Trans Bay Cable LLC

c/o Babcock & Brown Power Operating Partners LLC, 2 Harrison Street, San Francisco, CA 94105

DOCKET
04-AFC-1
DATE OCT 14 2005
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October 14, 2005

Mr. William Pfanner
California Energy commission
1516 Ninth Street
Sacramento, CA 95814

Subject: Docket 04-AFC-1 Comments

Dear Bill,

Trans Bay Cable, LLC (TBC) is the developer of the Trans Bay Cable Project, the high voltage direct current transmission line that will deliver electric energy from Pittsburg to San Francisco. Although TBC is not an intervenor in the San Francisco Electric Reliability Project ("SFERP"), the Staff Preliminary Staff Analysis ("PSA") discusses the Trans Bay Cable Project, so TBC offers these comments to the PSA.

We believe that Staff has performed an excellent analysis of alternatives for this project. We agree with Staff that the Trans Bay Cable Project is not an alternative to the SFERP.

We do, however, request that a clarification sentence be added to the discussion of the "Biological Resources – Aquatic" on page 6-76. This PSA discussion could leave the reader with the impression that the environmental impacts of dredging, on a limited area of the Bay near the City of Pittsburg, have been evaluated for the project. We believe that most, if not all, of the potential impacts on aquatic biota will be mitigated by using the hydroplow to install the cable and perform the work during dredge periods established by the National Marine Fisheries Service. Permits issued by federal, state and regional authorities will mitigate impacts to a very low level. Therefore, we request that the Staff include a sentence, such as "Staff anticipates that permits for dredging will include safeguards and mitigation for the aquatic biota."

Thank you for considering these comments.

Very truly yours,

TRANS BAY CABLE LLC,

By: Samuel L. Wehn