

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

**PROTEST OF THE RAMONA ALLIANCE AGAINST SUNRISE  
POWERLINK (RAASP)**

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# **PROTEST OF THE RAMONA ALLIANCE AGAINST SUNRISE POWERLINK (RAASP)**

## **I. INTRODUCTION**

Pursuant to Rule 44 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the Ramona Alliance Against Sunrise Powerlink (“RAASP”) submits this Protest in opposition to the Application of the San Diego Gas & Electric Company (“SDG&E”) for a Certificate of Public Convenience and Necessity (“CPCN”) for the Sunrise Powerlink Transmission Project (“Application”), and in which SDG&E proposes to defer certain CPNC filing requirements. The Application was filed on December 14, 2005. The period for submitting protests was extended to February 17, 2006, therefore this protest is timely pursuant to the Commission’s Rules of Practice and Procedure, Rule 44.1 and G.O. 131-D, Section XII.

## **II. SUMMARY**

In its application, SDG&E proposes, under Commission Rule 87<sup>1</sup>, to bifurcate the application process by postponing vital filing requirements, namely the Proponent’s Environmental Assessment (“PEA”)<sup>2</sup> for the project, which outlines initial environmental impacts and is normally submitted with an application. Additionally, SDG&E has requested that the Commission allow a deferment of the publication of the planned route for the proposed power line, contrary to Rule 18(c)<sup>3</sup>. Instead of the

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<sup>1</sup> See, Article 22. Rules, Rule 87, (Rule 87) Construction and Amendment, California Public Utilities Commission Rules of Practice and Procedure, Title 20 California Code of Regulations, March 2005.

<sup>2</sup> See, Rule 17.1(d), Preparation and Submission of Environmental Impact Report, California Public Utilities Commission Rules of Practice and Procedure, Title 20 California Code of Regulations, March 2005. The rule at (d) reads in part: “The proponent of any project subject to this rule shall include with the application of such project an environment assessment which shall be referred to as the Proponent’s Environmental Assessment (PEA). The PEA shall be employed by the Commission to quickly focus on any impacts of the project which may be of concern, and may be used as an aid in preparing the Commission’s Initial Study to determine whether to prepare a Negative Declaration of an Environmental Impact Report.”

<sup>3</sup> See, Rule 18(c), California Public Utilities Commission Rules of Practice and Procedure, Title 20 California Code of Regulations, March 2005. The rule reads at (c): “A map of suitable scale showing the location or route of the proposed construction or extension, and its relation to other public utilities, corporations, persons, or entities with which the same is likely to complete.” Therefore, not only is a map required for inclusion in the application for the proposed Sunrise Powerlink project, but other maps of other

normal filing, SDG&E seeks in its application to elevate the “need” for the project ahead of any other considerations, requesting that the Commission approve this novel approach and begin its determination for the “need” without being fully informed by the otherwise required information and regardless of the resulting legal insufficiency and incompleteness of the application.<sup>4</sup> It is important to note that SDG&E does not assert, along with this request, that these filing requirements do not apply to this project application. Rather, the company asks the Commission’s blessing to submit an incomplete application under the Commission’s own rules of procedure and existing law for SDG&E’s own reasons.

RAASP submits this protest in opposition to this attempt by SDG&E to radically alter the application process because the Commission would be in violation of its own regulations and California law were it to initially grant the postponements requested in the application and at the same time eventually approve the sought-after CPNC. The deferral of the Commission’s requirements extends beyond the rules of procedure to the law itself.

For example, under Section 1003 of the Public Utilities Code, there are even more requirements regarding the submission of an application, including preliminary engineering, and design information on the project<sup>5</sup>. SDG&E cannot fully comply with this requirement because the company has not chosen the route of the power line and says so in the application. In fact, instead of acknowledging that the preliminary

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projects that are likely to complete with the Sunrise Powerlink must also be included; which, it appears from other Protests received, they are not.

<sup>4</sup> See, APPLICATION OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902-E) FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE SUNRISE POWERLINK, December 14, 2005, Application No. 05-12-014, p. 1, where SDG&E states: “In addition, so SDG&E can complete a robust public participation process to select the best route for the project, SDG&E requests, per Commission Rule 87, that the Commission commence its determination for the need of the project now, but permit SDG&E to defer filing the Proponent’s Environmental Assessment (“PEA”) for the project, as well as certain other route-specific requirements. SDG&E will complete the Commission’s CPNC requirements in a subsequent filing after the public process initiated by SDG&E has identified a route for the project.” (Emphasis added.) Therefore, SDG&E proposes that for this particular application the Commission change entirely the established method of submitting applications under the Commission’s accepted rules of procedure.

<sup>5</sup> See Section 1003, Public Utilities Code.

engineering requirement has not been fully complied with, SDG&E uses the lack of the route as the basis for its incomplete engineering.

Should the Commission acquiesce to SDG&E's requests, the Commission would hand over to the company virtual authority to eventually construct and operate a 500 kV electric transmission line traveling from western San Diego County to the Imperial Valley, without thorough evaluation of the effects of the line on communities throughout both counties including the gamut of environmental, health, and safety impacts which otherwise would be carefully considered under the requirements of Rules 17.1 and 18 (c). The Commission would also support the idea that routes are not necessary to applications and that the preliminary engineering requirement does not have to be complied with under Section 1003.

Furthermore, the Commission would countenance the violation of General Order No. 131-D which specifies that applications for a CPNC must provide eight categories of information, including details related to routes, alternative routes, route maps, route justifications, proposed equipment, substations, switch yards, facility costs, construction schedules and environmental documentation.<sup>6</sup> Moreover, the Commission would signal to all other applicants for all other projects in the future that the bar to the desired CNPC would be lowered for all time and that future applications would not need to contain what the Commission rules and the law require. This would result in a dramatic distortion of the present law as embodied in the Commission's rules.

If, on the other hand, some other deviant arrangement is arrived at by the Commission due to the insistence of SDG&E to be granted a certificate to separate environmental considerations and route requirements from the issuance of the CNPC, the Commission still risks muddying the proverbial waters and setting dangerous

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<sup>6</sup> See G.O. No. 131-D, Panning and construction of facilities for the generation of electricity and certain electric transmission facilities.

precedents for future applications in which “need” will substantially trump all other matters.<sup>7</sup>

Accordingly, RAASP requests that the Commission reject SDG&E’s application based on the incompleteness of the application and require the company to submit a full application that would conform to the Commission’s rules and the laws of California.

