VIDHYA	PRABHAKARAN		DAVID MARK AND COMPANY CALIFORNIA INDEPENDENT SYSTEM OPERATOR	LS Power; South Bay Replacement Project, LLC	505 SANSOME STREET, SUITE 900	SAN FRANCISCO	C A	941 11 941 11-
P	jeffgray@dwt.com	JEFFREY P.	GRAY	ATTORNEY AT LAW	DIETRICH CONSULTING	California Independent System Operator Corp. California State Parks Foundation and Anza-Borrego Foundation	505 MONTGOMERY STREET, SUITE 800	SAN FRANCISCO	C A	653 3 945 98-
P	dietrichlaw2@earthlink.net	WILLIAM F.	DIETRICH	ATTORNEY AT LAW	DAVID MARK AND COMPANY CALIFORNIA INDEPENDENT SYSTEM OPERATOR	The Nevada Hydro Company	2977 YGNACIO VALLEY ROAD, NO. 613	WALNUT CREEK	C A	353 5 954 03-
P	dkates@sonic.net	DAVID	KATES		IBERDROLA RENEWABLES INC	California Farm Bureau Federation	3510 UNOCAL PLACE, SUITE 200	SANTA ROSA	C A	557 1
P	jsanders@caiso.com	JUDITH B.	SANDERS	ATTORNEY AT LAW	LATHAM & WATKINS, LLP	California Independent System Operator	151 BLUE RAVINE ROAD	FOLSOM	C A	956 30 958 11-
P	jdh@eslawfirm.com	JEFFERY D.	HARRIS	ATTORNEY AT LAW	ELLISON, SCHNEIDER & HARRIS LLP		2015 H STREET	SACRAMENTO	C A	310 9
P	btorgan@parks.ca.gov	BRADLY S.	TORGAN	ATTORNEY AT LAW	DEPT. OF PARKS & RECREATION CA DEPT. OF PARKS AND RECREATION CALIFORNIA FARM BUREAU FEDERATION	California Dept. of Parks & Recreation	1416 NINTH STREET, ROOM 1404-06	SACRAMENTO	C A	958 14
P	ktobias@parks.ca.gov	KATHRYN J.	TOBIAS	ATTORNEY AT LAW	IBERDROLA RENEWABLES INC	CA Department of Parks and Recreation	1416 9TH STREET, 14TH FLOOR	SACRAMENTO	C A	958 14
P	kmills@cfbf.com	KAREN NORENE	MILLS	ATTORNEY AT LAW	LATHAM & WATKINS, LLP	California Farm Bureau Federation	2300 RIVER PLAZA DRIVE 1125 NW COUCH ST., SUITE 700	SACRAMENTO PORTLAND	C O	958 33 972
P		KEVIN	LYNCH		LATHAM & WATKINS, LLP		555 11TH STREET NW, STE. 1000	WASHINGTON	D R	200 09
I	elizabeth.klein@lw.com	ELIZABETH	KLEIN		LATHAM & WATKINS, LLP		555 11TH STREET NW, STE 1000	WASHINGTON GTON	C D	04 200
I	janice.schneider@lw.com	JANICE	SCHNEIDER		LATHAM & WATKINS, LLP			GTON	C	04
I	julie.greenisen@lw.com	JULIE B.	GREENISEN		LATHAM & WATKINS LLP		555 ELEVENTH STREET, NW	WASHINGTON GTON	D C	130 4 200 04-
I	michael.gergen@lw.com	MICHAEL J.	GERGEN		LATHAM & WATKINS LLP		555 ELEVENTH STREET, NW	WASHINGTON GTON	D C	130 4
I	swers@wightlaw.com	ANDREW	SWERS		WRIGHT & TALISMAN, P.C.		1200 G STREET, N.W., SUITE 600	WASHINGTON GTON	D C	200 05
I	kelly@kellyfuller.net	KELLY	FULLER		ENERGY AND NATURE CENTER FOR BIOLOGICAL DIVERSITY	Center for Biological Diversity	PO BOX 6732	MINNEAPOLIS	M N	554 06
I	ssiegel@biologicaldiversity.org	STEVEN	SIEGEL	STAFF ATTORNEY	E. CRAIG SMAY PC	William and Shannon Davis	3421 PARK PLACE	EVANSTON SALT LAKE CITY	IL U T	602 841 11
I		E. CRAIG	SMAY		LADWP		174 EAST SOUTH TEMPLE			
I	Henry.Martinez@ladwp.com	HENRY	MARTINEZ		LOS ANGELES DEPT. OF WATER AND POWER		111 N. HOPE ST., ROOM 921	LOS ANGELES LOS ANGELES	C A	900 12
I	randy.howard@ladwp.com	RANDY S.	HOWARD		SOUTHERN CALIFORNIA GAS COMPANY	San Diego Gas & Electric Company	111 NORTH HOPE STREET, ROOM 921	LOS ANGELES	C A	900 12
I	cfaber@semprautilities.com	CLAY E.	FABER		MANATT, PHELPS & PHILLIPS, LLP	City of Santee	555 WEST FIFTH STREET, GT-14D6	LOS ANGELES	C A	900 13
I	dhuard@manatt.com	DAVID L.	HUARD	ATTORNEY AT LAW	MANATT PHELPS & PHILLIPS, LLP	City of Santee	11355 WEST OLYMPIC BOULEVARD	LOS ANGELES	C A	900 64
I	rkeen@manatt.com	RANDALL W.	KEEN	ATTORNEY AT LAW	SOUTHERN CALIFORNIA EDISON COMPANY	LAW DEPARTM ENT, ROOM 370	11355 WEST OLYMPIC BLVD.	LOS ANGELES	C A	900 64
I	Case.Admin@sce.com	CASE	ADMINISTRATION		SOUTHERN CALIFORNIA EDISON		2244 WALNUT GROVE AVENUE	ROSEMEAD	C A	917 70
I	darell.holmes@sce.com	DARELL	HOLMES	TRANSMISSION MANAGER	SOUTHERN CALIFORNIA EDISON		2244 WALNIT GROVE AVE, 238M, QUADB, G01	ROSEMEAD	C A	917 70

