

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT 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 CONSTRUCTION OF THE PINAL WEST TO SOUTHEAST VALLEY/BROWNING PROJECT INCLUDING THE CONSTRUCTION OF TRANSMISSION LINES FROM PINAL WEST TO THE BROWNING SUBSTATION AND OTHER INTERCONNECTION COMPONENTS IN PINAL AND MARICOPA COUNTIES, ARIZONA.

Docket No. L00000B-04-0126 Case No. 126

RECEIVED 2005 MAY -3 P 4: 15 AZ CORP COMMISSION DOCUMENT CONTROL

CLOSING BRIEF OF APPLICANT

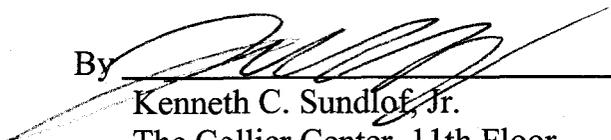
Pursuant to the procedural order dated April 18, 2005, Applicant, Salt River Project Agricultural Improvement and Power District, submits its closing summary (limit three pages per area). Applicant further reserves the right to make closing statements as per the discussion held on April 15, 2005 between the parties.

... ..

Arizona Corporation Commission DOCKETED MAY 03 2005 DOCKETED BY [Signature]

1 Dated this 3rd day of May, 2005.

2 JENNINGS, STROUSS & SALMON, P.L.C.

3
4 By 

5 Kenneth C. Sundlof, Jr.
6 The Collier Center, 11th Floor
7 201 East Washington Street
8 Phoenix, Arizona 85004-2385
9 Attorneys for Salt River Project
Agricultural Improvement and Power
District

10 ORIGINAL and 40 copies of the
11 foregoing filed on this 3rd day of
12 May, 2005 with

13 Docket Control
14 Arizona Corporation Commission
15 1200 W. Washington
16 Phoenix, AZ 85007

17 Copy of the foregoing sent electronically
18 and by Federal Express on this 3rd day of
19 May, 2005, to:

20 All parties of record and Committee
21 Members

22 By 

Area A

Description: The proposed transmission line between Pinal West and Santa Rosa is a single circuit 500 kV line. Because of the available transformer capacity at both Pinal West and Santa Rosa, a 230 kV circuit will not be needed on this segment. The straight line distance is approximately 12.1 miles.

Electrical issues: Because of the relatively short distance between the substations, with no electric facilities between the two stations, the line will serve a single purpose of bulk power transfer. Therefore, none of the routes pose electric opportunities or detriments. ACC Staff has raised an issue of reliability for the three quarter mile segment of the preferred alignment that travels South from the Pinal West substation.

Environmental issues: None of the four routes pose significant environmental issues. Generally, the area of the alignments is a cultivated valley (Hidden Valley), with some scattered homes.

Routes: The Applicant has identified four routes that have been discussed in the proceedings, and which are generally identified in the booklet introduced as Exhibit A-31:

1. The Preferred Alignment.
2. The Gas Line Alignment.
3. The ACC Staff Alignment.
4. The Preferred Alignment, with the Miller Road segment.

Pros and Cons:

The Preferred Alignment: This alignment is a combination of the alignment that was chosen following the four phases of the open houses and subsequent negotiations and two special open houses. Basically, it is an alignment that moves to the Southern edge of the property of a large landowner (Knorrs/Del Mar). The relocation of the route on the Del Mar property is consistent with SRP's practice of permitting a landowner to move a line within the landowner's property, and the other changes that were made to accommodate the new alignment were reviewed with the public in the two special open house sessions held for Area A.

The advantage of this route is that it is acceptable to Del Mar and was reviewed by the public at the two supplemental open houses.

The disadvantages of this route are greater cost, greater distance, and more turning structures.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$24	15	52	56	0.7	0	1

The Gas Line Alignment: This is the alignment that was chosen as the Preferred Alignment following the four phases of open houses. It follows the existing feature, the gas line easement, for most of the Western section of the route, and adopts a relatively direct alignment to Santa Rosa.

