



BEFORE THE ARIZONA CORPORATION COMMISSION

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AZ CORP COMMISSION  
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Arizona Corporation Commission

DOCKETED

JUN 22 2005

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11 IN THE MATTER OF THE APPLICATION OF )  
 12 SALT RIVER PROJECT AGRICULTURAL )  
 13 IMPROVEMENT AND POWER DISTRICT ON )  
 14 BEHALF OF ITSELF AND ARIZONA PUBLIC )  
 15 SERVICE COMPANY, SANTA CRUZ WATER )  
 16 AND POWER DISTRICTS ASSOCIATION, )  
 17 SOUTHWEST TRANSMISSION COOPERATIVE, )  
 18 INC. AND TUCSON ELECTRIC POWER IN )  
 19 CONFORMANCE WITH THE REQUIREMENTS )  
 20 OF ARIZONA REVISED STATUTES SECTION )  
 21 40-360, et. seq., FOR A CERTIFICATE OF )  
 22 ENVIRONMENTAL COMPATIBILITY )  
 23 AUTHORIZING CONSTRUCTION OF THE )  
 24 PINAL WEST TO SOUTHEAST )  
 25 VALLEY/BROWNING PROJECT INCLUDING )  
 26 THE CONSTRUCTION OF TRANSMISSION )  
 27 LINES FROM PINAL WEST TO THE )  
 28 BROWNING SUB-STATION AND OTHER )  
 INTERCONNECTION COMPONENTS IN PINAL )  
 AND MARICOPA COUNTIES, ARIZONA. )

) Docket No. L00000B-04-0126

) Case No. 126

) **NOTICE OF AND REQUEST**  
) **FOR REVIEW**

NOTICE OF AND REQUEST FOR REVIEW

21 Pursuant to A.R.S. §40-360.07(A) and A.A.C. R14-3-249(B), Walker Butte 700, L.L.C.,  
 22 Walker Butte 300, L.L.C., Walker Butte Granite, L.L.C., Magic Lake 80, L.L.C., Skousen &  
 23 Highway 87, L.L.C., Hunt & Hooper, L.L.C., Sonoran 382, L.L.C., MLC Farms, L.L.C., General  
 24 Hunt Properties, Inc., Skousen, CR and Elaine TRS (“Walker Butte *et al.*”), hereby submits its  
 25 notice of and request for review by the Commission of the June 8, 2005 decision of the Arizona  
 26 Power Plant and Transmission Line Siting Committee (“Siting Committee”) to grant a Certificate  
 27 of Environmental Compatibility (“CEC”) to the Applicant(s) in the above-captioned proceeding.  
 28

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**GROUNDS FOR REVIEW**

Pursuant to A.R.S. §40-360.07(B) and A.A.C. R14-3-214(C), the grounds for review upon which this notice and request are based are as follows:

1. Four (4) members of the Siting Committee who voted in favor of the transmission route ultimately selected based their respective vote(s) upon considerations that have nothing to do with the evidentiary record or the merits of the several alternative routes for Area "C" that were then before the Siting Committee. In each instance, the reliance upon an extraneous consideration constituted an abuse of discretion upon the part of the member in question. As a consequence, each of those votes is "tainted" by such abuse of discretion and should be disallowed and rejected by the Commission incident to its review of the June 8, 2005 decision of the Siting Committee and the resulting CEC. [See Discussion below, Section I]

2. The June 8, 2005 decision of the Siting Committee is legally deficient as to the selection of an approved route for Area "C," and the Commission must "fill in the gap" Incident to its review of the decision and the CEC. [See Discussion below, Section II]

3. The evidentiary record reflects that the Cornman Road/ Eastern/ Railroad Route provides greater electric system reliability, and has less overall impact upon the total environment, than the Backwards "C" Route. [See Discussion below, Section III]

4. The Backwards "C" Route does not reflect the results of a compromise between the City of Coolidge and the Town of Florence as to an acceptable route for Area "C"; and, the preponderance of its supporters either would not object to or would not be impacted by a Commission decision adopting the Cornman Road/ Eastern/ Railroad Route.

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DISCUSSION

I. IN ARRIVING AT A DECISION TO SUPPORT ADOPTION OF THE BACKWARDS "C" ROUTE, FOUR (4) OF THE MEMBERS OF THE SITING COMMITTEE RELIED UPON EXTRANEIOUS CONSIDERATIONS, RATHER THAN THE EVIDENTIARY RECORD, AND COMMITTED ABUSES OF DISCRETION WHICH REQUIRE THAT THEIR RESPECTIVE VOTES BE DISALLOWED AND REJECTED BY THE COMMISSION.