Sunrise A.06-08-010

I	margandona@calwild.org	MONICA	ARGANDO NA	DESERT PROGRAM DIRECTOR	CALIFORNIA WILDERNESS COALITION	167 NORTH THIRD AVENUE, STE M	UPLAND	C	917
I	donnatisdale@hughes.net	DONNA	TISDALE		BOULEVARD SPONSOR GROUP SAN DIEGO INTERFAITH HOUSING FOUNDATION	PO BOX 1272	BOULEVARD RD	C A	86 919 05
I	mjumper@sdihf.org	MATTHEW	JUMPER		FOUNDATION ENVIRONMEN TAL HEALTH COALITION	7956 LESTER AVE	LEMON GROVE	C A	919 45
I	rebeccap@environmentalhealth.org	REBECCA	PEARL	POLICY ADVOCATE, CLEAN BAY CAMPAIGN	ENVIRONMENTAL HEALTH COALITION	401 MILE OF CARS WAY, STE. 310	NATIONA L CITY	C A	919 50
I		BOB & MARGARET	BARELMANN			6510 FRANCIS CAN ROAD	CARLSBA D	C A	920 11
I	ddowney@nctimes.com	DAVE	DOWNEY		NORTH COUNTY TIMES	207 E. PENNSYLVANIA AVENUE	ESCONDI DO	C A	920 25
I	jharry.jones@uniontrib.com	J. HARRY	JONES		SAN DIEGO UNION TRIBUNE	800 WEST VALLEY PARKWAY, SUITE 114	ESCONDI DO	C A	920 25
I	patricia_fallon@sbcglobal.net	PAT/ALBER T	BIANEZ			1223 ARMSTR ONG CIRCLE	ESCONDI DO	C A	920 27
I		WALLY	BESUDEN	PRESIDENT	SPANGLER PEAK RANCH, INC	PO BOX 1959	ESCONDI DO	C A	920 33
I	dandbcarey@julianweb.com	DAVID W.	CAREY		DAVID CAREY & ASSOCIATES, INC.	PO BOX 2481	JULIAN	C A	920 36
I	celloinpines@sbcglobal.net	LAUREL	GRANQUIST			PO BOX 2486	JULIAN	C A	920 36
I	vmp@sbcglobal.net	MARTHA	BAKER		VOLCAN MOUNTAIN PRESERVE FOUNDATION	PO BOX 1625	JULIAN	C A	920 36
I	skyword@sbcglobal.net	JOHN	RAIFSNIDER			PO BOX 121	JULIAN	C A	920 36- 012 1
I	colobiker@gmail.com	BRIAN	KRAMER			PO BOX 516	JULIAN	C A	920 36- 051 6
I	nparinello@gmail.com	NANCY	PARINELLO			PO BOX 516	JULIAN	C A	920 36- 051 6
I	cpuc@92036.com	PAUL	RIDGWAY		3027 LAKEVIEW DR.	PO BOX 1435	JULIAN	C A	920 36- 143 5
I	dwvoss@cox.net	DAVID	VOSS			502 SPRINGF IELD AVENUE	OCEANSI DE PALOMA R MOUNTA IN	C A	920 57
I	WSK@astro.caltech.edu	SCOTT CAROLYN	KARDEL		PALOMAR OBSERVATORY RAMONA COMMUNITY PLANNING GROUP	PO BOX 200 17235 VOORHES LANE	RAMONA	C A	920 65
I	carolyn.dorroh@cubic.com	A.	DORROH			24566 DEL AMO ROAD	RAMONA	C A	920 65
I	polo-player@cox.net	CHRISTOP HER P.	JEFFERS		M-BAR TECHNOLOGIES AND CONSULTING	19412 KIMBALL VALLEY RD	RAMONA	C A	920 65
I	jwmitchell@mbartek.com	JOSEPH W.	MITCHELL, PH. D.		M-BAR TECHNOLOGI ES AND CONSULTING	M-BAR TECHNOLOGIES AND CONSULTING	RAMONA	C A	920 65
I	jwmitchell@mbartek.com	JOSEPH W.	MITCHELL, PHD			19412 KIMBALL VALLEY RD.	RAMONA	C A	920 65
I	soliviasmom@gmail.com	LARA	LOPEZ			16828 OPEN VIEW RD	RAMONA	C A	920 65
I	oldjulianco@integrity.com	PETER	SCHULTZ		OLD JULIAN CO.	PO BOX 2269	RAMONA	C A	920 65
I	wolfmates@cox.net	PHILLIP &ELIANE	BREEDLOVE			1804 CEDAR STREET	RAMONA	C A	920 65
I		WILLIAM	TULLOCH			28223 HIGHWA Y 78	RAMONA	C A	920 65
I	Csmmarket@aol.com	CAROLYN	MORROW		GOLIGHTLY FARMS RANCHITA REALTY	36255 GRAPEVI NE CANYON ROAD	RANCHIT A	C A	920 66
I	joe@ranchitarealty.com	JOSEPH	RAUH		RANCHITA REALTY	37554 MONTEZUMA VALLEY RD	RANCHIT A	C A	920 66
I	cesposit@sdcoe.k12.ca.us	STEVE/CA ROLYN	ESPOSITO			37784 MONTEZ UMA VALLEY	RANCHIT A	C A	920 66