The advantages of this route are that it is the shortest, straightest and least expensive. It also avoids the reliability issue raised by ACC Staff.

The disadvantage is that Del Mar has testified that this alignment would interfere with its development plans.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$21	14	45	17.7	0.4	0	1

ACC Staff Alignment: The ACC Staff has proposed a route that parallels the natural gas line alignment East from Pinal West. It then travels South along the West property boundary of Del Mar to pick up the Preferred Alignment.

The advantage of this route is that it eliminates a three quarter mile segment that would parallel other existing and planned high voltage lines. It also is shorter, with fewer turning structures.

The disadvantage is that it is opposed by Del Mar, as it would result in a line on both the West and South sides of the Del Mar property. It also results in the use of a segment not in the Application (the Sage Road segment), though this segment is within the noticed one half mile corridor.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$23	14	50	22.2	0.7	0	1

Preferred Alignment/Miller Road: The route is a variation on the Preferred Alignment. The same variation could be added to the Gas Line Alignment or the ACC Staff Alignment. This is a “double-back” route designed to miss the area of some existing homes along Teel Road.

The advantage of this route is that it is favored by homeowners along Teel Road.

The disadvantages are greater distance and additional turning structures. Also, this alignment is opposed by the Hindu Temple, as it would interfere with the Temple’s view of the

mountains to the South and Southwest.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$25	16	37	56	0.7	0	0

Summary of Applicant's Position:

The Preferred Alignment is the product of the agreement with Del Mar and the input of the community in the two supplemental open houses. The Gas Line Alignment and the ACC Staff Alignment are also acceptable routes. Applicant opposes the Miller Road Alignment because of the extra distance and turning structures, but Applicant would accept this alignment if it is chosen by the Committee.

Area B

Description: This route travels from the Santa Rosa substation east either to the Sundance Power Plant or to the Pinal South substation site. The application requests flexibility to build a 230 kV circuit on all or part of the 500 kV structures. The straight line distance between Santa Rosa and Sundance is approximately 23.7 miles.

Electrical issues: This segment provides opportunities to consolidate multiple electric needs into a single set of structures. Depending on the route chosen, the 230 kV circuit could serve local load, and could provide needed interconnections into the Desert Basin and Sundance power plants. Applicant does not view the choice of locating the 500 kV switchyard at Sundance, or at the "Pinal South" site, as being a significant issue.

Environmental issues: None of the routes pose significant environmental issues. Most of the routes are rural or desert, with some scattered homes. There are some new subdivision homes along the gas pipeline route.

Routes: The Applicant has identified four routes that have been discussed in the proceedings, and which are generally identified in the booklet introduced as Exhibit A-31. Note that Exhibit A-31 compares the routes from point to point (Santa Rosa to Southeast Valley). This summary will only focus on the routes in Area B, from Santa Rosa to Pinal South or Santa Rosa to Sundance (depending on whether the Northern or Southern Alignment is chosen):

1. The Preferred Alignment/Cornman Road.
2. The Preferred Alignment/Hanna Road.
3. Northern Alignment/Gas Pipeline.
4. Northern Alignment/Staff Route

Pros and Cons:

The Preferred Alignment/Cornman Road: The Preferred Alignment from the Application includes a segment that is directly North of Interstate 8. As no party supported the segment adjacent to the Interstate, Applicant presents the Preferred Alignment with the Cornman Road segment option.

The advantage of this route is that it was the alignment chosen through the public process. Additionally the Southern Alignment is generally advocated by Casa Grande, though Casa Grande would prefer to go further South.

