

INTERVENTION



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Quarles & Brady Streich Lang LLP Arizona Corporation Commission  
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JUL 07 2003

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Attorneys for Proposed Intervenor  
Roger K. Ferland  
Laura Raffaelli

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BEFORE THE ARIZONA

POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF  
ARIZONA PUBLIC SERVICE COMPANY IN  
CONFORMANCE WITH THE REQUIREMENTS  
OF ARIZONA REVISED STATUTES  
SECTION 40-360, et seq., FOR A CERTIFICATE  
OF ENVIRONMENTAL COMPATIBILITY  
AUTHORIZING THE WEST VALLEY-SOUTH  
230 KV TRANSMISSION LINE PROJECT,  
INCLUDING THE CONSTRUCTION OF  
APPROXIMATELY 18 MILES OF 230 KV  
TRANSMISSION LINES AND THREE  
230 KV SUBSTATIONS IN MARICOPA  
COUNTY, ARIZONA, ORIGINATING  
SOUTH OF BROADWAY ROAD  
AT AN EXISTING 230KV TRANSMISSION  
LINE IN SECTION 28, TOWNSHIP 1 NORTH,  
RANGE 2 WEST, G&SRB&M THAT WILL  
INTERCONNECT WITH THE PROPOSED  
TS4 SUBSTATION IN SECTION 19,  
TOWNSHIP 1 NORTH, RANGE 2 WEST AND  
CONTINUING TO THE PROPOSED TS3  
SUBSTATION IN SECTION 22,  
TOWNSHIP 2 NORTH, RANGE 2 WEST,  
G&SRB&M AND TERMINATING AT THE  
PROPOSED TS2 SUBSTATION IN SECTION 28,  
TOWNSHIP 3 NORTH, RANGE 2, WEST,  
G&SRB&M

Docket No:  
L-00000D-03-0122

Case No: 122

**MOTION FOR LEAVE  
TO INTERVENE BY  
CAMELBACK, L.L.C.**

Pursuant to Arizona Administrative Code R14-3-204, Camelback, L.L.C. ("Camelback")  
hereby applies to the Arizona Power Plant and Transmission Line Siting Committee (the  
"Committee") for an order granting Camelback leave to intervene in the above-captioned

1 proceeding. The Committee should grant Camelback leave to intervene because Camelback will  
2 be directly and substantially affected by the transmission line route proposed by Arizona Public  
3 Service Company ("APS") in its Application for a Certificate of Environmental Compatibility  
4 ("CEC") in the above-captioned matter.

5 Camelback owns a section of land within the city limits of Goodyear, Arizona that is  
6 bounded by Camelback Road on the north, Cactus Road on the east, Indian School Road on the  
7 south and Perryville Road on the west (the "Camelback Property"). The Camelback Property is  
8 in the process of being sold to a developer who plans on building a 640 acre master-planned  
9 community.

10 On Monday June 16, 2003, the Goodyear City Council approved a General Plan  
11 designation for the Camelback Property of 0-2 dwelling units per acre. The City Council ratified  
12 that decision on Monday July 7, 2003. This designation allows the developer to build up to 1280  
13 single family homes on the Camelback Property. In addition, if required by the Litchfield School  
14 district and approved by Luke Air force Base, the developer may be required to include a park  
15 and school site in the middle of the property. The developer also intends to design equestrian  
16 trails, drainage ways and open spaces, all of which are intended to enhance the area's scenic  
17 views.

18 However, the route proposed by APS for its 230 kV transmission line will seriously  
19 undermine if not destroy the use of the Camelback Property as a master-planned community. As  
20 currently sited, APS' preferred transmission line route will bisect the Camelback Property from  
21 east to west. The 160-foot transmission towers and associated power lines will not only split the  
22 property but will effectively destroy both the physical and visual features of the Camelback  
23 Property that are key to its economic viability. The location and height of the transmission towers  
24 would make them visible from every part of the property. Because a buffer zone would need to  
25 be created along the route of the transmission line and APS intends to locate a ten-acre electric  
26

1 substation on the Camelback Property, the amount of developable land will be drastically reduced  
2 and the available uses of the remaining property will be substantially curtailed. Thus, if APS is  
3 permitted to implement the proposed transmission line as currently sited, Camelback will suffer  
4 considerable economic loss. Indeed, the developer has indicated that it will not proceed further  
5 with development if the APS transmission line siting proposal is implemented.

6 Camelback believes that there are multiple feasible alternative routes for the transmission  
7 line that will not have the devastating impacts of APS' preferred route. As an intervenor,  
8 Camelback can provide meaningful comment on alternative routes that will reduce the impact of  
9 the transmission lines on the environment, will be consistent with Goodyear's General Plan and  
10 will substantially decrease the cost of transmission line construction and ultimately the cost to  
11 APS' ratepayers. Camelback's participation in these proceedings will not broaden the issues or  
12 unduly delay the proceedings.

13 For the reasons outlined above, Camelback respectfully requests that the Committee grant  
14 its Motion for Leave to Intervene in this matter. Camelback requests that all communications in  
15 connection with the above-captioned proceedings be directed to:

16 Roger K. Ferland  
17 Quarles & Brady Streich Lang LLP  
18 One Renaissance Square  
19 Two North Central Avenue  
20 Phoenix, Arizona 85004-2391

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RESPECTFULLY SUBMITTED this 7<sup>th</sup> day of July, 2003.

QUARLES & BRADY STREICH LANG LLP  
One Renaissance Square  
Two North Central Avenue  
Phoenix, AZ 85004-2391

By Roger Ferland  
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Laura Raffaelli

Attorneys for Proposed Intervenor Camelback, LLC.

ORIGINAL + 28 copies filed this  
7<sup>th</sup> day of July, 2003, with:

Arizona Corporation Commission  
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COPIES of the foregoing mailed this  
7<sup>th</sup> day of July, 2003, to:

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