

DOCKET 02-AFC-1
DATE MAR 17 2005
RECD. APR 11 2005

DESERT SOUTHWEST TRANSMISSION PROJECT

P. O. Box 9106
Boise, Idaho 83707

DOCKET 99-AFC-8c
DATE MAR 17 2005
RECD. MAR 22 2005

By Regular Mail

Jack W. Caswell
Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Re: Blythe I Transmission Line Amendment (Docket No. 99-AFC-8C)

Dear Mr. Caswell:

On behalf of the Desert Southwest Transmission Project ("DSWTP")¹, I am writing to provide information regarding our project that may be helpful for Staff's evaluation of the proposed route of the "Buck to Julian Hinds component" of the transmission line in the above-referenced application (hereafter "the Blythe I line"). We are also providing information regarding the location of the Midpoint Substation.

As you know, the DSWTP is a proposed transmission addition that follows a route substantially parallel to the existing Southern California Edison Palo Verde to Devers No. 1 line. We also understand that Blythe I has located one of their transmission alternatives along this same route. The DSWTP would provide increased transmission capability from the vicinity of the Blythe I and proposed Blythe II power plants to the high voltage transmission system owned by the Southern California Edison Company and operated by the California Independent System Operator. The DSWTP is a proposed regional transmission solution that would interconnect initially at Edison's Devers substation rather than the Julian Hinds substation and has a Midpoint switching/substation for regional connections where it intersects the proposed PVD2 right-of way near Blythe. The DSWTP is designed with a capability of 2340 MW sufficient to carry capacity from the Blythe 1 and Blythe 2 power plants and other regional utilities such as IID.

As staff noted in the Preliminary Staff Assessment ("PSA"), the DSWTP and the proposed Blythe I line both propose to use the "Interstate 10" corridor designated by the Bureau of Land Management ("BLM") for new high voltage transmission lines. This same corridor currently accommodates Edison's existing Devers to Palo Verde I ("DPV-I") transmission line and the recently CAISO approved Devers to Palo Verde II ("DPV-II") line. Staff has noted in the PSA the need to conserve this finite corridor space. The DSWTP takes no position on this issue at present, although it reserves its right to do so in the future.

¹ DSWTP is owned by a special purpose, limited liability company named Desert Southwest Power, LLC.

However, even assuming the Blythe I line goes forward independent of other proposed parallel projects, its route cannot conflict with other proposed projects that have established rights in the corridor. It is for that purpose that DSWTP offers these preliminary comments setting forth the route of the DSWTP in relation to that proposed for the Blythe I line.

The Status and Route of the DSWTP

In 2001, the Imperial Irrigation District ("IID") and BLM initiated a joint EIS/EIR process and conducted scoping for the proposed "BN-BS line" beginning in Blythe and ending in Niland. After the terrorist attacks of September 11, 2001, the preferred route for this line became unavailable because it crossed a bombing range used by the Department of Defense. As a result, the proposed route was modified and the project was renamed the DSWTP. IID and BLM conducted scoping again in 2002, and IID and BLM published a draft EIS/EIR and conducted public hearings in 2003.

DSWTP conducted environmental surveys and solicited public comment in the DEIS/DEIR on 3 primary routes:

- The Preferred Alternative and Alternative A, which both are immediately adjacent to the Edison right of way for PVD-I and PVD-II (these 2 alternatives vary from each other only in one area east of Desert Center).
- Alternative B, which generally follows Highway 86 to Midway in IID's system.
- Alternative C, which is approximately 1 to 2 miles north and parallel to the preferred Alternative and Alternative A routes.

The DSWTP Final EIS/EIR will be published in the Spring of 2005. It will identify the route adjacent to the PVD-I/PVD-II right-of-way as the preferred alternative and designate a Midpoint switching/substation. Attached is a detailed map showing the proposed route relative to Edison's existing right-of-way. As shown there, the DSWTP preferred route is immediately north of, and adjacent to, the Edison right of way. The Edison right of way is 290 feet wide on public lands and 330 feet wide on private lands. The DSWTP right of way extends from the boundary of the Edison right of way 300 feet to the north.

The Blythe I Route

According to the PSA, the route for the Blythe I line "would be located for most of its length adjacent to SCE's 500-kV transmission line...."² The route is described in more detail as follows:

² PSA at p. 2-3.

