

Dennis & Connie Berglund
Sandy Creek Ranch
33408 Sandy Creek Lane
P.O. Box 776, Pine Valley, CA 91962
(619) 478-2600 fax (619) 478-2555
Internet: <http://www.sandycreekranch.com>

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

By fax to: (866) 711-3106

SUBJECT: Opposition to the Sunrise Powerlink (SRPL) Project

We have prepared this letter of opposition to the proposed Sempra/San Diego Gas & Electric (Sempra) Sunrise Power Link (SRPL) for the following reasons stated below. We were both born and raised in San Diego County. We were both educated locally (SDSU) and have built businesses and employed people in San Diego County for the past 40 years. Dennis is also a registered electrical engineer licensed in California, and we are the owners of two San Diego based technical businesses. We are also property owners whose property could be affected by the SRPL project.

Summary

1. This is a Sempra project to promote Sempra goals of generating power in Mexico and delivering that power to Los Angeles customers and only provides marginal benefit to San Diego County ratepayers. Why should San Diego ratepayers be paying for this project?
2. Using Sempra's own publicly available information you will see that the current and future San Diego power requirements can be met with the existing power distribution lines and one to three "in-basin" power generating facilities of modest size and cost. There are two aging but connected power generating facilities (South Bay and Encina) that would be rebuilt or replaced with new smaller environmentally friendly facilities that would use the existing infrastructure. In addition, renewable power is increasingly available and is a better long-term choice for San Diego.
3. There are significant security problems with the proposed alternate routes. The proposed powerline route along the Highway 8 corridor if damaged, could both interrupt power to San Diego/Los Angeles AND block Highway 8, the only practical evacuation route East from the City of San Diego. The transmission line towers, located so close to the major highway, could be easily damaged with an explosive charge placed at the base of the towers by a highway traveler and remotely detonated with no witnesses.

4. The installation of the SRPL will have both short- and long-term negative effects on sensitive lands that have taken years to develop. San Diego is awash with developments that have consumed the habitats of local plants and animals. Decades of our work to revitalize and improve the La Posta Creek Valley will be both reversed and destroyed by the installation of the proposed power lines.
5. Local property values will be adversely affected by multiple proposed routes.

Detailed Discussion

1. Sempra's Goal is Delivering Non-Regulated Mexican Power to Los Angeles
 - a. Sempra Energy would like you to believe that the SRPL is a local San Diego effort generated by the "hometown" electric company, S.D.G.&E.
 - b. In reality, the SRPL is one element in a Sempra plan to generate power in Mexico and distribute this power to Los Angeles.
 - c. Sempra is a large company that does not currently have a sizable stake in providing power for the Los Angeles area. It is easy to see that Sempra can get into that market using its power plants and its LNG plant in Mexico only if there is a distribution line. That distribution line would be the SRPL.
 - d. Sempra has built power plants in Mexicali, Mexico, which are not regulated by either California or United States regulations. Further, Sempra has built a liquefied natural gas (LNG) plant in Ensenada, Mexico and has constructed a gas pipeline to transport the LNG from Ensenada to Mexicali. The Sempra financed Mexicali power plants are right across the border from the beginning of the proposed SRPL and there have discussions concerning building more electrical power plants to furnish additional power to the United States.
 - e. Sempra will tell you that the electrical power currently being generated in Mexicali is already sold to Los Angeles so we do not need the SRPL to deliver that power. For example, in a North County Times news article dated June 6, 2007, Mr. Simones, vice president of SEMPRRA, stated that all of the power being generated by the Mexicali power plants has already been sold to Southern California Edison for distribution in the Los Angeles region. In reality, this power must travel to Los Angeles by a much less direct route and in most cases, not on powerlines owned by Sempra. This raises the cost and lowers the profit for Sempra.
 - f. Under the current Sempra proposal, Sempra says that the benefit of the SRPL is for the San Diego County residents and therefore the San Diego County residents will pay the entire cost of the SRPL through a rate increase. Not only is this untrue, but it is vastly unfair to the residents of San Diego County.
2. No Real Benefit to San Diego County Residents
 - a. There is no direct benefit to San Diego power customers because, by Sempra's own information, San Diego is not in need of the amount of power the SRPL is being planned to provide.