				ROAD						
I	bgendron@nethere.com	BONNIE	GENDRON			4812 GLENSIDE E ROAD	SANTA YSABEL	C	920	
I	kimmerlys@yahoo.com	GLEND	KIMMERLY			PO BOX 305	SANTA YSABEL	C	70	
I	gedrown@mindspring.com	GLENN E.	DROWN			PO BOX 330	SANTA YSABEL	C	70	
I	gecko_greens@juno.com	JOHN&PHY LLIS	BREMER			PO BOX 510	SANTA YSABEL	C	920	
I	webron7@yahoo.com	RON	WEBB			PO BOX 375	SANTA YSABEL	C	70	
I	Reneeandbear@aol.com	K. RENEE	MARTIN			PO BOX 1276	SANTA POWAY	C	920	
I	dan@energysmarthomes.net	DAN	PERKINS	WWW.ENERGYSMARTHOMES.NET		983 PHILLIPS ST. 1295 EAST VISTA WAY	VISTA	A	83	
I	williegaters@earthlink.net	WILLIE M.	GATERS				VISTA	C	920	
I	deanna.spehn@sen.ca.gov	DEANNA	SPEHN	POLICY DIRECTOR	OFFICE OF SENATOR	39TH STATE SENATE DISTRICT	2445 5TH AVENUE, SUITE 200	SAN DIEGO	C	921
I	sfr@sandag.org	SUSAN	FREEDMAN	SENIOR REGIONAL ENERGY PLANNER	CHRISTINE KEHOE SAN DIEGO ASSOCIATION OF GOVERNMENTS		401 B STREET, SUITE 800	SAN DIEGO	C	921
I	jason.ohta@lw.com	JASON M.	OHTA		LATHAM &WATKINS LLP	San Diego Gas and Electric Company	600 WEST BROADWAY, SUITE 1800	SAN DIEGO	C	921
I	patricia.guerrero@lw.com	PATRICIA	GUERRERO	ATTORNEY AT LAW	LATHAM & WATKINS	San Diego Gas and Electric Company	600 WEST BROADWAY, SUITE 1800	SAN DIEGO	C	921
I	sierraclubintern@yahoo.com	KATHARIN E	WOLFROM		SIERRA CLUB OF SAN DIEGO		3802 RAY STREET	SAN DIEGO	C	921
I	mmitrosky@sierraclubsandiego.org	MICAH	MITROSKY		SIERRA CLUB		3820 RAY STREET 504	SAN DIEGO	C	921
I	kmkiener@cox.net	KIM	KIENER				CATALIN A BLVD 4862	SAN DIEGO	C	921
I	jimbellel@cox.net	JIM	BELL				VOLTAIR E ST. 1340	SAN DIEGO	C	921
I	srogers647@aol.com	STEPHEN	ROGERS				OPAL STREET	SN DIEGO	C	921
I	usdepic@gmail.com	EPIC	INTERN		EPIC/USD SCHOOL OF LAW		5998 ALCALA PARK	SAN DIEGO	C	921
I	scottanders@sandiego.edu	SCOTT J.	ANDERS	RESEARCH/ADMINI STRATIVE CENTER	UNIVERSITY OF SAN DIEGO - LAW		5998 ALCALA PARK	SAN DIEGO	C	921
I	bruce.bigelow@uniontrib.com	BRUCE V.	BIEGEL W	STAFF WRITER	THE SAN DIEGO UNION TRIBUNE		PO BOX 120191S 3142 COURSE R AVENUE	SAN DIEGO	C	921
I	gcourser@hotmail.com	GEORGE	COURSER				8330 CENTURY PARK COURT, CP31E	SAN DIEGO	C	921
I	centralfiles@semprautilities.com	CENTRAL	FILES		SAN DIEGO GAS & ELECTRIC		8520 TECH WAY, SUITE 110	SAN DIEGO	C	921
I	Irene.stillings@energycenter.org	IRENE	STILLING S	EXECUTIVE DIRECTOR	CALIFORNIA CENTER FOR SUSTAINABLE ENERGY		8690 BALBOA AVENUE, SUITE 100	SAN DIEGO	C	921
I	jennifer.porter@energycenter.org	JENNIFER	PORTER	POLICY ANALYST	CALIFORNIA CENTER FOR SUSTAINABLE ENERGY		8690 BALBOA AVENUE, SUITE 100	SAN DIEGO	C	921
I	sephra.ninow@energycenter.org	SEPHRA A.	NINOW	POLICY ANALYST	CALIFORNIA CENTER FOR SUSTAINABLE ENERGY		9601 RIDGEHA VEN COURT, SUITE 120	SAN DIEGO	C	921
I	tblair@sandiego.gov	TOM	BLAIR	ENERGY ADMINISTRATOR	CITY OF SAN DIEGO			SAN DIEGO	C	921
I	Dahvia.Lynch@sdcountry.ca.gov	DAHVIA JALEH (SHARON)	LOCKE	ENIRONMENTAL RESOURCE MANAGER	COUNTY OF SAN DIEGO		5201 RUFFIN ROAD, SUITE B 17114 TALLOW TREE LANE	SAN DIEGO	C	921
I	jfirooz@iesnet.com	FIROOZ, P.E.			ADVANCED ENERGY SOLUTIONS			SAN DIEGO	C	921
I	sanrocky@aol.com	EILEEN	BIRD				12430 DORMOU SE ROAD	SAN DIEGO	C	921
I		KIMBELRY	SCHULZ				10303 CANINIT O ARALIA	SAN DIEGO	C	921

