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 & Necessity for the Sunrise Powerlink Transmission Project	)	Application No. 06-08-010 (Filed August 4, 2006)

RANCHO PEÑASQUITOS CONCERNED CITIZENS' REPLY BRIEF (Phase II)

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I. INTRODUCTION

Rancho Penasquitos Concerned Citizens (RPCC) submits the following Phase II Reply brief to address SDG&E's Phase II Opening brief. The CAISO did not offer any Phase II comments, whether in testimony, hearings or briefing to RPCC's alternative. The only other party to offer comment on RPCC's alternative was UCAN, who supports the implementation of RPCC's alternative to the extent a transmission line is approved by this Commission from the Imperial Valley to Sycamore Canyon substation.

SDG&E's Phase II briefing, and subsequent developments, continue to show that SDG&E applies principles to their project, only to ignore them when evaluating alternatives; has not been forthright with information; and continues to contradict its own testimony. Since most of SDG&E's comments as to RPCC's alternative are confined to section K of the brief, which was specifically set aside to address RPCC's alternative, RPCC only includes that section within its reply brief.

A. The Garamendi Principles

SDG&E's testimony and subsequent briefing demonstrates that SDG&E continues to be a strong proponent of applying the Garamendi Principles. The Garamendi Principles are mentioned 10 different places within SDG&E's Phase II Opening Brief and SDG&E cites to its own witnesses' Phase II testimony on the Garamendi Principles, at footnote 38 of SDG&E's brief. SDG&E points out within this footnote that the Garamendi Principles, first contemplate "(1) encouraging the use of existing rights-of-way by upgrading transmission facilities where technically and economically feasible… ." SDG&E then concludes within this same footnote, "SDG&E took great care to abide by these principles and well-established standards."

SDG&E is talking out of both sides of its mouth again. SDG&E cannot advocate the use of Garamendi Principles to analyze its own project and yet ignore the use of the principles as

applied to RPCC's alternative. RPCC's alternative was designed to accomplish the primary Garamendi Principle – upgrade existing transmission facilities where technically and economically feasible before adding new transmission or ROW. The theory behind the Garamendi Principle is that new infrastructure should be first and foremost minimized. RPCC's alternative does just that. It eliminates 15 miles of new infrastructure, including approximately 2.5 miles within new ROW. Even SDG&E admits RPCC's alternative is technically feasible and makes no argument whatsoever on the economic aspects of the alternative, yet conveniently ignores the Garamendi Principles, so important elsewhere in SDG&E's analysis of this project.

K. RPCC's Coastal Link Alternative

1. Scope and Description

Recall that RPCC's phase II brief summarized the scope of RPCC's alternative as follows:

"In summary, and taking into account the changes made by SDG&E to SDG&E's system for Phase II testimony, RPCC's alternative is now best described as follows:

1. Installation of an additional 230/69 kV, 224MVA transformer at Sycamore Canyon substation with associated substation upgrades;
2. Re-conductor both 69 kV circuits of the Sycamore – Pomerado transmission line;
3. Re-conductor the 69kV circuit of the Sycamore – Scripps transmission line, **but only if** this Commission finds it prudent for SDG&E to have cancelled another transmission project between phases I and II of these proceedings which resulted in the need to re-conductor the Sycamore – Scripps transmission line; and
4. Either the installation of a 230/138 kV, 392 MVA transformer at Encina, **but only if** the CAISO will not approve a remedial action scheme designed to bring up

> Encina generation to solve overloads on the Sycamore – Chicarita 138 kV transmission line under CAISO Planning Standards criteria."

