



LWV OF SAN DIEGO COUNTY
4901 MORENA BLVD. SUITE 104
SAN DIEGO, CA 92117
619-222-9719

April 7, 2008

Dian Grueneich, Commissioner
California Public Utilities Commission
505 Van Ness
San Francisco, CA 94102

RE: COMMENTS ON SDGE'S SUNRISE POWERLINK PROJECT

Dear Commissioner Grueneich,

The League of Women Voters of San Diego County strongly urges that the CPUC, if it decides that a new transmission line is absolutely necessary, give greater weight to the proposed LEAPS transmission project, which would be shorter, much less expensive, and cost ratepayers less, creating fewer impacts on our environment. We, in addition, strongly oppose all of the proposed transmission line routes that would run through the Anza Borrego Desert State Park.

In 1975 the League of Women Voters of the United States adopted a position supporting the establishment of a national energy policy that includes conservation. The California League's recent update of the State Energy position under Resource Adequacy states: "regulatory and planning agencies, as well as the energy providers, should give primary consideration to conservation and energy efficiency. State regulation and planning should also address the critical need for demand-side management of peak power requirements including real-time pricing."

League positions include planning for Transmission Lines but specify that:

"The state should implement an integrated energy planning process that establishes consistent statewide procedures for the set-aside of land that will be needed for future transmission corridors and other associated energy infrastructure, in compliance with California Environmental Quality Act (CEQA) requirements", which would preclude SDG&E from running new lines through the Anza Borrego Desert State Park.

Based on these positions the County League assumes a regional public interest leadership role on energy issues. Therefore the League of Women Voters of San Diego County offers the following comments:

The LWV supports the State's Energy Action Plan loading order. Its largest chapter, the League of Women Voters of the City of San Diego, voted to support the current San Diego Association of Government's (SANDAG's) Regional Energy Strategy, calling for increasing the amount of in-basin energy resources to meet the area's growing peak demand instead of depending on fossil fuel power imported from far away regions.

The LWV San Diego County urges the CPUC to join its sister state agency, the California Coastal Commission, in protecting dedicated state park lands in the Anza Borrego Desert State Park on the same grounds that the commission applied to reject a proposed new toll freeway that would have negatively

impacted the San Onofre Beach State Park. The Commission found that preserving and protecting dedicated state parks is a higher priority than new toll road projects, a position we supported.

LWV joins the California State Parks Foundation in opposing any incursion of the proposed Sunrise transmission project that would for the first time violate existing constitutional and legislative provisions that protect state parks for our children and theirs. Transmission towers are not only unsightly in a desert state park, but we fear that additional lines into the area would only increase our vulnerability to wildfires that periodically decimate our region, as they did last October.

LWV has concerns over the viability of SDG&E's long term power purchase contract with Sterling Energy Systems, and the whole question of "pie in the sky" renewable contracts that the utilities have signed with contractors that have not met the provisions outlined in those contracts.

LWV thinks that, as part of this proceeding, the CPUC should seriously consider viable regional alternatives like the "Smart Energy 2020" proposal put forward by the Sierra Club, and recognize the public's preference for increased in-basin generation resources, including more renewables and customer distributed generation, as called for in SANDAG's Regional Energy Strategy.

We note that SB 1039 (Kehoe) requires the CPUC and the local utility exhaust all viable and cost effective energy efficiency, demand response, renewable energy and customer distributed generation alternatives within the region before considering new fossil fuel generation and associated transmission projects. LWV believes the CPUC should abide by these aforementioned directives.

LWV is concerned that the proposed Sunrise transmission project would require opening our back country to more new roads, increasing the energy footprint and making more sprawl development in the rural areas of our county inevitable.

We urge the Commission to use this proceeding to take the opportunity to be more innovative, earth friendly as well as bottom line oriented for its consumers, instead of allowing SDG&E to continue pursuing traditional transmission grid expansion practices focused on short term economic gain for the company.

Respectfully,

Nancy Mc Cleary, President
League of Women Voters of San Diego County

CC: Michael Peevey, CPUC President
Steven Weissman, Administrative Law Judge