### III. PROTEST

#### A. SDG&E Has Shown No Evidence of Special Case or Good Cause for Deviating from Established Rules

It is important to note at the outset of this discussion that the dividing (or in the company’s parlance “staggered consideration”<sup>8</sup>) of issues that SDG&E requests in its application is a deviation from the rules without any demonstration that this application is a special case and with no evidence presented to support good cause. Rule 87 states: “These rules shall be liberally construed to secure just, speedy, and inexpensive determination of the issues presented. **In special cases and for good cause shown, the Commission may permit deviations from the rules.** Rules may be amended at any time by the Commission.” (Emphasis added)

In fact, the reason SDG&E wants to secure a permit before substantially doing anything else was made clear by counsel during the prehearing conference held in Ramona on January 31, 2006, during which Mr. Gregory Barnes stated in a discussion concerning the link between “need” and project engineering:

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<sup>7</sup> The issue of the appropriate weight “need” should be accorded in applications is obviously on the cutting edge, as demonstrated in the California ISO “CAISO Transmission Plan, Planning for the Future ‘Today’”, STEP Meeting, January 24, 2006, during which presenter Gary DeShazo addresses “That little thing called ‘Need’ – CAISO versus CPUC/CEQA”, p. 2.

<sup>8</sup> Reply of San Diego Gas & Electric Company (U 902-E) to Protests, January 30, 2006, p. 5.

**“In the company’s judgment, if you don’t have a need, it’s imprudent to invest the money beginning detailed engineering. It’s just a business judgment. It’s not an absolute bar.”<sup>9</sup> (Emphasis Added)**

Besides requiring a substantial departure from established rules of procedure, the company’s application in and of itself causes additional time and expense to the Commission, which has now become engaged in extraordinary labor to decipher what should be done with this request. The application raises a whole host of questions that would not be normally considered. For example, assuming the Commission granted the CPCN, it is unclear as to what SDG&E’s legal rights would be should the Commission make an affirmative decision on purpose and need but subsequently deny the project based on other considerations. Should the Commission’s decision on the overall project conflict with its decision on need, it is unclear how the Commission would conform its decisions. These uncertainties create a risk of contention extending well beyond the Commission’s final decision.

In fact, SDG&E’s application, rather than being supported by Rule 87 runs against the good sense of Rule 87 because the rule was obviously never intended to support requests of this nature that do not demonstrate any special case and have no good cause.

SDG&E has made many assertions regarding this end run around Rule 87. Let’s look at some of them:

- While SDG&E claims that the deferment and bifurcation will allow it to deliver the economic benefits of the project as soon as the line comes into

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<sup>9</sup> Public Utilities Commission, State of California, Transcript, Ramona, California, January 31, 2006 – 2:00 P.M., p. 45. SDG&E asserts that they could begin detailed design and engineering without delay with bifurcation; the company does not need to wait to begin this effort. All new transmission line applicants before it have begun such work immediately. SDG&E’s risk of performing work on a project that fails to be approved would be equally applicable to all other similar applications and does not justify the proposed deviations.

service, the economic benefits of any transmission line only come into being after the line is in service;

- On the point of hiring an environmental consultant, all similar applications must provide for this so there is no special reason SDG&E would need the deferment and the bifurcation to accomplish this task; and
- SDG&E asserts that it needs a final decision on “purpose and need” by October 2006 with a final decision on route related matters by spring of 2007, yet the company provides no reason why this schedule is critical to a degree that the application differs from other similar applications; and
- The proposed shortfall of electric power that the company alleges the San Diego region will face in 2010, the projected date of the proposed project completion, is a matter of conjecture and significant debate. This debate is all the more reason for the company to comply with the rules, not deviate from them.

None of the reasons given by SDG&E for the deviation from Rule 87 make the application a “special case” or provide “good cause” for the Commission to consider such a change in procedure. There is a greater risk that the proposed deviation will increase uncertainty and delay, infuriate the public, decrease the Commission’s credibility with the public, and work against the goals of the legislature to provide for a fair and open process that gives equal consideration to the technical, economic and environmental merits of a project as a whole. In order to avoid this result, the Commission must reject the application as submitted and require SDG&E to comply in any future application regarding this proposed project with the same requirements that previous transmission line applications have met.

#### **B. SDG&E’s Public Education Program Is Not A Substitute for Disclosing the Proposed Route**

The rationale put forth by SDG&E in their application to not disclose the line’s route is that they need the extra time to do what is normally done with regard to fulfilling Rule 18(c) because the company wants to “complete a robust participation

process to select the best route for the project”<sup>10</sup>; however, in truth, it is hard to believe that a major utility company doesn’t have its own ideas about where the route should go. While the company has written pages and pages about this process<sup>11</sup> that it wants to “complete”, for people on the ground the process has hardly started. In fact, the process has itself become an excuse to do less, not more, than is normally done in such applications for major infrastructure projects, namely to disclose the route of the line.

The Commission doesn’t have to take our word for this. Commissioners can talk to people all around the county, who somehow missed out on the 75,000 “open house” invitations sent to property owners. Indeed, none of the three interveners for RAASP, who lives in close proximity to a primary, existing 69 kV line, which is anticipated to become much larger under this project in at least one of the routes outlined by SDG&E, ever received an invitation.<sup>12</sup> Additionally, RAASP homeowners/members who live near this line were generally not informed of the project; when one homeowner reported being informed in an SDG&E billing, the information was so general as to be practically useless.<sup>13</sup>

These omissions would be laughable if they were not so serious. SDG&E has not complied with legally mandated notice requirements, despite their massive public relations campaign. This lack of information sharing is a serious breach of the company’s responsibilities in law, but it is even more egregious when contrasted with the claims of the company that they must get the CPNC considered now and complete

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<sup>10</sup> See, Application, p.1.

<sup>11</sup> See, for example, Sunrise Powerlink, Chapter I, Executive Summary, James P. Avery, pp. 1-2 – 1-5.

<sup>12</sup> See, for example, Attachment A, Declaration of Connie Bull.

<sup>13</sup> See, Attachment B, a copy of information received by a Ramona family that was included in an SDG&E billing. An informal poll of 19 homeowners was conducted by RAASP on 2/12/06 along portions of Rutherford Road in San Diego Country Estates and Rancho San Vicente community, both in Ramona, CA. Homeowners were asked the question: Did you ever receive any notification from SDG&E/Sempra directly to your home address, with your name on it as well, re their SDG&E/SEMPRA proposed Sunrise Powerlink route plan? Results: 18 residents reported receiving no information; 1 resident reported receiving Attachment B in their regular electricity bill. These results indicate that even if notices were sent out in all billings for this neighborhood, they were of such a nature as to go unnoticed by residents.



the route later because of an outreach program the company initiated and which is not working.

