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BEFORE THE ARIZONA POWER PLANT
AND TRANSMISSION LINE SITING COMMITTEE

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IN THE MATTER OF THE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY AND ITS ASSIGNEES IN CONFORMANCE WITH THE REQUIRMENTS OF ARIZONA REVISED STATUTES SECTIONS 40-360.03 AND 40-360.06 FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING CONSTRUCTION OF A 500 kV ALTERNATING CURRENT TRANSMISSION LINE AND RELATED FACILITIES IN MARICOPA AND LA PAZ COUNTIES IN ARIZONA ORIGINATING AT THE HARQUAHALA GENERATING STATION SWITCHYARD IN WESTERN MARICOPA COUNTY AND TERMINATING AT THE DEVERS SUBSTATION IN RIVERSIDE COUNTY, CALIFORNIA.

CASE NO. 130

DOCKET NO. L-00000A-06-0295-00130

ARIZONA CORPORATION COMMISSION
STAFF'S MOTION REGARDING THIRD-PARTY WITNESS INVOLVEMENT

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Arizona Corporation Commission Staff ("Staff") has submitted Notice of Intent to Intervene as a Party in the above-captioned matter, on May 12, 2006. As a Party, Staff anticipates providing evidence in the record of this matter, as well as identifying a position based upon our analysis of the facts surrounding this Application. Staff will be providing the testimony of Jerry Smith.

However, upon our review of this Application and in consideration of the necessary review by the Arizona Power Plant and Line Siting Committee ("Committee"), Staff is concerned that we are not in a position to ensure that the record will contain testimony regarding all necessary elements that the Committee should be able to include in its consideration of this matter. In particular, Staff is concerned that the Committee be placed in a position to receive complete evidence regarding transmission congestion between Arizona and California. Because the Project is a multi-state project and the Staff is largely concerned with Arizona issues, there exists a possibility that the record could be deficient regarding transmission congestion between Arizona and California, unless the Committee takes action to ensure the completeness of the record.

1 Accordingly, Staff wishes to bring to the Committee's attention certain witnesses whose
2 testimony we believe will be helpful to the Committee's deliberations in this matter. Staff believes
3 that the Committee will benefit from taking testimony of these witnesses, notwithstanding the fact
4 that the transmission traffic congestion upon which they will testify is not directly within the purview
5 of Staff for purposes of developing our recommendation in this matter. The witnesses, and topic
6 areas upon which they should be asked to testify, are as follows:

7 1. Ron Konziolka, Chairman of the Western Congestion Assessment Task Force
8 ("WCATF") and the Southwest Area Transmission ("SWAT") study group; and

9 2. Robert Smith, co-chairman of the Southwest Transmission Expansion Plan ("STEP")
10 study group.

11 It is Staff's opinion that the individuals listed above can provide testimony that will be
12 important to developing a complete record in this proceeding. The testimony of these witnesses will
13 yield evidence that directly pertains to the U.S. Department of Energy ("DOE") review under
14 EPACT 2005 of the appropriateness of establishing National Interest Electric Transmission
15 Corridors ("NIETC"), for which FERC will have backstop siting authority. It is Staff's view that a
16 complete understanding of the status of evidence relating to NIETC will be invaluable to the
17 Committee as it assesses the Project in this matter. The status of evidence relating to NIETC is
18 undeniably of interest to the Committee and the Commission as Arizona's siting authority. Staff
19 witness Jerry Smith will be pleased to present testimony regarding the transmission traffic congestion
20 around the Palo Verde hub, for the Committee's consideration.

21 Staff respectfully requests that the Committee subpoena Mr. Konziolka and Mr. Robert
22 Smith, to provide their assessments of transmission traffic congestion in this proceeding. That
23 testimony should provide a record of historical, short-term and long-term transmission congestion
24 between Arizona and California. Their testimony should establish the context of such congestion
25 with that throughout the West. It is hoped their testimony will explain the cost impact of such
26 congestion on consumers and the effectiveness of alternative solutions studied in mitigating effects
27 of such transmission congestion. This request is not a part of Staff's direct case in this proceeding,

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1 but is made to ensure a robust and complete record upon which the Committee and ultimately the
2 Commission, is able to make a decision in this matter.

3 RESPECTFULLY SUBMITTED this 26th day of May, 2006.

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6 Christopher C. Kempley, Esq.
7 Keith A. Layton, Esq.
8 Legal Division
9 Arizona Corporation Commission
10 1200 West Washington Street
11 Phoenix, Arizona 85007
12 (602) 542-3402

13 Original and twenty-five (25)
14 copies of the foregoing filed this
15 26th day of May, 2006 with:

16 Docket Control
17 Arizona Corporation Commission
18 1200 West Washington Street
19 Phoenix, Arizona 85007

20 Copies of the foregoing
21 mailed this 26th day of
22 May, 2006 to:

23 Thomas H. Campbell
24 LEWIS & ROCA
25 40 North Central Avenue
26 Phoenix, Arizona 85004-4429

27 Margaret Trujillo
28 7158 So. Jen Tilly Lane
Tempe, Arizona 85283

Mike Palmer
604 Hovland
Bisbee, Arizona 85603

Mike Whalen
P.O. Box 1466
Mesa, Arizona 85211

Jeff McGuire
P.O. Box 1046
Sun City, Arizona 85372

Sandie Smith
575 N. Idaho Rd. #101
Apache Junction, Arizona 85219

- 1 Wayne Smith
6106 South 32nd St.
- 2 Phoenix, Arizona 85040

- 3 Gregg Houtz
500 N. Third St.
- 4 Phoenix, Arizona 85004-3903

- 5 Mark Ellery
1700 West Washington St. -600
- 6 Phoenix, Arizona 85007

- 7 Ed Ranger
1110 West Washington St.
- 8 Phoenix, Arizona 85007

- 9 David Eberhart
6801 W. Astor
- 10 Peoria, Arizona 85361

- 11 Laurie Woodall
1275 West Washington St.
- 12 Phoenix, Arizona 85007

- 13 Scott S. Wakefield
Residential Utility Consumer Office
- 14 1110 West Washington Street, Suite 220
- 15 Phoenix, Arizona 85007

16
17 Roseann Osorio

- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28