

Blythe Energy LLC
700 Universe Blvd.
Juno Beach, FL 33408

DOCKET 99-AFC-8C	
DATE	JUL 16 2008
RECD	JUL 22 2008

July 16, 2008

Ms. Mary Dyas
Project Compliance Manager
Energy Facilities Siting and Environmental Protection Division
California Energy Commission
1516 9th Street, MS 2000
Sacramento, CA 95814

RE: Blythe Energy Transmission Line Project Request for Approval of Insignificant Change (99-AFC-8C)

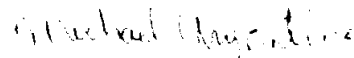
Dear Ms. Dyas:

Enclosed for your review is a Request for Approval of Insignificant Change for the Blythe Energy Transmission Project. The enclosed request addresses a number of minor pole realignments in response to recently available information, a request for changes in laydown yards, and a request to change conductor configuration. Blythe Energy and its contractors have discussed these changes with the utilities and with the private property owners affected. By copy of this package, the Bureau of Land Management (BLM) is also formally notified, though we have been discussing these changes with them over the last several months. We are planning a field review of the project in general and of these minor changes in particular on 23 July 2008.

It is our position that no modifications are required to the Blythe Energy Project AFC license conditions of certification, as amended, to accommodate the proposed insignificant changes described in the enclosed application. We, therefore, anticipate that this request can be approved expeditiously to allow us to get to construction this fall.

We appreciate the CEC staff's cooperation and comments during the last several months, look forward to answering any site-specific questions on the ground next week, and are prepared to quickly address any questions the staff has on the proposed revisions. Please contact me directly at (916) 474.5698 or by email at Michael.argentine@fpl.com. Technical questions may also be addressed to Penny Eckert at (425) 241.0415 or penny.eckert@tteci.com.

Regards,



Michael Argentine
Project Director
Blythe Energy LLC

Cc: Dan Mayers – FPL Energy
Claude Kirby – BLM Palm Springs

BLYTHE ENERGY PROJECT

**Request for Approval of Second
Insignificant Project Change
(99-AFC-8C)**

**Blythe Energy Project
Transmission Line
Minor Route Realignment and
Change in Laydown Yards**

Submitted to:

**California Energy Commission
Sacramento, California**

Prepared by:

Blythe Energy, LLC

and



TETRA TECH EC INC

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1 Introduction

Blythe Energy, LLC (Blythe Energy as the petitioner) hereby requests approval of insignificant project changes to the approved Blythe Energy Project Transmission Line (Project or BEPTL). In accordance with Section 1769(a)(2) of the California Energy Commission (CEC) Siting Regulations, the proposed changes do not have the potential to have a significant effect on the environment and would not result in the change or deletion of a condition adopted by the CEC or cause the project to not comply with applicable laws, ordinances, regulations or standards (LORS).

Blythe Energy is the owner of the Blythe Energy Project (BEP), a 520-megawatt (MW) combined cycle natural gas-fired electric-generating facility, approved by the CEC under docket 99-AFC-8 (CEC 2001). The BEP is located in the City of Blythe, California, just north of Interstate 10 (I-10), approximately 7 miles west of the California and Arizona border. The Project is presently connected to the Buck Boulevard Substation (Buck Substation) owned by the Western Area Power Administration (Western), which, in turn, is connected to the Blythe Substation and the Southern California Edison Company (SCE) transmission system.

In a CEC Notice of Decision dated October 11, 2006, CEC approved an amendment to the BEP license (99-AFC-8C) for the construction and operation of a 230 kV transmission line (BEPTL) to allow for delivery of the full BEP electrical output to the California Independent System Operator (CAISO)-controlled electrical transmission system (CEC 2006b). Western and the Bureau of Land Management (BLM) served as co-lead federal agencies for review of the Blythe Energy petition pursuant to the National Environmental Policy Act and have issued a Finding of No Significant Impact (FONSI) for the license amendment (Western & BLM 2007).

Blythe Energy requested approval of an insignificant project change in 2007. The change consisted of a modified interconnection from Buck Boulevard Substation to the new BEP switchyard, route realignment from milepost 0.0 to 3.0, and minor route realignment from milepost 6.5 to 62.1. The CEC approved these changes on July 17, 2007, and Western notified the BLM of Western's withdrawal from the project in a letter dated February 4, 2008. BLM is now the lead federal agency for the purposes of NEPA and for all consultations.

Blythe Energy hereby requests approval of the following additional insignificant project changes to the Blythe Transmission Line:

1. Realignment of structure numbers 153-159, 221-223, 232-234, and 343-345
2. Realignment of structure numbers 302-307
3. Realignment of structure numbers 5-6, 192-193, 241-242
4. Realignment of structure numbers 193-241
5. Realignment of structure numbers 408-409
6. Change in location of easternmost laydown yard from the Blythe Power Plant to the Blythe Airport area;

7. Change in westernmost laydown yard from the Julian Hinds Substation area to a small yard just south of the Interstate 10 Hayfield Road offramp on BLM-managed lands;
8. Addition of a 5-acre laydown yard just north of the Interstate 10 Ford Dry Lake offramp on BLM-managed lands;
9. Reconfiguration of the proposed conductor configuration to a 3-conductor bundle rather than a 2-conductor bundle.

In accordance with Section 1769 of the CEC Siting Regulations (California Code of Regulations [CCR] Title 20, Section 1769, Post Certification Amendments and Changes), this request for approval of insignificant project change presents a description of the proposed modifications, the necessity for the proposed modifications, and an analysis of potential impacts on the environment, nearby property owners, and the general public. This petition also outlines the Project's continued ability to comply with applicable LORS during construction and upon placing the modifications in service, and demonstrates that the proposed modifications will not result in significant environmental impacts. No changes to, or deletions of, any of the Conditions of Certification are necessary as a result of the proposed modifications.

The information necessary to fulfill the requirements of Section 1769 is provided in the sections that follow this introduction:

2. Description, Necessity, and New Information for the Proposed Project Changes
3. Environmental Analysis of Proposed Project Changes
4. Ability to Comply with LORS
5. Potential Effects on the Public
6. List of Property Owners
7. Potential Effects on Property Owners
8. References Cited

2 Description, Necessity, and New Information for the Proposed Project Changes

Figure 2-1 illustrates the overall route and the location of the seven site-specific changes in structure or laydown area location. Table 2-1 summarizes the change in disturbance footprint by proposed insignificant change component. Table 2-2 details the change in land ownership between present conditions and proposed changes.

The Siting Regulations require a discussion of the necessity for the proposed revision to the BEP and whether the modification is based on information known by the petitioner during the certification proceeding (Title 20, CCR, Sections 1769 [a][1][B], and [C]). There was no information regarding the necessity for these changes known by the petitioner during the certification proceeding. Details by change component follow.

Transmission Line Insignificant Project Change Request

Table 2-1. Summary of Additional Disturbance Due to Proposed Changes (Acres)

IPC	Structure Numbers	Changed Disturbance
Avoid Edison Parcels	153-159, 221-223, 232-234, 343-345	0.02
Avoid SoCal Gas Parcels	302-307	1.26
Cross Eagle Mountain line at 90 degrees	5-6, 192-193, 241-242	0.03
Shift 65 feet north to avoid Eagle Mountain Line	193-241	0.86
Avoid Caltrans Hayfield Road Offramp ROW	406-410	0.01
Avoid MWD fuel area	431-433	(0.10)
Easternmost Laydown (both sites disturbed, non-native)	N/A	N/A
Westernmost Laydown	N/A	2.00
Add Ford Dry Lake Laydown	N/A	5.00
TOTAL CHANGE IN DISTURBANCE		9.08

Table 2-2. Summary of Ownership Differences

Structure Number	2005 Parcel	2005 Ownership	2008 Parcel	2008 Ownership
Avoid Edison Parcels				
153	860-140-006	USA/BLM	860-140-006	USA/BLM
154	860-140-006	USA/BLM	860-140-006	USA/BLM
155	860-230-004	Edison	860-230-003	Surender Vuthoori
156	860-230-004	Edison	860-230-003	Surender Vuthoori
157	860-230-004	Edison	860-230-003	Surender Vuthoori
158	860-230-004	Edison	860-230-003	Surender Vuthoori
159	860-230-002	David J VanBebber	860-230-002	David J VanBebber
221	810-262-004	Rain For Rent, Inc.	810-262-004	Rain For Rent, Inc.
222	810-262-007	Edison	810-241-003	USA/BLM
223	810-241-002	USA/BLM	810-241-002	USA/BLM
232	810-232-012	Adapa Satya	810-232-012	Adapa Satya
233	810-232-009	Edison	810-232-011	Towner, James B & Veronica C. Evans
234	810-232-011	Towner, James B & Veronica C. Evans	810-232-011	Towner, James B & Veronica C. Evans
343	811-052-017	American Land Liquidators	811-052-017	American Land Liquidators
344	811-052-011	Edison	811-052-012	Liddle, George W. and Burman, Bonnie A.
345	811-052-008	Kao Li Yu	811-052-008	Kao Li Yu
Avoid SoCal Gas Parcel				
302	808-122-004	USA/BLM	808-122-004	USA/BLM
303	808-112-006	Southern California Gas Co.	808-122-003	USA/BLM
304	808-112-004	Stanley E Ragsdale	808-122-003	USA/BLM
305	808-112-004	Stanley E Ragsdale	808-122-003	USA/BLM
306-307	808-112-004	Stanley E Ragsdale	808-122-003	USA/BLM
Cross Eagle Mountain Transmission Line at Right Angle				
5	824-101-021	Blythe Energy LLC	824-101-021	Blythe Energy LLC
6	824-101-021	Blythe Energy LLC	824-101-021	Blythe Energy LLC
192	810-391-002	USA/BLM	810-391-002	USA/BLM
192a	810-391-002	USA/BLM	810-391-002	USA/BLM
193	810-391-002	USA/BLM	810-391-002	USA/BLM
241	810-211-001	USA/BLM	810-211-001	USA/BLM
241a	810-211-001	USA/BLM	810-211-001	USA/BLM
242	810-211-001	USA/BLM	810-211-001	USA/BLM