As far as the potential transmission facilities are concerned, SDG&E agrees that adding these facilities would provide reliable electrical service. Where RPCC and SDG&E disagree is on the issue of whether the Encina transformer would be required, or whether the overload the transformer is designed to remedy under RPCC's alternative could be remedied by bringing up Encina generation, instead. SDG&E states at footnote 154 that "… this is not an appropriate solution from a transmission planning perspective." First, this statement is directly opposite of what SDG&E had to say, through Linda Brown's testimony, in Phase I, and as discussed within RPCC's Phase II briefing at page 18. Second, Linda Brown is the head of transmission planning. How can SDG&E turn around and say re-dispatching Encina generation is not an appropriate solution when Ms. Brown testified that SDG&E had not even addressed SDG&E's own 138 kV reliability criteria violations because these issues were a function of short term dispatch planning?[1] The answer is simply that SDG&E continues to contradict themselves on this and other issues.[2]

The next direct contradiction on the issue of how SDG&E and/or RPCC is going to solve their common overload on the Sycamore – Chicarita 138 kV line comes from the Phase I testimony of Jonathan Woldemariam and the Phase II testimony of John Jontry. In Phase I, Jonathan Woldemariam was questioned in detail about SDG&E's plans for the existing Sycamore – Chicarita 138kV line. Importantly here, Mr. Woldemariam was specifically asked whether any reconductoring of the 138 kV line was going to occur:

[1] Transcript at 619:20 – 620:22
[2] See the Transcript at 4906:16 – 4907:18 for another example of SDG&E contradicting itself.

Q. You are familiar with the Sycamore to Chicarita 138 kV line?

A. I'm familiar with it, yes.

Q. Familiar with it at least in the sense that the proposed Sunrise project is proposed to run from Sycamore to just -- we'll call it south of Chicarita?

A. Yes.

Q. You are aware of that, correct?

A. I am aware of that.

Q. And the wooden structures that currently support the existing 138 kV line are designed to come down, and new mono-pole steel structures are scheduled to be erected in place of the wooden poles carrying the new 230 kV circuit on one side and the existing 138 kV circuit on the other; is that correct?

A. Yes, that's correct.

Q. Does SDG&E plan to replace any of their conductors on the 138 kV existing line from Sycamore to Chicarita when it moves those conductors from the existing wooden structures to the new mono pole?

A. Generally, if -- if there is -- if it's deemed necessary that the conductors be changed in terms of any damages or any wear and tear, that may be the case; or if it was -- any construction, there was construction difficulties, that may be the case. But at this time we propose to use the existing conductor.

Q. All right. So the current plan is just to use the existing conductor unless for unforeseen circumstances which occur, such as construction damage or in the review of the lines you see something that causes you concern, you would otherwise be using the existing conductors and simply putting them up on the mono pole, correct?

A. Yeah.[3]

[3] Transcript at 1254:10 – 1255:15.

Yet in Phase II hearings, Mr. Jontry testified completely the opposite on the issue of a new conductor:

> Q. You have no plans to -- well, strike that. How is SDG&E going to address overload on the Sycamore-Chicarita and Doublet Tap to Friars 138 kV line as shown in Exhibit R-2?
>
> A. Just so I'm clear, we're talking about the overload that appear on lines 21, 22 and 23 for the Sycamore to Chicarita?
>
> Q. Correct.
>
> A. Okay. And also the line 56, which is the Doublet Tap to Friars?
>
> Q. Correct.
>
> A. With regard to the Sycamore to Chicarita overloads, the Coastal link, if it is built, will be built on existing -- at least partially on existing right-of-way that's shared by this same circuit we're discussing here, the Sycamore to Chicarita 138 line. In fact, that circuit will be rebuilt. It's on an existing wooden H-frame structure right now between Sycamore and Chicarita substations.
>
> When the Coastal link is installed, this 138 line will be moved to the steel pole line, and the conductor will be our standard. I think it's around 6,000 ACSR -- 600 ACSR now. It will be upgraded to – I think our standard conductor is 1033 ACSR ACSS. So the line will be basically upgraded from Sycamore to within, I think, a couple of spans of Chicarita substation. And if it's necessary to upgrade it further, we are looking at a very short distance between the end of the rebuilt line and the substation.
>
> Q. Where does that information appear in your plan of service for Sunrise?
>
> A. Well, it appears in the description of the Coastal link in the DEIR.
> Q. In the what?
>
> A. In the DEIR in the description of the Coastal link.

