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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

KEVIN THOMPSON- CHAIRMAN
NICK MYERS - VICE CHAIRMAN
LEA MÁRQUEZ PETERSON
RACHEL WALDEN
RENE LOPEZ

IN THE MATTER OF THE APPLICATION OF
SALT RIVER PROJECT AGRICULTURAL
IMPROVEMENT AND POWER DISTRICT, IN
CONFORMANCE WITH THE REQUIREMENTS
OF ARIZONA REVISED STATUTES § 40-360,
ET. SEQ., FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY
AUTHORIZING THE SOUTHWEST MOUNTAIN
TRANSMISSION PROJECT, WHICH
INCLUDES THE CONSTRUCTION OF TWO
NEW 230 KV DOUBLE-CIRCUIT
TRANSMISSION LINES THAT WILL
INTERCONNECT THE EXISTING DOUBLE-
CIRCUIT ANDERSON-ORME TRANSMISSION
LINE TO A NEW SUBSTATION, EACH
LOCATED WITHIN THE CITY OF PHOENIX,
MARICOPA COUNTY, ARIZONA.

DOCKET NO. L-00000B-24-0223-00239

CASE NO. 239

DECISION NO. 79665

SAMPLE ORDER NO. 1

**(Sample Form of Order for the Convenience
of the Commission to Use if the Commission
Determines it is in the Public Interest to
Grant the Project a CEC as Issued by the
Siting Committee's Decision.)**

Arizona Corporation Commission

DOCKETED

JAN 22 2025

DOCKETED BY

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January 15, 2025
Open Meeting

BY THE COMMISSION:

Pursuant to A.R.S. § 40-360 et seq., after due consideration of all relevant matters, the
Arizona Corporation Commission ("Commission") finds and concludes that the Certificate of
Environmental Compatibility ("CEC") issued by the Arizona Power Plant and Transmission Line
Siting Committee ("Siting Committee"), as corrected by the Siting Committee Chairman's Notice of
Errata filed November 26, 2024, is hereby approved as granted by this Order.

1 The Commission, in reaching its decision, has balanced all relevant matters in the broad
2 public interest, including the need for an adequate, economical, and reliable supply of electric power
3 with the desire to minimize the effect thereof on the environment and ecology of this state, and finds
4 that granting the Project a CEC is in the public interest.

5 The Commission further finds and concludes that in balancing the broad public interest in this
6 matter:

- 7 1. The Project is in the public interest because it aids the state in meeting the need for an
8 adequate, economical, and reliable supply of electric power.
- 9 2. In balancing the need for the Project with its effect on the environment and ecology of the
10 state, the conditions placed on the CEC effectively minimize its impact on the
11 environment and ecology of the state.
- 12 3. The conditions placed on the CEC resolve matters concerning the need for the Project and
13 its impact on the environment and ecology of the state raised during the course of
14 proceedings and, as such, serve as the findings on the matters raised.
- 15 4. In light of these conditions, the balancing in the broad public interest results in favor of
16 granting the CEC.

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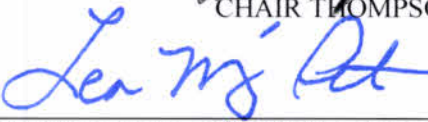
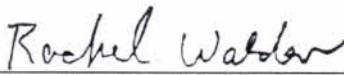
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1 THE CEC ISSUED BY THE SITING COMMITTEE AND CORRECTED BY THE SITING
2 COMMITTEE CHAIRMAN'S NOVEMBER 26, 2024, NOTICE OF ERRATA IS
3 INCORPORATED HEREIN AND IS APPROVED BY ORDER OF THE
4 ARIZONA CORPORATION COMMISSION

5
6  CHAIR THOMPSON  VICE CHAIR MYERS
7  COMMISSIONER MÁRQUEZ PETERSON  COMMISSIONER WALDEN  COMMISSIONER LOPEZ
8



9 IN WITNESS WHEREOF, I, DOUGLAS R. CLARK,
10 Executive Director of the Arizona Corporation Commission,
11 have hereunto, set my hand and caused the official seal of this
12 Commission to be affixed at the Capitol, in the City of Phoenix,
13 this 22nd day of January, 2025.

