

INTERVENTION
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Arizona Corporation Commission
DOCKETED
JAN - 3 2005

Attorneys for Intervenors
Roger K. Ferland
Michelle De Blasi

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BEFORE THE ARIZONA

POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF)
SALT RIVER PROJECT AGRICULTURAL AND)
POWER DISTRICT ON BEHALF OF ITSELF AND)
ARIZONA PUBLIC SERVICE COMPANY, SANTA)
CRUZ WATER AND POWER DISTRICTS)
ASSOCIATION, SOUTHWEST TRANSMISSION)
COOPERATIVE, INC. AND TUCSON ELECTRIC)
POWER IN CONFORMANCE WITH THE)
REQUIREMENTS OF ARIZONA REVISED)
STATUTES SECTION 40-360, et seq., FOR A)
CERTIFICATE OF ENVIRONMENTAL)
COMPATIBILITY AUTHORIZING THE)
CONSTRUCTION OF THE PINAL WEST TO)
SOUTHEAST VALLEY/BROWNING PROJECT)
INCLUDING THE CONSTRUCTION OF)
OF TRANSMISSION LINES FROM PINAL WEST)
TO THE BROWNING SUBSTATION AND OTHER)
INTERCONNECTION COMPONENTS IN PINAL)
AND MARICOPA COUNTIES, ARIZONA.)

Docket No:
L-00000B-04-0126

Case No: 126

**MOTION FOR LEAVE
TO INTERVENE**

Pursuant to A.R.S. § 40-360.05.A and Arizona Administrative Code R14-3-204, Dave Daley, Mike Hastings, and Joanne Muscarello (hereinafter referred to collectively as the "Curry Road Group"), hereby apply to the Arizona Power Plant and Transmission Line Siting Committee (the "Committee"), for an order granting leave to intervene in the "Area C" portion of the above-captioned proceeding. The Committee should grant leave to intervene because the real property of the proposed intervenors will be directly and substantially affected by the transmission line route proposed by Salt River Project ("SRP") in its Application for a Certificate of Environmental Compatibility ("CEC") in the above-captioned matter.

1 The members of the Curry Road Group individually own property southwest of the City
2 of Coolidge adjacent to Curry Road. The Curry Road Group's property would be directly
3 affected by SRP's Preferred Alternative along Curry Road.

4 The proposed Intervenor can provide meaningful comment on the Preferred Alignment as
5 well as the Segment Options. Indeed, the Curry Road Group has worked diligently with other
6 parties in "Area C" to develop an alternative route which we believe will be supported by a
7 number of affected property owners and the City of Coolidge. This alternative route would also
8 best fulfill the purpose of the CEC issuance process and meet the environmental factors contained
9 in A.R.S. § 40-360.06.

10 The proposed intervenors' participation in these proceedings should not broaden the issues
11 nor unduly delay the proceedings.

12 For the reasons outlined above, the Curry Road Group respectfully requests that the
13 Committee grant its Motion for Leave to Intervene in this matter. The Curry Road Group
14 requests that all communications in connection with the above-captioned proceedings be directed
15 to:

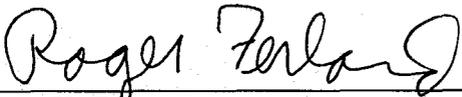
16 Roger K. Ferland
17 Quarles & Brady Streich Lang LLP
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20 RESPECTFULLY SUBMITTED this 3rd day of January, 2005.

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By 
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Attorneys for Intervenor, the Curry Road Group

ORIGINAL + 40 copies filed this
3rd day of January, 2005, with:

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COPIES of the foregoing mailed this
3rd day of January, 2005, to:

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