Q. Well, that's a document that's put together by somebody other than SDG&E. And whether that's an accurate statement or not, I don't know, but that's a document that's put together by an entity other than SDG&E, correct?

A. Yes.

Q. Does SDG&E's plan of service as proposed to this Commission include the reconductoring of the Sycamore to Chicarita line, the 138 kV line?

A. Yes, in the fashion I just described.

Q. Taking down the old conductor and putting up a new conductor that can carry more capacity?

A. Yes.

Q. Are you aware that I asked these questions of a witness, an SDG&E witness, in Phase 1? In fact, I think it was Mr. Woldemariam, if memory serves me correct. Are you aware of that?

A. No.

Q. So you don't know what he said?

A. On this particular topic, no, I don't.

Q. Would it surprise you if I told you that he said that they were simply going to use the same conductor after the wooden poles are removed and that existing conductor was simply going to be placed on the, quote, unquote, new side of the new steel mono poles that SDG&E proposes to build?

A. I don't know what he said with regard to this.[4]

SDG&E contradicts itself again. It is also wrong on the re-conductoring of this line being within the DEIR. Nowhere in the CPCN application or the DEIR (which uses the CPCN description of the project as the basis for its analysis) does SDG&E describe a re-conductoring of the Sycamore – Chicarita 138 kV line.

[4] Transcript at 5700:6 – 5702:12

RPCC is also confused by SDG&E's inclusion within the last paragraph of their brief, within this subsection, of a discussion of an Aspen Central East Substation alternative. Any 500/230 kV substation alternative has nothing to do with the Coastal link and it appears the addition of this paragraph within the discussion of the RPCC alternative was simply an oversight.

2. Feasibility of Obtaining Necessary Approvals and Construction

SDG&E agrees with RPCC that RPCC's alternative "… is feasible to approve and construct."

3. Estimated Cost

Not surprisingly, SDG&E spends no time discussing the costs of their proposed Coastal link as compared to RPCC's alternative. Within SDG&E's single paragraph within this subsection, SDG&E notes that RPCC's alternative would cost approximately $84 million, per Exhibit SD-35, Attachment 3-5 to SDG&E's direct testimony. What SDG&E did not tell this Commission, or RPCC for that matter, within SDG&E's Phase II brief, is that SDG&E has changed the scope of work required for both the Sycamore – Scripps 69 kV re-conductor and the Sycamore – Pomerado 69 kV double circuit re-conductor, ***after Phase II hearings were completed***. The changes are so dramatic, that the costs must have also changed dramatically. SDG&E, however, provides no new costs and fails to even point out this important development since the close of Phase II hearings, despite providing this information to the Energy Division one week before Opening briefs were due.

Since the cost estimate changes are estimated to be heavily weighted in RPCC's favor, the integrity of the information SDG&E has provided within these proceedings continues to be questionable.

The changes to the scope of work necessary to effectuate the re-conductoring of these lines are the result of the Energy Division and their consultants inquiring into the unilateral change to RPCC's alternative that SDG&E made after the DEIR was released (between Phase I and Phase II), which added a completely new line to be re-conductored (Sycamore – Scripps 69 kV). The Energy Division sent a data request to SDG&E asking SDG&E to explain the scope of work necessary for this re-conductor and the reason for changing RPCC's alternative. The entirety of the data request and SDG&E's response is as follows:[5]

Data Request to SDG&E from CPUC Energy Division:

28-1 **Coastal Link System Upgrade Alternative**. SDG&E's April 11, 2008 letter included the following comment on Section C:

> "For the Coastal Link System Upgrade Alternative, the following transmission upgrades need to be included in the FEIR/EIS: the upgrade of Sycamore - Pomerado 69 kV Circuits 1 and 2 and the upgrade of Sycamore - Scripps 69 kV line."[6]

Please define in detail the specific upgrades required for the two lines referenced (e.g., description of any ground disturbance, reconductoring, number and location of new poles or towers, or modifications to existing poles), and explain the reasons for this modification of the alternative from its previous definition.

