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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

JEFF HATCH-MILLER, CHAIRMAN  
WILLIAM A. MUNDELL  
MARC SPITZER  
MIKE GLEASON  
KRISTIN K. MAYES

Arizona Corporation Commission

DOCKETED

JUL 07 2005

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Docket No. L00000B-04-0126

Case No. 126

SOVA'S SUPPLEMENTAL BRIEF TO ITS  
REQUEST FOR REVIEW OF RECOMMENDED  
CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY

AZ CORP COMMISSION  
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IN THE MATTER OF THE )  
APPLICAITON 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 AND TUCSON )  
ELECTRIC POWER IN CONFORMATION )  
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 )  
INTER- CONNECTION COMPONENTS )  
IN PINAL AND MARICOPA )  
COUNTIES, ARIZONA. )

Pursuant to the Commission's Procedural Order dated June 27, 2005, Save Our Valley Association ("SOVA") files its Supplemental Brief.

SOVA incorporates herein by reference, its Request For Review Of Recommended Certificate Of Environmental Compatibility, including all quotations from and page references to the Siting Committee Record.

1 SOVA firmly believes the SOVA Route is preferred under A.R.S. §  
2 40-360.06.A, 5,6, 8 and 9. Item 5 relates to "[e]xisting scenic  
3 areas . . . at or in the vicinity of the proposed site." Item 6  
4 relates to "[t]he total environment of the area." A. Wayne Smith,  
5 a member of the Siting Committee, described the valley area the SRP  
6 Route crosses in Area A as "probably the more beautiful area that we  
7 tranversed . . ." He went on to describe it as "probably the most  
8 aesthetic area that this application goes through . . ." Siting  
9 Committee Record, page 4045. The SOVA Route totally avoids this  
10 area!

11 Item 8 relates to route costs. Once you consider the costs of  
12 turns and diversions to accommodate developers and the City of Casa  
13 Grande contained in the Siting Committee's Recommendation, the SOVA  
14 Route likely helps reduce the cost of the total project. Siting  
15 Committee Record, pages 876-87, and 1179-81.<sup>1</sup>

16 Item 9 relates to "[a]ny additional factors . . . ." Here we  
17 have two factors to consider, an established one-mile wide BLM  
18 electric transmission line corridor, and a Case 61 electric  
19 transmission line corridor certificated 23 years ago and unused.  
20 The SOVA Route uses both of these corridors.

21 \_\_\_\_\_  
22 <sup>1</sup> There was a lot of NIMBY during the Siting Committee hearing  
23 process, but it came primarily from big developers, not from  
24 homeowners. Please, Siting Committee, do not put your line directly  
25 through my unbuilt, planned area development. The many turns and  
26 diversions in the final committee-approved route attest to the many  
accommodations given developers. Yet, homeowners, for the most part,  
were ignored.

1 Failure to utilize existing electric transmission line  
2 corridors and double circuit lines, and to insist that each new line  
3 requires its own separate corridor, will clearly result in unsightly  
4 and impractical spider-webbing as Arizona continues its rapid rate  
5 of growth. There is nothing wrong with multiple line corridors,  
6 provided there is a degree of separation. Siting Committee Record,  
7 pages 1188-1192. Likewise, there is nothing wrong with double  
8 circuit lines. Siting Committee Record, page 1218.

9 There appears to be a strange bias for following El Paseo  
10 natural gas lines. First, since the gas lines are underground  
11 through existing neighborhoods, they do not have the same effect as  
12 160 foot tall electric poles, for example, on view sheds. Second,  
13 two of the subject gas lines being over 40 years old, they are  
14 subject to failure (e.g. leaks). In fact, one natural gas line  
15 actually failed during the Siting Committee process and had to be  
16 repaired. Siting Committee Record, pages 1332-1337, direct  
17 examination of Les Johnson, and SOVA Exhibit No. 10. SOVA does not  
18 believe that a mix of electricity and natural gas is a good idea and  
19 should be avoided whenever possible. For example, is the  
20 combination of electricity and natural gas the best way to plan  
21 against terrorism? The SRP Route follows (parallels), the El Paso  
22 natural gas lines in several places. The SOVA Route totally avoids  
23 the gas lines.

24 SRP's process for developing its preferred and alternate  
25 routes avoided the obvious. The very best route, not even developed  
26 by SRP, was through the AK Chin and Gila Indian Reservations, thus

1 avoiding all existing and planned communities. The best  
2 alternative, not considered by SRP, was to go directly South and  
3 follow (parallel) Interstate Eight (I-8). Considering what SRP  
4 actually proposed, the SOVA Route is the best through what has been  
5 identified as Area A.

6 A final concern of SOVA is what is the ultimate intended use  
7 of these new, additional transmission lines. A recent industry  
8 publication noted that there would be three (3) new 500 KV lines  
9 build and added to the Deavers Line which provides power from  
10 Arizona to California. This would result in 2,000 KV lines going to  
11 California. Why? Speculation is that these lines would move power  
12 from Arizona merchant plants to California, specifically, the Basin  
13 plant near Casa Grande owned by SRP, the Sun Dance plant near  
14 Coolidge owned by APS, the Panda plant near Gila Bend and the fourth  
15 plant applied for to be located near Gila Bend.

16 Are these proposed transmission lines truly designed solely to  
17 serve growing future needs in Casa Grande and East Valley, or is  
18 there another undisclosed purpose involved!

19 CONCLUSION

20 SOVA respectfully requests that the Commission approve the  
21 SOVA Route from the Pinal West Substation to the Santa Rosa  
22 Substation through what has been designated as Area A of the SRP  
23 proposal as being the appropriate route considering the evidentiary  
24 record and A.R.S. § 40-360.06.A.

25 / / /

26 / / /

1 RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of July, 2005.

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3 

4 David Wm. West  
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7 ORIGINAL hand-delivered to  
8 the Commissioners' Division,

9 And

10 An Original and 25 copies  
11 of the foregoing filed this  
12 7<sup>th</sup> day of July, 2005,  
13 with:

14 Docket Control  
15 Arizona Corporation Commission  
16 1200 West Washington Street  
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18 And

19 COPIES of the foregoing mailed  
20 this 7<sup>th</sup> day of July, 2005, to:

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