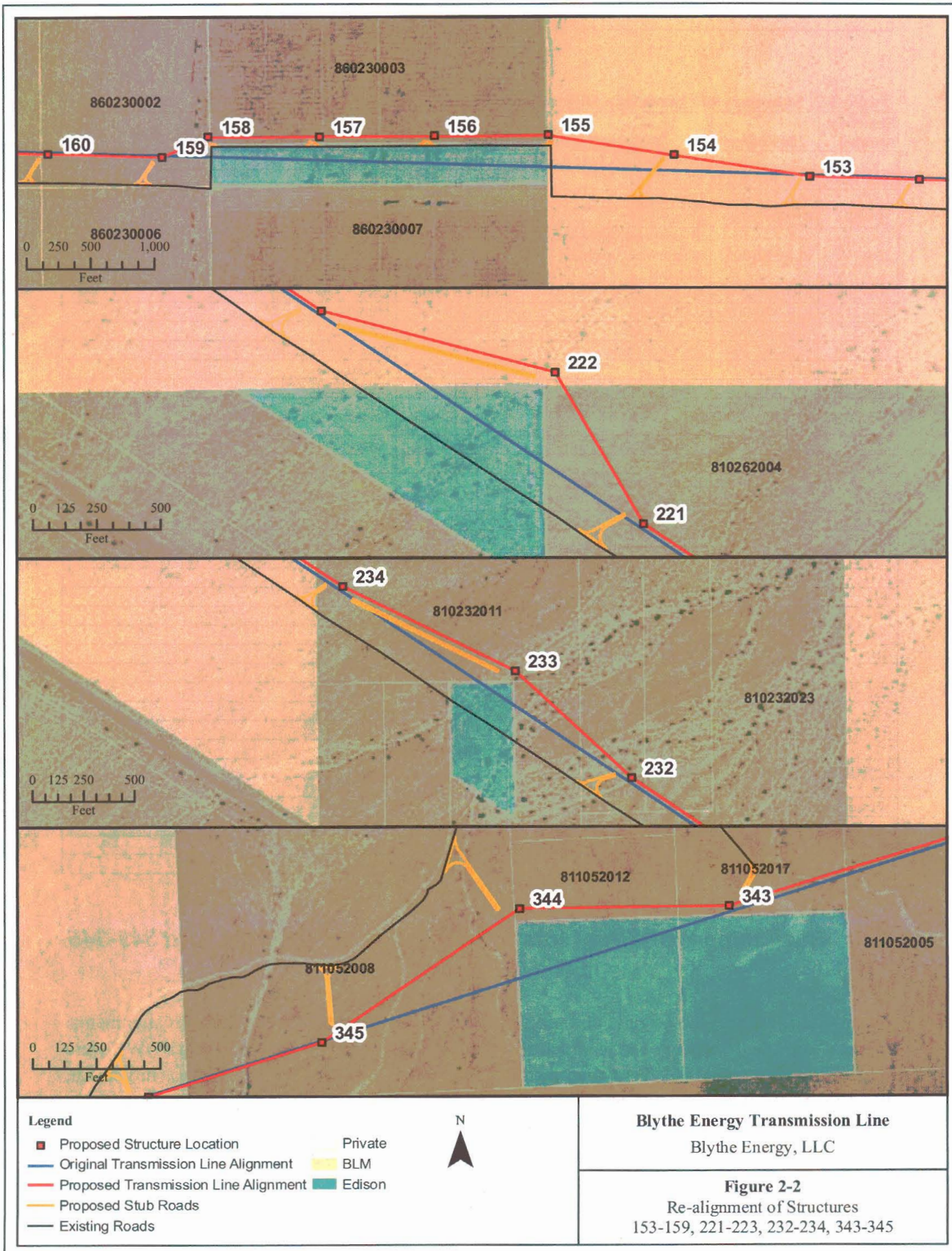
Table 2-2. Summary of Ownership Differences (continued)

Structure Number	2005 Parcel	2005 Ownership	2008 Parcel	2008 Ownership
Shift 65 Feet North to Avoid Eagle Mountain Line**				
193-196	810-391-002	USA/BLM	810-391-002	USA/BLM
197	810-382-001	USA/BLM	810-382-001	USA/BLM
198-203	810-352-008	USA/BLM	810-352-008	USA/BLM
204	810-352-005	Tuyet-Loan Thivu and Khanh Van Vo (Mary Kokam)	810-352-005	Tuyet-Loan Thivu and Khanh Van Vo (Mary Kokam)
205-209	810-352-006	USA/BLM	810-352-006	USA/BLM
210-213	810-320-001	USA/BLM	810-320-001	USA/BLM
214-217	810-262-005	USA/BLM	810-262-005	USA/BLM
218-220	810-262-004	Rain For Rent, Inc.	810-262-004	Rain For Rent, Inc.
222	810-262-007	Edison	810-241-003	USA/BLM
223-229	810-241-002	USA/BLM	810-241-002	USA/BLM
231	810-232-023	Rich Riel Asensi, Estelle Amou	810-232-023	Rich Riel Asensi, Estelle Amou
232	810-232-012	Adapa Satya	810-232-012	Adapa Satya
233	810-232-009	Edison	810-232-011	Towner, James B & Veronica C. Evans
234	810-232-011	Towner, James B & Veronica C. Evans	810-232-011	Towner, James B & Veronica C. Evans
235-238	810-211-002	USA/BLM	810-211-002	USA/BLM
239-242	810-211-001	USA/BLM	810-211-001	USA/BLM
Avoid Caltrans ROW at Hayfield Road Offramp				
406	709-370-013	USA/BLM	709-370-013	USA/BLM
407	709-370-013	USA/BLM	709-370-013	USA/BLM
408	709-370-013	USA/BLM	709-370-013	USA/BLM
409	709-370-014	USA/BLM	709-370-014	USA/BLM
410	709-340-001	MWD	709-340-001	MWD
Avoid MWD Fuel Area				
431	705-230-031	MWD	705-230-031	MWD
432	705-230-031	MWD	705-230-031	MWD
433	705-230-031	MWD	705-230-031	MWD
Changes in Laydown Yards				
Easternmost Laydown				
	824-404-013	Blythe Energy LLC	709-370-013	City of Blythe
Westernmost Laydown				
	705-230-031	MWD	824-020-005	USA/BLM
Ford Dry Lake Laydown				
	N/A		810-461-002	USA/BLM

2.1 Realignment of Structures 153-159, 221-223, 232-234, and 343-345

2.1.1 Description

Figure 2-2 illustrates the original and proposed realignment for each of these four realignments. In each case, the centerline of the structures, and the accompanying right-of-way (ROW), were moved to avoid parcels of fee-owned land by Southern California Edison (Edison). In general, the alignments were adjusted to the north or northeast to avoid placing any structures in the Edison fee parcels. There is a very small change (0.02 acre) in disturbance footprint due to slight changes in access roads to accommodate these minor structure realignments.



2.1.2 Necessity

Edison has stated that encroachment upon its fee-owned parcels for structure placement requires a difficult and time-consuming Section 851 process to gain permission from CPUC to allow the transfer of public utility fee-owned property (see Appendix D, Exhibit D-1). Through minor realignments of its structures, Blythe Energy was able to avoid structure placement on any Edison fee parcel.

2.1.3 New Information

At the time of certification, Edison was the designer and most probable builder of the line. Had Edison been the builder of the line, it may have been possible to cross Edison fee-owned parcels without a time-consuming process through the CPUC to allow for such use of the fee-owned parcels. Blythe has therefore responded to avoid these parcels with minor realignment of the listed structures.

2.2 Realignment of Structures 302-307

2.2.1 Description

Figure 2-3 illustrates the original and proposed realignment for structure numbers 302-307. Structure numbers 302-303 were moved about 150 feet to the south to avoid crossing the Southern California Gas Company (SoCal Gas) compressor station property. Structure numbers 304-307 were maintained in the alignment indicated by structure numbers 302-303 to minimize angles, and rejoined the original alignment at structure number 308. There is no change in overall disturbance footprint due to these minor structure realignments; however, the access road situation has changed. The previously-approved plan was to access structure numbers 302-307 across private property from the frontage road just south of I-10. The proposed revision includes an access road that would follow the alignment of the structures from structure number 302 to structure number 307, where the realignment ends. The revision would result in an estimated 1.26 acres of additional disturbance from minor changes in access roads.

2.2.2 Necessity

SoCal Gas will not allow encroachment upon its fee-owned parcels. As a result, Blythe Energy was unable to acquire easements from SoCal Gas for the original structure placement locations. However, Blythe Energy was able, through minor realignments of its structures, to avoid structure placement on the SoCal Gas fee parcel.

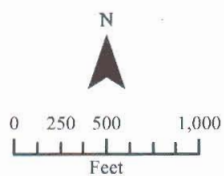
2.2.3 New Information

At the time of certification, Blythe Energy had not initiated conversations with landowners for easements. In early discussions with SoCal Gas, their inability to provide an easement without a time-consuming CPUC process was revealed. Because that timeline is incompatible with the BEPTL schedule, Blythe Energy chose to relocate the structures to avoid the SoCal Gas fee parcel.



Legend

- Proposed Structure Location
- Original Transmission Line Alignment
- Proposed Transmission Line Alignment
- Proposed Stub Roads
- Existing Roads
- - Gas Pipeline
- Private
- BLM
- SoCal Gas



Blythe Energy Transmission Line
Blythe Energy, LLC

Figure 2-3
Re-alignment of Structures 302-307

2.3 Realignment of Structures 5-6, 192-193, 241-242

2.3.1 Description

Figure 2-4 illustrates the original and proposed realignment for structure numbers 5-6, 192-193, and 241-242. Each of these pairs of structures was adjusted so that the three crossings of transmission lines owned by others could be constructed at $90^\circ (\pm 15^\circ)$ as required by the owners of the existing transmission lines. There is no change in overall disturbance footprint due to these minor structure realignments. Additional stub roads would be added to access structures 192a and 241a. The revision would result in an estimated 1,200 square feet (0.03 acre) additional disturbance from access roads.

2.3.2 Necessity

Edison has stated that crossings of its existing transmission lines must closely approximate a perpendicular crossing in order to minimize electromagnetic interference between the lines. (see Appendix D, Exhibit D-1).

2.3.3 New Information

At the time of certification, Edison was the designer and most probable builder of the line. In designing the line, Edison had not indicated a need to cross existing lines at $90^\circ \pm 15^\circ$. Edison made this information available in recent discussions, and Blythe Energy has now revised the crossings to meet this specification.