SDG&E Response 28-1:

Sycamore - Pomerado 69 kV Circuits 1 and 2 Upgrades

Upgrade of 69kV circuits TL6915 and TL6924 involves a reconductor of approximately 2 miles overhead line from single ACSR wire to bundled ACSR per circuit.

All twenty-two (22) existing wood and steel structures will be replaced with either direct buried steel or foundation double circuit steel poles to handle the increased loads associated with the bundled wire. The majority of the poles will require concrete foundations.

It is estimated that the design will not require any new structure locations. Existing access roads will be used to construct the upgrade.

Upgrades of associated substation breakers and disconnects would occur within SDG&E's Pomerado and Sycamore Canyon Substation

Sycamore - Scripps 69 kV line Upgrades

[5] There also appears to be a map(s) showing where the two lines run, produced by SDG&E and/or Aspen, attached to the response. This map is not included here.

[6] The Sycamore – Pomerado 69 kV Circuits 1 and 2 were always a part of RPCC's alternative and were in fact analyzed within the DEIR.

> Upgrade 69kV circuit TL6916 involves a reconductor of approximately 5 miles of overhead line from single ACSR wire to bundled ACSR.
>
> All forty-seven (47) existing wood and steel structures will be replaced with either direct buried steel or foundation double circuit steel poles to handle the increased loads associated with the bundled wire. The majority of the steel poles will require concrete foundations.
>
> It is estimated that the design will not require any new structure locations. Existing access roads will be used to construct the upgrade.
>
> Upgrade existing underground portions of the circuit from single to bundled Cable.
>
> - At Scripps (remove 1.5 mi of 1750 AL kcmil, install bundled 3000 CU, using existing ducts and new underground drops).
> - At Rue Biarritz (remove 0.2 mi of 1750 AL kcmil, and install bundled 3000 CU in new trench and change out existing wood cable poles to Steel cable poles).
> - At Sycamore Canyon Substation (remove 0.1 mi of 1750 AL kcmil, install bundled 3000 CU).
> - A new trench with single 1750 AL kcmil will be installed at Sycamore Canyon Substation to accommodate a relocation of existing 69kV circuit TL6920.
>
> Upgrades of associated Substation breakers and disconnects would occur within SDG&E's Scripps and Sycamore Substation.
>
> The reconductor of the Scripps-Sycamore 69 kV line was identified by SDG&E Transmission Planning through powerflow analysis performed in support of Phase 2 testimony. See SDG&E's March 28, 2008 Rebuttal Testimony, Chapter 6, Footnote 1 and SDG&E's response to RPCC data request 17, question 1, subpart (j) for additional details.

RPCC surmises that when the Energy Division saw that the scope of work necessary for the Sycamore – Pomerado re-conductor had changed dramatically (replacement of existing poles for new poles) as compared the analysis performed within the DEIR; the scope of work for the newly added re-conductor of the Sycamore – Scripps line was substantial (replacement of existing poles for new poles); and given that the Sycamore – Scripps line had not been analyzed within the DEIR at all, the Energy Division asked SDG&E to take another look at whether the re-conductor of these lines could be accomplished without the significant impacts of removing and replacing poles. If this could not be accomplished, SDG&E was potentially facing the recirculation of the DEIR.

Facing the recirculation dilemma, SDG&E's engineering department came up with a solution that did not require the replacement of poles and merely re-conductored these lines with a single conductor capable of carrying a higher current, instead of the original Phase II scope of work which would have installed a bundled conductor (which increases the weight and therefore effects the carrying capacity of the existing transmission poles). SDG&E then provided the following amended response to the data request:

SDG&E Supplemental Response 28-1, dated 5/23/08:

> Reduced Transmission Scope
>
> SDG&E has performed additional analysis to supplement the previous preliminary engineering performed on this project and has determined that the Sycamore-Scripps 69 kV and Sycamore – Pomerado 69 kV reconductor can utilize a single 900 kcmil ACSS conductor and meet system needs, rather than bundled conductor, and can therefore be installed on the existing overhead transmission structures. The reconductor project scope should only entail the replacement of the conductor and not require the replacement of any overhead transmission structures. This substantially reduces the potential effects and time associated with this reconductor. The underground portion of this upgrade will remain the same as described above. The short segment (930 ft.) of underground through the Rue Biarritz area would be re-located into city streets and would eliminate existing impacts to nearby residences. The work will occur in approximately just one month and occur in segments along the short underground segment. The reduced impact scope of this reconductor project still meets the defined system needs.