The outreach effort is, obviously, the company's idea. It should not legally substitute for established procedures of the Commission. Furthermore, the Commission should not, without proof, blindly accept the company's word that they are being successful in their aggressive approach with the public concerning this routing problem. And, finally, their success is not the issue. The issue is whether they are complying with the Commission's rules.

Among ordinary people the touted "robust" effort to sweep county-wide stakeholders into this route-defining process has become a cynical excuse for manipulation by the utility company, which seems hell bent on perverting all means to gain their desirable end. In fact, asking people to choose a route, if indeed they are asked, is in itself a clever means to divide communities, not unite them.

Surrounded by dozens of consultants, Ramona residents at the December 6, 2005 "Open House" meeting were required to go from exhibit to exhibit, akin to a bazaar, where they could get maps, look at sizes of towers, be given hand outs, and the like. At a previous meeting in November, a more exclusive "Community Working Group" some 20 persons got the business, according to a report in the Ramona Sentinel:

"Maps showing the proposed corridors were placed about the room and those in attendance were asked to study and suggest alternatives to the proposed route. Engineers and consultants were stationed at each map station to answer any questions and strongly suggested viewers to writ their concerns on a provided suggestion paper."<sup>14</sup>

Not content with limiting these, in practice, meaningless gatherings to route selection, SDG&E officials and hired consultants are requiring bewildered citizens

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<sup>14</sup> "Creelman power station eyed as possible link in SDG&E Powerlink," by Chuck Preble, Ramona Sentinel, November 24, 2005, p. A4. It must be noted that these smaller groups were even less likely, based on the experience in Ramona, to include persons in the community who may be affected directly by the proposed power line. See, on this point, Attachment A.

“to provide input and rank the various environmental constraints that will be used as part of the route selection criteria. Ranking environmental constraints is just one example of how Community Working Groups participants actually shape the decision-making process for the route.”<sup>15</sup> Obviously, this process does not substitute for the PEA, which SDG&E seems incapable of producing due to the fact that the company is equally incapable of selecting a route for its \$1.4 billion project.

**C. There Is No Rational Basis for a Need Determination To Be Made Without Taking Into Consideration Potential and Actual Impacts and Effects of the Proposed Project**

While SDG&E is touting reliability, renewable energy and reducing energy costs as “the best and most comprehensive solution” to meet their “vital objectives”<sup>16</sup>, and is asserting that these are the primary reasons for deviation from the norm,<sup>17</sup> the company is willing to ignore real life circumstances on the ground that should be weighed at the same time and equally with their request for a certificate. While, normally, an initial environmental review cannot be expected to be complete in terms of what is actually required and anticipated by a thorough review under the California Environmental Quality Act (“CEQA”), it is possible even at the outset to discover some important initial findings unique to San Diego County in a PEA.

Besides its national reputation as the one of the most, if not the most, bio-diverse county in the country, San Diego is known for another fact: the 2003 Cedar Fire, which was the largest area wildfire in the history of California. This fire killed 15 and destroyed more than 2,200 home; this disaster is not over in San Diego County. To this day the more than 280,000 acres scorched in the fire are still attempting to recover from the devastation caused by the conflagration. Whole mountain range forests were destroyed overnight; massive damage was inflicted on native plants and

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<sup>15</sup> Sunrise Powerlink, Chapter I, Executive Summary, James P. Avery, p. 1-3.

<sup>16</sup> Sunrise Powerlink, Chapter I, Executive Summary, James P. Avery, p. 1-1.

<sup>17</sup> It is important to note that all new transmission line applications in California are likely to address these same needs. There is nothing about the situation addressed by this application that makes it atypical. The standard procedural rules of the Commission are designed to address just this type of situation.

chaparral; according to some estimates 80% of all wildlife in the fire's path died, either as a direct result of the fire or in its aftermath. Any Environmental Impact Report ("EIR") will have to take into account, under the law, the massive changes wrought by this disaster; an initial PEA would spot these problems immediately.

The fact that San Diego has been in a long-term drought for at least seven years contributes to the fear of another fire. While rainfall in 2004-2005 winter season exceeded normal levels by a factor of 2, this year San Diego's backcountry has received very little rain. As of the writing of this protest, another Santa Ana is in progress; Ramona, known for its history of fires, and through which every route alternative SDG&E has publicized travels, has received a bare three inches of rain this winter. In fact, Santa Ana winds now regularly blow from year-to-year not only in October, but in November, December, January and February – drying out the county even further and materially increasing the risk of fire. Earlier this month San Diego experienced "red flag" alerts over whole weekends due to the extremely dry conditions.

A PEA could and should discuss the added risks of fire by a huge transmission line that would traverse the county, in part and ironically, in the very path of the Cedar Fire. Particularly in some areas where 69 kV lines already exist in established easement corridors and as a result could easily become the site for either 500 kV or 230 kV towers, the combination of homes (and people), high mountains, deep valleys and canyons, and ever-drier conditions is cause for substantial alarm.

More dry weather is predicted in the long-term future of San Diego and Southern California. El Nino and La Nina effects now dominate the weather pattern and heritage oaks and other long-established forests in the county are suffering from drought or drought-induced bark beetle infestations. San Diego County cannot risk another major fire without unimagined catastrophic consequences to large swaths of the backcountry already challenged by events in 2003.

While the percentage is small (10% of major recent wildfires were ignited by power transmission lines), the effects of even a small percentage can be enormous. It may very well be that big transmission lines and San Diego County, in the present and foreseeable circumstances, do not mix. Putting aside for the moment all the arguments presented by SDG&E for its purpose and need, the line may not be the right solution for this environment and this challenge may prove to be much greater in significance than all the present day discussions about how electricity will be produced and used.<sup>18</sup>

Of course, fire is not the only issue an environmental assessment would discover. However, the timeliness of the discovery is key to the use of the information gathered. The entire process of environmental review is skewed in the SDG&E approach, beginning with the idea that since CEQA process will be started before the Commission either grants or denies a CPCN<sup>19</sup>, everything is okay. It is as if SDG&E wants us to believe that because something is technically fulfilled, it is substantially correct. However, this ploy to pretend that a full fledged CEQA review will be the same whether the CPCN is granted or not is illogical to the extent that the “no project” alternative could not be meaningfully contemplated if the certificate is in the hands of the company.<sup>20</sup>

While it is plausible to argue that the Commission will perform its independent CEQA analysis “*before* it issues its *final* decision whether to approve the Sunrise Powerlink project” (Emphasis in the original),<sup>21</sup> the fact remains that SDG&E is asking for the need determination before an EIR is completed. The company says it can do this because Rule 17.1, which identifies the co-equal importance of environmental, economic, social and technological issues, “does not preclude staggered considerations of issues”.<sup>22</sup>

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<sup>18</sup> For a more detailed discussion of the fire issue, see Attachments C and D.

