## **BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

In the Matter of the Application of San Diego Gas & Electric Company (U 902-E) for a Certificate of Public Convenience and Necessity for the Sunrise Powerlink Transmission Project Application 06-08-010 (Filed August 4, 2006)

Application No. 05-12-014 (Filed December 14, 2005)

## CONSERVATION GROUPS' MOTION FOR LEAVE TO SUBMIT LATE-FILED PREHEARING CONFERENCE STATEMENT

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Dated: September 13, 2006

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Pursant to Rule 45 of the Commission's Rules of Practice and Procedure, the Center for Biological Diversity and the San Diego Chapter of the Sierra Club ("Conservation Groups") seek leave to submit their Prehearing Conference Statement. Conservation Groups served all parties with its Prehearing Conference Statement electronically on September 13, 2006.

Conservation Groups note that the volume and late service of SDG&E's re-filed, supplemented application and PEA imposed a considerable burden on their resources. Further, Conservation Groups raise a number of matters of law, that have not been raised by any other party, that should be addressed by the Commission and the parties to this proceeding. To the extent that additional time is required for response by SDG&E and/or other parties to matters raised by Conservation Groups, such additional process will not unduly delay the Commission's prehearing deliberations or prejudice other parties and can be fully accomplished through filings without resort to a third prehearing conference. Finally, all of the issues raised herein could also be included in a forthcoming supplemental protest, but Conservation Groups believe that the Commission would be better served to receive these issues now, rather than later. For all of these reasons, Conservation Groups respectfully request that the Commission grant leave to file their Prehearing Conference Statement.

Respectfully submitted this 13<sup>th</sup> day of September, 2006.

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