It is also important to note that SDG&E had changed the scope of work to the Sycamore – Pomerado circuits between Phase I and Phase II analysis as well. Within Phase I, SDG&E described the scope of work, within their Phase I cost estimate, as "Reconductor from from single 1033 kcmil ACSR and single 1750 kcmil AL to single 900 kcmil ACSS and single 3000 kcmil CU. Few pole replacements."[7] SDG&E then changed this scope of work to bundled conductor with pole replacements in Phase II, as described above, only to change it back again to what appears to be the exact same Phase I scope of work (as described within their response on May 23, 2008). This disturbing fact illustrates that SDG&E appears to have purposely attempted

[7] See Exhibit R-4, page 5, bottom row, last column.

to make RPCC's alternative look as expensive as possible in Phase II hearings, while ignoring, or perhaps purposely avoiding less expensive engineering solutions.

Further, despite providing a new scope of work on May 23, 2008, seven days before the Phase II Opening Brief was due, SDG&E failed to notify RPCC of this substantial change and made no mention of it within the Phase II Opening Brief. The magnitude of the change from a cost estimate standpoint is well over $10 million dollars. RPCC is able to make an educated estimate at the cost savings because of cost estimate for the same scope of work provided by SDG&E within Phase I. The Phase I "unescalated cost to construct (equipment/material/labor)"estimate to reconductor the Sycamore – Pomerado circuits was $5,900,000.[8] The comparative figure given by SDG&E in Phase II per their Exhibit SD-35, Attachment 3-5 is $8,963,022. This is over a three million dollar difference for a two mile line on costs to construct, alone. Add in the 30% contingency applied by SDG&E to this line in Phase II and you subtract almost another $1 million. Subtract AFUDC and escalation amounts and you are over $5 million in cost differential for the Sycamore – Pomerado line alone.

Given that the scope of work for the Sycamore – Scripps line is now the same as the Sycamore – Pomerado line, and given that the Sycamore – Scripps line is approximately five miles long (2 and ½ times longer than the Sycamore – Pomerado line), one can logically deduce that the cost savings attributable to not removing and replacing poles for the Sycamore – Scripps line is going to exceed the $5 million dollar cost savings estimated for the Sycamore – Pomerado line. Therefore, the total cost savings is likely to be well in excess of $10 million dollars. The result is that RPCC's alternative provides even greater cost savings to CAISO ratepayers.

One has to wonder where else SDG&E has failed to apply the least cost effective engineering technique to other Intervenors' alternatives. Further, how does this information

[8] See Exhibit R-4, page 5, bottom row, second column.

impact the comparative analysis performed by SDG&E on the relative economic benefits of the various alternatives? Recall that both the environmentally superior southern and northern routes include RPCC's Coastal link transmission upgrades. If the costs are adjusted to correct the lower costs to re-conductor these lines, not to mention the removal of an Encina transformer, how much more economic do the environmentally superior southern and/or northern alternatives become? RPCC does not have the answers to these questions but does question the slanted analysis performed by SDG&E.

4. Effect on system reliability

Without any quantifiable analysis, SDG&E wants this Commission to blindly accept their statement that building a new 230 kV line at a cost of *at least* $80 million dollars more than RPCC's alternative is the best way to proceed because, "RPCC's alternative would sacrifice system performance and flexibility for a short term benefit." SDG&E's Phase II rebuttal testimony is largely copied and inserted into their brief. There was no quantifiable analysis then, and nothing has changed. The information provided is akin to a magician's hand waving designed to draw one's attention away from the truth of the matter and to put on a show, with little substance.