<sup>19</sup> Reply of San Diego Gas & Electric Company (U 902-E) to Protests, January 30, 2006, p. 5.

<sup>20</sup> Bio-diversity lives in our backyards. See Attachment E. RAASP supports the filings of the Center for Biological Diversity and the Sierra Club in regard to Sunrise Powerlink.

<sup>21</sup> Ibid.

<sup>22</sup> Ibid.

This is a little like saying that if two runners are running competitively on the same racetrack, it doesn't matter if you allow one to start ahead of the other. But, of course, it does matter, because even though the handicapped runner may eventually finish the course, he won't win because while he was held back the first runner crossed the finish line.

That is not the intent of CEQA and there is good reason. Environmental conditions are crucial to understanding whether or not a project is a good idea. Deciding "need" exclusive of thorough environmental review advantages the company in its race for this project. It is also allowing a decision to buy to be made without taking into account the costs. SDG&E would only request the issue of "need" to be determined early on because the company knows that the costs, human and environmental, are likely to be very high. If an overriding "need" determination is decided, since the route is already strongly constrained, there will be effectively no more decisions to be made.<sup>23</sup>

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<sup>23</sup> See, SDG&E Transmission Comparison Study, April 27, 2005, STEP Meeting. In this presentation none of the original eighteen alternatives studied by SDGE were identified as infeasible, only less electrically desirable without some upgrades and/or less cost-effective based purely on power transmission criteria. No non-or quasi-technical criteria, such impact on state park or wilderness area, property value impact caused by running the line through populated areas, potential to cause wildfires or impede firefighting in remote backcountry areas were ever considered before deleting these feasible alternatives. A number of justifications given for discarding alternatives are essentially "wish list" items, hearsay considerations, or wrong (examples: not consistent with goal of building 500 kV loop, not consistent with CFE plans, can't build second 500 kV line in same right-of-way with existing 500 kV line, causes more congestion at Miguel (ML) substation).

See, also, comments of San Diego County Supervisor Dianne Jacob at the prehearing conference: "...With regard to the need of SDG&E's proposed transmission line, the case the utility is making for its proposal is still very, very weak and has become the subject of much debate. SDG&E says the region will need 5,900 megawatt of power by 2015. It projects that the region will fall about 600 megawatts short of that goal. Now credible experts – including the owners of two locally-based plants – disagree. Numerous experts insist that current forecasts have the region meeting or exceeding the 5,900 megawatt goal. Even if the gap were real, SDG&E's eagerness to invest in out-of-county generation is especially troubling to me. In 2002, a cross-section of leaders in this region formed a committee to create a blueprint for the county's energy needs through the year 2030. I sat on this committee along with Michael Shames and many others, policy makers, energy experts and SDG&E. The Regional Energy Policy Advisory Committee as it was called spent two long years drafting the Regional Energy Strategy and I learned more about energy than I ever thought I would want to know. The document, though, is important. A lot of good work went into this. And the document places an overwhelming emphasis on decreasing the region's dependence on

#### IV. CONCLUSION

Confusion caused by SDG&E's application has already stirred considerable anxiety among members of the public, as evinced in the January 31, 2006 prehearing conference in Ramona, which was attended by hundreds of people and during which ALJ Kim Malcolm and CPUC Commissioner Dian Grueneich had to use microphones to be heard. Hundreds more persons who could not fit into the Ramona Senior Center were unable to follow the proceedings.

This interest demonstrates the fact that people are particularly worried about the extraordinary requests of SDG&E and how the Commission will respond to these extraordinary requests. While SDG&E is conducting a public involvement campaign, it has not complied with the Commission's notice requirements, specifically with regard to information about the Commission's process and how citizens can participate in this process. Similarly, it is incumbent on the Commission to help people they represent to understand the process and, most importantly, the procedural issues involved. The Commission must be as clear as possible about procedure regarding this proposed application or else the public will be uninformed and left to ponder, unaided, SDG&E's own interpretation of the law.

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imported energy. In fact, the Strategy's number two goal—and there were nine goals altogether -- reads as follows and I quote: [reading:] Achieve and maintain capacity to generate 65 percent of summer peak demand with in-county generation by 2010 and 75 percent by 2020. We are far from this goal. Now the question is: Why is SDG&E backing away from a strategy it played a major role in developing? Why does the utility now believe that a costly transmission line through pristine lands is preferable to supporting in-basin generation that is in keeping with our Regional Energy Strategy? That is the \$1.4 billion question, which brings us to a couple of other theories. Many point to Sempra Energy's 600 megawatt plant in Mexicali and see the proposed line as a veiled attempt to profit from cheap Baja power by selling it to customers north of SDG&E's service territory. SDG&E says the new line will support renewable power from Imperial County. With the exception of one solar project, SDG&E has not been forthcoming about its efforts to procure renewable sources from that area. Further, experts say a 500 k-V line far exceeds the capacity appropriate for renewable transmission and is designed for energy produced from fossil fuels. Transcript at pp. 48 – 50.

RAASP members, many of whom live in direct proximity to 69kV lines that appear on SDG&E route maps for Sunrise Powerlink<sup>24</sup>, received no notification of the company's plans to potentially route a 500kV or 230kV through their communities. Notification that was included in some SDG&E billings was so vague as to be useless. Nevertheless, the company claims to have made substantial notification efforts, which contradicts the experience of RAASP members.

Perhaps the reason SDG&E is so anxious to control the public participation in this proposed project is that the company is unwilling to tell the public how very different this application is from other applications in the past. However, SDG&E is not shy about describing its different approach in this application with regard to the public portion:

“For the Sunrise Powerlink, SDG&E has departed from the traditional practice used to site major transmission projects, whereby public comment from local communities and regional stakeholders is gathered after the applicant has selected the preferred and alternate route, and has completed preliminary engineering and environmental studies. Beginning in 2004, SDG&E initiated an aggressive community outreach and public involvement program to consult elected officials, community leaders and the general public before selecting a final route and alternate route for Sunrise Powerlink<sup>25</sup>

To understand what is really at stake in this application this official statement should be compared to the words of SDG&E's counsel when he spoke to the Commission in Ramona:

“Now what we have asked in this case is simply that you allow us to defer certain filing requirements until we finish the route selection process. We think – I know of no case where a utility has actually asked the Commission to do that.”<sup>26</sup>

Some people may actually be flattered that they are asked by SDG&E to engage in a process of route selection, regardless of whether that is actually true. Rather than

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<sup>24</sup> There are at least two lines potentially involved in the proposed project that are located in both Southwest and Southeast Ramona, where RAASP members live.