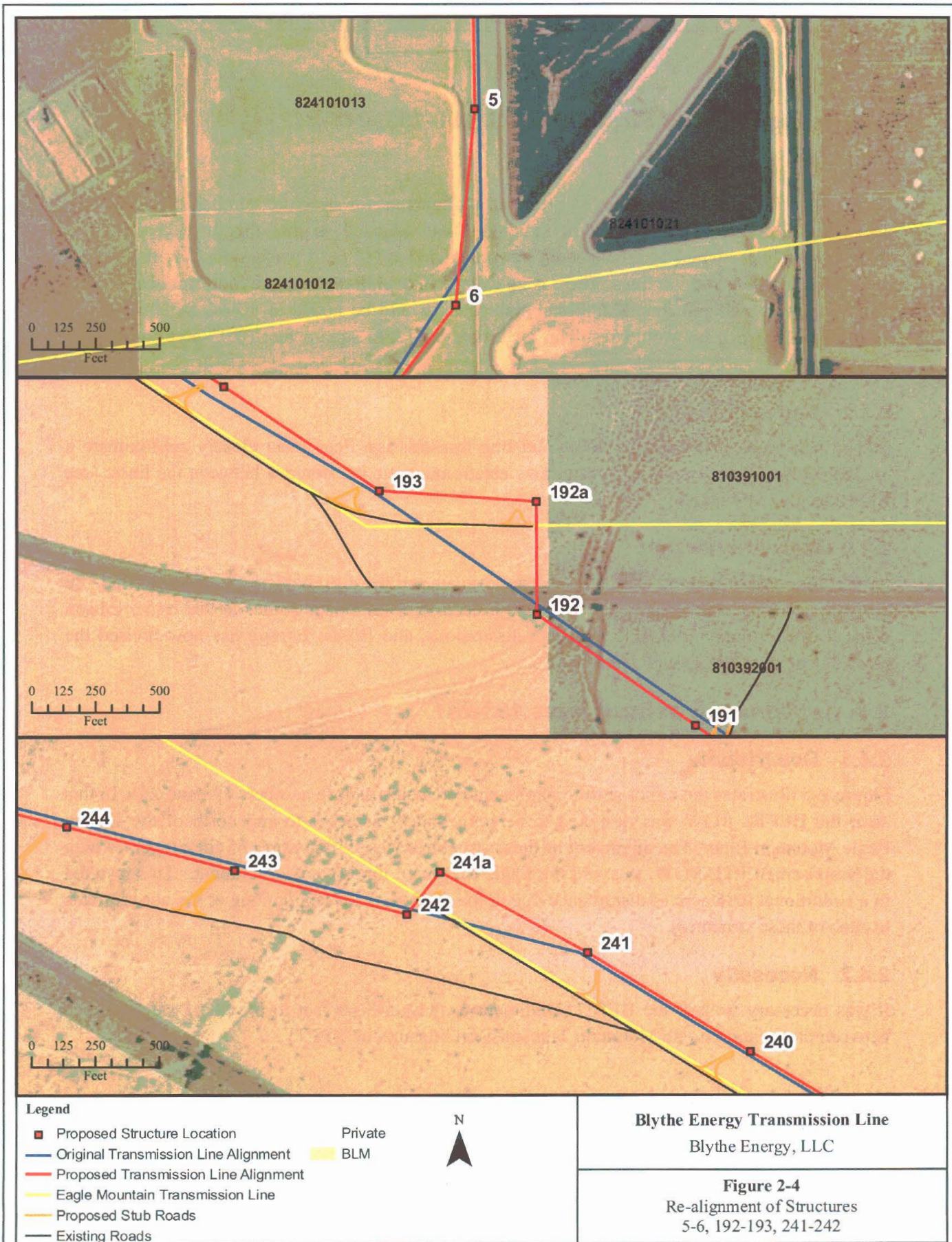
2.4 Realignment of Structures 193-241

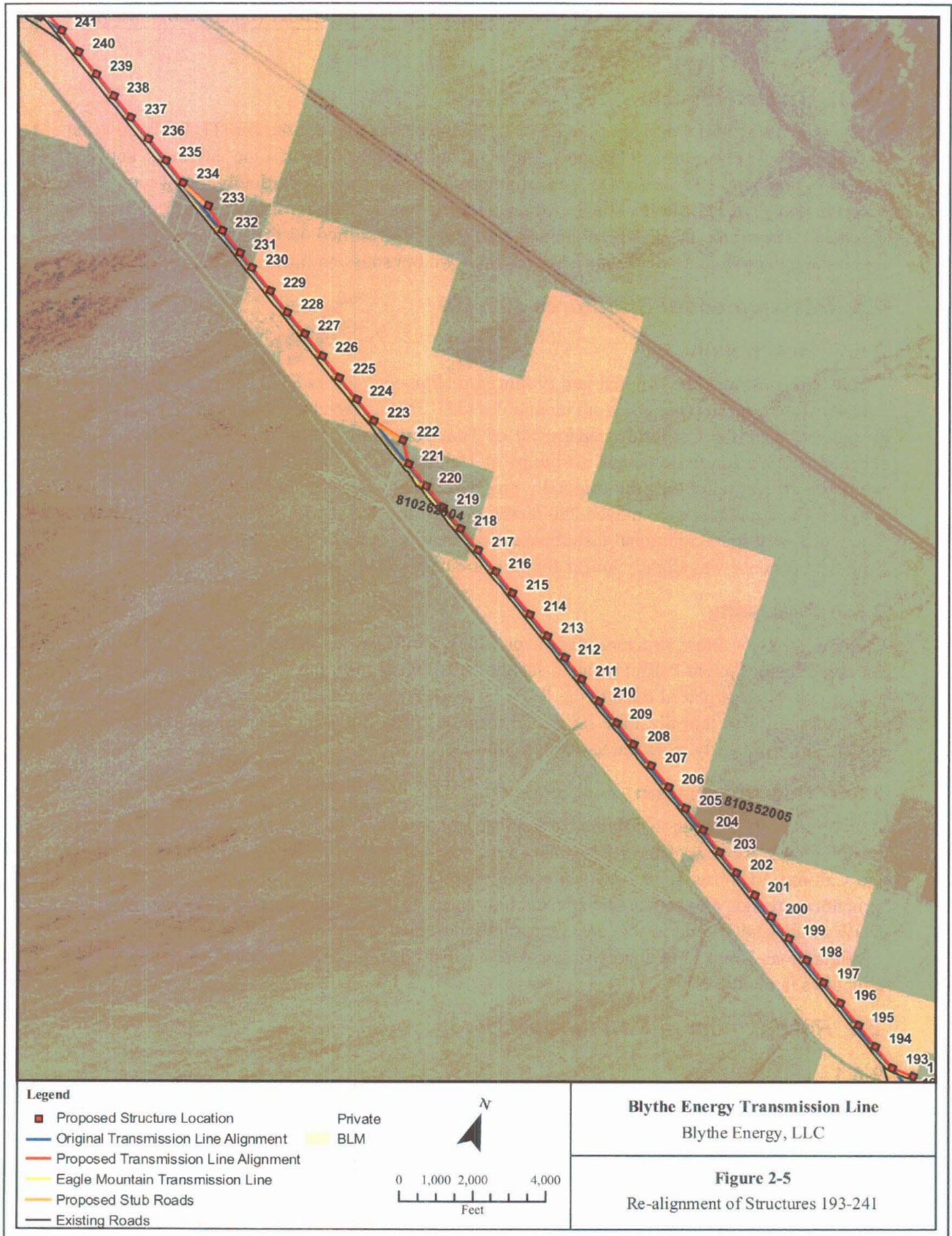
2.4.1 Description

Figure 2-5 illustrates the minor shift in alignment between structure numbers 193 and 241. In this area, the BEPTL ROW was designed to be immediately adjacent to and north of the Edison Eagle Mountain Line. The alignment of these structures was shifted north 65 feet, together with the proposed BEPTL ROW, to avoid the Eagle Mountain line's actual alignment. This resulted in an additional 0.86 acre of disturbance due to the needed minor lengthening of the access roads to each of these structures.

2.4.2 Necessity

It was necessary to shift the BEPTL alignment to the north 65 feet to provide a safe distance between the existing Eagle Mountain Transmission line and the BEPTL.





2.4.3 New Information

At the time of the initial design of the BEPTL, the intent was to place the BEPTL ROW adjacent to and immediately north of Edison's Eagle Mountain Transmission Line easement between structure numbers 193 and 241. The alignment was mapped accordingly. However, field investigation revealed that the Eagle Mountain Line was in fact constructed north of its own easement. Therefore, the BEPTL alignment and ROW was shifted 65 feet to the north to allow for this and to provide a safe distance between the two transmission lines.

2.5 Realignment of Structures 406-410

2.5.1 Description

Figure 2-6 illustrates the original and proposed realignment for structure numbers 406 to 410. The structure type has changed from monopoles to H-frame structures for structures 408 and 409 in order to span the California department of Transportation (Caltrans) ROW for I-10, which includes ROWs for the on- and off-ramps at Hayfield Road. The H-frame structure heights would be 10 feet taller than the originally proposed monopoles and the span would be 200 feet longer. The structures were moved 250 feet to the east to cross the ROW at a narrower location. There is a very small additional disturbance footprint due to these minor structure realignments. Stub road distance was slightly longer for structure numbers 407 and 410.

2.5.2 Necessity

Caltrans does not allow structure placement within the ROW for a limited-access freeway (see Caltrans Encroachment Permit manual, section 619). Initial mapping of the ROW indicated that the structures were placed outside the ROW. However, upon receipt of the "as-built" maps for the Caltrans ROW that illustrate the actual location of the ROW across BLM-managed lands, Blythe Energy slightly relocated structures 406-410.

2.5.3 New Information

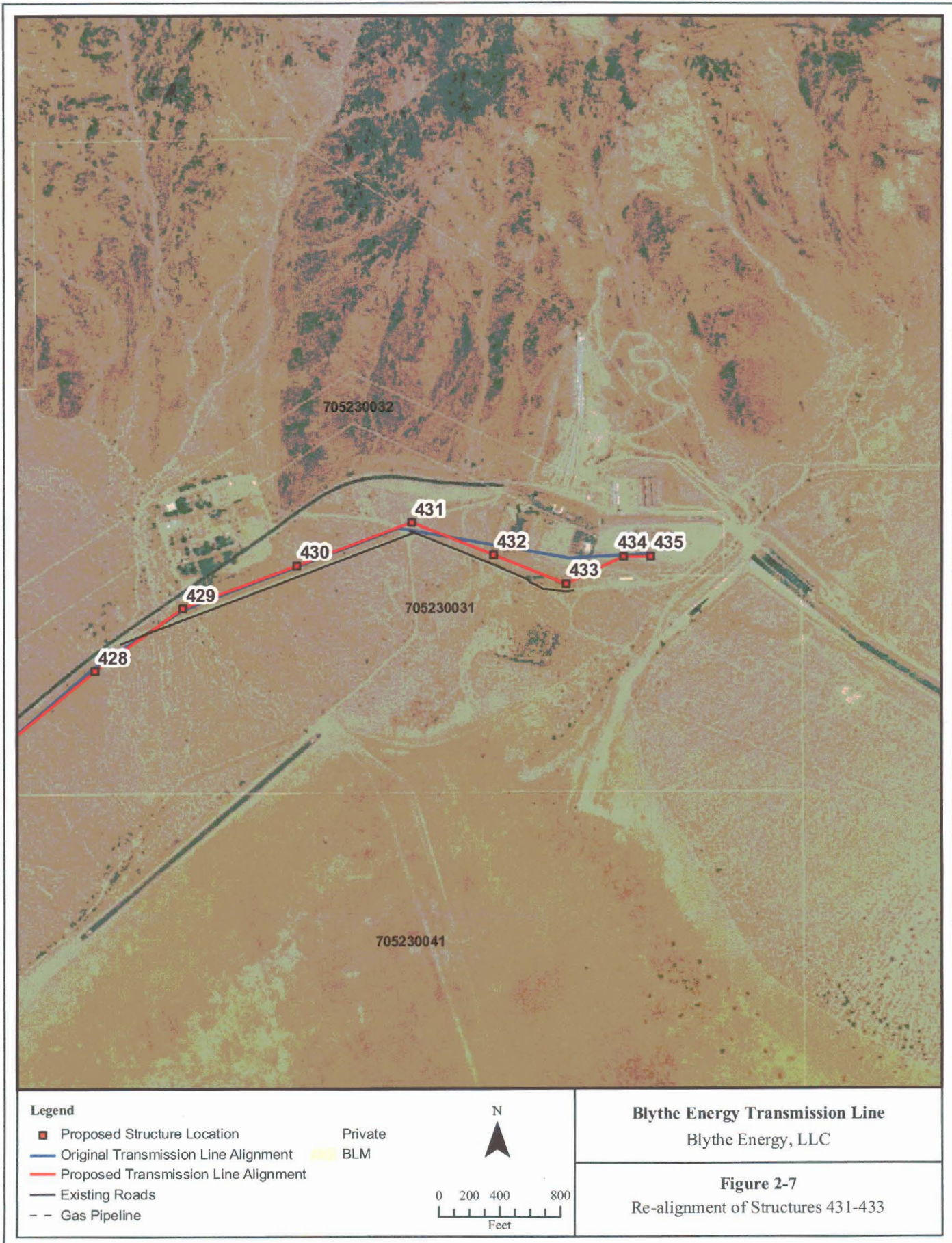
At the time of certification, Blythe Energy had not discussed the crossing of the I-10 freeway with Caltrans. Review of the ROW maps indicated that the structures would be located within the Caltrans ROW as shown on the as-built drawings. Subsequent discussions revealed that structures are not allowed under any circumstances in a limited-access highway ROW. The ROW is unusually large in this area, apparently designed to accommodate alternative off-ramp configurations from those finally constructed, and the realignment is needed to avoid placing structures in the ROW.

2.6 Realignment of Structures 431-433

2.6.1 Description

Figure 2-7 illustrates the original and proposed realignment for structure numbers 431-433. These structures were moved south to avoid a propane fuel area. The structures are closer to an existing access road and will not require stub roads, reducing the disturbance by 0.1 acre.





2.6.2 Necessity

MWD requested the change for safety reasons and to avoid conflict with their current use of their property.

2.6.3 New Information

MWD made this information available in an e-mail dated June 11, 2008 (see Appendix D, Exhibit D-2). Blythe Energy was able to realign the ROW to allow for this and to provide a safe distance between the transmission line and the fuel area.

2.7 Change in Location of Easternmost Laydown Yard

2.7.1 Description

Figure 2-8 illustrates the new proposed laydown area within the Blythe Airport area. It is anticipated that the project will temporarily occupy about 5 acres. No laydown facility would be used at the Blythe Energy Plant. Appendix D, Exhibit D-3, demonstrates permission from Butch Hull, City of Blythe Acting City Manager, for this use of the Blythe Airport. This area is devoid of vegetation and is a disturbed area with no biological resources. Blythe Energy would collect and remove trash and garbage from the area and erect temporary fencing around the perimeter. The fencing would be equipped with desert tortoise (*Gopherus agassizii*) exclusion fencing (see Section 3.2, Biological Resources, for details). There is an existing access road for this area and no additional road construction is being considered.

