

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

Application of San Diego Gas & Electric  
Company (U 902-E) for a Certificate  
Of Public Convenience and Necessity  
For the Sunrise Powerlink Transmission Project

A. 05-12-014

**PROTEST OF THE  
IMPERIAL IRRIGATION DISTRICT**

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Date: January 18, 2006

Attorneys for Imperial Irrigation District

PUBLIC UTILITIES COMMISSION  
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Pursuant to Rule 2.6(a) and Article 12 of the Commission's Rules of Practice and Procedure of the Public Utilities Commission of the State of California ("Commission"), the Imperial Irrigation District ("IID") respectfully submits this protest in opposition to the deficient application filed by San Diego Gas & Electric Company ("SDG&E") in the above-referenced proceeding. As discussed further below, SDG&E failed to inform the Commission of an important competing project and SDG&E omitted crucial details necessary for the Commission to reach a reasoned decision. Accordingly, SDG&E's deficient application should be rejected.

**I. SDG&E NEGLECTED TO INFORM THE COMMISSION OF THE  
COMPETING GREEN PATH PROJECT**

Rule 18(b) (Competing Utilities) requires applicants for a certificate of public convenience and necessity to include in their applications: "The names and addresses of all utilities, corporations, persons or other entities, whether publicly or privately operated, with which the proposed construction is likely

to compete, and the cities or counties within which service will be rendered in the exercise of the requested certificate.” In violation of this requirement, SDG&E’s application fails to disclose that SDG&E’s proposed construction of the Sunrise Powerlink transmission project is competing with the proposed construction of another transmission project, known as the “Green Path” project. This omission is significant because the estimated cost of the Green Path project is far less than SDG&E’s estimated \$1.015 billion to \$1.437 billion cost for the Sunrise Powerlink project.<sup>1</sup> Furthermore, the Green Path Project creates greater reliability benefits and provides access to a significantly larger amount of renewable energy resources than SDG&E’s proposed Sunrise Powerlink project.

IID, Citizens Energy Corporation (“Citizens”), and the Los Angeles Department of Water and Power are developing the new Green Path transmission project in Southern California to meet growing load demands in their service areas, provide greater market access to renewable energy sources located or under development in Imperial County, relieve congestion and enhance the overall EHV transmission system reliability. The Green Path project promotes the State’s energy policy of improving transmission infrastructure and delivering renewable energy at lower cost to California ratepayers. Furthermore, a large portion of the proposed 500 kV Green Path line from Imperial Valley to the San Diego Central area will be constructed

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<sup>1</sup> IID and Citizens currently estimate that the cost of constructing a new 500 kV line from Imperial Valley to San Diego Central through San Felipe switch station (not including upgrades on SDG&E’s system south of San Diego Central) is approximately \$333 million.

on IID's existing right-of-way, thereby reducing costs, expediting the permitting process, creating less environmental impacts and improving the certainty of project completion prior to 2010. The Green Path project eliminates the need for facilities included in SDG&E's application, making them duplicative and not in the best interest of the public.

Not only is the Green Path project less costly, but it is expected to provide greater reliability and renewable energy benefits as well. For example, the Green Path project, which includes a new interconnection at the San Felipe Substation, creates a redundancy that guards against the loss of the IV-San Felipe transmission line. SDG&E's Sunrise Powerlink project, in contrast, lacks this added reliability benefit and is estimated to cost far more. In addition, the Green Path project has the capability to deliver up to 1100 MW of renewable energy, whereas SDG&E Sunrise Powerlink project would only have the capability to deliver 650 MW from the Imperial Valley, again at a far higher estimated cost. Where, as here, a significantly lower cost or otherwise superior alternative exists, it would be imprudent for SDG&E to proceed with its proposed Sunrise Powerlink project at the expense of California ratepayers.

SDG&E's application is deficient in other respects as well. For example, Rule 18(d) (Required Permits) requires an applicant for a certificate of public convenience and necessity to include in its application: "A statement identifying the franchises and such health and safety permits as the

appropriate public authorities have required or may require for the proposed construction or extension." In violation of this requirement, SDG&E has not made any such identifications, thereby depriving the Commission of the ability to reasonably assess the impacts on health and safety.

Plainly, SDG&E's application is premature and SDG&E has more homework to do before it asks this Commission to devote its limited resources to evaluating whether its proposed project is in the public interest. Moreover, when SDG&E finally submits a completed application, it is crucial that SDG&E fully inform this Commission of all competing projects, including the Green Path project, and provide sufficient details to reach a thorough and reasoned decision.


## II. CONCLUSION

Wherefore, SDG&E's application is deficient and should be rejected by the Commission.

January 18, 2006

Respectfully submitted:

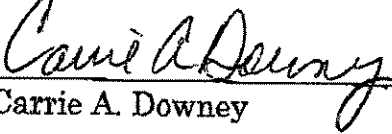
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By   
Carrie A. Downey  
Attorneys for Imperial Irrigation  
District

PROOF OF SERVICE

I hereby certify that on January 18, 2006, I served, by United States mail, the Protest of the Imperial Irrigation District to San Diego Gas & Electric Company.

DATED at San Diego, California.

  
Carrie A. Downey