

November 9, 2016

Dear Commissioners:

On behalf of the Santan Neighborhood Committee, I am writing in support of Salt River Project's (SRP) request regarding Conditions 20 and 38 in the Santan Expansion Certificate of Environmental Compatibility, Decision Numbers 63611 and 72636 (the "CEC"). We support the recommendations of the Sargent and Lundy report that SRP should not be required to install additional plume abatement or air emission controls at the Santan Generating Station (SGS) at this time.

The Santan Neighborhood Committee was formed as a requirement of Condition 19 in the CEC. The Condition required SRP to establish a citizens committee to monitor air and noise compliance, and water quality reporting. The Committee includes representatives from the Arizona Department of Health Services, Maricopa County Air Quality Department, the Town of Gilbert, and adjacent homeowners associations. Since its initial creation, the role of the Committee has expanded to provide a forum in which SRP advises the plant's neighbors on activities at SGS, and neighbors have an opportunity to provide feedback to SRP.

We have reviewed the Sargent and Lundy report. Based on the report, we agree that the costs associated with the plume abatement technology and additional emission controls outweigh the benefits. Therefore, we recommend that the Commission find that no plume abatement technology or additional emission controls are required.

In addition, this Committee has reviewed the CEC, specifically conditions 20, 38, and 39. Condition 20 requires SRP to study and deploy when practicable plume abatement technologies on the plant's cooling towers if a Commission decides it is feasible. Condition 38 requires SRP to review plant operations and equipment and implement emission control improvements if a Commission decides it is feasible as well. Condition 39 requires that SRP pay the Arizona Corporation Commission \$20,000 annually to the Pipeline Safety Fund. In our opinion, these conditions are no longer necessary. The Santan Expansion units are state-of-the-art and the upgraded legacy units have lower emissions today than they did before the expansion. In addition, the cooling tower plumes are comprised of water vapor and are visible for relatively few hours per year, normally on slightly-humid, winter mornings. Furthermore, it is our understanding that the annual payment to the Pipeline Safety Fund is transferred to the State General Fund via statute and is no longer used for its intended purposes.

Therefore, we would support relieving SRP of the requirements CEC Conditions 20, 38, and 39 going forward. We thank the Commission in advance for your consideration of our recommendations.

Sincerely,



Heath Westenskow

Vice Chair Santan Neighborhood Committee