

ORIGINAL

INTERVENTION



0000097069

BEFORE THE ARIZONA CORPORATION
RECEIVED

1
2 **COMMISSIONERS**

- 3 **Kristin K. Mayes**
- 4 **Gary Pierce**
- 5 **Sandra D. Kennedy**
- 6 **Paul Newman**
- 7 **Bob Stump**

2009 MAY 18 P 2:37

AZ CORP COMMISSION
DOCKET CONTROL

8 IN THE MATTER OF THE APPLICATION OF UNS ELECTRIC,
9 INC., FOR A CERTIFICATE OF ENVIRONMENTAL
10 COMPATIBILITY FOR THE VAIL TO VALENCIA 115 KV TO
11 138 KV TRANSMISSION LINE UPGRADE PROJECT,
12 ORIGINATING AT THE EXISTING VAIL SUBSTATION IN
13 SEC. 4, T.16S., R.15E., PIMA COUNTY, TO THE EXISTING
14 VALENCIA SUBSTATION IN SEC. 5, T.24S., R.14E., IN THE
15 CITY OF NOGALES, SANTA CRUZ COUNTY, ARIZONA.

0190-00144

Docket No. L-00000F-09-0144-

**Arizona Transmission and
Power Plant Line Siting
Case No. 144**

16 **Notice of Filing a**
17 **Motion to Intervene**
18 **by**
19 **Marshall Magruder**

Arizona Corporation Commission
DOCKETED

MAY 18 2009

DOCKETED BY	
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20 As a ratepayer, consumer, and interested party, I respectfully request to intervene to be a party
21 in this matter. I have experiences involving Santa Cruz County energy issues as an appointed member
22 of the Joint Santa Cruz County/City of Nogales Energy Commission in late January 2001 until August
23 2008. Potential issues should be prudently resolved during this case. The total environment is a major
24 issue that involves natural and human environments. The key issue is the cost impact to ratepayers.

The following are concerns in this case:

- 25 a. Consumer cost impacts by the change from the Western Area Power Administration (WAPA) to
26 Tucson Electric Power Company (TEP) for transmission services for UNS Electric in Santa
27 Cruz County with potential increases in wheeling charges;
- 28 b. Total environmental impacts in terms of increased air pollution and water consumed with a
29 change from dominant natural gas to coal-generated electricity from the Four Corner's area;
- 30 c. Electrical and economic impacts due to increased energy (transmission) losses on the TEP
31 lines from Four Corners versus the WAPA transmission system that are now over 15%;
- 32 d. Electrical and economic impacts on the Tucson area power sink (deficit) by UNSE's 75 to 120
33 MW plus 133 MW for Rosemont Copper (considered separately) by importing "market" power;
- 34 e. Impacts of new routes that reduce trees in a riparian area;
- 35 f. Visual and safety impacts of segment 4 in the City of Nogales;

- 1 g. Visual impacts of "weathered" compared to less visible galvanized steel poles;
2 h. And other environmental issues.

3 If this motion is approved, request a discovery period through 30 June 2009, Due to the short
4 time between now and the hearings, if the applicant denies any discovery data request, that response,
5 requires rapid adjudication. Such denied response needs to include the Committee Chairman as an
6 addressee so any dispute can be promptly resolved. I plan to dispute any data request denial to the
7 Committee Chairman within 3 days. As usual, ten calendar days for data request responses is
8 expected.

9 This filing has been mailed to all parties in the Service List below.

10 Respectfully submitted on this 7th day of May 2009

11 MARSHALL MAGRUDER

12 By 

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19 **Service List**

20 Original and 27 copies of the foregoing are filed this date with:

21 **Docket Control** (25 copies)
22 **Arizona Corporation Commission**
23 1200 West Washington Street
Phoenix, Arizona 85007-2927

24 **Janice Alward**, Chief Counsel, Legal Division
25 **Earnest G. Johnson**, Director, Utilities Division
26 **John Foreman**, Chairman of the Arizona Power Plant and Transmission Line Siting Committee
Assistant Attorney General, State of Arizona, Office of the Attorney General
27 1275 West Washington Street
Phoenix, Arizona 85007

28 Additional Distribution (1 copy each) are filed this date:

29 **Jason D. Gillman**, Attorney for Applicant
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32 **Daniel W. Pozefsky**, Chief Counsel
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