

Los Angeles
WATER and POWER ASSOCIATES, Inc.

A Non-Profit Corporation Dedicated to the Public Interest

April 14, 2006

Board of Directors

Nancy I. Day
President

Le Val Lund
First Vice President

Carlos Solorza
Second Vice President

Dorothy M. Fuller
Secretary

Vincent Foley
Treasurer

Robert Agopian

Wally Baker

Richard A. Dickinson

Kenneth W. Downey

Steven P. Erie

Gregory Freeman

Edward G. Gladbach

Joseph L. Hegenbart

Abraham Hoffman

Alice Lipscomb

Thomas J. McCarthy

Michael T. Moore

Catherine Mulholland

David J. Oliphant

James F. Wickser

William G. Williams

Paul D. Thayer
Executive Officer
California State Lands Commission
100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202

Re: Comments on Once-Through Cooling Resolution – Proposed
April 12, 2006

Dear Mr. Thayer:

Water and Power Associates, Inc. (W&PA) is a non-profit, independent, private organization, incorporated in 1971, to inform and educate its members, public officials, and the general public on critical water and energy issues affecting the citizens of Los Angeles, Southern California, and the State of California.

Our organization is vitally interested in matters concerning the provision of the essential water and power resources needed to fuel the dynamic growth and vitality of our community and our State.

W&PA is opposed to the adoption of the proposed resolution dealing with once-through cooling because it fails to recognize the adverse impacts this rule will have on California's existing and new power plants and proposed water desalination facilities. Implementation of a categorical ban on once-through cooling would result in greatly increased costs for the customers of the power plants that could change cooling systems (one third) and forced shut down of two thirds of the plants which cannot convert. We do not believe it is appropriate for the State Lands Commission to attempt to limit the current options available to meet the needs of California's water and electric consumers. Those decisions must be made on a case-by-case basis by the regulatory agencies charged with that responsibility.

Sincerely,

Nancy I. Day
President

320 Cambridge Drive ~ Arcadia, California 91007
(626) 445-7376