I	GREGORY T.	LAMBRON		LAMBRON LAKESIDE RANCH, LLC	PO BOX 15453	SAN DIEGO	C	921 75- 545 3		
I	LYNDA	KASTOLL	REALTY SPECIALIST	BUREAU OF LAND MANAGEMENT	1661 SOUTH 4TH STREET 1661 SO. 4TH STREET	EL CENTRO EL CENTRO	C A	922 43 922 43		
I	Thomas_Zale@blm.gov	THOMAS	ZALE	BUREAU OF LAND MANAGEMENT						
I	up@undergroundpower.us	J.	STHURA	UNDERGROUND POWER ASSOCIATION	PO BOX 1032	HEMET	C A	925 46		
I	c@californiabotanicalhabitat.com	JOHN	STHURA	CALIFORNIA BOTANICAL HABITAT	PO BOX 1032	HEMET	C A	925 46		
I	swilson@pcta.org	SUZANNE	WILSON	California Botanical Habitat	PO BOX 798	IDYLLWILD	C A	925 49 928 60- 000		
I	Lnastro@parks.ca.gov	LOUIS	NASTRO		PO BOX 942896	SACRAMENTO	C A	000 1		
I	bruce.foster@sce.com	BRUCE	FOSTER	SENIOR VICE PRESIDENT	SOUTHERN CALIFORNIA EDISON COMPANY	601 VAN NESS AVENUE, STE. 2040 234 VAN NESS AVENUE	FRANCISCO SAN FRANCISCO	C A	941 02 941 02	
I	diane_felman@fpl.com	DIANE I.	FELLMAN	ATTORNEY AT LAW	FPL ENERGY, LLC					
I	wolff@smwlaw.com	SHERIDAN	PAUKER	WEINBERGER LLP	Cities of Temecula, Hemet and Murrieta	396 HAYES STREET	SAN FRANCISCO	C A	941 02	
I	rcox@pacificenvironment.org	AARON	QUINTANAR		RATE PAYERS FOR AFFORDABLE CLEAN ENERGY	311 CALIFORNIA STREET, STE 650	FRANCISCO	C A	941 04	
I	bbirdsall@aspeneq.com	BREWSTER	BIRDSALL		ASPEN ENVIRONMENTAL GROUP	235 MONTGOMERY STREET, SUITE 935	FRANCISCO	C A	941 04	
I	dtk5@pge.com	DAVID T.	KRASKA	ATTORNEY AT LAW	PACIFIC GAS AND ELECTRIC COMPANY	PO BOX 7442, 77 BEALE ST, B30A	FRANCISCO	C A	941 05	
I	jay2@pge.com	JASON	YAN		PACIFIC GAS AND ELECTRIC COMPANY	77 BEALE STREET, MAIL CODE B13L	FRANCISCO	C A	941 05	
I	kmsn@pge.com	KATARZYNA M.	SMOLEN		PACIFIC GAS AND ELECTRIC COMPANY	77 BEALE STREET, MC B9A	FRANCISCO	C A	941 05	
I	mspe@pge.com	MICHAEL S.	PORTER		PACIFIC GAS AND ELECTRIC COMPANY	77 BEALE ST., MAIL CODE 13L RM 1318	FRANCISCO	C A	941 05	
I	placourciere@thelenreid.com	PAUL C.	LACOURCIERE	VICE PRESIDENT	RAYSMAN & STEINER	The Nevada Hydro Company	101 SECOND STREET, SUITE 1800	FRANCISCO	C A	941 05
I	jwoodruff@nexttightrp.com	JAMES B.	WOODRUFF	REGULATORY AND GOVT AFFAI	NEXTLIGHT RENEWABLE POWER, LLC	101 CALIFORNIA STREET, STE 2450 275 BATTERY STREET, 23RD FLOOR	FRANCISCO	C A	941 11	
I	jfieber@flk.com	JULIE L.	FIEBER		FOLGER LEVIN & KAHN LLP		FRANCISCO	C A	941 11	
I	cem@newsdata.com				CALIFORNIA ENERGY MARKETS	425 DIVISADERO ST.	FRANCISCO	C A	941 17 942 44- 246 0	
I	robin.harrington@fire.ca.gov	ROBIN	HARRINGTON		CAL. DEPT OF FORESTRY AND FIRE PROTECTIO	PO BOX 944246 4140 DUBLIN BLVD., STE. 100	SACRAMENTO	C A	246 0	
I	joe.paul@dyneqy.com	JOSEPH	PAUL	SENIOR CORPORATE COUNSEL	DYNEGY, INC.		DUBLIN	C A	945 68	
I	hzaininger@aol.com	HENRY	ZAININGER		ZAININGER ENGINEERING COMPANY, INC.	1718 NURSERY WAY	PLEASANTON	C A	945 88	
I	phil@auclairconsulting.com	PHILIPPE	AUCLAIR			11 RUSSELL COURT	WALNUT CREEK	C A	945 98	
I	editorial@californiaenergycircuit.net	J.A.	SAVAGE		CALIFORNIA ENERGY CIRCUIT	006 SHEFFIELD AVE	OAKLAND	C A	946 02	
I	mrw@mrwassoc.com				MRW & ASSOCIATES, INC.	1814 FRANKLIN STREET, SUITE 720	OAKLAND	C A	946 12	
I	dmarcus2@sbcglobal.net	DAVID	MARCUS			PO BOX 1287 14635 N. KIERLAND BLVD., SUITE 130	BERKELEY	C A	947 01	
I	kbagley@rwbeck.com	KEN	BAGLEY		R.W. BECK		SOCTSD ALE	A Z	952 54	