2.7.2 Necessity

The original 10-acre laydown yard was on land owned by Caithness and part of the “Blythe II” project. Caithness has advised that they will need the originally planned area for the construction of the “Blythe II” plant and will not be able to make the area available for BEPTL construction. Blythe Energy has sought and obtained permission to use an area near the airport for a construction laydown facility.

2.7.3 New Information

At the time of certification, the construction laydown area, proposed immediately west of and adjacent to the existing Blythe Energy Project plant, was available for use. However, that area belongs to Caithness, who has advised that they will need the area for the construction of their plant and will not be able to make the area available for BEPTL construction. Therefore, Blythe Energy has sought and obtained permission to use an area near the airport for a construction laydown facility.

2.8 Change in Location of Westernmost Laydown Yard

2.8.1 Description

Figure 2-9 illustrates the proposed Hayfield Exit laydown yard and the previously approved Julian Hinds laydown yard. The originally proposed Julian Hinds Laydown Yard will not be used. The proposed 2.4-acre Hayfield area is presently used as an informal layover area by





truckers and campers; it is without vegetation and is heavily littered. It lies on either side of one of the access roads for Edison's Devers-Palo Verde Transmission Line. Blythe Energy would collect and remove trash from the area and erect temporary fencing around the perimeter with gates at the north and south road crossings. A key to the lock for each gate, or a separate lock, would be made available to Edison and BLM in case of emergency access needs to the DPV transmission line. The fencing would be equipped with desert tortoise exclusion fencing (see Section 3.2, Biological Resources). There is an existing access road that serves the DPV transmission line south of the freeway offramp. No additional access road construction is proposed.

2.8.2 Necessity

Because the Metropolitan Water District (MWD) and Edison have advised Blythe Energy that the originally proposed laydown yard near the Julian Hinds Substation will not be available for use, Blythe has located a slightly larger area south of the Hayfield Road freeway interchange to provide temporary storage of structures and other materials.

2.8.3 New Information

At the time of certification, Blythe Energy planned for a small (0.4-acre) laydown yard adjacent to the proposed substation modifications just south of the existing Julian Hinds substation. However, subsequent conversations with MWD have indicated that they would not provide a temporary easement for the laydown yard. In addition, Edison has indicated that the laydown yard as initially proposed could constitute a safety hazard during its use. Therefore, Blythe Energy is petitioning for an alternative site.

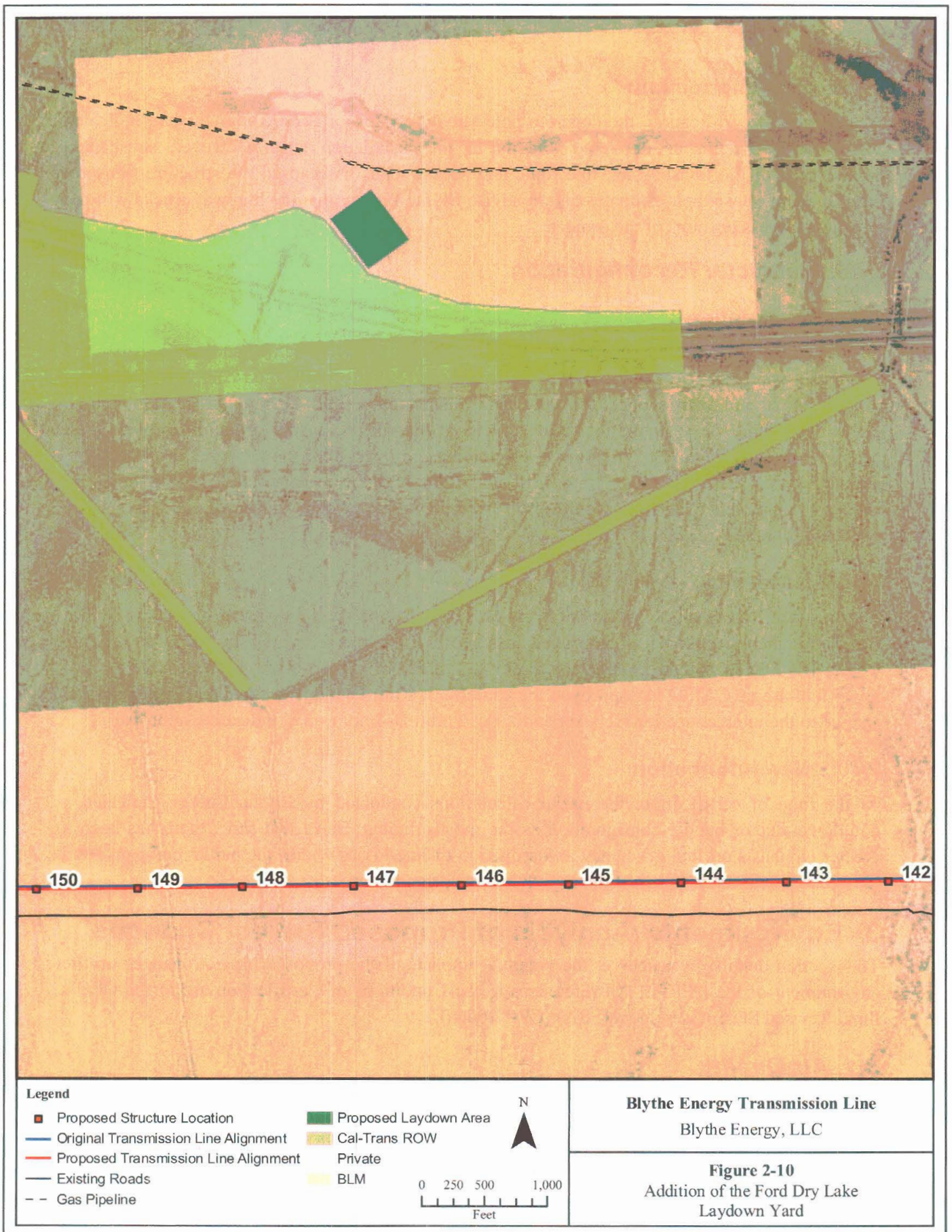
2.9 Addition of the Ford Dry Lake Laydown Yard

2.9.1 Description

Figure 2-10 illustrates the proposed 5-acre Ford Dry Lake Exit laydown yard. The area is presently used as an informal layover area by truckers and campers; it is without vegetation and is heavily littered. It is adjacent to the Caltrans ROW on the south and west of the laydown area. Blythe Energy would collect and remove trash and garbage from the area and erect temporary fencing around the perimeter with a gate to allow truck access. The fencing would be equipped with desert tortoise exclusion fencing (see Section 3.2, Biological Resources). There is an existing access road that continues past the proposed laydown yard and accesses a natural gas pipeline, the Ford Dry Lake area, and the McCoy Wilderness trailhead. No additional access road construction is proposed.

2.9.2 Necessity

Blythe has requested an additional laydown yard to accommodate the needed additional space for structure transfer from highway trucks to desert-road-capable tractors.



2.9.3 New Information

At the time of certification, the concrete pole structure transportation contractor had indicated that structures could be delivered directly to the installation sites. However, subsequent examination of the transmission line route and access roads has caused the structure transport companies to revise their estimates and to advise Blythe Energy that the highway trucks will not be able to access portions of the project.

2.10 Conductor Reconfiguration

2.10.1 Description

Blythe Energy proposes to construct the BEPTL with a three-conductor bundle rather than the previously approved two-conductor bundle. See Figure 2-11 for a detailed comparison drawing of the original and additional proposed design. This design will not change the location, height, embedment depth, or configuration of the structures, but will increase their diameter by 15 to 20 percent over the original design. The sag calculations performed for the I-10 crossings at Blythe and at Hayfield Road are not altered by the addition of the third conductor to the bundle. No change in disturbance footprint would result from the addition of an additional conductor to the conductor bundle.

2.10.2 Necessity

As a result of a transmission line optimization study, Blythe determined that by adding a third conductor, there would be an improved loss profile and transfer capability. With lower line losses, Blythe can deliver contractual power to the SP-15 market with greater efficiency and lower fuel usage. CAISO has approved the addition of a third conductor bundle as an immaterial change to the interconnection (see Appendix D, Exhibit D-4, for e-mail indicating approval).

2.10.3 New Information

At the time of certification, the initial calculations conducted by Blythe Energy indicated a double-conductor bundle configuration as the most efficient. Since that time, there has been a greater emphasis on fuel efficiency and reduction of line losses within the parent company, and the decision was made to invest the capital in a third conductor.

3 Environmental Analysis of Proposed Project Changes

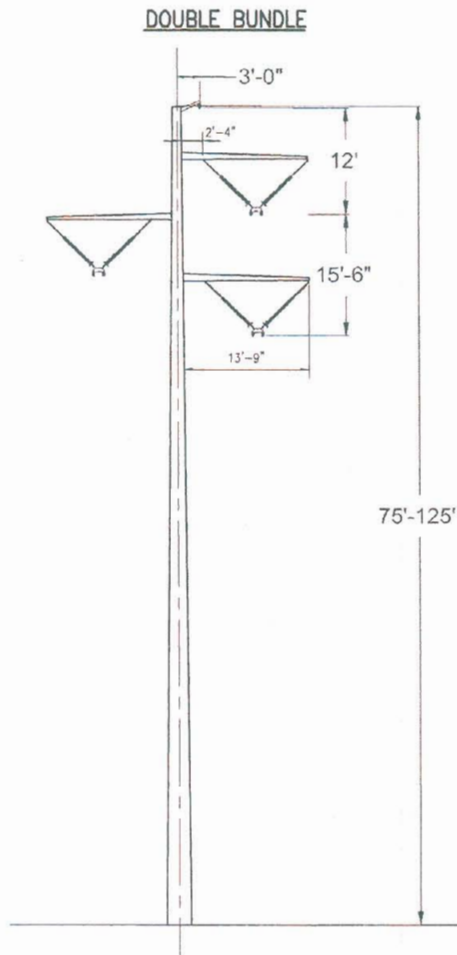
This section details, by resource, the potential impacts of the proposed project changes on the environment of the BEPTL. All references to the Conditions of Certification are to the CEC's Final Revised Staff Assessment (FSA) (CEC 2006a).

3.1 Air Quality

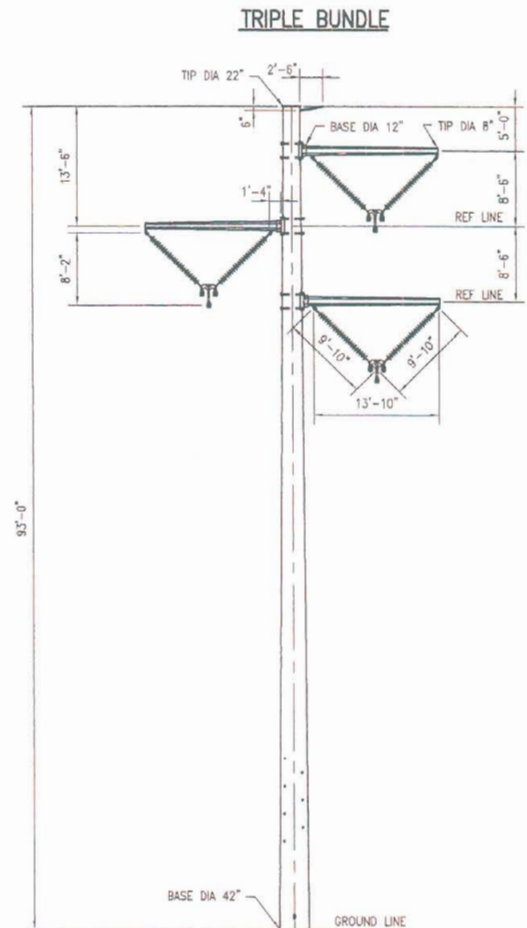
Impacts to air quality from the project as modified with the proposed changes would be essentially the same as the impacts associated with the project as currently approved, because there are no proposed changes in construction methods including dust control and management

THIS DRAWING WAS PREPARED BY POWER ENGINEERS, INC. FOR A SPECIFIC PROJECT, TAKING INTO CONSIDERATION THE SPECIFIC AND UNIQUE REQUIREMENTS OF THE PROJECT. REUSE OF THIS DRAWING OR ANY INFORMATION CONTAINED IN THIS DRAWING FOR ANY PURPOSE IS PROHIBITED UNLESS WRITTEN PERMISSION FROM BOTH POWER AND POWER'S CLIENT IS GRANTED.