<sup>25</sup> Application, p. 6

<sup>26</sup> Transcript, p. 10

facing the wrath of persons and communities across San Diego County, from Anza Borrego State Park to Rancho Penasquitos, SDG&E works pro-actively to involve the base. The problem, however, remains: it is a clever strategy that essentially doesn't work.

While the company meets with small groups, thousands of citizens are rallying against the project and the process; community-by-community people are linking up together through grass roots organizing. In fact, SDG&E's community involvement campaign has succeeded in engaging concerned citizens to actively participate and take, as the members of RAASP have begun to do, matters into their own hands.

The Commission should realize that people who are busy in their own lives are waking up to what SDG&E is all about.<sup>27</sup> Precious political capital is being used up by the company; this error should not be repeated by the Commission. The public perception of the Commission still remains clouded by the 2000-01 California energy crisis, which Californians are still paying for to this day.

The public requires a higher standard of behavior than ever before on the part of the Commission; particularly in light of the public perception that SDG&E's parent company Sempra was partially responsible for the crisis. The pending suits brought by the California State Attorney General<sup>28</sup> and the recently announced settlement of the class action suit against Sempra<sup>29</sup> add to the general unease about new energy plans by SDG&E. People are aware that Sempra also settled with the Federal Energy

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<sup>27</sup> See, for example, Attachment F regarding health and property values.

<sup>28</sup> See, "State attorney general to sue Sempra over 2001-01 power crisis", by Elliot Spagat, Associated Press, *San Diego Union Tribune*, November 15, 2005; See, "Attorney general accuses Sempra of widespread market manipulation", by Steve Lawrence, Associated Press, *San Diego Union Tribune*, November 16, 2005. Also, see, "Senators charge Sempra manipulated energy market, lied about it", by Tom Chorneau, Associated Press, *San Diego Union Tribune*, February 16, 2005.

<sup>29</sup> See, "Sempra to Settle State Suits, The case had alleged wrongdoing by the firm during the energy crisis," by Elizabeth Douglass, *Los Angeles Times*, January 5, 2006. In the settlement, Sempra agreed to pay \$377 million in cash, provide electricity and gas price discounts to California customers and make business practice changes. The original suit was estimated to be worth some \$23 billion. A year ago, the attorney general settled for \$749.7 million a suit with Mirant Corporation to resolve allegations price gouging and other unlawful conduct by Mirant during the California energy crisis. See, Attorney general Lockyer Announces \$749.7 Million Settlement with Mirant in Energy Price Gouging Case, January 14, 2005. Litigation and other fallout from the energy crises continue to the present time.



Regulatory Commission (FERC) and has agreed to pay \$7.2 million based on earnings from “paper trading”.<sup>30</sup> The CPUC itself is investigating Sempra over manipulation of gas supplies during the energy crisis.<sup>31</sup>

Adding to the sense of mistrust of a vital industry in the wake of the energy crisis is the ongoing trial of Enron executives Ken Lay and Jeffrey Skillings, which focuses extraordinary public attention on the widespread corruption of energy traders, generators and providers.<sup>32</sup> These generally held perceptions form the context of both the application and the Commission’s actions regarding the application.

There are also internal inconsistencies regarding the process. For example, RAASP is pleased to note that evidentiary hearings are planned on this application, as announced by ALJ Kim Malcolm at the Ramona prehearing conference. During her introduction to the meeting, Judge Malcolm stated, on page 3 of the transcript, that “The commission will also be conducting evidentiary hearings on issues relating to system reliability, cost/benefit, economics, the need for the project. (Emphasis added)

However, it is unclear how evidentiary hearings on the issue of need for the project can be held by the Commission in the future when the Commission is being asked to decide the issue of need now. If the Commission makes a decision regarding need without hearing from the public in evidentiary hearings on an incomplete and legally insufficient application, the Commission must realize that this action would signal a disregard for public participation.

This would be especially true in this case where the Commission is presented with an incomplete application and asked to do something abnormal. Approving bifurcation now would mean abandoning established precedent, adopting an entirely

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<sup>30</sup> See, Sempra to pay \$7.2 million to settle charges, San Diego Regional Energy Office, November 2003.

<sup>31</sup> See, “Sempra unite rigged gas prices, PUC says”, by Craig D. Rose, *San Diego Union Tribune*, November 17, 2004.

<sup>32</sup> California also reached its own settlement with the Enron Corporation. Parties to the settlement included the CPUC, as well as SDG&E. See, Attorney General Lockyer Announces Energy Crisis Settlement with Enron Valued at \$1.52 billion, Bankrupt Firm May Pay Less in Real Dollars to Resolving Gaming, Gouging Claims, Press Release, Office of the Attorney General, July 15, 2005.

new procedure, and ignoring the thousands of San Diego County citizens who are not convinced that the transmission line is needed. The Commission would be essentially telling citizens that they do not matter, that the utility company matters, and this would not bode well for the Commission or the utility company.

In light of the foregoing, RAASP urges the Commission to reject the SDG&E application for the proposed Sunrise Powerlink project.

Dated: February 16, 2006

Respectfully submitted,  
RAASP (Ramona Alliance Against  
Sunrise Powerlink)

By: \_\_\_\_\_

Diane Conklin

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## ATTACHMENT A

### DECLARATION

On, or about, October 1, 2005, my husband, Richard, asked me what I knew of the SDGE/SEMPRA SUNRISE POWERLINK as he had just read something about it. Of course I knew nothing but made one phone call to someone I thought would know. That person actually had an invitation to attend a SUNRISE POWERLINK “Community Working Group” Phase I meeting for October 5, 2005. He asked if I would like to go in his place as he was unable to attend. I said yes and I attended because we do have a power line running directly behind our property, we had not received any such notice for the proposed transmission line.

October 5, 2005, I attended SDCE/SEMPRA Phase I meeting, Ramona Elementary School from 5:30 p.m. - 8:30 p.m. with about 20 of us in attendance. Additionally, I noticed that none of those in attendance, as per invitation, lived directly along the proposed transmission routes and the scheduling of these workshop/open houses during one of our most traditional American Holidays was of great concern as well. Furthermore, since then, in checking with my neighbors who all live along this proposed Powerlink line, only one in thirteen (thus far) received any information.

The meeting of October 5, 2005, was filled with various speakers from SDGE/SEMPRA, who briefed us with the proposal but would not answer as to where the actual line would be placed or other specifics. The meeting was disappointing and the information given was too vague to be of use. I went for answers from SDG&E but did not get them.