14 

15 DOUGLAS R. CLARK
16 Executive Director

17 DISSENT: _____

18
19 DISSENT: _____

1 **BEFORE THE ARIZONA POWER PLANT AND**
2 **TRANSMISSION LINE SITING COMMITTEE**

3 Docket No. L-00000B-24-0223-00239

4 Case No. 239

5 IN THE MATTER OF THE
6 APPLICATION OF SALT RIVER
7 PROJECT AGRICULTURAL
8 IMPROVEMENT AND POWER
9 DISTRICT, IN CONFORMANCE WITH
10 THE REQUIREMENTS OF ARIZONA
11 REVISED STATUTES § 40-360, ET SEQ.,
12 FOR A CERTIFICATE OF
13 ENVIRONMENTAL COMPATIBILITY
14 AUTHORIZING THE SOUTH
MOUNTAIN TRANSMISSION PROJECT,
WHICH INCLUDES THE
CONSTRUCTION OF TWO NEW 230 KV
DOUBLE-CIRCUIT TRANSMISSION
LINES THAT WILL INTERCONNECT
THE EXISTING DOUBLE-CIRCUIT
ANDERSON-ORME TRANSMISSION
LINE TO A NEW SUBSTATION, EACH
LOCATED WITHIN THE CITY OF
PHOENIX, MARICOPA COUNTY,
ARIZONA.

**CERTIFICATE OF
ENVIRONMENTAL
COMPATIBILITY**

15 **A. INTRODUCTION**

16 Pursuant to notice given as provided by law, the Arizona Power Plant and
17 Transmission Line Siting Committee (the "Committee") held public hearings on November
18 12 through November 14, 2024, in Laveen, Maricopa County, Arizona, in conformance
19 with the requirements of Arizona Revised Statutes ("A.R.S.") § 40-360, *et seq.*, for the
20 purpose of receiving evidence and deliberating on the Application of Salt River Project
21 Agricultural Improvement and Power District ("SRP" or "Applicant") for a Certificate of
22 Environmental Compatibility ("Certificate") in the above-captioned case for the South
23 Mountain Transmission Project (the "Project").

24 The following members and designees of members of the Committee were present
25 at one or more of the hearing days for the evidentiary presentations and/or for the
26 deliberations:

1	Adam Stafford	Chairman, Designee for Arizona Attorney
2		General Kris Mayes
3	Leonard Drago	Designee for the Director, Arizona Department
4		of Environmental Quality
5	David French	Designee for the Director, Arizona Department
6		of Water Resources
7	Nicole Hill	Designee for the Director, Governor's Energy
8		Office
9	Gabby Saucedo Mercer	Designee for the Chairman of the Arizona
10		Corporation Commission ("Commission")
11	Jon Gold	Appointed Member, representing the General
12		Public
13	Margaret "Toby" Little	Appointed Member, representing the General
14		Public
15	David Kryder	Appointed Member, representing Agricultural
16		Interests
17	Roman Fontes	Appointed Member, representing Counties

17 Applicant was represented by Matt Derstine of Snell & Wilmer, L.L.P. and Alysha
18 Gilbert of SRP. The following party was granted intervention pursuant to A.R.S. § 40-
19 360.05: Banner Health represented by Michelle De Blasi of the Law Office of Michelle De
20 Blasi. BRIO Investment Group ("BRIO") made a limited appearance pursuant to A.R.S. §
21 40-360.05(B).

22 At the conclusion of the hearing, the Committee, after considering (i) the
23 Application, (ii) evidence, testimony, and exhibits presented by the parties, (iii) limited
24 appearance of BRIO, and (iv) comments of the public, and being advised of the legal
25 requirements of A.R.S. §§ 40-360 through 40-360.13, and upon motion duly made and
26 seconded, voted 9 to 0 in favor of granting Applicant this Certificate for the construction

1 of the Project as described below.

2 **B. PROJECT DESCRIPTION**

3 The Project will involve the construction of two (2) new double-circuit 230 kV
4 transmission lines that will extend and interconnect the existing double-circuit Anderson –
5 Orme 230 kV transmission line to the New Substation shown on **Exhibit A**. The approved
6 right-of-way is 100 feet wide for each line within a 350-foot-wide corridor for each line.
7 The Committee approves the Applicant's Preferred Routes and Contingent Segments for
8 the Project as shown on **Exhibit A** that are generally described as follows:

9 **Preferred Route, Line One**

10 The Preferred Route for Line One consists of Nodes B, E, H, J, N, and O. Preferred
11 Route, Line One starts at the northeast corner of the New Substation site at Node B, runs
12 north along South 63rd Avenue alignment, then travels east along the south side of West
13 South Mountain Avenue alignment and travels north along the west side of Loop 202
14 intersecting the Laveen Area Conveyance Channel ("LACC") at Node J. Preferred Route,
15 Line One continues north along the west side of Loop 202, past West Baseline Road, then
16 turns east at Node N, to connect to the Anderson – Orme 230 kV transmission line at Node
17 O.