A	ISSUED FOR ILLUSTRATION	07/07/08	JLQ	DWN	EAR				
REV	REVISIONS	DATE	DRN	DSGN	CKD	APPD			



TYPICAL 230 KV SINGLE CIRCUIT TANGENT POLE



D-TAN-C-E
DELTA CONFIGURATION
TANGENT
CONCRETE POLE
EMBEDDED
(0'-2')

		DSGN	DWN	07/07/08	 POWER ENGINEERS www.powereng.com	FLORIDA POWER & LIGHT ENERGY	JOB NUMBER	REV
		DRN	JLQ	07/07/08		BUCK - JULIAN HINDS 230 KV TRANSMISSION LINE	114313	
		CKD	EAR	07/07/08				
REFERENCE DRAWINGS		SCALE: NTS		DOUBLE BUNDLE AND TRIPLE BUNDLE COMPARISON ILLUSTRATION		DRAWING NUMBER	FIGURE 2-11	
		FOR 8.5x11 DWG ONLY						

of construction vehicle emissions. There will be no changes in operations or maintenance activities due to the proposed changes. An estimated additional 7 acres of disturbance will be added to the project with the relocated Hayfield laydown and the additional Ford Dry Lake laydown area. Both of these areas are previously disturbed and devoid of vegetation; however, there is the potential for additional dust emissions from these areas. Dust that could be generated as a result of the additional laydown areas will be minimized and controlled through existing Conditions of Certification. Therefore, the proposed changes would not cause any substantial additional adverse air quality impacts above and beyond those already identified. No changes to, or deletions of, any air quality Conditions of Certification are required.

3.2 Biological Resources

Project impacts to biological resources would be essentially the same as currently approved project impacts. Therefore, the proposed changes would not substantially change the impacts to biological resources above and beyond those already identified and mitigated for in the existing CEC Decision and Conditions of Certification. No changes to, or deletions of, any biological resources Conditions of Certification are required.

Desert tortoise, Mojave fringe-toed lizard, and burrowing owl are the sensitive wildlife species most likely to occur in the areas of structure realignment and laydown areas. As required in the FSA (CEC 2006a pages 4.2, 15-20) Blythe Energy will implement mitigation measures to decrease the likelihood of direct or indirect impacts to desert tortoise, Mojave fringe-toed lizard, and burrowing owl. Harwood's milk vetch is also likely to occur in areas of dune or disturbed habitat; however, there are no changes in overall impact due to minor realignment of structures in sandy areas.

Pedestrian transects were completed for the entire length of BEPTL during several survey events. The initially proposed ROW was surveyed in meandering transects covering a total width of 1,000 feet. The proposed changes, with the exception of the new laydown areas at the Blythe Airport and at Ford Dry Lake, are within the originally surveyed area. Those two areas were reviewed in 2008 (Appendix B) and found to be actively disturbed areas devoid of vegetation and without habitat for any sensitive species. In addition, consistent with the USFWS protocol, desert tortoise transects were conducted concurrently for the DPV-2 project, BEPTL, and the Desert Southwest Transmission Line, from May 2 to 17, 2005. One-hundred percent of the BEPTL 95-foot ROW was surveyed using parallel, 30-foot-wide belt transects, as were the ROWs for the other two projects. Zones of influence surveys extended out from the 100 percent survey swath to 2,400 feet on either side of the combined projects, providing a very wide survey corridor (Tetra Tech 2005). The insignificant project changes are proposed within the originally surveyed area with the exception of the Blythe Airport and Ford Dry Lake laydown areas, which were reviewed in 2008 (Appendix B). The biological surveys documented the location and types of habitats and all occurrences of sensitive species.

The proposed Blythe Airport Laydown Area is smaller than the originally proposed Blythe Plant laydown area and would not require any changes in Conditions of Certification or compensatory

mitigation. It would be enclosed with temporary fencing with desert tortoise exclusion fencing included as required by the Condition of Certification BIO-1.

The Hayfield Laydown area, located just south of the Hayfield Road interchange with I-10, is in critical desert tortoise habitat and is within the Chuckwalla Desert Wildlife Management Area (DWMA). The additional 2 acres of disturbance would be compensated at a 5:1 ratio as specified in the text of the FSA and in BIO-17. This would add approximately 10 acres of compensatory mitigation land purchases to the overall mitigation package. The final mitigation cost will be determined by comparison of aerial photography taken just before and immediately after the construction, and may be larger or smaller than that estimated for the purposes of initial mitigation calculations. It would be enclosed with temporary fencing with desert tortoise exclusion fencing included as required by the Condition of Certification BIO-1.

The proposed Ford Dry Lake laydown area will be located immediately north of the Ford Dry Lake/I-10 interchange. This laydown area is located outside of critical desert tortoise habitat, but would impact 5 acres of suitable desert tortoise habitat, which would be compensated for at a 1:1 ratio and would add approximately 5 acres of compensatory mitigation land purchases to the overall mitigation package. However, the laydown area is directly adjacent to I-10 on previously disturbed ground with little vegetation. Given the area's current use for an informal truck layover area, the probability of tortoise presence is low, and impacts from its temporary use as a laydown yard are insignificant. It would be enclosed with temporary fencing with desert tortoise exclusion fencing included as required by the Condition of Certification BIO-1. Mitigation terms and compensation rates for this impact are as specified in BIO-17, and the net impact to biological resources as a result of the change will be compensated for to a level of insignificance under the existing Conditions of Certification.

Overall disturbance footprint for the BEPTL will increase by 7 acres for the laydown areas and by an estimated 2.18 acres for the changes in access roads occasioned by the proposed structure realignments (see Table 2-1, above). However, because some changes were expected between the proposed project and final engineering, and because there was a difference of opinion regarding potential total disturbance, Condition BIO-17 was provided to allow for determination of the final disturbance caused by the project using a "Protocol for Disturbance Calculation and Compensation" (CEC 2006a, page 4.2-25).

3.3 Cultural Resources

Impacts to cultural resources from the project as modified with the proposed changes would be essentially the same as the impacts associated with the project as currently approved. Cultural resources surveys conducted for the additional disturbance areas (Appendix C) revealed no additional cultural resources. Therefore, the proposed changes would not cause new cultural resource impacts above and beyond those already identified and mitigated for in the existing CEC Certification and would not alter any existing or call for any new Conditions of Certification. No changes to or deletions of any cultural resources Conditions of Certification are required.

Previous reports, inventories, and evaluations of cultural resources in the project area were reviewed, and additional record searches and intensive surveys were conducted for an Area of Potential Effects (APE) that include the proposed transmission line realignment and the proposed new laydown areas.

Blythe Energy conducted a record search and intensive surveys for 100 percent of this alignment in January and February 2005. A final inventory report was provided in July 2005 (Mooney, Jones & Stokes 2005). The survey areas were defined as a 300-foot-wide corridor for the transmission line, a 100-foot-wide corridor for all access and spur roads, and the footprint and a 200-foot buffer in all directions from the perimeter of the footprint of substations, staging areas, and other project components. In addition, any sensitive resources within one-quarter mile, for which setting is an important aspect of the integrity of the resource, are also considered to be within the APE. The combined efforts of this current study (record search/pedestrian survey) of the proposed realignment did not result in the identification of previously unidentified cultural resources within the APE; therefore, this stretch of the transmission line and associated laydown areas would not impact any new cultural resources.

The cultural resources (excluding isolates) observed or recorded within the survey area were summarized in the CEC Staff Assessment/Environmental Assessment (CEC 2006a; Table 2 on Page 4.3-14). These measures are still appropriate for all proposed structure realignments and laydown areas, and when implemented, the proposed modifications would not change the impact of the proposed project or have a significant adverse impact on cultural resources.

3.4 Geology and Paleontology

Literature and archival reviews conducted for the approved project did not provide evidence of any paleontological resources that would be impacted by the Project. All areas affected by the proposed eight modifications were included in the original literature and archival reviews, including the proposed laydown area north of I-10 at the Ford Dry Lake interchange. Because the proposed changes involve minor facility relocations and only seven additional acres of disturbance for laydown areas, they would not cause any new geological or paleontological impacts above and beyond those already identified and mitigated for in the existing CEC Decision and Conditions of Certification. No changes to, or additions of, any geological or paleontological resource Conditions of Certification are required.

3.5 Hazardous Materials Management

The proposed modifications would not change the impact that the project would have on hazardous materials management. The one new and two relocated laydown areas will be used to store minor quantities of hazardous materials such as fuels and lubricants, and standard Storm Water Pollution and Prevention Plan measures will be applied. No changes to or additions of any hazardous materials management Conditions of Certification are required.

3.6 Land Use

Impacts to land use from the project as modified with the proposed changes would be essentially the same as the impacts associated with the project as currently approved. Structure numbers 302-307 are relocated from private to public lands, increasing the amount of public land disturbance by 1.26 acres and reducing private land disturbance by an equivalent amount. The proposed relocation of the Hayfield laydown yard reduces non-federal temporary disturbance by 0.4 acres and increases federal land temporary disturbance by 2.4 acres. The addition of the Ford Dry Lake laydown area adds 5 acres to public land utilization and temporary disturbance. Table 2-1 summarizes the disturbance footprint changes for all proposed minor project changes. The calculations show a 42 percent increase in disturbance for these project features, and that overall, the proposed changes vary the initial estimate of total project disturbance by about 3.6 percent. Proposed realignments on private land have been agreed to by landowners. No changes proposed would impact current or future land use. Therefore, the proposed changes would not cause any new land use impacts above and beyond those already identified and mitigated for in the existing CEC Decision and Conditions of Certification. No changes to or additional Conditions of Certification are required.

3.7 Noise and Vibration

The proposed modifications would not change the noise impact of the project. The proposed modifications are located in areas that have no permanent residents and there are no additional activities that would generate substantial sustained noise events. No changes to or additional Conditions of Certification are required.

3.8 Public Health

The transmission line would not be substantially closer to any residence or other sensitive receptor. The proposed modifications would not change the impact the project would have on public health. No changes to or additional Conditions of Certification are required.

3.9 Socioeconomics

The proposed modifications would not change the impact the project would have on socioeconomics or on schools, housing, law enforcement, emergency services, hospitals, or utilities. No changes to or additional Conditions of Certification are required.

3.10 Soil and Water Resources

The proposed route realignment modifications and additional laydown areas would not substantially change the impacts the project would have on soil and water resources or be different from those already identified and mitigated for in the existing CEC Decision and Conditions of Certification.

Table 2-1 summarizes the overall change in estimated disturbance footprint. The additional 5-acre laydown area at the Ford Dry Lake/I-10 interchange and 2.4-acre relocated laydown area south of Hayfield Road are on disturbed, level surfaces. The easternmost laydown area at Blythe

airport is previously disturbed land with little vegetation, and its use will not cause a different impact from the temporary use of the originally proposed laydown area adjacent to the BEP. Total additional soil disturbance would be approximately 9.08 acres, although the laydown areas are in previously disturbed areas.

