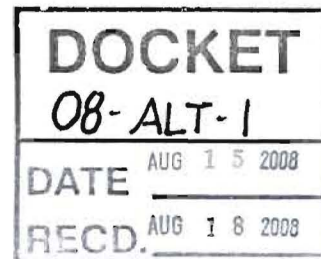




# IMPERIAL IRRIGATION DISTRICT

GENERAL MANAGER'S OFFICE • P. O. BOX 937 • IMPERIAL, CA 92251

August 15, 2008



California Energy Commission  
Attn: Commissioners Karen Douglas and James D. Boyd  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814

Dear Commissioners Douglas and Boyd:

**Re: Docket No. 08-ALT-1, Assembly Bill 118 Regulations**

The Imperial Irrigation District recently became aware of draft regulations proposed for the implementation of Assembly Bill 118 that, in our view, could be detrimental to this region's emerging renewable energy industry. Specifically, we are concerned that certain provisions being contemplated by the Sustainability Working Group in support of AB 118 would have a deleterious effect on the production of crops for conversion to biofuels within the Imperial Valley.

For this reason, we would ask that commissioners refrain from imposing a 10-day grace period in which to evaluate the proposed regulations before they take effect. Our request would be for this 10-day window to be extended so that stakeholders who will be directly impacted might have more of an opportunity to comment on these regulations prior to their implementation.

Thank you for your consideration of this request, and we look forward to working with the CEC to craft regulations that succeed in reducing greenhouse gas emissions without causing undue and unnecessary hardships on our agricultural water users.

Sincerely,

Brian J. Brady  
General Manager