Sunrise A.06-08-010

I	kent@wkpalmerton.com	W. KENT	PALMERTON	WK PALMERTON ASSOCIATES, LLC	2106 HOMEWOOD WAY, SUITE 100	CARMICH AEL	C	956	08
I		NANCY J.	SARACINO	ATTORNEY	CALIFORNIA INDEP. SYSTEM OPERATOR CORP.	151 BLUE RAVINE ROAD	FOLSOM	C	956
I	ziad@zglobal.biz	ZIAD	ALAYWAN	LEGAL & REGULATORY DEPARTMENT	ZGLOBAL INC. ENGINEERING AND ENERGY	193 BLUE RAVINE RD, STE 120	FOLSOM	C	956
I	e-recipient@caiso.com				CALIFORNIA ISO	151 BLUE RAVINE ROAD	FOLSOM	C	956
I	david@branchcomb.com	DAVID	BRANCHCOMB		BRANCHCOMB ASSOCIATES, LLC	9360 OAKTREE LANE	ORANGEVILLE	C	956
I	PGS@IEEE.org	PAUL G.	SCHEUERMAN		SHEUERMAN CONSULTING	3915 RAWHIDE RD.	ROCKLIN	C	956
I	lonwhouse@waterandenergyconsulting.com	LON W.	HOUSE		WATER & ENERGY CONSULTING	4901 FLYING C RD. 1304 ANTRIM DR.	N PARK	C	956
I	ddfreesman@yahoo.com	DARRELL ANDREW	FREEMAN				ROSEVILLE	C	957
I	abb@eslawfirm.com	B.	BROWN	ATTORNEY AT LAW	ELLISON SCHNEIDER & HARRIS, LLP	2015 H STREET 980 NINTH STREET, SUITE 2130	SACRAMENTO	C	958
I	Audra.Hartmann@Dynegy.com	AUDRA	HARTMANN		DYNEGY, INC. CALIFORNIA ENERGY COMMISSION	1516 - 9TH STREET 1416 NINTH STREET, ROOM 1404-06	SACRAMENTO	C	958
I	jreedede@energy.state.ca.us	JAMES W.	REEDE JR. ED.D			1100 K STREET, SUITE 204	SACRAMENTO	C	958
I	KMCDO@parks.ca.gov	KELLI	MCDOWELL		CA DEPT. OF PARKS AND RECREATION SENATE ENERGY/UTILITIES & COMMUNICATION	2379 GATEWAY OAKS DRIVE, SUITE 200	SACRAMENTO	C	958
I	kellie.smith@sen.ca.gov	KELLIE	SMITH			3934 SE ASH STREET	PORTLAND	C	972
I	kdw@woodruff-expert-services.com	KEVIN	WOODRUFF		WOODRUFF EXPERT SERVICES, INC.	430 8170 50TH STREET	EDMONTON	C	T6B1E6
I	riauckhart@globalenergy.com	RICHARD	LAUCKHART		GLOBAL ENERGY	320 WEST 4TH STREET SUITE 500	LOS ANGELES	C	900
I	alan.comnes@nrgenergy.com	G. ALAN	COMNES		CABRILLO POWER I LLC	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214
I	daniel@wildroseenergy.com	DANIEL	SUURKASK		WILD ROSE ENERGY SOLUTIONS, INC. PUBLIC ADVISOR OFFICE	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214
S	mrxc@cpuc.ca.gov	Marcus	Nixon		CALIF PUBLIC UTILITIES COMMISSION	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214
S	bcb@cpuc.ca.gov	Billie C.	Blanchard		CALIF PUBLIC UTILITIES COMMISSION	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214
S	dhn@cpuc.ca.gov	David	Ng		CALIF PUBLIC UTILITIES COMMISSION	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214
S	dsh@cpuc.ca.gov	Donald R.	Smith		CALIF PUBLIC UTILITIES COMMISSION	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214
S	kwh@cpuc.ca.gov	Keith D	White		CALIF PUBLIC UTILITIES COMMISSION	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214
S	lau@cpuc.ca.gov	Laurence	Chaset		CALIF PUBLIC UTILITIES COMMISSION	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214
S	mjd@cpuc.ca.gov	Matthew	Deal		CALIF PUBLIC UTILITIES COMMISSION	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214
S	rae@cpuc.ca.gov	Robert	Elliott		CALIF PUBLIC UTILITIES COMMISSION	EA 505 VAN NESS AVENUE	SAN FRANCISCO	C	94102-3214