The proposed Ford Dry Lake/I-10 laydown area is southeast of the Ford Dry Lake playa (dry lake bed) and in an area where trucks park off the freeway as an informal layover stop. The Hayfield area is just south of the Interstate-10 Hayfield offramp. It has also been informally used as a trucker layover area and is devoid of vegetation and heavily littered with trash. Both areas will be cleared of trash and fenced. After their temporary use as laydown areas, the fencing and all materials will be removed. Both areas will be free of trash at the end of their temporary use. Mitigation measures found in the Drainage, Erosion and Sedimentation Plan/Storm Water Pollution Prevention Plan will be implemented for all areas included in the proposed modifications. No changes to or additional Conditions of Certification are required.

3.11 Traffic and Transportation

The proposed modifications would not change the impact the project would have on traffic and transportation. Access from state and county roads will be similar to the approved project and the proposed modifications will not cause substantial changes to construction or operation traffic. The proposed modifications will require the reconfiguration and extension of 90 stub roads. These stub roads will follow the approximate configuration of the approved project and remain accessible via I-10, existing interchanges, and the existing SCE maintenance routes. Therefore, no significant traffic or circulation impacts will occur from the extension or reconfiguration of stub roads. No changes will occur in type of vehicles or equipment traveling on these routes, or their structural or cargo specifications. Structure realignment and additional or repositioned laydown areas will not cause substantial changes to traffic or circulation in the area over that evaluated in the initial application.

The relocation of the easternmost laydown area to the Blythe Municipal Airport has been authorized by the airport manager and will not result in substantial impacts to airport traffic or circulation at this location. The relocation of the westernmost laydown area from the Julian Hinds Substation to a 2.0-acre site just south of the Hayfield Road/ I-10 interchange will redirect construction and operation traffic to the new location, reducing the potential for traffic conflict with MWD operations. Both the previous and proposed laydown areas are in isolated areas with little to no traffic, and no significant impacts to local traffic or circulation are expected at the proposed Hayfield Road location.

The addition of a new laydown yard at the Ford Dry Lake/I-10 interchange will redirect construction and operation traffic to the new location; however, this new location is in an isolated area with very little traffic and is accessible via an established freeway interchange. There will be no changed impacts to local traffic or circulation at the proposed Ford Dry Lake laydown area. No changes to or additional Conditions of Certification are required.

3.12 Visual Resources

The proposed modifications would not substantially change the impact of the project on visual resources nor alter any Condition of Certification of the originally approved project.

The transmission line would cross I-10 near the Hayfield exit 250 feet to the east of the originally proposed crossing shown in the FSA as KOP 5 (CEC 2006a, page 4.11-12). The structures were relocated to be outside the Caltrans ROW, resulting in a longer span and taller structures to meet Caltrans specifications regarding minimum clearances over the freeway. As shown in the KOP 5 simulations, the structures are clearly visible. The revised locations would place the structures at the same apparent height to the viewer, but lower on the slope to the north and south of the exit complex, and therefore, of greater overall height. The difference in structure height and the change from monopoles to H-frame structures would not substantially change the visual impact as shown in the simulation at KOP 5.

Other structure realignments to avoid resources or to avoid utility-owned parcels would not change the appearance of the overall project from key observation points. Therefore, there will be no change in visual impacts resulting from these structure realignments as compared to the originally proposed alignment.

The additional proposed laydown area at Ford Dry Lake and the relocated laydown area at Hayfield are temporary and will not introduce any high-profile visual structures to the existing landscape. In addition, the removal of existing trash and garbage from each of these areas, and the restoration of the areas after use as temporary laydown areas, will improve the visual context of each of these offramp areas. The relocation of the easternmost laydown area from the Blythe plant to the Blythe Municipal Airport will not impact sensitive visual receptors and has been approved by the airport manager. Therefore, visual impacts resulting from these changes will be insignificant.

The proposed increase in conductor bundle size from a double-conductor to a triple-conductor bundle will result in changes that will not be readily apparent to the casual observer from the freeway, especially at freeway speeds. The additional conductor will not be detectable from observer distances. Structures will be 15 to 20 percent larger in diameter and therefore somewhat more apparent against the landscape, but the change is minor given the distance and speed of the observers. No changes to or additional Conditions of Certification are required.

3.13 Waste Management

Waste management during the construction and operation would not change as a result of the proposed modifications. No changes to or additional Conditions of Certification are required.

3.14 Worker Safety and Fire Protection

Construction and operation of the proposed modifications would not change the impact the project would have to worker safety or cause a change in fire hazard. No changes to or additional Conditions of Certification are required.

4 Ability to Comply With LORS

The proposed project modifications are minor and are consistent with all applicable LORS. The findings and conclusions contained in the Commission Decision for BEP (CEC 2001) and the Blythe Transmission Line (CEC 2006b) are still applicable to the project as modified. The proposed modifications will not require any changes to the Conditions of Certification.

5 Potential Effects on the Public

Construction and operation of the proposed modifications would not change the impact of the proposed project or have a significant adverse impact to the public. The temporary use of the Hayfield and Ford Dry Lake laydown areas would reduce the area previously used for informal truck layovers, reducing the tendency to deposit trash and garbage into the desert environment.

6 List of Property Owners

Appendix A provides a list of all property owners whose property is located within 1,000 feet of the proposed project modifications in accordance with the CEC Siting Regulations (Title 20, CCR, Section 1769[a][1][H]).

7 Potential Effects on Property Owners

Relocated structures for changes as proposed have already received easements from affected property owners, with the exception of those structures relocated from private to public lands. The changed $\frac{1}{4}$ - $\frac{1}{4}$ sections are found in Table 7-1, below:

Table 7-1. Changes in BLM $\frac{1}{4}$ - $\frac{1}{4}$ Sections

Proposed Change	Additional BLM aliquots
Structure Numbers 153-159, 221-223, 232-234, and 343-345	SWSW Sec 14 T 06 S R 17 E
Structure Numbers 302-307	NESE Sec 26 T 05 S R 15 E NWSE Sec 26 T 05 S R 15 E NESW Sec 26 T 05 S R 15 E NWNW Sec 26 T 05 S R 15 E
Westernmost (Hayfield) Laydown	SENE Sec 8 T 06 S R 13 E
Ford Dry Lake Laydown	NESW Sec 34 T 06 S R 19 E

All crossings of private property for the BEPTL are subject to voluntary agreements negotiated with the landowner. Changes in structure locations and in access road locations have resulted in additional or different negotiations with landowners. However, no change in overall impact to property owners has resulted from the structure or access road realignments.

8 References Cited

- California Energy Commission (CEC). 2000. Final Staff Assessment/Environmental Assessment for the Blythe Energy Power Plant Project (99-AFC-8).
- California Energy Commission (CEC). 2001. Commission Decision for the Blythe Energy Project (99-AFC-8).
- California Energy Commission (CEC). 2006a. Revised Staff Assessment/ Draft Environmental Assessment.
- California Energy Commission (CEC). 2006b. Commission Decision on Amendment Petition for the Blythe Energy Project (99-AFC-8).
- Mooney, Jones & Stokes (MJ&S). 2005. Draft Cultural Resource Inventory of the Proposed Blythe Energy Transmission Project. Submitted to the Docket on June 14, 2005.
- Tetra Tech. 2005. Combined Desert Tortoise Survey Report, conducted for Southern California Edison, Inc., Desert Southwest Energy, LLC, and Blythe Energy, LLC. Submitted to the Docket on October 6, 2005.
- Western & BLM. 2007. Finding of No Significant Impact and Floodplain Statement of Findings – Blythe Energy Project Transmission Line Modifications Project, Riverside County, California. Western/DOE EA-1522.

Appendix A

List of Property Owners within 1,000 Feet Affected by Project Change



**The
Holt
Group**

201 E. Hobsonway, # 36, Blythe, CA 92225
1601 North Imperial Avenue, El Centro, CA 92273
Phone (760) 337-3883 • Fax (760) 337-5997

THG Project No.:	632.030E
Project Title:	Blythe Transmission Line (BTL)
Sheet Content:	List of Property Owners within 1,000 feet Affected by Project Change.
Date:	July 15, 2008
Crew:	

POLE LOCATION	ASSESSOR PARCEL NUMBER (APN)	OWNER'S NAME	MAILING STREET ADDRESS
153-159	860-140-016	USA	US DEPT OF INTERIOR, WASHINGTON DC 20401
153-159	860-230-002	DAVID J VANBEBBER	2723 GLENVIEW WAY, ESCONDIDO CA 92025
153-159	860-230-003	SURENDER VUTHOORI	42800 BOB HOPE DR #204, RANCHO MIRAGE CA 92270
153-159	860-230-004	S C E	PO BOX 800, ROSEMEAD CA 91770
153-159	860-230-006	CHARLES WATKINS	9108 NORTHRIDGE AVE NE, ALBUQUERQUE NM 87111
153-159	860-230-007	SURENDER VUTHOORI	42800 BOB HOPE DR #204, RANCHO MIRAGE CA 92270
192-193	810-391-001	RUTH CASPER	211 FRANCISCAN DR, VALLEJO CA 94589
192-193	810-392-001	CASPER FAMILY TRUST	211 FRANCISCAN DR, VALLEJO CA 94589
192-193	810-391-002	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
192-193	810-392-002	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
221-223	* 810-241-002	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
221-223	810-241-003	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
221-223	810-261-005	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
221-223	* 810-262-004	WESTERN OILFIELDS SUPP	3404 STATE RD, BAKERSFIELD CA 93308
221-223	810-262-007	S C E	PO BOX 800, ROSEMEAD CA 91770
232-234	810-211-002	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
232-234	810-232-002	SHARON F SUNN	2746 S ARCADIAN SHORES RD, ONTARIO CA 91761
232-234	810-232-003	KATHLEEN T HOGAN	1500 ANTOINETTE DR, LA HABRA CA 90631
232-234	810-232-005	WILLIAM R HARRIS	PO BOX 439016, SAN YSIDRO CA 92143
232-234	810-232-007	VERONICA C EVANS	43661 TAMARISK DR, DESERT CENTER CA 92239
232-234	* 810-232-011	VERONICA C EVANS	43661 TAMARISK DR, DESERT CENTER CA 92239
232-234	810-232-012	ADAPA SATYA	216 SHADYBROOK CT, PITTSBURG CA 94565
232-234	810-232-013	RODERICK T WARING	44420 ROYAL LYTHAM DR, INDIO CA 92201
232-234	* 810-232-014	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
232-234	810-232-015	ROBERT B HELMAND	170 S MAIN ST #750, SALT LAKE CITY UT 84101
232-234	810-232-017	ROBERT B HELMAND	170 S MAIN ST #750, SALT LAKE CITY UT 84101
232-234	810-232-019	S C E	PO BOX 800, ROSEMEAD CA 91770
232-234	* 810-232-023	ESTELLE AMOU ASENSI	9070 WOODED HILL DR, CORONA CA 92883
241-242	* 810-211-001	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
241-242	* 810-211-002	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401



201 E. Hobsonway, # 36, Blythe, CA 92225
 1601 North Imperial Avenue, El Centro, CA 92273
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THG Project No.:	632.030E
Project Title:	Blythe Transmission Line (BTL)
Sheet Content:	List of Property Owners within 1,000 feet Affected by Project Change.
Date:	July 15, 2008
Crew:	