18 **Preferred Route, Line One, Contingent Segment A-E**

19 The Applicant is continuing to coordinate with stakeholders to determine whether
20 Contingent Segment A-E would better support future planned development. In the event
21 stakeholders confirm the Project will best serve development if a part of the Project is
22 located south of West Dobbins Road and west of South 63rd Avenue alignment, then
23 Preferred Route, Line One, Contingent Segment A-E will be built instead of Preferred
24 Route One, as follows:

25 Preferred Route, Line One with Contingent Segment A-E starts at the northwest
26 corner of the New Substation site at Node A, travels north along an irrigation channel to

1 West Dobbins Road, then travels east along West Dobbins Road to Node E and runs north
2 along South 63rd Avenue alignment, then travels east along the south side of West South
3 Mountain Avenue alignment to Node H and travels north along the west side of Loop 202
4 intersecting the LACC at Node J. Preferred Route, Line One with Contingent Segment
5 Nodes A to E continues north along the west side of Loop 202, past West Baseline Road,
6 then turns east at Node N, to connect to the Anderson – Orme 230 kV transmission line at
7 Node O.

8 **Preferred Route, Line Two**

9 Preferred Route, Line Two consists of Nodes C, F, H, I, K, and L. Preferred Route,
10 Line Two starts at the northeast corner of the New Substation site at Node C and runs north
11 along the west side of Loop 202, through Node F, until Node H. Preferred Route, Line Two
12 turns east, crosses Loop 202 between Nodes H and I, and proceeds north along the east
13 side of Loop 202 until intersecting the LACC at Node K. Preferred Route, Line Two then
14 travels east along the LACC, then travels north on the western side of Cheatham Substation
15 to connect to the Anderson – Orme 230 kV transmission line at Node L.

16 **Preferred Route, Line Two, Contingent Segment H-J-K**

17 In addition, the Applicant is continuing to work with the Arizona Department of
18 Transportation (“ADOT”) to study the feasibility of constructing transmission structures
19 between Nodes I and K. If a final feasibility study determines that the land between Nodes
20 I and K is incompatible with the Project, then Preferred Route, Line Two, Contingent
21 Segment H-J-K will be built instead of Preferred Route, Line Two, as follows:

22 Preferred Route, Line Two, Contingent Segment H-J-K starts at the northeast corner
23 of the New Substation site at Node C and runs north along the west side of Loop 202,
24 through Node F, until Node H. Preferred Route, Line Two, Contingent Segment H-J-K
25 continues north along the west side of Loop 202 between Nodes H and J until intersecting
26 the LACC at Node J. Preferred Route, Line Two, Contingent Segment H-J-K then travels

1 east along the LACC to Node K, then travels to the western side of Cheatham Substation
2 to connect to the Anderson – Orme 230 kV transmission line at Node L.

3 CONDITIONS

4 This Certificate is granted upon the following conditions:

5 1. This authorization to construct the Project shall expire ten (10) years from
6 the date this Certificate is approved by the Commission, with or without modification.
7 Construction of the Project shall be complete, such that the Project is in-service within this
8 ten-year timeframe. However, prior to the expiration of the time period, the Applicant may
9 request that the Commission extend the time limitation.

10 2. In the event the Project requires an extension of the term(s) of this Certificate
11 prior to completion of construction, the Applicant shall file such time extension request at
12 least one hundred and eighty (180) days prior to the expiration of the Certificate. The
13 Applicant shall use reasonable means to promptly notify Maricopa County, the City of
14 Phoenix, all landowners and residents within a one (1) mile radius from the centerline of
15 the Project, all persons who made public comment in this proceeding who provided a
16 mailing or email address, all persons who made a limited appearance pursuant to A.R.S. §
17 40-360.05(B), and all parties to this proceeding. The notification provided will include the
18 request and the date, time, and place of the hearing or open meetings during which the
19 Commission will consider the request for the extension. Notification shall be no more than
20 three (3) business days after the Applicant is made aware of the hearing date or the open
21 meeting date.