25. shawn.hagerty@bbklaw.com
26. liddell@energyattorney.com
27. mshames@ucan.org
28. sdenergy@sierraclubsandiego.org
29. gorhamedward@cox.net
30. ko'beirne@semprautilities.com
31. hpayne3@gmail.com
32. kritchey@san.rr.com
33. jleslie@luce.com
- 34.
35. dhogan@biologicaldiversity.org
36. cadowney@san.rr.com
37. sjkeene@iid.com
38. barbschnier@yahoo.com
39. AirSpecial@aol.com
40. wblattner@semprautilities.com
41. mflorio@turn.org
42. wolff@smwlaw.com
43. map@cpuc.ca.gov
44. nms@cpuc.ca.gov
45. jaugustine@biologicaldiversity.org
46. norman.furuta@navy.mil
47. rcox@pacificenvironment.org
48. bcragg@goodinmacbride.com
49. richard.raushenbush@lw.com
50. vprabhakaran@goodinmacbride.com
51. jeffgray@dwt.com
52. dietrichlaw2@earthlink.net
53. dkates@sonic.net
54. jsanders@caiso.com
55. jdjh@eslawfirm.com
56. btorgan@parks.ca.gov
57. ktobias@parks.ca.gov
58. kmills@cfbf.com
- 59.
60. elizabeth.klein@lw.com
61. janice.schneider@lw.com
62. julie.greenisen@lw.com
63. michael.gergen@lw.com
64. swers@wightlaw.com
65. kelly@kellyfuller.net
66. ssiegel@biologicaldiversity.org
- 67.
68. Henry.Martinez@ladwp.com
69. randy.howard@ladwp.com
70. cfaber@semprautilities.com
71. dhuard@manatt.com
72. rkeen@manatt.com
73. Case.Admin@sce.com
74. darell.holmes@sce.com
75. margandona@calwild.org
76. donnatisdale@hughes.net
77. mjumper@sdihf.org
78. rebeccap@environmentalhealth.org
- 79.
80. ddowney@nctimes.com
81. jharry.jones@uniontrib.com
82. patricia_fallon@sbcglobal.net
- 83.
84. dandbcarey@julianweb.com
85. celloinpines@sbcglobal.net
86. vmp@sbcglobal.net
87. skyword@sbcglobal.net
88. colobiker@gmail.com
89. nparinello@gmail.com
90. cpuc@92036.com
91. dwvoss@cox.net
92. WSK@astro.caltech.edu
93. carolyn.dorroh@cubic.com
94. polo-player@cox.net
95. jwmitchell@mbartek.com
96. jwmitchell@mbartek.com
97. soliviasmom@gmail.com
98. oldjulianco@integrity.com
99. wolfmates@cox.net
- 100.
101. Csmmarket@aol.com
102. joe@ranchitarealty.com
103. cesposit@sdcoe.k12.ca.us
104. bgendron@nethere.com
105. kimmerlys@yahoo.com
106. gedrown@mindspring.com
107. gecko_greens@juno.com
108. webbron7@yahoo.com
109. Reneeandbear@aol.com
110. dan@energysmarthomes.net
111. williegaters@earthlink.net
112. deanna.spehn@sen.ca.gov