POLE LOCATION	ASSESSOR PARCEL NUMBER (APN)	OWNER'S NAME	MAILING STREET ADDRESS
193-241	810-320-001	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
193-241	810-352-002	JULIUS JOHN BOLTON	7928 NE 55TH ST, KANSAS CITY MO 64119
193-241	810-352-005	LAON THI VU TUYET	11326 TRAILSTONE CT, RIVERSIDE CA 92505
193-241	* 810-352-006	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
193-241	* 810-352-008	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
193-241	* 810-391-002	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
241-242	810-212-001	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
343-345	811-042-010	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
343-345	811-052-005	MARY URSEGAY	57303 PUEBLO TRL, YUCCA VALLEY CA 92284
343-345	811-052-008	KAO LI YU	179 SEC 3 NAN KANG RD ROC, TAIPEI TAIWAN
343-345	811-052-011	S C E	PO BOX 800, ROSEMEAD CA 91770
343-345	811-052-012	GEORGE LIDDLE	7416 RAINBOW HEIGHTS RD, FALLBROOK CA 92028
343-345	811-052-013	TOM NEAL INC	710 N MAIN ST, SANTA ANA CA 92701
343-345	811-052-014	HUNG LAI CHONG	11 FINCHLEY CIR, MARKHAM ON L3R 8S2 CANADA
343-345	811-052-015	RICHARD L LUM	21355 STANWELL ST, CHATSWORTH CA 91311
343-345	* 811-052-016	BLYHE ENERGY LLC, CA	700 UNIVERSE BLVD, JUNO BEACH FL 33408
343-345	* 811-052-017	BLYHE ENERGY LLC, CA	700 UNIVERSE BLVD, JUNO BEACH FL 33408
343-345	811-072-008	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
343-345	811-080-011	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
406-410	709-340-001	MWD	PO BOX 54153, LOS ANGELES CA 90054
406-410	709-370-012	USA	U S DEPARTMENT OF INTERIOR, WASHINGTON DC 20401
005-006	824-101-021	BLYTHE ENERGY	700 UNIVERSE BLVD, JUNO BEACH FL 33408
005-006	* 824-101-012	BLYTHE ENERGY	700 UNIVERSE BLVD, JUNO BEACH FL 33408
005-006	824-101-013	CAITHNESS BLYTHE II	565 5TH AVE #29TH, NEW YORK NY 10017
005-006	* 824-102-020	SUN WORLD INTERNAT	16350 DRIVER RD, BAKERSFIELD CA 93308
005-006	* 824-102-026	SUN WORLD INTERNAT	16350 DRIVER RD, BAKERSFIELD CA 93308
192-193	* 810-391-001	RUTH M CA5PER	211 FRANCISCAN DR, VALLEJO CA 94589
192-193	* 810-392-001	RUTH M CASPER	211 FRANCISCAN DR, VALLEJO CA 94589
431-433	705-230-032	MWD	PO BOX 54153, LOS ANGELES CA 90054



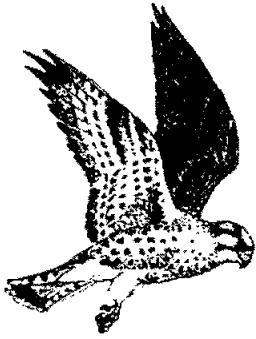
201 E. Hobsonway, # 36, Blythe, CA 92225
 1601 North Imperial Avenue, El Centro, CA 92273
 Phone (760) 337-3883 • Fax (760) 337-5997

THG Project No.:	632.030E
Project Title:	Blythe Transmission Line (BTL)
Sheet Content:	List of Property Owners within 1,000 feet Affected by Project Change.
Date:	July 15, 2008
Crew:	

POLE LOCATION	ASSESSOR PARCEL NUMBER (APN)	OWNER'S NAME	MAILING STREET ADDRESS
REALIGNMENT OF POLE NUMBER 302-307			
302-307	808-092-004	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
302-307	808-102-005	STANLEY E RAGSDALE	1212 HEXEM AVE, SANTA ROSA CA 95404
302-307	808-112-004	STANLEY E RAGSDALE	1212 HEXEM AVE, SANTA ROSA CA 95404
302-307	808-112-006	S C E	101 ASH ST #HW07, SAN DIEGO CA 92101
302-307	808-122-003	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
302-307	808-122-004	USA	US DEPT OF THE INTERIOR, WASHINGTON DC 20401
BLYTHE AIRPORT LAYDOWN AREA			
	824-020-005	COUNTY OF RIVERSIDE	3525 14TH ST, RIVERSIDE CA 92501
	824-080-004	COUNTY OF RIVERSIDE	3525 14TH ST, RIVERSIDE CA 92501
FORD DRY LAKE LAYDOWN AREA			
	810-461-002	ELTON NIXON	1905 VINEYARD AVE, VISTA CA 92081
HAYFIELD LAYDOWN AREA			
	709-370-013	USA	US DEPT OF INTERIOR, WASHINGTON DC 20401

Appendix B

Biological Resources Letter Report Airport, Ford Dry Lake, and Hayfield Laydown Yards



Applied Biological Consulting

4012 South Rainbow Boulevard #K192
Las Vegas, Nevada 89103
(702) 596-4346

To: Penny Eckert, Jenna Farrell, Alice Karl
TetraTech ECI

From: Rick Goette

At the request of TetraTech ECI surveys were done at two locations proposed to be used as lay-down sites during the construction of the Blythe Energy Transmission Line Project. These locations were a 5 acre site immediately north of I-10 on the east side of the Ford Dry Lake exit, 23 miles west of Blythe CA, and a 4.5 acre parcel located near the southeastern corner of the Blythe airport property, 7.2 miles west of Blythe city center. These areas and zones of influence around them were to be surveyed for presence of sensitive species and to have their vegetative component and degree of disturbance assessed. The surveys were done on the morning of 7-7-08 by Richard Goette.

Methods: Surveys were done through meandering transects of 8 meter width, in line with the approved protocol for 100% coverage for desert tortoise surveys. The entire interior areas of the sites were covered and Zone of Influence survey transects were done out to 2400' when possible. Due to the presence of the I-10 freeway and the Blythe Airport a full 2400' survey on all sides of these sites was not possible.

Results : Ford Dry Lake Site.

This site is predominantly flat with a well-consolidated sandy substrate. Due to its proximity to the I-10 exit it is frequented by semi trucks which often park here overnight. There is considerable evidence of off-road driving and abundant litter and dumping of tires, pallets and car batteries. This area is profoundly disturbed with several roads and pipelines on the western and northern edges of the site. There is little to no vegetation within the site and only a few creosote bushes (*Larrea tridentata*) and a small amount of Sahara mustard (*Brassica tournefortii*) around the edges. Within the ZOI to 2400' the vegetative cover remained very sparse, with creosote and Sahara mustard remaining the dominant species. 400' north of the edge of the site is a slightly depressed one acre area which showed an abundance of tamarisk (*Tamarix ramosissima*), creosote, Sahara mustard and mesquite (*Prosopis glandulosa*).

No sensitive species. Scat, burrows or other sign were encountered.

Richard L. Goette Margaret L. Goette Partners

Results : Blythe Airport Site.

This site has a well consolidated sandy substrate with some cobbles on the surface. It is located immediately south of the Blythe airport and shows signs of having been graded, perhaps when the airport was built. This grading extends past the site boundaries for approximately $\frac{1}{2}$ mile to the east, north and west. The site has gravel and asphalt roads on all sides, and the airport runway less than a $\frac{1}{4}$ mile to its north. It is located only a few hundred meters north of Hobsonway and the I-10 freeway.

The area shows a near monoculture of white bursage (*Ambrosia dumosa*). Some few creosote bushes and Sahara mustard plants are evident along the road edges near the site. Several digs/animal burrows in the area were noted. All were in severe disrepair. None showed evidence of being of desert tortoise, kit fox or badger manufacture or showed use by burrowing owls. They were most probably either made by rabbits or were the result of a coyote digging after rodents.

No sensitive species, scat, burrows or other sign were encountered.

Appendix C
Cultural Resources Report
(Confidential, under separate cover)

The Cultural Resources Report is confidential and is being provided separately.

Appendix D

Additional Documentation

Exhibit D-1



Blythe Energy, LLC
700 Universe Blvd
Juno Beach, Florida 33408

December 21, 2007

Attn: Gary Palo

Subject: Blythe Energy Transmission Project/
Blythe Energy Generation Tie-Line Project

After further review of your project with SCE's Senior Management and response to your letter dated April 13, 2007 and subsequent letter dated July 18th 2007, SCE has reviewed your request to cross certain SCE Rights of Ways and has identified and modified the following issues that must be resolved before SCE will allow the use of such Rights of Ways by Blythe Energy:

SCE **will** allow the parallel transmission line crossings on its fee owned property however Blythe Energy will need to adjust the parallel crossings so impact to the SCE Rights of Ways is minimized. To minimize the impact, Blythe Energy will need to adjust the crossings to the edge of the SCE parcels. See the attached exhibits marked in red. Below we have broken down the requirements and information required for reviews on SCE's fee property and/or easement (noted where mapping is required on both).

SCE's Fee Owned Property – Crossings by Blythe Energy

1. A legal description for each transmission crossing on SCE fee property along with an exhibit A.
2. An overall topographical site plan which identifies the Devers Palo Verde No. 1 500kV and proposed tower locations for Devers Palo Verde No. 2 500kV.
3. A \$5,000 processing fee and appraisal per parcel, your appraisal will be reviewed by SCE's appraisal group to determine the compensation required. Please follow legal descriptions guidelines attached.
4. Overall topographical site plan which depicts the Devers Palo Verde No. 1 500kV and the proposed tower locations for Devers Palo Verde No. 2 500kV and access road plan (which covers both SCE fee and easement areas). This will be used to review the overall project impacts on both SCE's fee and easement).

In order for SCE to secure the necessary approval to allow Blythe Energy 115kV pole-line crossings on SCE's fee-owned property, SCE is required to file application with the CPUC through the 851 process. We are currently investigating this process in detail.

As described in our last meeting, SCE will execute a license for the Blythe Energy access roads on SCE's fee owed lands, please follow the license application and site plan guidelines attached for submittal to SCE. To minimize impacts to SCE's property and allow SCE use of it s property for future facilities, Blythe Energy must design the roads at the edge of the SCE parcels.

Proposed Blythe Crossing Where SCE Holds Easement Rights

As previously discussed, SCE will issue a master consent for the access roads and transmission crossings on the easements held by SCE, as part of the consent Blythe Energy must secure permission from the underlying fee owner.

The transmission crossings of the Eagle Mountain 161 kV line proposed by Blythe Energy are not at a 90 degree angle (plus or minus 15 degrees). Also, certain of the proposed crossings are at adjoining easements areas. All crossings must be at a 90 degree angle (plus or minus 15 degrees) and SCE will not allow crossings at points where there are adjoining easements. To resolve these issues, Blythe Energy will have to adjust the angle of the crossing to meet SCE's criteria, and site the transmission line such that crossings do not occur at points where there are adjoining easements.

Blythe Energy must demonstrate to SCE that the number of crossings have been kept to a minimum to avoid impacts to SCE's facilities and Rights-of Ways.

Additional Information Required

In addition to resolution of the issues described above, Blythe Energy will be required to enter into an agreement with SCE that addresses use and maintenance of the access/spur roads to be shared by the parties.

Also, a Large Generator Interconnection Agreement will be required among SCE, Blythe Energy, and the California ISO which will govern the physical interconnection and operation of the generation tie-line and the associated generation to the ISO Controlled Grid and SCE's 230kV substation. Such agreement will identify the point on the generation tie-line at which ownership and operation changes from Blythe Energy to SCE.

Unless noted otherwise in this letter, all other information noted in the letter dated July 18, 2007 is still valid (copy attached). Please ensure that all information requested is provided to avoid unnecessary delays in review of your project.

An engineering advance of \$25,000 for the Master Consent review of your plans must be submitted with your request. For your information additional fees may be required and this project moves forward.

SCE acknowledges the changes and or adjustments may generate several questions on your proposed project. We are available to meet with you the week of January 7th 2008.

If you have any questions, please call me at 909-944-4408

Sincerely,



Robert R. Castillo
Right of Way Agent

Exhibit D-2



<eruggeri@powereng.com>
07/17/2008 11:08 AM

To <Penny.Eckert@tteci.com>
cc <jmcgrew@powereng.com>
bcc
Subject FW: Route Alignment on MWD

Penny,
Here's the e-mail from MWD that initiated the pole move. As usual, it took many e-mails back and forth to get the move finalized. Let me know if you need anything else.