- b. Using Sempra's own publically available information that you will find on their website, you will see that the current and future San Diego power requirements can be met with the existing power distribution lines and one to three "in-basin" power generating facilities of modest size and cost.
- c. SDG&E has already built three new power plants in San Diego located in Miramar, Escondido, and soon to be completed in Otay Mesa. Two of the power plants generate 550 megawatts or more each.
- d. The SDG&E website states that with these power plants San Diego will only have a shortage of approximately 300 megawatts by 2010. This shortfall can easily be accommodated by the construction of one additional regional power plant.
- e. San Diego already has two aging but connected power generating facilities: one located in Chula Vista (South Bay) in the South County and one located in Carlsbad (Encina) which is in the North County. These plants were sold by San Diego Gas & Electric years ago when (they said) that they were no longer going to be in the business of generating electricity. These electrical plants although old, still have connections to the San Diego power grid so it will be much less expensive to continue electrical generation at these locations.
- f. Sempra is in the electrical energy generating business as you can see by the electrical plants in Mexicali. Sempra (or another company) could rebuild or replace with these aging power plants with new environmentally friendly power plants. The new plants will be smaller, more efficient and mor attractive than the current plants, leaving excess land for other developments.
- g. Any electrical power engineer will tell you that the best location for generating electrical power is near the location where you need it. When you generate the electrical power near the user, there is a substantially reduced need for expensive and unsightly power distribution lines. As evidenced by the recently completed CPUC environmental impact report (EIR), "in-basin" or locally generated power is also the best environmental solution for San Diego's future electrical power needs.
- h. Renewable power is increasingly available and is a better long-term choice for San Diego. As a practical matter, sufficient electrical power from solar, wind or other renewable sources is quite a few years off. However, this should be the primary goal of San Diego, and there should be a County plan with benchmarks for renewable electrical power generation that could eventually provide a large percentage of the County power requirements. It is not sufficient to discount renewable power as a practical source because it cannot fully meet today's electrical power needs.

3. Significant Security Problems Exist with Proposed San Diego Transmission Line Alternates

- a. Sempra has recommended several SRPL installation alternatives running through eastern San Diego County. At least one of these runs overhead

along Highway 8, the only federal highway transportation corridor running East from San Diego. Underground--???

- b. San Diego is unique in that it is a major port of entry on the international border plus a major military hub. Therefore, San Diego could be a prime target for future terror operations.
 - c. San Diego is further unique because it is bordered on the South by the international border with Mexico and on the West by the Pacific Ocean. If a natural disaster or an act of terrorism occurs on the West Coast, a practical assumption is that all of the Southern California coast (Los Angeles and San Diego) would be affected. In this case, there will be only ONE evacuation and supply route to San Diego and that is Highway 8.
 - d. The SRPL alternates cross Hwy. 8 as many as five times in eastern San Diego County.
 - e. If a terror activity, or a natural disaster, caused the power link to collapse across the freeway, both power distribution and the use of the only east-west transportation corridor would be destroyed.
 - f. Additionally, due to the close proximity of a major highway, a terrorist could quickly access the towers from the freeway and easily compromise one or more electrical distribution towers, unnoticed, which in turn would destroy the electrical transmission system and the only San Diego east-west transportation corridor.
 - g. This situation could be improved if the power distribution lines were placed underground. Other countries-?? place their power lines underground. The underground installation will solve both the unsightly installation and the security problems. Unfortunately, to date, Sempra has not considered our recommendations for an underground installation.
4. Sensitive Lands will be Permanently Affected
- a. We were both born and raised in San Diego County. We were both educated locally (SDSU), built businesses and employed people in San Diego County for the past 40 years.
 - b. We have constantly strived to improve the environment around us by investing our funds and our labor on local projects. Eighteen years ago we established Lakeside Families for Trees when we lived in Lakeside. This organization planted trees along State Highway 67.
 - c. In 1995, upon moving to Rural San Diego County we organized LapThing (the La Posta-Thing Valley Conservation Society) to help restore and improve the local environment.
 - d. Our properties lie along the La Posta Creek which is a sensitive and important wildlife corridor. La Posta Creek and our land is especially critical to the wildlife corridor because at the South end of our property lies one of the very few high bridges that allows animal migration across the Highway 8 freeway.
 - e. Over the past twelve years we have built erosion control basins, rehabilitated ponds and developed a tree nursery that has allowed us to

plant hundreds of trees every year. All this has been accomplished without funds from outside sources.

- f. The result of our labors and that of our neighbors has been the return of wildlife and plants that were not in this valley 12 years ago. Migratory ducks and geese visit every year. We've seen deer graze in the pastures and have noticed the appearance of raccoons, possums and many species of birds. Hawks have nests high in the oak trees and have been breeding here for the past six years.
- g. On birding websites, you will see that this valley with its water and plant growth has become a prime spot for bird watching.
- h. Unfortunately, two possible SPRL alternatives cross East-West and North-South through this valley and would, if allowed, permanently affect these sensitive lands and the migration of indigenous animals through the valley.
- i. As you examine closely the detailed maps contained within the Sempra application for the SRPL, you will see the access roadways and the other heavy construction that will be required to construct the transmission lines.
- j. For whatever reason, the transmission lines are proposed to go right down the La Posta Creek valley; one in the East-West direction and the other in the North South direction.
- k. The construction of the SRPL in this area will cause both temporary and permanent destruction to the wildlife habitat and to our efforts over the past twelve years. For these reasons, the SRPL must not be constructed in these sensitive land areas.

5. Local Property Values Adversely Affected

- a. Sempra has proposed many power link alternatives throughout San Diego county.
- b. Once a power link alternative is proposed, we have observed that the related property values have been immediately reduced.
- c. In our specific example, we have appraisals and market information that show our lands have been adversely affected just by the information published by Sempra.
- d. It is a reality that these properties will be held hostage and unable to be sold or transferred while Sempra continues to evaluate their large number of proposed alternatives.

Thank you for this opportunity to submit our sincere comments.
Sincerely,

Dennis H. Berglund

Connie A. Berglund