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BEFORE THE ARIZONA CORPORATION COMMISSION SEP 26 P 12: 15

COMMISSIONERS

Marc Spitzer, Chairman
Jim Irvin
William A. Mundell
Jeff Hatch-Miller
Mike Gleason

Arizona Corporation Commission

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SEP 26 2003

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IN THE MATTER OF THE APPLICATION
OF SALT RIVER PROJECT AGRICULTURAL
IMPROVEMENT AND POWER DISTRICT IN
CONFORMANCE WITH THE REQUIREMENTS
OF ARIZONA REVISED STATUTES
SECTIONS 40-360-03 AND 40-360.06, FOR,
A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AUTHORIZING THE
EXPANSION OF ITS SANTAN GENERATING
STATION LOCATED AT THE INTERSECTION OF
WARNER ROAD AND VAL VISTA DRIVE, IN
GILBERT, ARIZONA.

NO. L-0000B-00-0105

**JOINDER OF CATHERINE
M. LATONA, INTERVENOR
AND CWG MEMBER
in support of
Jim and Saretta Parrault's
Emergency Motion to
Enforce the Terms of the CEC
Conditions**

Intervenor & CWG member Cathy LaTona join in Jim and Saretta Parraults
Emergency motion to enforce the terms of the CEC orders as violations are harming the
communities neighboring the power plant.

Additionally, Intervenor & CWG member Cathy LaTona alleges that key SRP
employees mislead her regarding the construction and onsite mitigation scheduling
resulting in undue harm and suffering for her and her family.

See "Affidavit" attached as exhibit "A".

RESPECTFULLY SUBMITTED THIS 26th day of September 2003.

BY: *Catherine M. LaTona*
Catherine M. LaTona

Original and 25 copies filed this
26th day of September with:

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

Copies electronically mailed or mailed this 26th day of September 2003 to:

See attached list entitled Santan Updated Service List - 9/16/03

BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

Marc Spitzer, Chairman
Jim Irvin
William A. Mundell
Jeff Hatch-Miller
Mike Gleason

Exhibit "A"

IN THE MATTER OF THE APPLICATION
OF SALT RIVER PROJECT AGRICULTURAL
IMPROVEMENT AND POWER DISTRICT IN
CONFORMANCE WITH THE REQUIREMENTS
OF ARIZONA REVISED STATUTES
SECTIONS 40-360-03 AND 40-360.06, FOR,
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STATION LOCATED AT THE INTERSECTION OF
WARNER ROAD AND VAL VISTA DRIVE, IN
GILBERT, ARIZONA.

NO. L-00000B-00-0105

**AFFIDAVIT AND ACTION IN
LIEU OF APPEARANCE FROM
CATHERINE M. LATONA,
INTERVENER AND CWG MEMBER
TO SUPPORT JOINDER TO JIM
AND SARETTA PARRAULTS
EMERGENCY REQUEST FOR
HEARING AND ENFORCEMENT OF
CEC ORDERS.**

In the event that my employment prevents my appearance to be called upon as a witness, Catherine M. LaTona, intervener and CWG members hereby request that the Corporation Commission formally acknowledge that SRP is currently in violation of Conditions 9 and 29 of the CEC Order for the following reasons.

Regarding Conditions 9:

SRP alleges that their delay in planting trees on top of the berm facing the residential communities was due to hardship created by the CWG's untimeliness in producing the final set of plans. I support the chronology prepared by Saretta and Jim Parrault of the CWG process, as I was a member and present at a majority of the meetings. Many were delayed for significant periods of time due to SRP's failure to produce pertinent information for our group to make the best decisions possible for our community. The CWG went only a few short months beyond their goal. It took SRP 8 months to complete their construction documents for the CWG to come back and finalize. That is almost the same amount of time it took the CWG to develop them. SRP continued preparatory work on the site throughout this entire period, even before they had obtained their permit from Air Quality. We did not cause them any undue delays. The berm has sat virtually untouched through the summer months. Irrigation is still not installed in spite of that. SRP should be penalized heavily for this violation as they may have caused damage to those citizens selling their homes during the peak selling season of May - September, 2003 and they violated the very trust that they are soliciting the community for.

Regarding Condition 29

On many occasions I tried to acquire accurate information from key SRP personnel regarding the scheduling of the most visible components of the expanded plant. I was told that the stacks wouldn't be visible until late 2003. I was very clear in my communication as to why I needed to have information of this nature. It was so I could time the selling of my home. I feel extremely violated by the fact that there was never a mention that the HRSGs would be going up and visible in advance of the stacks in December of 2003. I am not saying that the withholding of this information was intentional. I do not believe that at all. It is just important to understand how these errors can cause significant problems for the residents. There is no way that I will sell my house now with a clear view of the huge blue cranes from my property. I have lost the opportunities of peak selling season 2003.

Given the above, I am hopeful that the ACC will consider taking the following action be taken on SRP.

- A severe monetary penalty that could be distributed among the schools in zip code 85296.
- That the verbiage of the CEC orders be amended where necessary to require that before SRP takes it upon itself to deviate from the intent of an order, they must first apply to the ACC for permission.
- That communication take place with the neighboring HOA's to assure that the money's given them to date have been sufficient to produce the best mitigation possible.

RESPECTFULLY SUBMITTED THIS 26th day of September 2003.

BY: Catherine M LaTona
Catherine M. LaTona, Intervener/CWG Member

SUBSCRIBED and sworn to before me this 26th day of Sept., 2003.

My Commission Expires:

Notary Public

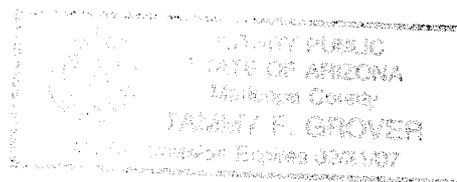
02-21-07

Tommy F Grover

Original and 25 copies filed this 26th
Day of September with

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

Copies electronically mailed or mailed
this 26th day of September 2003 to
See attached list entitled Santan
updated service list – 9/16/03



SANTAN UPDATED SERVICE LIST
L-00000B-00-0105
9/16/03

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