The disadvantages of this route are greater distance and cost. Additionally, it does not facilitate serving load in the fast growing area North of Casa Grande, and does not facilitate a 230 kV interconnection to Desert Basin and Sundance. The result, if one of the Southern alternatives is chosen, is that additional 230 kV lines will be needed anyway in the North part

of Area B.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$51	36	61	21	246.4	0	0

The Preferred Alignment/Hanna Road: This route would cross Interstate 8, travel along Hanna Road for approximately 6 miles, then cross the Interstate again to resume the Cornman Road route. This alignment is not in the Application, but it is within the one half mile noticed corridor.

The advantage of this alignment is that it is proposed by Casa Grande. It also misses the area of a few homes on the East part of the Cornman Road alignment.

The disadvantages of this double back route are additional distance and cost, plus two unnecessary crossings over Interstate 8.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$54	38	34	234.8	191.9	0	0

The Northern Alignment/Pipeline: This is the shortest and most direct route. Much of the alignment would parallel the El Paso Natural Gas pipeline easement. Where possible, the transmission line easement would use portions of the pipeline easement to reduce right of way requirements.

This alignment is the shortest and least expensive. Additionally, the 230 kV circuit would provide an opportunity to serve local load in the fast growing Northern Casa Grande area. Also, this route would facilitate a needed 230 kV interconnection with the Desert Basin and Sundance power plants.

The disadvantage of this route is that it is opposed by Casa Grande, and developers in the Northern area. Applicant does not view the proximity of the route to the Casa Grande Airport as an issue. While there are more houses within a one quarter mile corridor, most of these are concentrated in two new housing developments, that are separated from the line corridor by the pipeline easement.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$34	24	535	0	20.2	1	0

The Northern Alignment/ACC Staff: This route is the same as the Northern Alignment/Pipeline, except for the section just East of the Santa Rosa substation. Here ACC Staff suggests going South initially, then meeting the pipeline at Node 196 (adding an

additional 1.9 pipeline miles from the basic Northern Alignment). SRP does not see any advantage in this route from a reliability perspective.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$37	26	562	28.4	6.1	1	0

Summary of Applicant's Position:

Applicant opposes the Hanna Road alignment, as it is an unnecessary double back, adding unneeded miles as well as two Interstate crossings. The choice between the Cornman Road and Gas Pipeline Alignments contrasts considerations of electrical, distance and cost issues against the route chosen in the public process and favored by Casa Grande and the developers.

Area C

Description: This route travels alternately (depending on the Northern or Southern route from Area B) from the Sundance power plant or the Pinal South substation. It intersects with the Southeast Valley substation site, and terminates at the existing Browning substation in Mesa. The application requests optionally to build a 230 kV circuit on all or part of the 500 kV line to SEV, and proposes to build double circuit from SEV to Browning. The straight line distance is 29.5 miles from Sundance and 33.5 miles from Pinal South.

Electrical issues: Putting aside the interconnection issues discussed in Area B, there are no electric issues. This line can provide a source of power to serve local load, particularly in the Florence area.

Environmental issues: None of the routes pose significant environmental issues. Most of the routes are rural or desert, with some scattered homes. There are two subdivisions with existing homes, both in the Florence area. Applicant does not view the archeological sites or the proximity to the Casa Grande Ruins as being significant routing issues.

Routes: The Applicant has identified six routes that have been discussed in the proceedings, and which are generally identified in the booklet introduced as Exhibit A-31. This summary adjusts the numbers to correspond to the routes from Sundance and Pinal South to Browning:

1. The Blue Route from Sundance.
2. The Blue Route from Pinal South.
3. ACC Staff Alignment from Sundance.
4. The Green route from Pinal South.
5. The Green route with the railroad option
6. The Backwards C.

As no party has opposed the preferred alignment for Southeast Valley to Browning, this discussion will assume the Preferred Alignment North of Southeast Valley for all proposed routes.

Pros and Cons:

The Blue Route from Sundance: This is the shortest route. It parallels existing transmission, the Santan gas line and the Magma railroad.