Instead, we were told, that announcements would not happen until after Phase III workshop in January; the SDG&E officials were not receptive to discussion of “other alternatives”. The information sheets and maps were devoid of specific information and curiously, the maps themselves were devoid of markings that would clarify the three proposed routes to specifics. Eventually, we were divided into work groups and put through a “hypothetical” exercise to determine how to run a transmission line from point A to point B while considering all obstacles e.g., parklands, housing communities, farmlands, etc. We re-grouped, evaluated and went home.

I received notice of Phase II meeting; however, because of the schedule running through the Holidays, I was unable to attend.

When I did not receive notice of the Phase III meeting for January, I called to inquire and was told that Phase III would not be until February or March. It was confusing as I did not realize that just before Christmas SDGE/SEMPRA filed their application in contradiction of original public information the company provided.

As a Licensed Active Realtor in the State of California, since 1980, I take Full Disclosure Laws very seriously.

As a former elected official, it is common knowledge that to divide is to conquer. I find the lack of proper notice/disclosure to the directly affected homeowners and the exclusive nature of the mailed invitations to the "Working Groups" highly offensive and suspect. There truly is something wrong with this process.

It was not until the December 6, 2005 Community Open House in Ramona that it became quite clear, with the newly provided maps, as to just where the proposed Ramona route would run.

Materials in connection with this Declaration:

- 1) Agenda for October 5, 2005 Community Working Group
- 2) Fact sheet in Phase I packet
- 3-6) SDGE/SEMPRA\_News Release dated August 31, 2005
- 7) General Project Areas
- 8-9) 2 paged map of non-specific suggested proposed routes
- 10) Process and Schedule
- 11) Routing Methodology
- 12) Open House schedule for October
- 13) Environmental Routing Criteria
- 14) Opportunities and Constraints
- 15) Map of challenge in "hypothetical" exercise


I certify the following to be true on this 14<sup>th</sup> day, February, 2006:

Submitted by:

Connie Bull  
24572 Rutherford Road  
Ramona, Cal. 92065

Former SDCWA (San Diego County Water Authority) Board of Director  
Former RMWD (Ramona Municipal Water District) Board of Director  
Former SDCEA (San Diego Country Estates Homeowners Association) Board of Directors  
Currently a Licensed Realtor

## ATTACHMENT B



A Semptra Energy utility™


JANUARY 2006  
ENERGY NOTES

*Serving you today.  
Planning for tomorrow.™*

### 2006 OUTLOOK: **SECURING A RELIABLE ENERGY FUTURE**

Looking forward to 2006, the prospects for the region's energy future are improving, with SDG&E\* recently reaching several milestones in its energy resource plan.

"In 2005, we made substantial progress in helping customers improve their energy efficiency, increasing use of renewable energy, and developing the infrastructure necessary to meet our customers' growing energy needs," says Ed Guiles, SDG&E chairman and chief executive officer. "In 2006, we plan to continue these efforts to meet the region's growing need for energy."



Ed Guiles, chairman and chief executive officer of SDG&E, reviews 2005 company performance and major 2006 initiatives.

For example, in 2006 SDG&E is expanding energy-efficiency programs to help customers save energy and money while limiting the need for additional power plants. The goals for 2006 are to help customers use energy more efficiently, thereby saving 280 million kilowatt-hours of electricity, or enough energy for 560,000 homes for a month.\*

To meet a goal of supplying 20% of customers' energy needs from renewable sources by 2010, SDG&E has signed several important contracts. Among the most recent is a 20-year agreement to buy 300 megawatts of solar power from a new facility to be constructed in Imperial County, with options on future phases that could bring the total to 900 megawatts.

To respond to the need for energy in the region, a new, large power plant is coming online in 2006. This state-of-the-art, 550-megawatt plant in Escondido will produce enough electricity for 550,000 homes when it begins operation.

In addition, to help relieve congestion on electric transmission lines and meet peak power needs, SDG&E has begun the process to build a 120-mile electric transmission

\* Based on a residential customer's use of 500 kilowatt-hours per month. (Continued inside - see "2006 Outlook...")

Nationwide, natural gas prices are higher this winter than last winter. Saving energy is the key to keeping heating costs in check, so try these five simple tips to start:

1. Lower the furnace thermostat by 3 degrees to 5 degrees, which can save up to 20% on heating costs.
2. Turn the thermostat all the way down or off at bedtime and before leaving the house.
3. Check furnace filters monthly, and clean or replace them as recommended by the manufacturer.
4. Keep the furnace and vents free of dust, lint and obstructions such as furniture.
5. Close drapes and blinds at night to keep heat indoors, and open them during the day for warmth from the sun.

Helping you manage energy costs is part of SDG&E's commitment to providing exceptional customer service. For more energy-saving tips, visit [www.sdge.com](http://www.sdge.com).



*(continued from cover)*

link to the east connecting its transmission network in central San Diego to its transmission facilities in Imperial County. This new line would expand access to electricity produced using the sun, wind and other renewable sources. The company is also working on expanding electric transmission within the region with a new 52-mile transmission line, which will enable SDG&E to serve the growing electric needs in the cities of San Diego, National City and Chula Vista.


For more information about SDG&E's resource plan and commitment to providing safe, reliable energy, visit [www.sdge.com](http://www.sdge.com).

## Carbon monoxide ALERT

Improperly installed, poorly maintained or misused natural gas appliances such as furnaces can produce carbon monoxide. You can't see, taste or smell it, but carbon monoxide can cause illness or even death. Warning signs include:

- A yellow, large, unsteady burner flame (except in decorative gas logs).
- An unusual pungent odor when the appliance is running.
- Unexplained nausea, drowsiness and flu-like symptoms in household members.

If you suspect carbon monoxide poisoning, shut off the appliance in question, get everyone outdoors for fresh air and seek emergency medical attention if needed. Don't use the suspected appliance until it has been inspected and deemed safe by a licensed heating contractor or SDG&E.



A blue burner flame is normal, while a yellow, large, unsteady flame is a warning sign of carbon monoxide.

