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August 30, 2006

James W. Reede, Jr.
Project Manager
California Energy Commission
1516 9th Street, MS-15
Sacramento, CA 95814

DOCKET	
06-AFC-4	
DATE	Aug 30 2006
RECD.	SEP 08 2006

Dear Mr. Reede:

Subject: Docket No. 06-AFC-4

The Los Angeles Department of Water and Power (LADWP) is submitting comments on the Request for Agency Participation in the Review of the Vernon Power Plant Project, Application for Certification (06-AFC-4) by the California Energy Commission. In general, LADWP is concerned about the thoroughness of the applicant's proposal and wants to be assured that the proposed project will not negatively affect the LADWP power distribution system.

Questions

- Is the City of Vernon planning to encroach onto the LADWP Right of Ways (ROW) for either of the proposed routes?
- The application states that the new line would combine and replace two existing 66-kV lines. Is there an existing Edison ROW adjacent to the LADWP ROWs? If so, what is the route?
- Which side of the LADWP towers does the City of Vernon plan on using?

Concerns

- If LADWP has to relocate lines to accommodate the proposed transmission lines, it would be difficult to achieve as it would require multiple outages and moving/raising of at least four lines on multiple circuit towers.
- LADWP will not allow an easement parallel to LADWP lines on a LADWP corridor.
- The City of Vernon needs to understand that LADWP's rights are paramount for crossings of all future work.
- LADWP may not be able to support the engineering or construction schedule of the proposed project in the event that tower raisings/relocations are needed.
- Crossing of the existing gas lines is a problem in terms of the cathodic protection and explosion hazard potential.

Water and Power Conservation ... a way of life

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- The proposed project will have to under cross at two points in a vertical to horizontal configuration. A vertical configuration may not be possible but a horizontal configuration may be possible.
- There is no mention of General Order Number 95 for code; LADWP believes following a more stringent public utility code is more appropriate than the NESC.

Please add LADWP to the correspondence list concerning the proposed Vernon Power Plant. Letters may be addressed to:

Mr. Chuck Holloway
Supervisor of Environmental Assessment
Los Angeles Department of Water and Power
111 N. Hope Street, Room 1044
Los Angeles, CA 90012

If you should have any questions, please contact Ms. Amy Schulenberg of my staff at (213) 367-0610. Thank you for your consideration of these matters.

Sincerely,



Charles C. Holloway
Supervisor of Environmental Assessment

AS:lr

c: Mr. James Gokey
Ms. Amy Schulenberg