The advantages of this alignment are that it is the shortest route, and mostly parallels existing features. The route is also supported by the Town of Florence, and the impact on Coolidge is less.

The disadvantage of this route is that it contains more turning structures and is not supported by Coolidge.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$70	41	191	53.4	395.9	0	0

The Blue Route from Pinal South: This is the route that was chosen as the Preferred Alignment. At that time, this route was supported by both Coolidge and Florence.

The advantage of this route is that it makes maximum use of existing features (transmission lines, gas lines and railroads).

Disadvantages of this route are that it involves more turning structures and is now opposed by Coolidge. Also, this route would be near the Oasis at Magic Ranch subdivision. The Applicant does not view the comments of the various developers as significant from a routing perspective, as all of the developers admit that they could accommodate the line, if necessary.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$81	48	204	53.4	403.1	0	0

ACC Staff Alignment from Sundance: ACC Staff proposes to use the Northern Alignment in Area B (in order to take advantage of the electrical opportunities). From Sundance ACC Staff suggests a route that would travel South to pick up the Pinal South substation site. ACC Staff then recommends the Green Route to SEV.

The advantage of this alignment is that it does the most for the electric system. In a fairly direct manner the route provides a 230 kV connection for the North Casa Grande area, a 230 kV connection to both Desert Basin and Sundance, and the optionality and load serving advantages provided by Pinal South. Also, the Green Route, with its central location, provides load serving opportunities for the Florence area.

The disadvantage is that it adds miles as compared to the most direct route, the Northern Alignment. While Pinal South could be a good addition to the electric system, its need is in the future. Plus, Pinal South gains only about four miles toward a Southern interconnection.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$82	52	212	101.9	396	0	1

The Green Route from Pinal South: If the Southern Alignment is chosen, then this is a fairly direct route that is near the middle of some expected load centers. This is the route that was chosen by Coolidge in its recent resolution, and is opposed by Florence.

The advantage of this alignment is that it is a fairly open alignment, with little interference with existing residences, except in the Sun Valley Farms area.

The disadvantage of this alignment is that it is opposed by Florence. But, this opposition appears to be based on the interests of Anthem South, whose representative testified that the development can accommodate the route (and in fact, based on Mark Etherton's testimony, the development may need the 230 kV circuit).

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$75	45	220	101.9	346	0	1

The Green Route with the Railroad Option: This is a variation of the Green Route. This route has the advantage that it misses both the existing homes in Sun Valley Farms and Oasis at Magic Ranch. It may be more acceptable to Florence.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$77	46	200	18.3	356.3	0	1

The Backwards C: This is a route devised by the real estate developers (except the developers represented by Larry Robertson), and is clearly designed to miss the specific properties of the proponents. The route is opposed by both Coolidge and Florence. The route adds unnecessary miles and impact, for no benefit. The cut back on Route 287 would effect an additional 68 existing residences. While the lines are on the map, this is not a route that is contemplated by the Application and is opposed by the Applicant.

The disadvantages of this alignment are many. They include added distance, added cost, and added impact. The "backwards C", coupled with the exiting lines from Sundance, would build a transmission box around Coolidge. In the long term the impacts would be much greater.

Cost (millions)	Miles	Homes	Habitat (acres)	Cultural (acres)	Schools	Churches
\$82	50	284	46.4	488.9	0	1

Summary of Applicant's Position:

If the Northern Alignment is chosen, then the Blue Route is the most direct route. The Blue Route has the added advantage of following a number of existing features. The ACC Staff proposal is a good alternative.

If the Southern Alignment is chosen, then the Green Route makes the most sense as it avoids the loop in at Pinal South. Had Coolidge opposed the blue alignment at the time of the Application, it may not have been chosen as the preferred alignment from Pinal South. The railroad option provides a way to avoid the existing homes at both Sun Valley Farms and Oasis at Magic Ranch. Applicant strongly opposes the Backwards C.