## ATTACHMENT C

# The Sunrise Powerlink Fire Hazard

*Joseph W. Mitchell, Ph. D.*  
*M-bar Technologies and Consulting*  
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*Feb. 13, 2006*

The Sunrise Powerlink, regardless of the final path proposed for it, would traverse many miles of extremely flammable vegetation between its eastern and western terminals. That power lines present a significant fire hazard is acknowledged by both fire agencies and utilities. This has prompted CDF, the US Forest Service, SDG&E, and PG&E to collaborate on the “Power Line Fire Prevention Field Guide”[12]. This reference guide makes the following observation:

*“The potential exists that power line caused fires will become conflagrations during the long, hot and dry fire season commonly experienced in California. The very same weather conditions that contribute to power line faults also lead and contribute to the rapid spread of wildfire. The most critical of these weather factors is high wind, which is commonly accompanied by high temperatures and low humidity.*

*High, gusty winds may cause vegetation to sway into power lines, break off limbs or fall into power lines. High winds may also create vibrations in power lines that can lead to stress failures or cause loose connections to separate. Arcing usually accompanies such faults. Automatic reclosers re-energizing the line into the fault may cause repeated arcing and increase the probability of igniting vegetation.”*

Many of the communities potentially along the path of the Sunrise Powerlink are fire-weary, having suffered massive losses during the Cedar fire of October 2003 and the Pines fire of 2002. By the time the Powerlink, if constructed, becomes operational, the wildland fuel load in these communities will have returned to the level capable of supporting a major conflagration. Having another potential fire source in the backcountry would be perceived as an affront to communities that had recently suffered the loss of over 2,200 homes and 15 lives.

How significant is the risk? CDF statistics from 1998 indicate that 155 fires in their jurisdiction were ignited by power lines, representing a fraction of 3% of the total [7]. However, if we look at only major fires (leading to the greatest structure losses or acreage burned), the fraction caused by power lines seems to be higher – approximately 10% or more. Examining the 20 historically largest fires in terms of area gives three started by power lines: Laguna (San Diego, 1970), Campbell Complex (Tehama, 1990), and Clappitt (Los Angeles, 1970) [1]. In terms of structure loss, there were also three fires

started by power lines: Laguna (San Diego, 1970), City of Berkeley (1923), and Sycamore (Santa Barbara, 1977)[2]. If we examine the top five fires for acreage and structure loss in the years spanning 1999 and 2004 [3,4,5] we find a similar pattern emerge: 5 of the 60 top slots were power line fires (the Geysers, Pines, and Poe fires). The Pines fire was near Julian, not far from the proposed routes, and was the largest fire in terms of structure and acreage loss in California during 2002.

The probability of seeing 10% of large fires caused by power lines while only 3% of smaller fires were caused by power lines could be a statistical fluctuation, but this is somewhat improbable. Two possible causal connections can also be suggested here: 1) Power lines are more likely to be near human habitation than other ignition sources, thus making structure loss more likely. This would not explain the enhancement of large acreage fires, though. 2) As noted in the CDF/USFS/SDG&E/PG&E guide [12], power lines are more likely to be a source of combustion during high wind conditions. These are the very conditions under which catastrophic wildfires take place [20].

### **Power lines and Firefighters**

The presence of power lines complicates wildland firefighting. The power lines themselves are hazardous to firefighters. NIOSH reports 10 firefighter deaths due to power lines between 1980 and 1999[6]. Hazards from power lines include ground gradient, energizing of conducting equipment, contact with line, solid stream water contact, and flashover through charged smoke. Reports of line-to-ground flashover in heavy smoke were made during the Eagle Eye fire in Arizona [9].

Firefighters are trained in these hazards, and therefore will tend to avoid activities near potentially live power lines. This creates an “indefensible space” near the line where it is less likely that firefighting will be conducted.

Sometimes, firefighting resources need to be diverted from other tasks to protect a critical power line. Examples of fires where this occurred are:

Pack Rat Complex (AZ) 9/2002 [8]

Yellow Jacket Fire (AZ) 7/2004 [11]

Cave Creek Complex (AZ) 7/2005 [10]

### **Power lines and Ramona Airspace**

Power lines are responsible for 6% of all helicopter accidents reported to the National Transportation Safety Board [13]. A Drug Enforcement Agency helicopter started the 2002 Pines fire when it struck a power line near Julian. As the pole heights are raised, the potential for interaction with low-flying aircraft will be significantly increased. This is true for all power lines everywhere, but this is a particular hazard in the Ramona area – which happens to be the only area where all the potential Powerlink routes converge.

Ramona generates several sources of low-altitude air traffic:

1. ***The CDF air attack base.*** CDF fire suppression aircraft need to make low altitude runs in order to drop their retardant payload. Increasing their altitude makes their attack less effective.



2. **Experimental aircraft.** Ramona is something of a Mecca for experimental aircraft enthusiasts [14,16,17] and hosts its own company headquarters for an experimental aircraft company [15].
3. **Helicopter training school.** The Silver State Flight School, headquartered at Gillespie Field, often makes runs near the Ramona Airport, and over other Ramona areas, including near the proposed power line routes [19]. These inexperienced pilots can often be seen flying at low altitudes.
4. **Marine Attack Helicopters.** The Sycamore Canyon substation is adjacent to the Marines' Miramar Air Station. While operation over backcountry areas are proscribed for low altitude flight, Marine attack helicopters have been seen by residents making low altitude attack runs over the areas east and north of the substation.
5. **Ultra-light Aircraft.** The one existing ultra-light base near Barona was destroyed by the Cedar fire and has not reopened [18]. However, the operators are currently searching for another location in the area.

This unusual combination of low altitude flight sources would tend to pose a greater hazard for power line collision than would normally be expected.

#### **Power Line Fire Mitigation Problems**

It is possible to mitigate for the above risks, but the measures taken for fire risk mitigation only exacerbate other issues associated with the power line.

One method to reduce fire hazard along the line route is the removal of all fuel. This creates a wide swath of disturbed land, and significantly increases the ecological footprint of the project. This swath then becomes an attractive ingress for off-road vehicles, and a route by which non-indigenous and invasive species can be introduced.

Making the line more visible can reduce the risk to aircraft. The installation of lights on the towers or ornamentation along the line might reduce the risk to low-flying aircraft, but it greatly increases the visual impact of the project, thus further damaging view-sheds and reducing property values.

*Joseph W. Mitchell is a physicist with a 15-year research career in elementary particle physics, and has worked at laboratories in Los Alamos, Hamburg, and Geneva. He has also worked in software for major electronics and software companies in Brussels and San Diego. He started M-bar Technologies and Consulting to raise consciousness about the risk of wind-driven firebrand ignition during wildland fires and to popularize his public domain WEEDS home protection system.*

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## ATTACHMENT D

# Power Transmission Lines and Wildland Fire Suppression Operations

By Rick Tallman

Overhead power transmission lines are an impediment to fire suppression and wildland urban interface structure protection operations. They also pose a potential impediment to evacuation of residents who are attempting to flee to fire area.

That power transmission lines pose a safety hazard to firefighters is well documented in fire service training materials and accident review literature.