The record in Case No. 126 contains several incidents which constitute a ground for review of the Siting Committee's decision, and examples of an "abuse of discretion." First, there is the expressly stated view of Members Williamson and Whalen that the Siting Committee should accede to the preference and arguments of the Town of Florence in Area "C," since the Siting Committee selected the alignment in Area "B" for which the City of Casa Grande had contended.

"I would like to discuss the backwards C option. And let me explain why I bring this up, even though some people think it is a stupid option. By the previous vote we just took a while ago approving the southern route [in Area "B"], we basically acceded to the request and desires of the City of Casa Grande or the Town of Casa Grande. And I would think by using the backwards C approach, we can meet the needs of both Coolidge and Florence. . ." [Williamson; Tr. 4225, 1.21- Tr. 2426, 1.4]

\* \* \* \*

". . . I was looking for the northern alignment [in Area "B"]. I believe it was better alignment through Casa Grande. We voted for the southern alignment really at the convenience of Casa Grande, and I think we should give Florence the same consideration." [Whalen; Tr. 4255, 1. 20-25]

This line of reasoning is not included among the decision-making criteria prescribed for the Siting Committee by A.R.S. §40-360.06. Nor, is it supported by evidence in the hearing record. Moreover, it has nothing to do, per se, with the merits of any of the several alignments that were under consideration for Area "C." Thus, reliance upon this reasoning as a basis for a decision constitutes an "abuse of discretion" by these two members of the Siting Committee.

1 Second, Member Palmer appears to have developed a bias against considering the  
2 Cornman Road/ Eastern/ Railroad Route on the merits because of the City of Coolidge's  
3 ultimate decision to formally support the Green route.<sup>1</sup>  
4

5 "MEMBER PALMER: Are you, Madam Chairman, Mr.  
6 Sundlof, are you concerned, appalled, or anything in  
7 between of those extremes that there is a conspicuous  
8 absence of the City of Coolidge and its representatives  
9 during these proceedings?

10 CHMN. WOODALL: I won't require that you answer that,  
11 Mr. Sundlof, if you prefer not to.

12 MR. SUNDLOF: I certainly can't comment on anybody's  
13 participation

14 MEMBER PALMER: Do you miss them?

15 MR. SUNDLOF: Coolidge did come in and make  
16 comments and indicates its preference. And that's what  
17 happened.

18 MEMBER PALMER: Well, Madam Chairman, I am  
19 concerned and somewhat appalled. We have had  
20 representatives from not only developers, but the  
21 jurisdictions that have been impacted. And they have been  
22 very active in their participation. And I am concerned that  
23 there was at least the appearance of some compromise and  
24 that there was [a] precipitous, you know, event unknown to  
25 us, and now the City of Coolidge supports the green route  
26 and they are not here to defend that position." [Tr. 4238, l.  
27 17- Tr. 4239, l.14] [Emphasis added]

28 In alluding, and reacting, to this unspecified "event unknown to us," Member Palmer has  
apparently allowed himself to be influenced by a consideration which is not a part of the hearing  
record; and, he has engaged in conjecture as to both the existence and nature of an unspecified  
"precipitous event," which has offended him. This constitutes an "abuse of discretion" upon his  
part.

Third, Member Sandie Smith appears to have believed that, had it known that the City of  
Coolidge was not going to support the Preferred Alignment in Area "C," the Town of Florence  
would have explored other alternatives.

<sup>1</sup> As noted in Footnote 5, the City of Coolidge formally adopted a resolution supporting the Green Route which  
is, for all practical purposes, the equivalent of the Cornman Road/Eastern/Railroad Route.

1 "MEMBER SANDIE SMITH: To that point, I believe that  
2 had Florence had an indication that there wasn't support for  
3 the west side, which I believe there is many reasons why  
4 that changed from a preferred route, including the number  
5 of lines that they already have, but if they had had advance  
6 notice of that, I believe that Florence would have been  
7 choosing alternative routes to get over and through their  
8 community, which they didn't have an indication because  
9 they thought it was worked out.