22 3. During the development, construction, operation, maintenance, and
23 reclamation of the Project, the Applicant shall comply with all existing applicable air and
24 water pollution control standards and regulations, and with all existing applicable statutes,
25 ordinances, master plans, and regulations of any governmental entity having jurisdiction
26 including, but not limited to, the United States of America, the State of Arizona, Maricopa

1 County, the City of Phoenix, and their agencies and subdivisions including, but not limited
2 to, the following:

- 3 a. All applicable land use regulations;
- 4 b. All applicable zoning stipulations and conditions including, but not
5 limited to, landscaping and dust control requirements;
- 6 c. All applicable air permitting, water use, discharge and/or disposal
7 requirements of the Arizona Department of Water Resources, the
8 Maricopa County Air Quality Department, and the Arizona
9 Department of Environmental Quality;
- 10 d. All applicable noise and lighting control standards; and
- 11 e. All applicable regulations governing storage and handling of
12 hazardous chemicals and petroleum products.

13 4. The Applicant shall obtain all approvals and permits necessary to construct,
14 operate, and maintain the Project required by any governmental entity having jurisdiction
15 including but not limited to, the United States of America, the State of Arizona, Maricopa
16 County, the City of Phoenix, and their agencies and subdivisions.

17 5. The Applicant shall comply with the Arizona Game and Fish Department
18 ("AGFD") guidelines for handling protected animal species, should any be encountered
19 during construction and operation of the Project, and shall consult with AGFD or U.S. Fish
20 and Wildlife Service, as appropriate, on other issues concerning wildlife. The Applicant
21 commits to follow the mitigation measures in Table C-3 (in Exhibit C on page C-21) of the
22 Application, as applicable and feasible.

23 6. The Applicant shall design the Project's facilities to incorporate reasonable
24 measures to minimize electrocution of and impacts to avian species in accordance with the
25 Applicant's avian protection program. Such measures will be accomplished through
26 incorporation of Avian Power Line Interaction Committee guidelines set forth in the

1 current versions of *Suggested Practices for Avian Protection on Power Lines* and *Reducing*
2 *Avian Collisions with Power Lines* manuals.

3 7. The issuance of a Certificate by the Commission is a state action pursuant to
4 A.R.S. §§ 41-861 through 41-864, also known as the State Historic Preservation Act ("State
5 Act") and is subject to review by the Arizona State Historic Preservation Office ("SHPO").
6 As a State Agency, the Commission remains the responsible entity for compliance with the
7 State Act.

8 a. The Applicant shall consult, on behalf of the Commission, with the
9 SHPO regarding the Project and its impacts on historic properties and
10 construction shall not commence until the SHPO has had an
11 opportunity to review and comment.

12 b. If a Project involves federal funding, permitting, licensing, or
13 approval pursuant to 36 C.F.R. § 800.16(y), it may be a federal
14 undertaking pursuant to Section 106 of the National Historic
15 Preservation Act ("NHPA") (36 C.F.R. Part 800). Section 106 of the
16 NHPA requires SHPO concurrence on the adequacy of the federal
17 agency's efforts to identify historic properties and establish an area of
18 potential effects. If any part of the Project is a federal undertaking, the
19 Applicant will provide SHPO with notice of federal agency
20 involvement if not known prior to issuance of the Certificate.

21 8. The Applicant will conduct a new Class III cultural survey of all final rights-
22 of-way prior to construction. If any archaeological, paleontological, or historical site or a
23 significant cultural object is discovered on state, county, or municipal land during the
24 construction or operation of the Project, the Applicant or its representative shall promptly
25 report the discovery to the District of the Arizona State Museum ("ASM"), and in
26 consultation with the Director, shall immediately take all reasonable steps to secure and

1 maintain the preservation of the discovery as required by A.R.S. § 41-844.

2 9. The Applicant shall comply with the notice and salvage requirements of the
3 Arizona Native Plant Law (A.R.S. § 3-901 *et seq.*) and shall, to the extent feasible,
4 minimize the destruction of native plants during the construction and operation of the
5 Project.

6 10. The Applicant shall make every reasonable effort to promptly investigate,
7 identify, and correct, on a case-specific basis, all complaints of interference with radio or
8 television signals from operation of the Project addressed in this Certificate and where such
9 interference is caused by the Project, take reasonable measures to mitigate such
10 interference. The Applicant shall maintain written records for a period of five (5) years of
11 all complaints of radio or television interference attributable to operations, together with
12 the corrective action taken in response to each complaint. All complaints shall be recorded
13 to include notation on the corrective action taken. Complaints not leading to specific action
14 or for which there was no resolution shall be noted and explained. Upon request, the written
15 records shall be provided to the Staff of the Commission. The Applicant shall respond to
16 complaints and implement appropriate mitigation measures. In addition, the Project shall
17 be evaluated on a regular basis so that damaged insulators or other line materials that could
18 cause interference are required or replaced in a timely manner.