The National Wildfire Coordinating Group Fire Line Handbook contains the following warning for firefighters:

### *Power Line Hazards*

*If possible, the power company should deactivate lines in the fire area that may endanger firefighters. All personnel should be cautioned against directing water streams or aerial retardant into high-tension lines. They should also be made aware that the smoke may become charged and conduct the electrical current.*

*Deactivated transmission and distribution lines may continue to pose a hazard due to conduction.*

*Identify, map, and discuss at briefings all electrical lines on the incident. When around power lines:*

- *If a power line falls on your vehicle, **DON'T** leave vehicle until the power company arrives. If the vehicle is on fire or fire is near, jump clear, **DON'T** hang on, keep feet together and bunny hop away.*
- *Minimize operation of heavy equipment under power lines.*
- ***DON'T** drive under power lines with long antennas.*
- ***DON'T** fuel vehicles under power lines.*
- ***DON'T** stand near power lines during air tanker or helicopter drops.*
- ***DON'T** go near or move downed power lines.*
- ***DON'T** direct fire retardant or water on power lines.*
- ***DON'T** stand or work in dense smoke near power lines.*

The National Institute for Occupational Safety and Health warns firefighters of the following:

*Fire fighters performing fireground operations near downed power lines may be exposed to electric shock hazards through the following means [NWCG 1998; IFSTA 1998b]:*

- *Electrical currents that flow through the ground and extend several feet (ground gradient)*
- *Contact with downed power lines that are still energized.*
- *Overhead power lines that fall onto and energize conductive equipment and materials located on the fireground*
- *Smoke that becomes charged and conducts electrical current*
- *Solid-stream water applications on or around energized, downed power lines or equipment*



A picture is worth a thousand words. The photo above is from a Southern California Edison presentation on the 2003 fire season. The photo clearly shows heavy smoke conditions along a 500kV transmission line. Given the above information, if you were firefighter, would you conduct fire

suppression or structure protection operations near or beneath these lines in heavy smoke conditions? How would you feel about it if these fire conditions and this power line were adjacent to your property?

### Fire Fighting Near Power Lines

It is common for energized electrical wires to start fires when they fall into dry grass. If the fire has spread away from the downed lines a distance equal to one span between poles or towers, the fire can be fought like any other wildland fire. If the fire has not yet burned that far from the downed wire the attack should be delayed until it has. Because solid fire streams are conductive, firefighters should only use fog streams in the vicinity of downed power lines. Work from the uphill side and avoid water run off.

How close can firefighters safely work to down power lines during wildland fires?

The following is a quote from the International Fire Service Training Association (IFSTA) training manual titled *"Wildland Firefighting for Structural Firefighters": page 335, 4th ed.*

The span between power poses can be several hundred feet apart, thereby limiting access by the same distance.

It is common for power lines to drop to the ground during wildfires. Many of these lines cross and/or are adjacent to roadways. Downed power lines can impede firefighter access to the fire and resident evacuation from the fire.



The picture above is of the Cedar Fire in the Lake Cuyamaca area. Note the distance between power poles, the approaching fire, threatened structures, and fire apparatus.

In many cases firefighters have no idea whether or not power lines in the fire area are energized. In heavy smoke conditions it can be difficult to see power lines.

Given that firefighter fatalities from downed power lines are well documented, and that fire service training materials warn of power line hazards during wildfires, the recent

contention by an SDG&E representative that power lines are not a problem during wildfires, “*because we always shut them down during fires*” seems ludicrous.

*Rick Tallman is a Fire Apparatus Engineer and Paramedic with 22 years of experience in the fire service.*

## ATTACHMENT E

Kim Miller Ph.D.  
24216 Rutherford Rd.  
Ramona, Ca. 92065

After my husband and I retired from our local University where we both taught classes, we added to our pursuits by becoming avid bird watchers. We took two years to find just the right property. We subsequently built on this property in Ramona because birds and wildlife abound here.

We have felt fortunate to have a family of endangered gnatcatchers return each spring to our patio to nest. We wait to see them appear each year. We have been delighted for the past two years to see a pair of eagles that nest in the rocks in the mountains behind our house. We keep binoculars on both levels of our home in order to observe them.

The home we built here has 69kv power lines behind our home. We have major ongoing concerns that SDG&E is trying to establish a transmission route along that area. In the event that should take place, not only the displacement of the birds and wildlife would suffer but our way of living not to mention the financial investment we have in our property would be completely discounted.

My hope is that all alternatives would be considered before that drastic measure that would affect so many people who live in this area not to mention the wildlife.

My research has shown that there are many viable alternatives that would be much more environmentally prudent but cost effective as well. SDG&E has offered no route design or cost documents as yet. IN FACT I HAVE NOT RECEIVED ANY NOTIFICATION FROM SDG&E REGARDING THIS PROJECT.

Thank you for your attention and my hope that this matter will be given serious scrutiny before making any decision.



## **ATTACHMENT F**

The SDG&E Sunrise Powerlink will negatively affect property values and has the potential for increasing public health risks in Ramona and elsewhere along the transmission line. Many homeowners would have their life savings risked by diminished property values. Over the past 20 years, several epidemiological studies have found an association between exposure to electromagnetic fields (EMF) and health risks. Experts disagree whether this association is causal. However, the CPUC has set guidelines for setbacks from high voltage transmission lines. A set back of 350 feet has been set for 500 KVA transmission lines for schools in California. Yet, the same care for the protection of public safety is not given to homes, daycare centers and businesses. Therefore a mixed message is sent regarding public safety. Reports that the proximity to electrical transmission lines may be responsible for increases in human health risks, including childhood leukemia and brain cancers have resulted in a sharp rise in the level of public concern despite decidedly mixed scientific results. The perception of public health risks from EMF have resulted in measurable reductions in property values. EMF health risks whether proven or not still will diminish property values. The stress from living under these lines is also a real health risk. A California sales analysis showed that property values of homes abutting power lines diminished by 18-53%.

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Submitted by:

Donna M. Murdoch, Ph.D. CAsP  
Captain, Medical Service Corp, USN (Ret)

**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to the California Public Utilities Commission's Rules of Practice and Procedure, I have this day served a true copy of **PROTEST OF THE RAMONA ALLIANCE AGAINST THE SUNRISE POWERLINK (RAASP)** to parties listed on the following pages.

Service was completed by email where available or, where email service was not available, by causing true copies thereof, enclosed in sealed envelopes with first class postage prepaid, to be deposited in the United States Mail.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this \_\_\_\_ day of February 2006, at San Diego, California.

\_\_\_\_\_  
Diane Conklin

## SERVICE LIST

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