10 And so I think that needs to enter into at least the  
11 accountability that we are expecting to hold our cities and  
12 towns to plan for future use that we are going to be needing  
13 more and more of this. So I think that there was a good  
14 point made." [Tr. 4239, 1.18-Tr. 4240, 1.7] [Emphasis  
15 added]

16 The "point" to which she was referring was the City of Coolidge's "unanticipated" support for  
17 the Green route; and, in effect, she appears to suggest that the route preference of the Town of  
18 Florence should receive special consideration because it did not have the opportunity to  
19 formulate a back-up plan. This is a consideration that is not only not a part of the hearing record,  
20 it is also based upon conjecture and speculation. Thus, to the extent it constituted a basis for her  
21 vote(s), and that clearly appears to be the case, this line of reasoning constituted an "abuse of  
22 discretion" on the part of Member Sandie Smith.

23 It is quite apparent from a review of the May 10, 2005 hearing transcript that the  
24 members of the Siting Committee were struggling to reach a decision on an approved route for  
25 Area "C." Illustrative of this is the fact that they conducted four (4) votes on three different  
26 routes and one modified route. However, their good intentions<sup>2</sup> and frustrations do not allow its  
27 members to base their individual votes upon extraneous considerations, rather than the evidence  
28 before them. As discussed above, in Case No. 126 several members of the Siting Committee  
appear to have allowed such extraneous considerations to influence their decision-making. This  
resulted in an abuse of discretion as to their respective votes. As a consequence, the same should

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<sup>2</sup> Ironically, and as indicated in Appendix "A" hereto, the use of a mile-wide corridor along Christensen Road does not have the effect of avoiding an impact on the residential communities of Oasis at Magic Ranch and Mirage at Magic Ranch, which the Siting Committee intended through its fourth vote.

1 be disallowed and rejected by the Commission incident to its review of the June 8, 2005 decision  
2 of the Siting Committee, and the CEC should be modified as to the route to be approved for Area  
3 "C."  
4

5 **II. THE JUNE 8, 2005 DECISION OF THE SITING COMMITTEE IS LEGALLY**  
6 **DEFICIENT AS TO THE SELECTION OF AN APPROVED ROUTE FOR AREA**  
7 **"C," AND THE COMMISSION MUST "FILL IN THE GAP."**

8 Ten (10) members of the Siting Committee were in attendance during the May 10, 2005  
9 deliberations. After three (3) previous votes had been conducted in which the six (6) votes  
10 necessary to constitute a majority could not be reached as to any of the routes then being  
11 considered, the Siting Committee adopted the Backward "C" Route by a 9-1 vote (with  
12 Chairman Woodall dissenting) on the fourth ballot. When the four (4) votes tainted by an abuse  
13 of discretion are eliminated from consideration and subtracted from the nine (9) vote majority  
14 that favored the Backward "C" Route on the fourth vote, the required six (6) vote majority to  
15 constitute a legal decision as to the route for Area "C" does not exist. Thus, the June 8, 2005  
16 decision of the Siting Committee is legally deficient as to the selection of an approved  
17 transmission alignment for Area "C," as is the related portion of the CEC. As a consequence, the  
18 Commission, in terms of legal effect, has been presented with a decision (and a CEC) by the  
19 Siting Committee with respect to which the Commission must "fill in the gap" as to the selection  
20 of a route for Area "C."  
21

22 **III. THE EVIDENTIARY RECORD REFLECTS THAT THE CORNMAN**  
23 **ROAD/EASTERN/ RAILROAD ROUTE PROVIDES GREATER ELECTRIC**  
24 **SYSTEM RELIABILITY, AND HAS LESS OVERALL IMPACT UPON THE**  
25 **TOTAL ENVIRONMENT, THAN THE BACKWARDS "C" ROUTE.**

26 A. The Cornman Road/Eastern/Railroad Route Provides Greater Electric System  
27 Reliability Than the Backwards "C" Route.

28 This case is unusual in that the Commission's Utilities Division Staff ("Staff") was able  
to listen to the evidence, and thereafter refine its testimony and recommendations to fit with the  
general criteria it considered when recommending an appropriate route for the Applicant(s)

1 proposed 500kV transmission line through Area "C." These criteria are: 1) consumer benefit  
2 versus cost; 2) long-range system needs; and 3) reliability [Tr. at 3447-3466] The Staff is  
3 "usually fairly receptive to any route, as long as there was not undue harm to the public or in the  
4 environment." [Tr. 3448, 1.22-25] However, based on the evidence presented during the Area  
5 "C" hearings, the Staff modified its original position - which had been to support the Preferred  
6 Alignment - and it recommended the Green Alignment, based primarily on reliability concerns  
7 that would not only impact the City of Coolidge and surrounding area, but areas in metropolitan  
8 Phoenix, Pinal County, Pima County and Cochise County.

