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Sheila Stoeller

OPEN MEETING AGENDA ITEM

From: jim kramp [hiltonroad@msn.com]
 Sent: Sunday, September 13, 2009 8:08 AM
 To: Mayes-WebEmail
 Subject: Arizona Corporation Commission Docket No. L-00000F-09-0190-00144 Case #144 Vail to Valencia
 Attachments: CommentVailtoValenciaCommission.doc

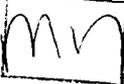
Dear Chairman Mayes,

Thank you for holding a Special Open Hearing in Tucson to hear public comments. Unfortunately I may not be able to attend due to a work conflict. I have attached my comment.

Thanks

James Kramp

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Arizona Corporation Commission Docket No. L-00000F-09-0190-00144 Case #144 Vail to Valencia

Public Comment for Special Open Hearing

Dear Chairman Mayes and Commissioners,

Thank you for holding a Special Open Hearing in Tucson to hear public comments. Unfortunately I may not be able to attend due to a work conflict.

My name is Jim Kramp. I am a customer of Tucson Electric Power. I am also a resident along a designated Scenic Arizona Scenic Highway in Vail, AZ; SR 83 in the Empire Mountains in Supervisor Ray Carroll's District 4. I write today as a spokesman for the Hilton Ranch Road Community Association, a registered Neighborhood Association with Pima County in the vicinity of the proposed Vail to Valencia project. I wrote a letter when this project was before the committee but I feel compelled to write again.

I was pleased to see that the Committee listened to our concerns and asked for dull grey galvanized poles next to the existing steel lattice structures on the northern portion of the project. I would like to thank them. As a registered Community Association in the direct vicinity of the line I believe we should be notified after completion of the Pole Finish Plan so we can make comments on the other sections. As a small isolated rural community our association chose the registration boundaries we did because we know that what happens with infrastructure on the north and west sides of our community affects us. Our boundary extends west to Interstate 19. Pima County provides this information online for public notices. Anyone who made comments during the hearing about pole color should be notified also. We are surrounded by large amounts of state and federal land and the impacts to communities are different than those with a lot of private land.

I would like to request a copy of the certificate when it is issued. Although small, our association is very involved in local issues and planning.

I read the brief written by UNS Electric's attorneys for the Open Hearing. My biggest concern in the brief is that the attorneys keep making comments about the Project Study area, about Elizabeth living outside of the Project Study Area and how they fulfilled all legal requirements for public notice. I used to be in the "Project Study Area" for the Rosemont Electric project and now the company has excluded my neighborhood by shrinking the size of the "Project Study Area". My community would be directly and indirectly impacted by the Rosemont Electric Project. My home is served by the tiny Greaterville Substation proposed for construction activities. It is the only community that would suffer new transmission lines in a view shed where previously there has been none. The substation which I understand does not have alternative locations would be in my view shed. One parcel of land owned by Rosemont Copper is adjacent to our community. What happens when Rosemont Copper decides to string utility lines over SR 83 on to that parcel of land? Ours is the community that would suffer traffic impacts on a dangerous winding scenic highway during the construction phase.

Does this mean if I make comments when the Rosemont Electric Project goes in front of the Commission they will be discounted because I am not in the Project Study Area? If I am outside of the Project Study Area does that mean the company can be excused from providing comparable amounts of outreach to my community while it provides extensive outreach to another? From reading the brief it sure seems that way.

When I spoke in front of the Commissioners on August 18th 2008, Commissioner Mayes made the comment to me after I spoke: *"...And so I hope that going forward the company learns a lesson from this case from its customers, which is you need to maximize outreach prior to do any case being filed and also multiple alternatives have to be offered. So I commend everybody who has been involved in this case for making those points."*

It doesn't seem like much changed with this case, which was filed about eight months after those comments were made. There was not "maximum outreach" to our community. There were two newspaper advertisements that did not

describe the full extent of the project and two Open Houses held in Tucson outside of the Vail School District. No NGOs in the direct vicinity of the project or within 2 miles were contacted. We work with Sandy and Bruce Whitehouse from Corona de Tucson. The Corona de Tucson Fire Department serves our neighborhood and it also serves less than one mile from the project. I know Sandy spoke to the Commissioners in August 2008 when I did.

It is my understanding from reading the transcripts online that TEP intends to share the cost of a large 345kV transformer with UNS Electric, indeed potentially bearing the majority of the cost for "future capacity" of 552 megawatts. If this is the case why weren't we as customers of TEP and members of a community association in the direct vicinity of the proposed project notified of this? Why were the notices written to imply that this project was merely an upgrade with a few minor changes? Cost is not the only issue. It is the idea of TEP receiving 552 megawatts of power without having to justify the need or say where it is going that is disturbing.

It is for this reason I ask you to add a Citizens Advisory Council to the certificate. It is clear this project will have several other projects associated with it and we as a community should have input into transmission line planning. The job of the Committee is to place lines on a case by case basis not to do transmission line planning. I do think the Committee should consider cumulative effects but that would not be the same thing as long term planning.

Representatives from our community cannot always take the time to attend meetings held outside of our area, but we do communicate with each other. We are a predominately working class neighborhood and many of us have long commutes and are tired by the end of the day. Gas is expensive too. I am sure this will have an impact on attendance on September 15th.

We place a certain amount of trust in the fact that individuals in our community have settled into certain roles with certain responsibilities. It just sort of happened that way. Elizabeth Webb is the one who typically attends electric events and reports back. She may not represent all of us, but she keeps us informed. If she can't make electric meetings, such as the Rosemont project meeting that was held in March at Acacia Elementary, we are sure to have someone else there. I know she attended three separate meetings about this particular project, Case 144. I maintain our website, attend specific environmental meetings, report back via email and typically chair neighborhood meetings. Some in our community are responsible for local issues. Others plan and attend public outreach events where we need representation. When we need a large cohesive effort we come together. This is the way our community conserves its limited resources.

I am also very concerned about the perceived attempt to diminish the role of the BLM in this case to the public. The Nogales substation is located on BLM property. The preferred alignment crosses BLM land. It is extremely difficult to see this (if at all) on any of the photos on the Unisource Energy Services website. It is not mentioned on the project display board for right of way on the Unisource Energy Website except in a very general way. "Establish positive long term relationships between Unisource Energy Services and the landowner ". There is a case where the Commission granted a certificate eight years ago where the Forest Service still has not allowed access through its land in Southern Arizona. Doesn't it make sense to work with the federal agencies concurrently?

Thank you,
Dated this 12th day of September 2009

Jim Kramp

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