113. sfr@sandag.org
 114. jason.ohta@lw.com
 115. patricia.guerrero@lw.com
 116. sierraclubintern@yahoo.com
 117. mmitrosky@sierraclubsandiego.org
 118. kmkiener@cox.net
 119. jimbellelsi@cox.net
 120. srogers647@aol.com
 121. usdepic@gmail.com
 122. scottanders@sandiego.edu
 123. bruce.bigelow@uniontrib.com
 124. gcourser@hotmail.com
 125. centralfiles@semprautilities.com
 126. Irene.stillings@energycenter.org
 127. jennifer.porter@energycenter.org
 128. sephra.ninow@energycenter.org
 129. tblair@sandiego.gov
 130. Dahvia.Lynch@sdcounty.ca.gov
 131. jfirooz@iesnet.com
 132. sanrocky@aol.com
 133.
 134.
 135.
 136. Thomas_Zale@blm.gov
 137. up@undergroundpower.us
 138. c@californiabotanicalhabitat.com
 139. swilson@pcta.org
 140. Lnastro@parks.ca.gov
 141. bruce.foster@sce.com
 142. diane_fellman@fpl.com
 143. wolff@smwlaw.com
 144. rcox@pacificenvironment.org
 145. bbirdsall@aspenerg.com
 146. dtk5@pge.com
 147. jay2@pge.com
 148. kmsn@pge.com
 149. mspe@pge.com
 150. placourciere@thelenreid.com
 151. jwoodruff@nextlightrp.com
 152. jfieber@flk.com
 153. cem@newsdata.com
 154. robin.harrington@fire.ca.gov
 155. joe.paul@dynegy.com
 156. hzaininger@aol.com
 157. phil@auclairconsulting.com
 158. editorial@californiaenergycircuit.net
 159. mrw@mrwassoc.com
 160. dmarcus2@sbcglobal.net
 161. kbagley@rwbeck.com
 162. kent@wkpalmerton.com
 163.
 164. ziad@zglobal.biz
 165. e-recipient@caiso.com
 166. david@branchcomb.com
 167. PGS@IEEE.org
 168. lonwhouse@waterandenergyconsulting.com
 169. ddfreeman@yahoo.com
 170. abb@eslawfirm.com
 171. Audra.Hartmann@Dynergy.com
 172. jreede@energy.state.ca.us
 173. KMCDO@parks.ca.gov
 174. kellie.smith@sen.ca.gov
 175. kdw@woodruff-expert-services.com
 176. rlauckhart@globalenergy.com
 177. alan.comnes@nrenergy.com
 178. daniel@wildroseenergy.com
 179. mrx@cpuc.ca.gov
 180. bcb@cpuc.ca.gov
 181. dhn@cpuc.ca.gov
 182. dsh@cpuc.ca.gov
 183. kwh@cpuc.ca.gov
 184. lau@cpuc.ca.gov
 185. mjd@cpuc.ca.gov
 186. rae@cpuc.ca.gov
 187. wsc@cpuc.ca.gov
 188. sjl@cpuc.ca.gov
 189. saw@cpuc.ca.gov
 190. tdp@cpuc.ca.gov
 191. tbo@cpuc.ca.gov
 192. slee@aspenerg.com
 193. Claufenb@energy.state.ca.us
 194. mpryor@energy.state.ca.us
 195. prichins@energy.state.ca.us
 196. trf@cpuc.ca.gov
 197. jgrau@energy.state.ca.us
 198. tmurphy@aspenerg.com

Phase IV. Email service list extracted from spreadsheet data (commas are manually inserted after each address and *ascii* carriage return characters removed to prepare for an email insertion block).

It's no wonder that participants don't update their emailing list and the CPUC has to request updating efforts. Why wouldn't a small program extract an email address block and a list of addresses for postal mailing, or alternatively why wouldn't the document submission process automatically include the emailing and eliminate postal mailing altogether, or a private company could provide a mailing service if needed, or better just make the emailing of documents option and just list them on the CPUC web site for retrieval when needed, naturally flexibly sorted by subject and content through a real-time data base index, so information would not get lost.

Podgorsky@wrightlaw.com, thompson@wrightlaw.com, sara@calparks.org, nwhang@manatt.com, sptp@msk.com, thomas.burhenn@sce.com, dwood8@cox.net, dlindsay@sunbeltpub.com, mwells@parks.ca.gov, scotmartin478@msn.com, david.lloyd@nrgenergy.com, conniebull@cox.net, dj0conklin@earthlink.net, edwrdsgrfx@aol.com, pwhalen2@cox.net, oakhollowranch@wildblue.net, jhfark@pacbell.net, denis@vitalityweb.com, hikermomma1@yahoo.com, gbarnes@sempra.com, fortlieb@sandiego.gov, jwalsh@sempra.com, mcalabrese@sandiego.gov, shawn.hagerty@bbklaw.com, liddell@energyattorney.com, mshames@ucan.org, sdenergy@sierraclubsandiego.org, gorhamedward@cox.net, ko'beirne@semprautilities.com, hpayne3@gmail.com, kritchey@san.rr.com, jleslie@luce.com, dhogan@biologicaldiversity.org, cadowney@san.rr.com, sjkeene@iid.com, barbschnier@yahoo.com, AirSpecial@aol.com, wblattner@semprautilities.com, mflorio@turn.org, wolff@smwlaw.com, map@cpuc.ca.gov, nms@cpuc.ca.gov, jaugustine@biologicaldiversity.org, norman.furuta@navy.mil, rcox@pacificenvironment.org, bcragg@goodinmacbride.com, richard.raushenbush@lw.com, vprabhakaran@goodinmacbride.com, jeffgray@dwt.com, dietrichlaw2@earthlink.net, dkates@sonic.net, jsanders@caiso.com, jd@eslawfirm.com, btorgan@parks.ca.gov, ktobias@parks.ca.gov, kmills@cbbf.com, elizabeth.klein@lw.com, janice.schneider@lw.com, julie.greenisen@lw.com, michael.gergen@lw.com, swers@wrightlaw.com, kelly@kellyfuller.net, ssiegel@biologicaldiversity.org, Henry.Martinez@ladwp.com, randy.howard@ladwp.com, cfaber@semprautilities.com, dhuard@manatt.com, rkeen@manatt.com, Case.Admin@sce.com, darell.holmes@sce.com,

