



**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

**DOCKET**

**99-AFC-8C**

DATE JAN 15 2009

RECD. JAN 28 2009

January 15, 2009

Mr. John Tucker  
Southern California Edison Company  
Grid Contracts Administration and Billing  
P.O. Box 800  
Rosemead, CA 91770

Dear Mr. Tucker:

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

Based on your recent telephone discussion and request to Ms. Ann Finley, the Metropolitan Water District of Southern California (Metropolitan) is providing the following proposed changes to the Blythe Energy Project (BEP) Request for Approval of Third Insignificant Project Change (00-AFC-8C) document dated November 2008 (Request). These changes are based on discussions with you as well as the land use at Julian Hinds described in an agreement executed June 13, 2008 between Edison and Metropolitan.

**Metropolitan proposed changes to the BEP Request:**

1. Section 2.5.1, page 17:

Append the first sentence in the second paragraph with the following:  
"which is within the 0.5 acre laydown area referenced in Section 2.6.1."

2. Section 2.6.1, page 19

It is Metropolitan's understanding that the 0.5 acre laydown area at Julian Hinds (originally listed in the BEPTL May 2006 staff report and in the Metropolitan and Edison Supplemental Facilities Agreement) should not have been relinquished by Blythe Energy, LLC in the BEP Request for Approval of Second Insignificant Project Change dated July 2008. Since Metropolitan and Edison agree that Edison will have access to and use of this 0.5 acre laydown area under the Supplemental Facilities Agreement dated June 13, 2008, the last two sentences in this section should be modified as follows:

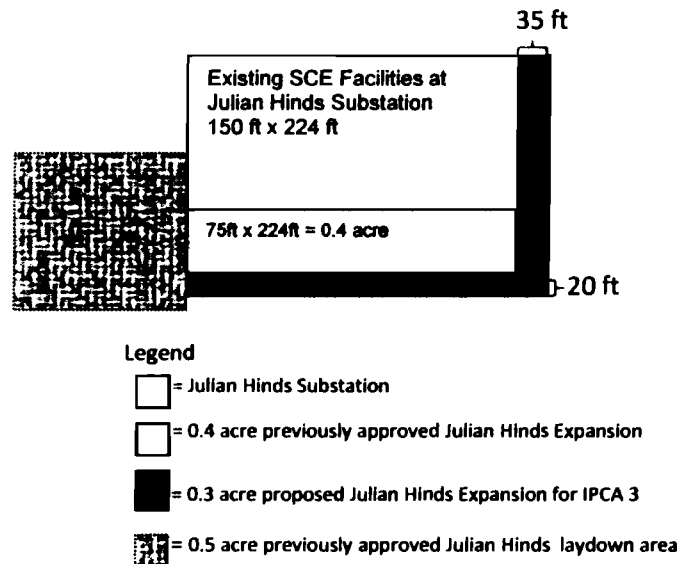
"Figure 2-7 illustrates the additional 0.3 acres that Edison has stated is needed to accommodate the addition of the MEER and communications microwave tower (Figure 2-8) referenced in Section 2.5.1, above. This 0.3 acres is in addition to the 0.4 acre expansion already permitted. Also, a previously permitted 0.5 acre laydown area which was relinquished by Blythe Energy is still necessary as it has been agreed upon for

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Edison's use in a separate agreement between the Metropolitan Water District of Southern California (MWD) and Edison.”

3. Figure 2-7, page 18:

Please modify the drawing and legends for clarity similar to the diagram below. The only crosshatched area designating the laydown area is in the smaller left side rectangle as shown below. There should be no laydown area and no crosshatched area within the larger box to the right in Figure 2-7. It is Metropolitan's understanding that the new 0.3 acre of additional substation expansion is to be a strip of land 35 ft to the east of the existing substation and an additional 20 ft to the south of the 0.4 acres of expansion previously approved and described on page 3-4 of the CEC Revised Environmental Assessment dated September 2006. Also, please replace “Hines” with “Hinds” in the lower right hand corner of this figure.



4. Section 3.6, page 24

Remove the words, “laydown yards” in the fourth line.

In the third to last sentence insert the words, “expansion and” before “laydown areas on private land...”.

5. Request global change in document:


Replace “Municipal Water District” with “Metropolitan Water District of Southern California”.

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If the changes above are acceptable to the parties in the attached letter to the California Energy Commission (CEC), please respond to me by letter or email with a copy to Ms. Mary Dyas that Edison and Blythe Energy, LLC concur with these proposed changes and that the purpose and scope of the proposed modification is clarified by these changes.

Once these changes are incorporated in the pending Request, Metropolitan will remove its opposition before the CEC.

Very truly yours,



Jon C. Lambeck  
Manager of Operations Planning

ATF:ms  
01-15-09 MWD letter to SCE on BEPTL third insig project change final-clean

Enclosure

cc: Ms. Mary Dyas, CEC  
Compliance Project Manager  
California Energy Commission  
1516 9<sup>th</sup> Street, MS2000  
Sacramento, CA 95814

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**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Office of the General Counsel

**Via Email and U.S Mail**

December 23, 2008

Mary Dyas  
Compliance Project Manager  
California Energy Commission  
1516 9<sup>th</sup> 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.

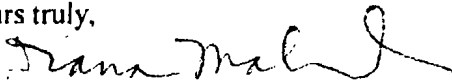
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

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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,



Diana Mahmud  
Senior Deputy General Counsel

Cc: A. Finley