Regards,
Erik

From: Winkler,Lynn A [mailto:lwinkler@mw dh2o.com]
Sent: Wednesday, June 11, 2008 4:36 PM
To: Erik Ruggeri 3595
Cc: King,John D
Subject: RE: Route Alignment on MWD

Erik,

Attached is the plan with my suggested modifications to the pole route. Our plant manager, John King, would like to review it in the field before final approval, and I want to make sure we don't have a down guy in the roadway at relocated #433. If necessary, it could be slid north (and east) to avoid that calamity. Also, there would be some room to adjust #434 if it's too close to the slope or to make sure it fits SCE's interconnection facilities, if necessary.

How is your time frame – are there any deadlines on this?

Please let me know if you have any further questions/comments.

Thank you,

Lynn Winkler
213.217.7374.

From: eruggeri@powereng.com [mailto:eruggeri@powereng.com]
Sent: Wednesday, June 11, 2008 12:53 PM
To: Winkler,Lynn A
Subject: Route Alignment on MWD

Lynn,
It was good to speak with you yesterday. As discussed, I think we can re-align poles 431 through 434 as you have requested. However, I am looking at my notes and the images and coming up with a few questions. Perhaps it would facilitate the process if you could draw the preferred route on a blow up of the sheet Mike sent you and either e-mail it or fax it to me at (208) 788-0525? I think this may save

iterations caused by guessing on my part! Thank you.

Best Regards,

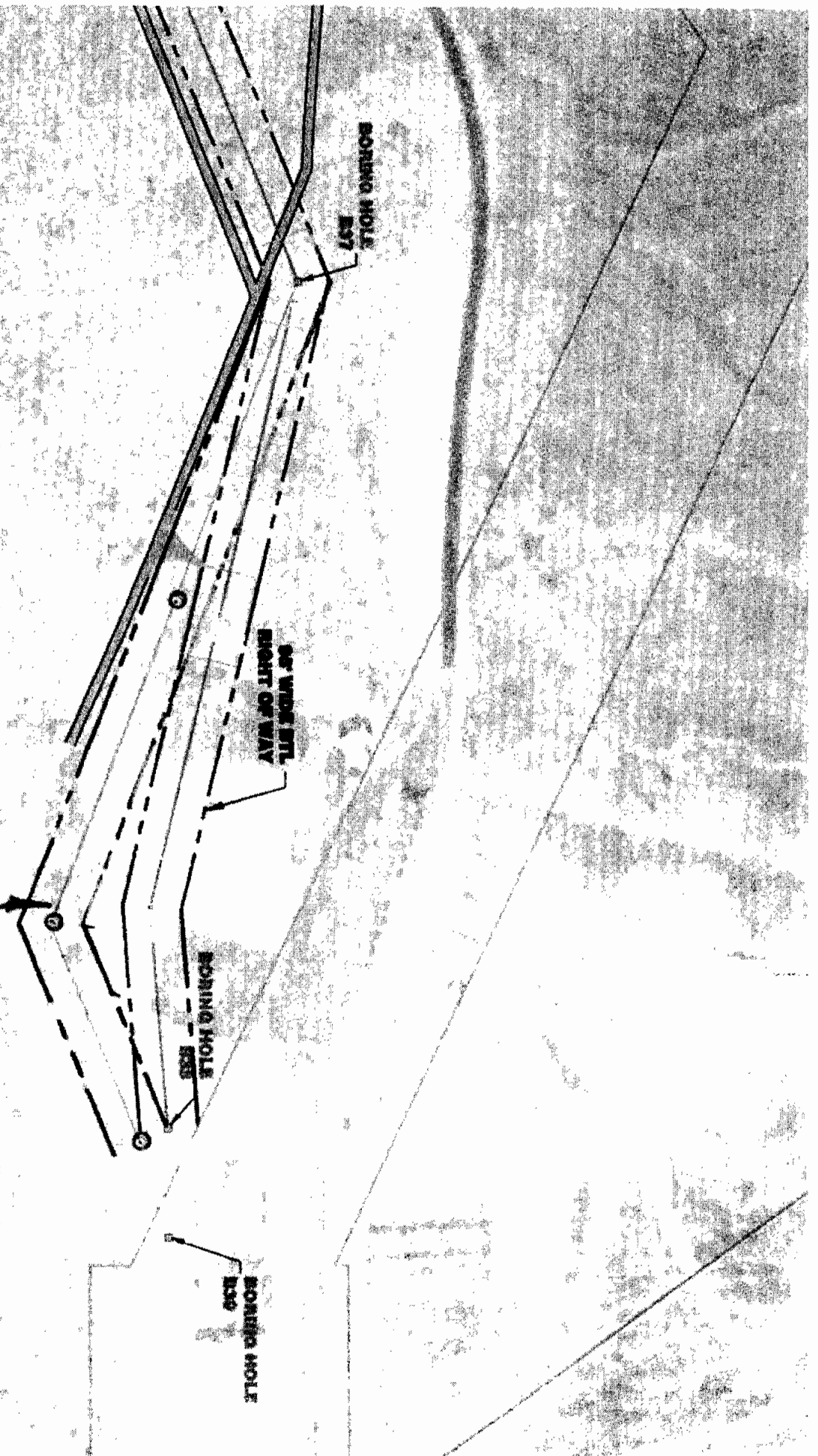
Erik Ruggeri
POWER Engineers, INC
(208) 788-0595



Revis001.pdf

705-230-032
COPOLITAN WATER DISTRICT

REVISED
POLE ALIGNMENT



LAW.
6-11-08

Exhibit D-3



"rob" <rob@theholtgroup.net>
07/07/2008 01:27 PM

To <Penny.Eckert@tteci.com>
cc
bcc

Subject Fwd: RE: 632030E Proposed Laydown Area at Blythe Airport
- Blythe Transmission Project (BTL)

Penny,

Below you will find written authorization for use of Blythe Airport laydown area.

Thanks,
Rob

-----Original Message-----

From: Charles Hull <chull@cityofblythe.ca.gov>
To: 'jvillegas' <jvillegas@theholtgroup.net>, rob <rob@theholtgroup.net>
Cc: "Steve Foley (cobairport11@verizon.net)" <cobairport11@verizon.net>, Jennifer Wellman <jwellman@cityofblythe.ca.gov>
Date: Thu, 26 Jun 2008 17:18:49 -0700
Subject: RE: 632030E Proposed Laydown Area at Blythe Airport - Blythe Transmission Project (BTL)

Good afternoon Rob. This message follows our phone conversation a few minutes ago wherein you outlined the need and utility of the five acre lay-down area at the Blythe Airport for the concrete transmission poles. Please see the subject line above. With your explanation and the attached identified potential lease area map, the City of Blythe takes "No Exception" to your proposal. At a subsequent date I will transmit a per acre rental rate for the area involved. I understand that the actual use will be in the third quarter of this calendar year and for a fairly short duration.

Please use this e-mail to address any CEC/owner issues as it may relate to this topic and seeking the City's concurrence with this project. If anyone one reading this e-mail has any questions or concerns about this matter I can be reached directly at (760)921-2740.

Sincerely,
Charles Hull,
ACM/Blythe Airport Manager

From: jvillegas [mailto:jvillegas@theholtgroup.net]
Sent: Thursday, June 26, 2008 4:23 PM
To: Charles Hull
Cc: THG - Rob; FPL - Michael Argentine
Subject: 632030E Proposed Laydown Area at Blythe Airport - Blythe Transmission Project (BTL)

Butch;

For your review and comments, please find transmitted a JPF file illustrating a 5-acre portion of land at the Southerly side of the Blythe Airport that might be suitable for a laydown area for BTL project.

Rob Holt has already reviewed it. Rob will contact you either later today or tomorrow morning to discuss about it.

Thanks,

Jesús



Blythe Airport Laydown Area_Jun26_08_dim.jpg

Exhibit D-4



"Argentine, Michael"
<Michael.Argentine@fpl.com>

07/09/2008 01:59 PM

To Penny Eckert <penny.eckert@tteci.com>

cc

bcc

Subject FW: Blythe 1

The email chain below provides CAISO's approval of the third conductor.

-----Original Message-----

From: Brown, Judy [mailto:jbrown@caiso.com]
Sent: Wednesday, July 09, 2008 1:57 PM
To: Argentine, Michael
Subject: FW: Blythe 1

Judy Brown
Project Manager
California ISO
(916) 608-7062

-----Original Message-----

From: Zhu, Songzhe
Sent: Wednesday, July 09, 2008 1:53 PM
To: Brown, Judy
Subject: RE: Blythe 1

Yes, I concur.

Songzhe

-----Original Message-----

From: Brown, Judy
Sent: Wednesday, July 09, 2008 1:52 PM
To: Zhu, Songzhe
Subject: FW: Blythe 1

Songzhe:
Do you concur?

Judy Brown
Project Manager
California ISO
(916) 608-7062

-----Original Message-----

From: Argentine, Michael [mailto:Michael.Argentine@fpl.com]
Sent: Wednesday, July 09, 2008 1:49 PM
To: Brown, Judy
Subject: RE: Blythe 1

Judy,

I saw this email from SCE, but this does not include CAISO's approval/concurrence.

Thanks,

Mike

-----Original Message-----

From: Brown, Judy [mailto:jbrown@caiso.com]
Sent: Wednesday, July 09, 2008 1:47 PM
To: Argentine, Michael
Subject: FW: Blythe 1

Mike:
Here is the response from SCE.

Judy Brown
Project Manager
California ISO
(916) 608-7062

-----Original Message-----

From: John.Tucker@sce.com [mailto:John.Tucker@sce.com]
Sent: Thursday, June 26, 2008 10:03 AM
To: Argentine, Michael
Cc: Mayers, D J; Brown, Judy; Goodwin, John; Hayden, Jolly; Mary Dyas; Givens, Phillip; Zhu, Songzhe
Subject: RE: Blythe 1

Judy,

based on the notice provided below by Mike Argentine, with your concurrence, I will instruct SCE Grid Planning to include this change in base cases going forward and I will begin drafting an amendment to the LGIA that reflects this change. Please advise.

John Tucker
Southern California Edison
T&D - Federal Regulation and Contracts
(626) 302-8623
Fax (626) 302-1152

"Argentine,

Michael"

<Michael.Argentin

To

e@fpl.com>

"Brown, Judy" <jbrown@caiso.com>

cc

06/25/2008 11:58

"Zhu, Songzhe" <SZhu@caiso.com>,

AM

"Tucker, John"

<john.tucker@sce.com>, Mary Dyas

<Mdyas@energy.state.ca.us>,

"Hayden, Jolly"

<Jolly.Hayden@fpl.com>, "Mayers,

D

J" <D.J.Mayers@fpl.com>,

"Goodwin,

John" <John.Goodwin@fpl.com>,

"Givens, Phillip"

<Phillip.Givens@fpl.com>

Subject

RE: Blythe 1

Judy,

This email serves as formal notice that Blythe Energy, LLC will implement the proposed conductor modification as described below that includes adding a third conductor bundle to the existing double bundled configuration. No changes are planned for either the type of conductor or the project right of way. We will still be using the same conductor referenced in the LGIA.

If you have any questions concerning this matter, please call.

Thanks,

Mike

From: Brown, Judy [mailto:jbrown@caiso.com]
Sent: Thursday, May 29, 2008 10:53 AM
To: Argentine, Michael
Cc: Zhu, Songzhe; Tucker, John
Subject: Blythe 1

Based on SCE's findings, the ISO review and concurrence, and the comments received from MWD, I want to inform Blythe Energy that your

proposed conductor modification would not be considered a material modification. Since your initial communication was only an "inquiry" from Blythe Energy you will need to make a written request to now make the modification, which we would then consider in the base cases from that point forward.

Judy Brown
Project Manager
California ISO
(916) 608-7062