margandona@calwild.org, donnatisdale@hughes.net, mjumper@sdihf.org, rebeccap@environmentalhealth.org, ddowney@nctimes.com, jharry.jones@uniontrib.com, patricia_fallon@sbcglobal.net, dandbcarey@julianweb.com, celloinpines@sbcglobal.net, vmp@sbcglobal.net, skyword@sbcglobal.net, colobiker@gmail.com, nparinello@gmail.com, cpuc@92036.com, dwvoss@cox.net, WSK@astro.caltech.edu, carolyn.dorroh@cubic.com, polo-player@cox.net, jwmitchell@mbartek.com, jwmitchell@mbartek.com, soliviasmom@gmail.com, oldjulianco@integrity.com, wolfmates@cox.net, Csmmarket@aol.com, joe@ranchitarealty.com, cesposit@sdcoe.k12.ca.us, bgendron@nethere.com, kimmerlys@yahoo.com, gedrown@mindspring.com, gecko_greens@juno.com, webbron7@yahoo.com, Reneeandbear@aol.com, dan@energysmarthomes.net, williegaters@earthlink.net, deanna.spehn@sen.ca.gov, sfr@sandag.org, jason.ohta@lw.com, patricia.guerrero@lw.com, sierraclubintern@yahoo.com, mmitrosky@sierraclubsandiego.org, kmkiener@cox.net, jimbellelsi@cox.net, srogers647@aol.com, usdepic@gmail.com, scottanders@sandiego.edu, bruce.bigelow@uniontrib.com, gcourser@hotmail.com, centralfiles@semprautilities.com, Irene.stillings@energycenter.org, jennifer.porter@energycenter.org, sephra.ninow@energycenter.org, tblair@sandiego.gov, Dahvia.Lynch@sdcountry.ca.gov, jfirooz@iesnet.com, sanrocky@aol.com, Thomas_Zale@blm.gov, up@undergroundpower.us, c@californiabotanicalhabitat.com, swilson@pcta.org, Lnastro@parks.ca.gov, bruce.foster@sce.com, diane_fellman@fpl.com, wolff@smwlaw.com, rcox@pacificenvironment.org, bbirdsall@aspenerg.com, dtk5@pge.com, jay2@pge.com, kmsn@pge.com, mspe@pge.com, placourciere@thelenreid.com, jwoodruff@nextlightrp.com, jfieber@flk.com, cem@newsdata.com, robin.harrington@fire.ca.gov, joe.paul@dynegy.com, hzaininger@aol.com, phil@auclairconsulting.com, editorial@californiaenergycircuit.net, mrw@mrwassoc.com, dmarcus2@sbcglobal.net, kbagley@rwbeck.com, kent@wkpalmerton.com, ziad@zglobal.biz, e-recipient@caiso.com, david@branchcomb.com, PGS@IEEE.org, lonwhouse@waterandenergyconsulting.com, ddfreeman@yahoo.com, abb@eslawfirm.com, Audra.Hartmann@Dynegy.com, jreede@energy.state.ca.us, KMCDO@parks.ca.gov, kellie.smith@sen.ca.gov, kdw@woodruff-expert-services.com, rlauckhart@globalenergy.com, alan.comnes@nrgenergy.com, daniel@wildroseenergy.com, mrx@cpuc.ca.gov, bcb@cpuc.ca.gov, dh@cpuc.ca.gov, dsh@cpuc.ca.gov, kwh@cpuc.ca.gov, lau@cpuc.ca.gov, mjd@cpuc.ca.gov, rae@cpuc.ca.gov, wsc@cpuc.ca.gov, sjl@cpuc.ca.gov, saw@cpuc.ca.gov, tdp@cpuc.ca.gov, tbo@cpuc.ca.gov, slee@aspenerg.com, Claufenb@energy.state.ca.us, mpryor@energy.state.ca.us, prichins@energy.state.ca.us, trf@cpuc.ca.gov, jgrau@energy.state.ca.us, tmurphy@aspenerg.com,

Phase V. Notices for mailing preparation (converted from Excel spreadsheet format to Word 2007):

LINDA A.	CARSON	EXECUTIV E DIRECTOR	ANZA- BORREGO FOUNDATION	PO BOX 2001	BORREGO SPRINGS	CA	92004
JOETTA	MIHALOVIC H			11705 ALDERCRES T POINT	SAN DIEGO	CA	92131
KEVIN	LYNCH		IBERDROLA RENEWABLES INC	1125 NW COUCH ST., SUITE 700	PORTLAND	O R	97209
E. CRAIG	SMAY		William and Shannon Davis	174 EAST SOUTH TEMPLE	SALT LAKE CITY	UT	84111
BOB & MARGARE T	BARELMANN			6510 FRANCISCA N ROAD	CARLSBAD	CA	92011
WALLY	BESUDEN	PRESIDEN T	SPANGLER PEAK RANCH, INC	PO BOX 1959	ESCONDID O	CA	92033
WILLIAM	TULLOCH			28223 HIGHWAY 78	RAMONA	CA	92065
KIMBELRY	SCHULZ			10303 CANINITO ARALIA NO 96	SAN DIEGO	CA	92131
GREGORY T.	LAMBRON		LAMBRON LAKESIDE RANCH, LLC	PO BOX 15453	SAN DIEGO	CA	92175 -5453
LYNDA	KASTOLL		BUREAU OF LAND MANAGEMEN T	61 SOUTH 4TH STREET	EL CENTRO	CA	92243
NANCY J.	SARACINO	ATTORNEY	CALIFORNIA INDEP. SYSTEM OPERATOR CORP.	151 BLUE RAVINE ROAD	FOLSOM	CA	95630

Southeastern Communities

Anza Borrego Desert State Park

Bankhead Springs

Boulevard

Bureau of Land Management

Campo

Campo Reservation

Cleveland National Forest

Ewiiapaayp

Jacumba

La Posta

Lake Morena

Live Oak Springs

Manzanita

Pine Valley

San Diego County

State of California

Tierra Del Sol