9  
10 The Staff's main electric system reliability concern in Area "C" centers around the  
11 Coolidge substation, and the number of connected transmission lines already in existence.<sup>3</sup> Both  
12 the Preferred and Backward "C" routes add to that congestion, whereas the Green alignment  
13 does not. [Tr. at 3482-3486] The Staff was quick to address the Backwards "C" Route, and  
14 underscored its opposition with the conclusion that this route "doesn't serve the system in any  
15 fashion." [Tr. 3485, 1.18-19] The Staff further noted that "To put another transmission line in this  
16 vicinity of these accumulation of lines is a risk that [I] feel should be avoided if we can." [Tr. at  
17 3485, 1.5-8<sup>4</sup>] Staff recommended the Green alignment to avoid such risk; it bypasses the  
18 Coolidge substation transmission congestion to the east, and then runs north in an almost direct  
19 route to the proposed SEV substation.  
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22 Likewise, the Applicant(s)' witnesses voiced "serious concerns" about the Backwards  
23 "C" Route. [Tr. at 2482] These concerns include not only the overall impact of the Backwards  
24 "C" Route, given numerous siting criteria, but also the detrimental impact on reliability and  
25 future planning by siting a future 500kV transmission line to the south, east and north of the City  
26 of Coolidge. *Id.* Furthermore, such a design would essentially "box in" that municipality, and  
27

28 <sup>3</sup> There are a total of 7 transmission lines currently connected to the Coolidge substation. [Tr. 3484, 1.17-19]  
<sup>4</sup> "Staff is not supportive of that [route] because Coolidge doesn't need additional transmission lines. It has plenty  
of transmission lines at the Coolidge substation already." [Tr. 3485, 1.15-19]

1 reverses the transmission line's direction (i.e., a double-back route) to create almost redundant  
2 paths along the northern and southern boundaries of the City of Coolidge. During closing  
3 argument, Applicant(s)' counsel summed up the Backwards "C" Route best, stating:

4 "We think that [it] is, as the Mayor of Florence said, a dumb route.  
5 There is no point to it. It is a huge double-back route. It comes  
6 back into the area of congestion. There is nothing gained by it,  
7 boxes off Coolidge. The only advantage to the Backward "C,"  
8 developer opponents like it because it would miss their land. [Tr.  
4115, 1.24 – Tr. 4116, 1.6]

9 Unfortunately, the Siting Committee ultimately chose to ignore the expert testimony  
10 offered by both the Applicant(s) and the Staff, opting instead to choose a cleverly crafted  
11 "political solution"<sup>5</sup> that sacrifices greater electric system reliability in exchange for a route that  
12 will bypass several large *future* residential developments near the Town of Florence.

13 B. The Cornman Road/ Eastern/Railroad Route Will Have Less Overall Impact Upon  
14 the Total Environment Than the Backwards "C" Route, and Less Financial Impact  
15 on Ratepayers.

16 Criteria that the Siting Committee must weigh in siting a transmission line include the  
17 overall effect its placement will have on the total environment. It is undisputed that the  
18 Backward "C" Route will have a greater affect on *existing* residents than the Cornman Road/  
19 Eastern/ Railroad Route alternative. Because it incorporates the Preferred Alignment  
20 commencing at Node 188, then proceeds north to the SEV substation, the Backward "C" Route  
21 will bring the transmission line through the Oasis at Magic Ranch and Mirage at Magic Ranch  
22 subdivisions, where approximately 533 homes had been constructed as of the hearings. [Tr.  
23 3430, 1.1] Furthermore, the segment option along Hwy 287 will potentially impact 215 existing  
24 residences along this route, and represents an additional \$5 million in costs compared to the  
25

26  
27 <sup>5</sup> Both the City of Coolidge and Town of Florence formally passed competing resolutions, the former in support of  
28 the Green alignment, and the latter in support of the Preferred alignment. These resolutions have not been amended,  
and the evidence reflects that council members for the City of Coolidge actually expressed open opposition to the  
Backwards "C" alignment. [Tr. 2925, 1.18 – Tr. 2926, 1.8] Meanwhile, the Town of Florence resolution continues to  
support the Preferred alignment to the exclusion of all others. Nowhere in the record is there a formal resolution by  
either the City of Coolidge or Town of Florence that supports the Backwards "C" Route.

