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METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

DOCKET 99-AFC-8C
DATE DEC 23 2008
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Office of the General Counsel

Via Email and U.S Mail

December 23, 2008

Mary Dyas
Compliance Project Manager
California Energy Commission
1516 9th Street, MS 2000
Sacramento, CA 95814

Re: Notice of Insignificant Project Change, Blythe Energy Project Transmission Line (BEPTL) Modifications; Docket No. 99-AFC-8C.

Dear Ms. Dyas:

The Metropolitan Water District of Southern California (Metropolitan) wishes to express its concern regarding one of three identified proposed modifications to the BEPTL Project. Preliminarily, Metropolitan notes it is the owner of real property at its Julian Hinds pumping plant. Pursuant to long-term interconnection agreements with Metropolitan, Southern California Edison (SCE) has located a substation on Metropolitan's property at Julian Hinds, and that substation is the proposed terminus of the BEPTL.

With respect to the second proposed modification identified in the above-referenced Notice, "Expansion of the Desert Center and Julian Hinds laydown yards," Metropolitan requires further information. Metropolitan's lead contact for construction of the BEPTL, Ms. Ann Finley, was recently informed by her SCE counterpart, Mr. John Tucker, that SCE needed no further use of Metropolitan's property at Hinds for a laydown area beyond the .5 acre already identified and agreed between the parties. This communication may conflict with Section 2.6.1 of Blythe Energy Project's (BEP) Request for Approval of Third Insignificant Project Change (Request) which triggered the referenced Notice. That Section states that SCE needs an additional 0.3 acre, although it doesn't state for what purpose. Although Section 2.6.2 represents that "an additional 0.3 acre is needed to install additional communications equipment," it nowhere states additional area at Hinds is required for a laydown yard at Hinds. Yet, that is clearly what is described in the Energy Commission's Notice's second proposed modification.

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Because there is apparent ambiguity in BEP's Request, which ambiguity appears to have been incorporated in the referenced Notice, Metropolitan recommends that the Energy Commission forego approval of the requested change until all parties have a clear understanding of the purpose and scope of the proposed modification.

Metropolitan further submits Blythe Energy Project has not met all applicable criteria for modification of the Commission's final decision in accordance with Title 20, Section 15769 of the California Code of Regulations since the Request does not appear to justify an expansion of the laydown area.

Yours truly,

A handwritten signature in black ink, appearing to read "Diana Mahmud". The signature is fluid and cursive, with a large loop at the end.

Diana Mahmud
Senior Deputy General Counsel

Cc: A. Finley