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September 8, 2006

Arizona Corporation Commission

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SEP 12 2006

Docket Control Center
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

DOCKETED BY	
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RE: Docket No. L-00000A-06-0295-00130
Devers-Palo Verde No. 2 Transmission Line

Docket Control:

I am submitting my comments as a concerned citizen of Arizona on the above Docket number for distribution to the Line Siting Committee. I have enclosed the required 25 copies.

If you need to contact me, please call me at 602-617-1133.

Respectfully submitted,


Lon Stewart

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September 7, 2006

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Docket Control Center
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

RE: Docket No. L-00000A-06-0295-00130
Devers-Palo Verde No. 2 Transmission Line
"No Action/No Project" Alternative

Dear Line Siting Committee:

I am requesting that the Line Siting Committee/Arizona Corporation Commission select the "No Action/No Project" Alternative as the best alternative to the Devers-Palo Verde No. 2 transmission line project as identified in the Draft Environmental Impact Report/Environmental Impact Statement for the project. The EIR/EIS clearly points out that the impact to the environment and the cost to the people of Arizona is much more than any benefits that will be derived from the project.

Phoenix is the fifth largest city in the country and one of the fastest growing in the nation. The power generated by the APS power plants and others in the area will soon (one knowledgeable estimate at less than 5 years) be completely consumed by the Phoenix Metropolitan area. What benefit does a power line sending power out of the state serve?

Since December 2005, the Palo Verde Generating station has had issues with the reactors. Starting in December there was an issue with a vibrating valve in Unit 1 that took several months to repair while operating at reduced capacity. In June 2006, Unit 3 was down with maintenance issues. What will it be next month? Even if APS says everything is fixed and does not expect any more problems, you know there will be. This is a highly regulated, sophisticated, aging system that will inherently have more problems.

The Phoenix metropolitan area has broken maximum electrical usage days in 12 of the past 13 years. In May 2006, I received notice in my APS electric bill that rates were going up 8% because APS was, among other things, purchasing power. Purchasing power? I thought Palo Verde, the largest nuclear generating station in the country, was the mother lode for supply of the Valley's power. As an electrical consumer my rates will increase even more if APS cannot meet its contract obligations to sell electricity to Southern California Edison (SCE) using power from Palo Verde. And APS is still in the process of applying for an additional rate increase with the Arizona Corporation Commission (ACC).

In June 2006 the Western Governor's Association committed to take action to bring on line substantially more clean and diversified energy resources and improve energy efficiency. If the governors of Arizona and California are working together to create renewable energy, why should we allow SCE to build a power line to tap into non-renewable sources of power generated by natural gas, coal, and nuclear and thus undermine the intent of what the governors are trying to do? The Draft EIR/EIS (ES-52) clearly states that this project will increase the air pollution of Arizona. No thank you, Arizona has enough problems meeting federal air attainment standards, why should Arizona be asked to create the pollution but send the power out of state?

The Devers Palo Verde No. 2 line was conceived 25 years ago and was permitted 15 years ago. California has managed without this line for all these years. If power was so crucial to southern California, SCE, as the operator of the Mohave Generating Station, could have elected to install emission controls on the plant. Instead, SCE chose the other option and elected to shut it down as per a Court Order on January 1, 2006. If power were so desperately needed in California, SCE would have elected to install the emission controls. Therefore it does not appear as though the DPV2 line is needed as much as SCE implies.

On page ES-2 of the Executive Summary, it is stated, "this project is designed to provide economic benefits and is not primarily a reliability enhancement." The land, animals, and people of Arizona should not have a lesser quality of life so that SCE can improve their economic benefit. This simply is not fair to Arizona.

The EIR/EIS does not provide sufficient study to the impact of fauna in the path of the DPV 2 route. There are some small and fragile colonies of desert tortoises and desert big horn sheep in the KOFA National Wildlife Refuge. The construction of the project cutting across the habitat could significantly endanger the population of these local animals. The smaller animals are more in danger as the two parallel rights of ways are nearly 600 feet wide. That is a long way for a slow moving tortoise to hide from a predator. What other animals will be affected that were not addressed in the EIR/EIS?

The construction of the project will introduce invasive plant species that are making the desert of Arizona more susceptible to wildfire and total destruction of native plants that cannot withstand fire.

Even though right of way roadways are established, construction crews will still wander off of these, especially at the tower construction sites, further widening the area of destruction and establishing area for more invasive plant species.

The addition of DPV 2 would increase the probability for off road vehicles to enter the KOFA Wilderness Area and destroy the natural habitat along with creating erosion issues. Even with fences or roadblocks, people are still determined to go beyond the barrier and enter these areas.

SCE should be supporting the Million Solar Roofs Initiative of California along with significant energy conservation and energy efficiency programs. The same amount of money spent on environmentally friendly renewable or sustainable energy sources would most likely be less than

Comments in regards to
Docket No. L-00000A-06-0295-00130
Page 3 of 3

the cost of construction of transmission lines. Local power generating facilities would not need to be as large as those in Arizona simply through the transmission line losses transporting across Arizona and California. The cost of electrical generation from wind and solar energy generating facilities is comparable to conventional pollution generating facilities. Renewable energy facilities built in California for Californians appears to be a more sound economic approach and complies with the commitment of the governors of our two states.

The only benefit of the DPV-2 transmission line appears to be in the pocket book of SCE. Please select the "No Action" alternative. It is the only alternative that is compatible with the wildlife refuge and the other important public lands in the path of this transmission line, the air of Arizona, the great views of Arizona, and the pocketbooks of the citizens of Arizona.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Lon Stewart".

Lon Stewart
102 E Kaler Dr.
Phoenix, AZ 85020