1 Green alignment [Exhibit A-31, pages 39 and 36, respectively].

2 Conversely, the Cornman Road/Eastern/Railroad Route represents a variation of the  
3 Green alignment that incorporates a segment option<sup>6</sup> which bypasses (and thus does not impact)  
4 approximately 58 residences at Sun Valley Farms, Unit 5. [Tr. 2742, 1.14-16] Unlike the  
5 Backward "C" Route, the Cornman Road/ Eastern/ Railroad Route incorporates a segment option  
6 that does not create any electric system reliability concerns for either the Applicant(s) or the  
7 Staff. Neither does it represent additional unneeded costs to existing and future ratepayers,  
8 whereas the Backwards "C" Route does. Even if reliability concerns did not exist, the Backward  
9 "C" Route clearly does not satisfy the Staff's "consumer benefit versus cost" criterion<sup>7</sup>, whereas  
10 the Cornman Road/ Eastern/ Railroad Route does.

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13 **IV. THE BACKWARDS "C" ROUTE DOES NOT REPRESENT A COMPROMISE**  
14 **BETWEEN THE CITY OF COOLIDGE AND THE TOWN OF FLORENCE AS**  
15 **TO AN ACCEPTABLE ROUTE FOR AREA "C"; AND, THE**  
16 **PREPONDERANCE OF ITS SUPPORTERS EITHER WOULD NOT OBJECT**  
17 **TO OR WOULD NOT BE IMPACTED BY A COMMISSION DECISION**  
18 **ADOPTING THE CORNMAN ROAD/ EASTERN/ RAILROAD ROUTE.**

19 A. Neither the City of Coolidge or the Town of Florence Have Expressed Support for  
20 the Backwards "C" Route or Indicated It Would Represent an Acceptable  
21 Compromise Between Their Official Positions As to a Route for Area "C."

22 Certain of counsel for the developers who supported the Backward "C" Route  
23 endeavored to portray and promote the same as a "natural" compromise between the positions of  
24 the City of Coolidge, which supported the Eastern or Green Route, and the Town of Florence,  
25 which supported the Preferred Route. However, this "bootstrap" or "make weight" line of  
26 argument is undercut from the outset by the fact that neither the City of Coolidge or the Town of  
27 Florence ever expressed any support for the Backward "C" Route during the approximately 5½  
28 month period that the hearings in Case No. 126 were in progress, despite the fact that the

<sup>6</sup> Incorporation of this segment option, from Node 81 to Node 45, is also supported by Commission Staff. [Tr. at 3486]

<sup>7</sup> Likewise, the Backwards "C" Route represents a greater impact on the existing Adamsville Hohokam archeological site between Node 175 and 174. [Tr. at 2050-2052]

1 Backward "C" Route concept was raised by its supporters in the developer community at an  
2 early stage in the proceedings. To the contrary, the City of Coolidge at no time expressed any  
3 support for the developers' promotion. In the case of the Town of Florence, after having  
4 characterized the Backward "C" Route as a "dumb" proposal, Mayor Rankin stated that he  
5 "would have to take that [suggestion] to my council" before he could say whether or not the  
6 Backward "C" Route would be acceptable to the Town of Florence. [Tr. 3848, 1.8-13] That  
7 presentation to the Florence Town Council never occurred. Thus, there is no evidence in the  
8 hearing record in Case No. 126 to support the contention of counsel for the developers, and  
9 possibly the conjecture of some members of the Siting Committee, that selection of the  
10 Backward "C" Route would in fact represent an acceptable compromise to these two  
11 municipalities.  
12

13  
14 B. The Preponderance of Parties Who Supported the Backwards "C" Route Either  
15 Would not Object to or Would Not be Impacted by a Commission Decision  
16 Adopting the Cornman Road/ Eastern/ Railroad Route.