19 11. Encounters of Human Remains.

20 a. If human remains and/or funerary objects are encountered during the
21 course of any ground-disturbing activities related to the construction
22 or operation of the Project, the Applicant shall cease work on the
23 affected area of the Project and notify the Director of the ASM as
24 required by A.R.S. § 41-865 for private land, or as required by A.R.S.
25 § 41-844 for state, county, or municipal lands.

26 b. If human remains and/or funerary objects are encountered during the

1 course of any ground-disturbing activities related to the construction
2 or operation of the Project on federal land, the Applicant shall cease
3 work on the affected area of the Project and notify the federal land
4 manager as required by the Native American Graves Protection and
5 Repatriation Act (NAGPRA; Public Law 101 601; 25 U.S.C. 3001
6 3013). The Project shall not proceed without federal agency approval.

7 12. Within one hundred twenty (120) days of the Commission's decision
8 approving this Certificate, the Applicant shall post signs in or near public rights-of-way, to
9 the extent authorized by law, reasonably adjacent to the Project giving notice of the Project.
10 Such signage shall be no smaller than a roadway sign. The sign shall advise:

- 11 a. The future site of the Project;
- 12 b. A phone number and website for public information regarding the
13 Project; and
- 14 c. Refer the public to the Docket.

15 Such signs shall be inspected at least once annually and, if necessary, be repaired or
16 replaced, and removed at the completion of construction. The Applicant shall make every
17 reasonable effort to communicate the decision either approving or disapproving the
18 Certificate in digital media.

19 13. At least ninety (90) days before construction commences on the Project, the
20 Applicant shall provide Maricopa County, the City of Phoenix, and known builders and
21 developers who are building upon or developing land within one (1) mile from the
22 centerline of the Project with a written description, including the approximate height and
23 width measurements of all structure types of the Project. The written description shall
24 identify the location of the Project and contain a pictorial depiction of the facilities being
25 constructed. The Applicant shall also encourage the developers and builders to include this
26 information in their disclosure statements. Upon approval of this Certificate by the

1 Commission, the Applicant may commence construction of the Project.

2 14. The Applicant shall use non-specular conductor and non-reflective surfaces
3 for the transmission line structures on the Project.

4 15. The Applicant shall be responsible for arranging that all field personnel
5 involved in the Project receive training as to proper ingress, egress, and on-site working
6 protocols for environmentally sensitive areas and activities. Contractors employing such
7 field personnel shall maintain records documenting that the personnel have received such
8 training.

9 16. The Applicant shall follow the most current Western Electricity Coordinating
10 Council ("WECC") and North American Electric Reliability Corporation ("NERC")
11 planning standards, as approved by the Federal Energy Regulatory Commission ("FERC"),
12 National Electrical Safety Code ("NESC") standards, and Federal Aviation Administration
13 ("FAA") regulations.

14 17. The Applicant shall participate in good faith in state and regional
15 transmission study forums to coordinate transmission expansion plans related to the Project
16 and to resolve transmission constraints in a timely manner.

17 18. When Project facilities are located parallel to and within one hundred (100)
18 feet of any existing natural gas or hazardous pipeline, the Applicant shall:

- 19 a. Ensure grounding and cathodic protection studies are preformed to
20 show that the Project's location parallel to and within one hundred
21 (100) feet of such pipeline results in no material adverse impacts to
22 the pipeline or to public safety when both the pipeline and the Project
23 are in operation. The Applicant shall take appropriate steps to ensure
24 that any material adverse impacts are mitigated. The Applicant shall
25 provide to Staff of the Commission and file with Docket Control, a
26 copy of the studies performed and additional mitigation, if any, that

1 was implemented as part of its annual compliance-certification letter;
2 and

- 3 b. Ensure that studies are performed simulating an outage of the Project
4 that may be caused by the collocation of the Project parallel to and
5 within one hundred (100) feet of the existing natural gas or hazardous
6 liquid pipeline. The studies should either: (i) show that such simulated
7 outage does not result in customer outages; or (ii) include operating
8 plans to minimize any resulting customer outages. The Applicant shall
9 provide a copy of the study results to Staff of the Commission and file
10 them with Docket Control as part of the Applicant's annual
11 compliance certification letter.

