

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



John Kessler
Project Manager
Energy Facilities Siting Division
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

DOCKET**07-AFC-3**DATE SEP 23 2008RECD. SEP 23 2008

September 23, 2008

Re: ***California Energy Commission***, CPV Sentinel Energy Upgrade Project (07-AFC-3) Preliminary Staff Assessment, Comments from the California Public Utilities Commission CEQA staff on the Environmental Review of the 3250 ft, 230 kV Gen-tie and associated transmission line relocations

Dear Mr. Kessler:

The California Public Utilities Commission CEQA staff respectfully submits its comments on the California Energy Commission's Preliminary Staff Assessment (PSA) for the CPV Sentinel Energy Upgrade Project. These comments specifically address the CEC's environmental review of the gen-tie and associated transmission line relocations of the CPV Sentinel Energy Upgrade Project.

The construction of the gen-tie and possibly the associated transmission line relocations – for which Southern California Electric is responsible - will require authorization by the California Public Utilities Commission (CPUC). As a responsible agency, the CPUC will rely on the CEC's Final Decision to make a determination on SCE's permit application and its compliance with CEQA guidelines. These comments are intended to provide early input to the CEC on the transmission portion of its PSA such that the proceeding Final Decision is sufficiently comprehensive for CPUC review. CPUC staff appreciates CEC's consideration of the attached comments and continued support in the interagency effort to streamline environmental review and permitting processes. Please feel free to contact me with any questions the CEC may have.

Respectfully submitted,

Monisha Gangopadhyay
CEQA Analyst
Public Utilities Commission of the State of California
505 Van Ness Avenue
San Francisco, CA 94102
415-703-5595

CPUC Comments on the CEC PSA for the CPV Sentinel

Re: The 3250 foot long, 230kV single circuit overhead transmission line between the CPV Sentinel project and SCE's Devers substation, and associate relocated transmission lines.

General Questions and Concerns:

1. The CEC's environmental assessment should include technical details (i.e. – distance from existing location, ROW) and environmental impacts of the relocation of the Devers-Coachella 230 kV line and the Devers-Vista #1. If the environmental impacts are not significant, an explanation for such a decision should be included. (reference: CEC Preliminary Staff Assessment (PSA) for CPV Sentinel, pp. 5.5-5).
2. Does the term "CPVS project site" encompass the generation-tie associated with the project?
3. There is a page-number issue: Sections 4-9 to 4-11 are missing causing a mismatch in page numbering between the Table of Contents and the text of the PSA.

Resource Specific Questions and Concerns:

PSA Reference	Resource-Specific Questions and Concerns
Air Quality	
4.1-23, Table-12	Does the Air Quality Construction Impact table include impacts from construction of the generation-tie between CPV Sentinel's switchyard and the SCE Devers substation?
	Does assessment of state violations of annual and 24-hour PM10 and 24-hour federal violations of PM2.5 AAQS include the impacts from transmission line construction and relocations of the project?
4.1-53	Are greenhouse gas emissions calculated for the transmission line construction and relocations of the project?
4.1-72	The low-sulfur requirement for diesel-fueled vehicles used during construction on the facility should apply to transmission construction and relocations as well.
Biology	
4.2-12	Has the CEC assessed the impact that additional transmission lines or movement of existing lines will have on the state and federally endangered Bells vireo (<i>Vireo belli pusillus</i>) and the states species of concern, vermilion flycatcher (<i>Pyrocephalus rubinus</i>), which the CEC has assessed, frequent the mesquite bosque riparian forest in the area?
4.2-31	Will the mitigation measures to reduce bird electrocution threats (phase-to-phase and phase-to-ground clearances, etc.) also mitigate (i.e. – reduce to less than significant levels) the collision of the above-mentioned migratory birds?
Land Use	
4.5-5	Is the relocation of the two transmission lines included in the project impact assessment on land use? It is not included on the list on 4.5-5 of the PSA.
	Has the right-of-way been secured for the project-associated relocation of the two transmission lines?