For example, let's accept for argument's sake the premise that RPCC's proposal somehow represents a short term solution. One would expect to see power flow and other quantifiable analysis that RPCC's alternative would not work starting at some year into the future. SDG&E provides no such analysis. To the contrary, the CAISO purposely studied 2015 power flows in Phase I to make sure the intervenor alternatives worked into the future and were in fact not merely short term fixes.[9] SDG&E also studied 2015. RPCC's alternative continues

[9] Transcript at 2092:21 – 2093:10.

to work in 2015. Therefore, SDG&E's statements are not only unsupported by evidence, they are not accurate.

More examples of hand waiving waving come from the "statistics" that SDG&E has thrown together in an attempt to obscure the issue. At page 224, SDG&E states that the Coastal Link "…adds 796 MVA of thermal outlet capacity...RPCC's alternative adds only 224 MVA." While this statement is factual, it is irrelevant, unless there is some underlying analysis which shows why this matters and how the system is going to suffer because this amount of MVA is lacking. There is no such evidence because this fact alone does not affect the overall reliability or economics of RPCC's proposal.

This type of analysis, or lack thereof, continues throughout this section. At page 224, SDG&E states that the RPCC alternative adds no outlet capability at Penasquitos. Again, there is no supporting evidence indicating why this is important and relatively speaking, how important this is. Again, there is no such evidence because this fact alone does not affect the overall reliability or economics of RPCC's proposal.

At page 224, SDG&E indicates that "A more robust transmission network" would be advantageous. They go on to state that SIL "…is a critical consideration during periods of heavy system loads… ." SDG&E further indicates that RPCC's alternative increases real losses by about a MW, and reactive power losses by 50-60 MVAR. Again, SDG&E has provided no information showing why this is important. Further, adding some 60 MW of capacitors would make up the reactive loss differential, and this addition is readily quantifiable, yet SDG&E fails to provide this analysis. Why? SDG&E either is unable to quantify these real and reactive power losses (this is highly unlikely), or has chosen not to. To infer that these losses make up the $80 million plus cost differential between the alternatives is not supported, and seems

incredulous. RPCC believes that if quantifying the differences would come close to making up the cost differential, SDG&E would have done so.

At page 225, SDG&E references a concept they call sub-transmission loop flow, and they show a table with loadings increased by the RPCC alternative. It is noted that the Sycamore – Scripps 69 kV line is overloaded. This is extremely misleading, since the cost of mitigating that overload is listed on page 222, and its cost is included in the RPCC costs. The two Sycamore – Pomerado lines shown on page 225 are also included in the costs of RPCC's alternative, shown on page 222. At any rate, SDG&E has not demonstrated that increased loading on these lines are of any consequence, other than being double counted in their testimony. There are no facts in evidence that increasing loadings on some 69 kV lines matters to SDG&E customers. Further, they did not provide a list of lines where the RPCC alternative reduces line and/or transformer loadings. In fact, there are many lines where RPCC's alternative reduces line and/or transformer loadings as discussed within RPCC's Phase I testimony.

At page 226, SDG&E infers that the RPCC alternative could reduce dispatch flexibility. There are no facts in evidence to support this hypothesis. RPCC believes that SDG&E has used a fine-toothed comb to find problems caused by RPCC's alternative, and that if any such problems were found they would have been identified, as compared to a general statement without the proper analysis supporting the statements.

At page 227, SDG&E has a table showing load growth in certain substations. Since loads similar to these were modeled in the power flow cases, tabulating them may be of interest to someone, but it has nothing to do with whether the RPCC alternative works. SDG&E provides no analysis that substation growth is not going to be able to be served if SDG&E's Coastal link is not implemented. SDG&E also states that RPCC "… would push all of the impacts onto its neighbors." All of what impacts? The upgrading of existing transmission lines

with new conductors (re-conductoring)? If so, RPCC pleads guilty. However, the State of California also believes this is the best way to conduct transmission planning as well.

Importantly here, the concept of what the transmission system will look like in 3, 5, 10 or 15 years is extremely uncertain. This fact is demonstrated by SDG&E's own cancellation of the Sycamore to Miramar 69 kV line between Phase I and Phase II. New generators are added; old generators retire. Changes to the topology can make big differences given CAISO reliability criteria. Since the transmission system is an ever evolving, complex system, to infer that RPCC's proposal is a short term solution is bogus.

