

E-0345A-08-0393  
E-01575A-08-0393  
E-01575A-08-0448



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ORIGINAL

ARIZONA CORPORATION COMMISSION  
UTILITY COMPLAINT FORM

**Investigator:** Carmen Madrid

**Phone:**

**Fax:**

**Priority:** Respond Within Five Days

**Opinion No. 2008 70894 Date: 8/21/2008**

**Complaint Description:** 19L misc line siting  
N/A Not Applicable

**Complaint By:** **First:** Linda **Last:** Kennedy Ph.D., Director  
**Account Name:** Appleton-Whittell Research Ranch - **Home:** (000) 000-0000  
**Street:** **Work:**  
**City:** Elgin **CBR:**  
**State:** AZ **Zip:** **is:** E-Mail

**Utility Company:** Sulphur Springs Valley Electric Cooperative, Inc.

**Division:** Electric

**Contact Name:** n/a **Contact Phone:** n/a

**Nature of Complaint:**

From: Linda Kennedy [mailto:]  
Sent: Monday, August 18, 2008 12:53 PM  
To: Gleason-WebEmail; Mayes-WebEmail; Mundell-Web; Hatch-WebEmail; Pierce-Web; Utilities Div - Mailbox  
Subject: 69 kV power line to Sonoita

Dear Commissioners,

<<...>>

Attached please find an electronic copy of a letter that I have delivered to the Board of Directors of Sulphur Springs Valley Electric Cooperative. In it I ask them to halt construction of the above referenced line until a greater evaluation of the project has been completed. SSVEC has not properly notified members of community, has not been willing to work with the community, has not documented the purpose and need for the project, has not analyzed alternatives, and has not fully examined the consequences of this action.

I urge you to give this situation your consideration.

Thank you,

Linda Kennedy

Linda Kennedy, Ph.D., Director  
Appleton-Whittell Research Ranch  
National Audubon Society

Arizona Corporation Commission

DOCKETED

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DOCKETED BY

AZ CORP COMMISSION  
DOCKET CONTROL

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RECEIVED

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August 18, 2008

# ARIZONA CORPORATION COMMISSION

## UTILITY COMPLAINT FORM

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Board of Directors  
Sulfur Springs Valley Electric Cooperative  
P.O. Box 820  
Willcox, AZ 85644-0820

Re: 69kV power line to Sonoita

Dear Members of the Board:

I am well aware of the time and effort you, as Board members, invest for the communities you serve and wish to tell you that I appreciate your willingness to serve in such an important role. Safe and affordable electric power has transformed rural areas of the United States, and is an integral support to our society. However, I encourage you to use your position wisely, and carefully consider the unintended consequences of what may, at first, appear to be a worthy action.

I urge you, as board members, to immediately halt the construction activities on the above referenced power line until all aspects of the project have been thoroughly considered.

As a cooperative, you have an obligation to your customers not only to provide safe and affordable electric power, but to do so by working cooperatively with the communities served. I present the following bullet list as indication that this has not been done for this project:

- Work by a previous planning committee has been rejected with no explanation,
- A written proposal of this project was not made available for public comment,
- A clear purpose and need for this project has not been presented,
- Alternative solutions have not been fully considered,
- Staff members have stone-walled efforts by members of the Sonoita community to discuss the situation,
- The current route is not consistent with the character description of the area as described in the approved Santa Cruz County Comprehensive Plan,
- All property owners have not been contacted,
- All consequences of this action have not been considered including the impacts on wildlife, the watershed, the riparian corridor, the viewshed, spread of invasive species, and on the community.

As an example, let me briefly outline a major impact the proposed project will have on the Research Ranch, a nationally recognized ecological preserve and research facility. One of our primary research objectives is to elucidate the effects of domestic livestock on southwestern grasslands with the goal of sustaining ecosystems and wildlife habitats in the Southwest. Cross fence comparisons between the ungrazed lands of the Research Ranch and our ranching neighbors such as the Babacomari Ranch have been conducted for over four decades, resulting in numerous scientific publications and providing valuable guidance to private entities and to federal and state entities charged with land management (i.e. Bureau of Land Management, U.S. Forest Service, Arizona State Parks, Arizona Game & Fish). Topics addressed through our research program include the spread of invasive non-native species, water infiltration and run-off, listed and common species, effects of fire on grasslands and savanna habitat and many more. By placing this power line immediately adjacent to our north boundary you will effectively halt future meaningful cross-fence comparisons for decades. You will negate the value of archived data accumulated over the past 40 years.

I ask you, again, to halt this project immediately. I believe that, after proper deliberation and consultation with the community, a solution can be developed that is mutually beneficial to all.

Sincerely,

**ARIZONA CORPORATION COMMISSION**  
**UTILITY COMPLAINT FORM**

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Linda Kennedy, Ph.D., Director

e-mailed to Director Joseph Furno

with hard copy mailed to SSVEC

CC: Arizona Corporation Commission, Janet Napolitano, John Kyl, John McCain, Gabrielle Giffords, Timothy S. Bee, Marian McClure, Jonathan Paton, John Maynard, Ben Brophy, Sam Campana, Waite Osterkamp, Sonoita Crossroads Community Forum, Sonoita Chamber of Commerce  
\*End of Complaint\*

**Utilities' Response:**

**Investigator's Comments and Disposition:**

8/21/08 I researched the e-docket database for this application and I was not able to find anything. I called Ms. Kennedy's office and left a message for a return call.

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8/22/08 I contacted Ms. Kennedy and she states that there was a meeting by Sulphur Springs Valley Electric informing them of the plans to install this line. I explained that we did not have an application for this line filed. I also explained that it could be that the line was not big enough to require a Line Siting Committee application. I told her that we were waiting for some information from our engineer or the company regarding this issue.

See:

Per Arizona Revised Statutes - Article 6.2 Power Plant and Transmission Line Siting Committee  
40-360 definitions

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8/29 (Added to this Opinion by Richard Martinez as this was assigned to me per Commissioner's Wing via Betty Camargo):

Dear Linda Kennedy:

Your letter regarding Sulphur Springs Valley Electric Cooperative ("SSVEC") 69 KV line will be placed on file with the Docket Control Center of the Arizona Corporation Commission ("Commission") to be made part of the record. Since the 69 KV line is too small to come before the Commissioners your comments will be docketed in another application currently before the Commissioners encompassing transmission and distribution lines within the following docket numbers:  
E-01575A-08-0393 & E-01345A-08-0393.

The concerns raised in letters received from customers will assist the Commission in the investigation and review of the rate application. The Commission's independent analysis of the utility request attempts to balance the interest of the utility and its customers.

Staff appreciates your comments.

Sincerely,

Richard Martinez  
Public Utilities Consumer Analyst II  
Utilities Division

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12/31/08 filed in docket nos. E-01345A-08-0393, E-01575A-08-0393 and E-01575A-08-0448. closed  
\*End of Comments\*

ARIZONA CORPORATION COMMISSION  
UTILITY COMPLAINT FORM

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Date Completed: 12/31/2008

Opinion No. 2008 - 70894

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