Department of Energy
Western Area Power Administration
Desert Southwest Customer Service Region
P.O. Box 6457
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Mr. John L. Geesman
Commissioner and Presiding Member
BEP II AFC Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95825-5512

Dear Commissioner Geesman:

I am writing you in response to testimony provided on transmission system engineering (TSE) Conditions of Certification at your evidentiary hearing on the Blythe Energy Project II (BEP II) held August 1, 2005. We have been working with the California Energy Commission (CEC) Staff on transmission system engineering issues and the Final Staff Assessment, which serves as Western Area Power Administration's (Western) Draft Environmental Assessment for the project. Western owns, operates, and maintains the Buck Boulevard Substation, which has been proposed as a point for interconnection of the BEP II.

TSE testimony at your evidentiary hearing focused on whether or not CEC jurisdiction should extend to Buck Boulevard Substation additions and modifications needed to accommodate the BEP II interconnection. Presently, Western is responding to three transmission requests at its Buck Boulevard Substation namely the BEP II interconnection sponsored by Caithness and the two requests made by Florida Power for interconnection at the Buck Boulevard Substation, these include the 230-kV proposed line to Julian Hinds Substation and the new tie to the proposed Midpoint 500-kV Substation. For all three projects the extent of additions and modifications at the Buck Boulevard Substation would not be identified until Western completes facility-related studies for the project. Since Western would design, own, and operate the additions and modifications at Buck Boulevard Substation, the recommended Conditions of Certification are not the same as those typically recommended by staff for facilities owned by a private developer. Western has the expertise and experience to conform to industry standards and regulations. Western will continue to coordinate with CEC staff on future transmission system studies and required additions and modifications by providing upon request, and for information purposes only, copies of System Impact Studies and Substation drawings showing proposed and/or as built additions and modifications associated the associated project modifications at the Buck Boulevard Substation.

However, by voluntarily agreeing to coordinate the CEC staff on a joint analysis process, and to any Conditions of Certification imposed by you for approval of the project, Western is not ceding any jurisdictional authority over Federal facilities to the State of California.

I hope this information is useful in your proceedings. If you have any questions, please contact Nick Saber at (602) 605-2796.

Sincerely,

Anthony H. Montoya
Assistant Regional Manager of Operations

cc w/Enclosure:

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