So at what point in the future does RPCC's alternative not work or the initial cost savings become outweighed but future upgrades? If either of these statements were accurate, and could be proven true, SDG&E would have provided quantifiable evidence/analysis in support of these statements. SDG&E failed to do so despite multiple chances to do so. Therefore, this Commission should not blindly accept SDG&E's sweeping statements that the Commission should approve SDG&E's proposed Coastal link because RPCC's alternative is a short term fix, without providing the data to back up these assertions.

In summary, all of these sub-issues within this subsection are intended to cloud the real issues – does the RPCC alternative work? Yes. Is the RPCC alternative economic? Yes. Does the RPCC alternative impact the environment and communities less? Yes.

5. Effect on "ability to deliver renewable energy to SDG&E customers."

SDG&E agrees that RPCC's alternative does not effect the ability of SDG&E to deliver renewable energy to SDG&E customers.

/ / /

/ / /

6. Environmental impacts

Similar to the cost estimate issue, SDG&E fails to address the impacts its project would cause versus the lack of impact caused by RPCC's alternative. SDG&E does make an odd statement about how RPCC did not address the GHG emission impact of its Coastal link alternative, yet does not explain how RPCC's alternative would impact construction GHG emissions. Presumably, the party with the most knowledge in this area would be the party who would be constructing the improvements, i.e. SDG&E. If SDG&E had something to say about increased construction GHG emissions as to RPCC's alternative, compared to SDG&E's proposed Coastal link, SDG&E should have provided evidence in this regard. In fact, the logical conclusion is the opposite. How could the installation of one or two transformers and the re-conductoring of two transmission lines 7.5 miles in total length cause more construction GHG emissions as compared to the addition of 10 miles of new 230 kV towers and 4.5 miles of digging underground trenches, not to mention the removal and replacement of 10 miles of existing conductor on the new towers?

As discussed within RPCC's brief, the significant unmitigable impacts are eliminated with the adoption of RPCC's alternative.

7. Meets Project objectives?

SDG&E's agrees the project objectives are met, only arguing that they are met in a "sub-optimal fashion." Apparently SDG&E believes that the optimal way to meet the project's objectives is to charge CAISO ratepayers at least $80 million more for this project and to cause unmitigable impacts to the environment and communities within the Coastal link.

/ / /

/ / /

XI. CONCLUSION

The weakness of SDG&E's arguments are not only in their lack of analysis, but in the timing of their arguments. If SDG&E could truly make its arguments stand up to scrutiny, we would have seen them by at least the beginning of Phase II in this matter. Instead, SDG&E largely failed to address RPCC's alternative within its direct testimony and waited until Phase II rebuttal testimony to throw out concepts and statistics without analysis or meaningful discussion. This Commission should not be swayed by this last minute desperate attempt to save face on why RPCC's alternative had not been incorporated into SDG&E's preferred route(s). Further, given all the conflicts in testimony, at what point to you trust what they have to say?

Should this Commission approve the Sunrise project, the scope of the project should be altered through the Coastal link to substitute the transmission upgrades developed by RPCC, in place of the new 230 kV transmission line proposed by SDG&E because the option provides reliable electric service for a much less expensive cost and impact to the environment and communities.

Dated: June 13, 2008

Respectfully submitted,

/s/Harvey M. Payne
Rancho Penasquitos Concerned Citizens
By: Harvey M. Payne

CERTIFICATE OF SERVICE

I, Harvey M. Payne, hereby certify that I have this day served a copy of:

RANCHO PEÑASQUITOS CONCERNED CITIZENS'
OPENING BRIEF
(Phase II)

on all known parties with an e-mail address on the service list in proceeding A.06-08-010, by electronic mail, consistent with the attached list of e-mail addresses. I also caused the above described document to be filed electronically with the Commission.

Dated: June 13, 2008

/s/Harvey M. Payne
Harvey M. Payne

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