Along most of its 67.4 mile length, the Buck to Julian Hinds transmission line would be located within a 95 foot right-of-way adjacent to and north of the existing Southern California Edison's Devers-Palo Verde right-of-way as illustrated in Figure 1.³

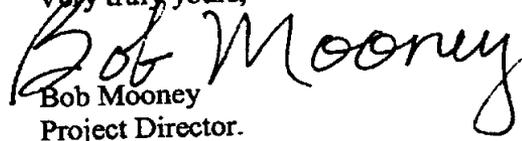
Based on this description and other information, the proposed route for the Blythe I line appears to overlap and be within the right of way of the DSWTP. Plainly, absent some consolidation, both projects cannot be constructed and operated within the same right of way.

As noted above, the BLM controls access to this property and its policies will determine the priority and merit of competing uses within the corridor. The DSWTP understands that BLM's policy is to grant right of ways on a "first in time, first in right" basis in accordance with the submission of the request. Based on this fact and that the DSWTP already has a published DEIS/DEIR and is further along in the BLM process than the Blythe I proposal, the DSWTP believes that it has established its right to the right of way in question.

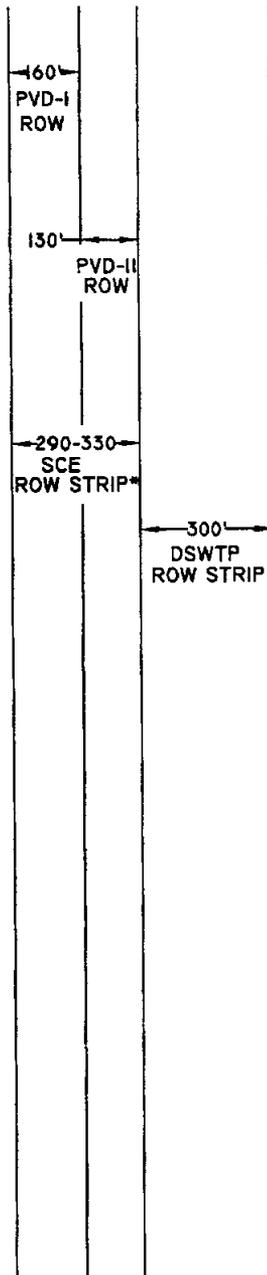
Conclusion

In conclusion, the DSWTP has no interest in obstructing a proposal for Blythe I that is compatible with the DSWTP route. However, it is obliged to call attention to the apparent conflict between the instant proposal and the right of way established and relied upon by both the project proponent and the BLM for the DSWTP environmental studies. In addition, the designation of Midpoint should be consistent with what will be in the DSWTP Final EIS/EIR. The DSWTP intends to work cooperatively with the applicant and the Commission toward finding a mutually-acceptable resolution of this apparent overlap in routes that is consistent with applicable law and BLM policies.

Very truly yours,


Bob Mooney
Project Director.

³ PSA at p. 2-1 and Figure 1.



**DESERT SOUTHWEST
TRANSMISSION PROJECT**

*RIGHT-OF-WAY LOCATIONAL RELATIONSHIPS
AMONG DSWTP, PVD-I, AND PDV-II*

ANALYSIS AREA: CALIFORNIA

Date: 03/10/05

File: 1480 Alignment Options_1.dwg

Drawn By: ETC

Layout: 005



NORTH

200 0 200 400 Feet

STATE OF CALIFORNIA

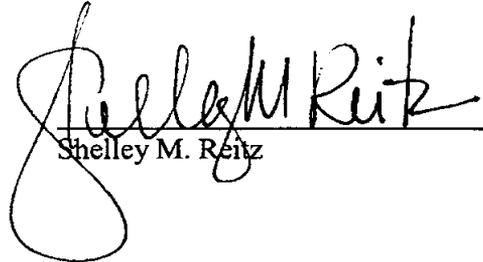
Energy Resources Conservation
and Development Commission

Application for Certification for the)
) Docket No. 99-AFC-8C
BLYTHE ENERGY PROJECT)
TRANSMISSION LINE MODIFICATION)
_____)

PROOF OF SERVICE

I, Shelley M. Reitz, declare that on March 17, 2005, I deposited copies of the attached *Letter to Jack Caswell at the California Energy Commission regarding Blythe I Transmission Line AMendment* in the United States mail in Sacramento, California, with first-class postage thereon fully prepaid and addressed to all parties on the attached service list.

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



Shelley M. Reitz

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99-AFC-8C**

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