17 As previously noted, the Backward "C" Route was literally "cobbled together" by certain  
18 parties representing large developer interests in an effort to fashion a politically acceptable  
19 compromise route for Area "C" which would avoid their respective land holdings. It was not the  
20 result of professionally conducted environmental, economic or electric reliability studies as to  
21 which route(s) were suitable for Area "C." Moreover, during the course of cross-examination in  
22 the hearings on Area "C," four (4) of the parties who either supported the Backwards "C" Route,  
23 or who would benefit from its adoption, testified that they would not oppose a decision by the  
24 Siting Committee or the Commission selecting the modified Eastern or Green Route.<sup>8</sup> Another  
25 five (5) parties supporting or benefiting from the Backwards "C" Route acknowledged that their  
26

27  
28 <sup>8</sup> See Tr. 2924, 1.22-Tr. 2925, 1.1 and Tr. 2925, 1.1215 [Pivotal Group]; Tr. 3061, 1.9-14 and Tr. 3062, 1. 5-10  
[Miller Holdings]; Tr. 3112, 1.12-17 and Tr. 3113, 1.2-5 [David M. Daley]; Tr. 3132, 1.20-24 [Joanne Francesca  
Muscarello] As previously noted, as a practical matter, for purposes of this Request for Review, the modified  
Eastern or Green Route is the equivalent of the Cornman Road/ Eastern/ Railroad Route.

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respective properties would not be adversely impacted by the modified Eastern or Green Route.<sup>9</sup> Further, four (4) additional parties affirmatively supported the Cornman Road/ Eastern/ Railroad Route for Area "C," including the Applicant(s) and the Staff.<sup>10</sup> Only three (3) parties who supported the Backwards "C" Route opposed the Cornman Road/ Eastern/ Railroad Route.<sup>11</sup> Given this, and the strong evidentiary record supporting the Cornman Road/ Eastern/ Railroad Route, the Siting Committee's decision to select the Backwards "C" Route for Area "C" should be set aside.

**V. CONCLUSION**

For each and all of the grounds for review listed and discussed above, Walker Butte *et al.*, requests that the Commission exercise its jurisdiction and authority pursuant to A.R.S. §40-360.07 so as to (i) deny that portion of the Siting Committee's June 8, 2005 decision and CEC adopting the Backwards "C" Route for Area "C," and (ii) modify the June 8, 2005 decision and CEC so as to adopt the Cornman Road/ Eastern/ Railroad Route as the route to be approved and granted for Area "C."

Dated this 22nd day of June, 2005

Respectfully submitted,  
  
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and

<sup>9</sup> See Tr. 2677, l. 18-22 [Langley Properties]; Tr. 2688, l. 18-Tr.2689, l.4 [Dobson Family Farms/ Dwayne Dobson]; Tr. 2707, l. 21- Tr. 2708, l.8 [Centex Homes]; Tr. 2727, l. 20- Tr. 2728, l.3 [Aspen Farms/ Donald Myers]; Tr. 2758, l. 15- Tr. 2759, l. 1 [ Sun Valley Farms, Unit 5]

<sup>10</sup> In addition, the City of Coolidge adopted a resolution favoring adoption of the Eastern or Green Route, which, as noted above, for all practical purposes, is the equivalent of the Cornman Road/ Eastern/ Railroad Route. The City of Coolidge was not an Intervenor, but its resolution was received into evidence as one of the Applicant's Exhibits [Exhibits A-23]

<sup>11</sup> One of these opponents, however, acknowledged during cross-examination that, if the Eastern or Green Route were to be selected, they would simply incorporate it into their development plan. Tr. 2645, l. 13-20 [Pulte Homes]

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An original and 28 copies of the  
foregoing were filed on the 22<sup>nd</sup>  
day of June, 2005 with:

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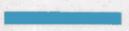
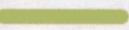
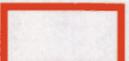
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26  
27  
28

**APPENDIX "A"**

# Legend

-  .5 Mile Offset
-  Chosen Alignment
-  Walker Butte et al.

Oasis at Magic Ranch  
Mirage at Magic Ranch

Oasis at Magic Ranch  
Mirage at Magic Ranch

.5 Mile offset from  
center line of UPRR  
Per June 8, 2005  
Decision

.5 Mile offset from  
center line of UPRR  
Per June 8, 2005  
Decision

.5 Mile offset from  
center line of  
Christensen Rd.  
Per June 8, 2005  
Decision

.5 Mile offset from  
center line of  
Christensen Rd.  
Per June 8, 2005  
Decision

Christensen Road

UPRR

UPRR

**Appendix 'A'**  
**To Walker Butte et al.**  
**Request For Review**

