April 14, 2006

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

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

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