12 19. The designation of the corridors in this Certificate, as shown in **Exhibit A**,
13 does not authorize rights-of-way greater than 100 feet wide for each transmission line nor
14 does it grant the Applicant exclusive rights within the corridors outside of the final
15 designated transmission rights-of-way. The maximum height of the structures shall not
16 exceed 199 feet.

17 20. The Applicant shall submit a compliance certification letter annually,
18 identifying progress made with respect to each condition contained in this Certificate,
19 including which conditions have been met. The letter shall be submitted to the
20 Commission's Docket Control commencing on October 1, 2025. Attached to each
21 certification letter shall be documentation explaining how compliance with each condition
22 was achieved. Copies of each letter, along with the corresponding documentation, shall be
23 submitted to the Arizona Attorney General's Office. With respect to the Project, the
24 requirement for the compliance letter shall expired on the date the Project is placed into
25 operation. Notification of such filing with Docket Control shall be made to Maricopa
26 County, the City of Phoenix, all parties to this Docket, and all parties who made a limited

1 appearance in this docket.

2 21. The Applicant shall provide a copy of this Certificate to Maricopa County
3 and the City of Phoenix.

4 22. Any transfer or assignment of this Certificate shall require the assignee or
5 successor to assume, in writing, all responsibilities of the Applicant listed in this Certificate
6 and its conditions as required by A.R.S. § 40-360.08(A) and Rule R14-3-213(F) of the
7 Arizona Administrative Code.

8 23. In the event the Applicant, its assignee, or successor seeks to modify the
9 Certificate's terms at the Commission, it shall provide copies of such request to Maricopa
10 County, the City of Phoenix, all parties to this Docket, and all parties who made a limited
11 appearance.

12 24. The Certificate Conditions shall be binding on Applicant, its successors,
13 assignee(s) and transferees, and any affiliates, agents, or lessees of the Applicant who have
14 a contractual relationship with the Applicant concerning the construction, operation,
15 maintenance, or reclamation of the Project. The Applicant shall provide any agreement(s)
16 or lease(s) pertaining to the Project that the contracting parties and/or lessee(s) shall be
17 responsible for compliance with the Conditions set forth herein, and the Applicant's
18 responsibilities with respect to compliance with such Conditions shall not cease or be
19 abated by reason of the fact that the Applicant is not in control of or responsible for
20 operation and maintenance of the Project facilities.

21 **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

22 This Certificate incorporates the following Findings of Fact and Conclusions of
23 Law:

24 1. The Project aids the State and the Southwest Region of the United States in
25 meeting the need for an adequate, economical, and reliable supply of electric power.

26 2. When constructed in compliance with the conditions imposed in this

1 Certificate, the Project aids the State, preserving a safe and reliable electric transmission
2 system.

3 3. During the course of the hearing, the Committee considered evidence on the
4 environmental compatibility of the Project as required by A.R.S. §§ 40-360 *et seq.*

5 4. The Project and the conditions placed on the Project in this Certificate
6 effectively minimize the impact of the Project on the environment and ecology of the State.

7 5. The Conditions placed on the Project in this Certificate resolve matters
8 concerning balancing the need for the Project with its impact on the environment and
9 ecology of the State arising during the course of the proceedings and, as such, serve as
10 findings and conclusions on such matters.

11 6. The Project is in the public interest because the Project's contribution to
12 meeting the need for an adequate, economical, and reliable supply of electric power
13 outweighs the minimized impact of the Project on the environment and ecology of the
14 State.

15 7. The Project substation is not jurisdictional because the definition of a
16 "transmission line" under A.R.S. § 40-360(10) only includes "new switchyards to be used
17 therewith," not substations.

18 8. The Project's 500 kV transmission lines are not jurisdictional because the
19 definition of a "transmission line" under A.R.S. § 40-360(10) "means five or more new
20 structures that span more than one mile in length," and the 500 kV transmission lines will
21 not meet these criteria.

22
23 DATED this 22nd day of November, 2024.

24
25 

26
Adam Stafford

Assistant Attorney General
Chairman, Arizona Power Plant and
Transmission Line Siting Committee

CERTIFICATION OF MAILING

ORIGINAL of the foregoing was e-filed this 22nd day of November, 2024with:

Utilities Division – Docket Control
ARIZONA CORPORATION COMMISSION
1200 W. Washington St.
Phoenix, AZ 85007

COPIES of the foregoing e-mailed this 22nd day of November, 2024to:

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7 *Attorneys for Salt River Project Agricultural Improvement and Power District*

8 /s/ Tod Brewer
9 CEC 239
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Exhibit A

