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RE: Docket No. L-00000A⁰⁰-0295-00130

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To Whom It May Concern:

I am writing to protest Southern California Edison's (SCE) proposed 2nd Devers-Palo Verde 500kV power line (DPV2). Besides causing significant environmental damage, the project is not justifiable economically. The Proposed Project provides no lasting solution but merely encourages continued overconsumption and waste of natural resources. The Proposed Project also places a burden on Arizona consumers to pay for California's energy consumption.

Having reviewed the Draft Environmental Impact Statement (DEIS) for the Proposed Project, I wish to emphasize the following points:

1. The economic benefits of the project are highly questionable. In the DEIS, it states that the Proposed Project will produce an economic benefit to California consumers (not Arizona consumers) of only \$0.61 cents per MWh (p.A-15). The economic analysis was conducted under the assumption that the benefits of accessing Palo Verde generation in the southwest area will continue beyond 2012 (SCE 2004). Given the exponential growth of the Phoenix area, this assumption is questionable. SCE's Cost Effectiveness report also states that uncertainty beyond 2012 is so large that forecasting future generation patterns is too imprecise to be useful. This brings the '\$1.1 billion in benefits' figure into question. Also, SCE determined in its Cost Effectiveness Report that "...constructing DPV2 was found to have a net negative impact of around \$16 to \$20 million per year to Arizona..." (SCE 2004:41).
2. There is no distinct need for the project. In several places in the DEIS, it is emphasized that the Proposed Project could be useful but is not essential: DVP2 is primarily driven by SCE's desire to reduce energy costs to California customers, not by a need for improved reliability, and no new generation or major transmission facilities would be required if the DPV2 project is not constructed (p.C-64)
3. There are numerous unmitigable environmental impacts to several sensitive areas in both Arizona and California, including 2 National Wildlife Refuges, Areas of Critical Environmental Concern, National Forests, and designated wilderness areas. The DEIS did not examine in depth any alternatives for the Devers-Harquahela segment that did not traverse the Kofa National Wildlife Refuge. The project will impact fish and wildlife, wilderness, cultural resources, and visual resources. The project would also increase NO_x emissions near Phoenix, which is already out of air quality compliance. As our population continues to grow, more and more pressure is put on our wild areas. Their

protections are slowly being eroded away, and I have read nothing in this proposal that would justify continued erosion.

4. While the DEIS has done a fair job of *enumerating* the many environmental damages that would occur from the Proposed Project, I have yet to come across sufficient information *justifying* those damages. If this project were essential, perhaps there would be some justification. But SCE's own documents state that the project is NOT essential. Indeed, there is "uncertainty surrounding the SCE customer base, which could be diminished by direct access and municipalization trends..." (p.C-54).

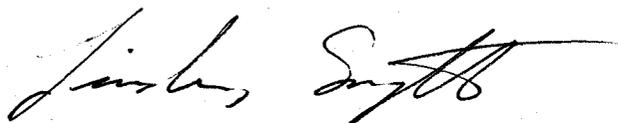
5. Alternatives to building a new power line were never examined in depth. This project has been planned for more than twenty years and was abandoned once already. Surely in twenty years some better ideas have come along. However, alternatives such as distributed generation, alternative energy, and conservation were given only lip service in the DEIS. It is clear that SCE has no intention of truly examining any options other than the Proposed Project. Just because this project might have been a good idea twenty years ago does not mean that it is still a good idea today.

When the above points are considered together, the project does not make sense. A power company with an uncertain customer base is proposing a nonessential project that will cause extensive environmental impacts and cause \$16 to \$20 million dollars in damages to Arizona *every year* in order to save California power consumers \$0.61 per MWh. I believe in political circles this is called "fuzzy math". It is true that many of the values that would be compromised by this project are difficult to quantify with a monetary value. However, I hope that these values will be adequately considered even if they do not appear in black and white in a cost-benefit analysis.

If nothing else, this proposal demonstrates how desperately new thinking is needed to solve our power demands. We have long passed the threshold where we can consume thoughtlessly. If we wish to leave any environment worth having to our children, difficult decisions must be made now on how we will address our power needs. This project does nothing to address power overconsumption or conservation, nor does it provide any lasting solution, and I respectfully request that its Certificate of Environmental Compatibility be denied.

Thank you for considering my comments.

Sincerely,



Lindsay Smythe

References:

Aspen Environmental Group. 2006. Draft Environmental Impact Report/Environmental Impact Statement, Southern California Edison Company's Application for Devers-Palo Verde No. 2 Transmission Line Project. 3 Volumes.

Southern California Edison Company. 2004. Devers-Palo Verde No.2 Cost-Effectiveness Report. Submitted to the California Independent System Operator (CAISO) April 7, 2004. Updated March 17, 2005. 48pp including update.