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A PROFESSIONAL LIMITED LIABILITY COMPANY

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August 6, 2003

Arizona Corporation Commission  
**DOCKETED**

**AUG 06 2003**

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ARIZONA CORPORATION COMMISSION  
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Director of Utilities  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

Re: Electrical Substation Placement Near Glendale Avenue and Loop 303  
Docket Number: L-00000D-03-0122

Dear Sir or Madam:

Please consider this letter to be our limited appearance for the hearing regarding the application of Arizona Public Service Company for a Certificate of Environmental Compatibility authorizing the West Valley-South Project in Maricopa County, Arizona.

Please be advised that our law firm represents both the owner and the tenant of the parcel of land which the APS West Valley-South Power Line and Substation Project map indicates to be the preferred site for a proposed 69kV substation. For convenience sake, I will refer to our clients as "Bickman Farms." The particular substation of concern is the one shown to be south of Glendale Avenue and west of the Loop 303.

For many years, Bickman Farms has grown primarily rosebushes on the subject parcel. Bickman Farms continues to grow rosebushes on the parcel. Rosebushes are a relatively sensitive crop and can only be grown successfully in a very limited number of locations, including areas north and west of Luke Airforce Base. Rosebushes require nearly three years from planting to harvesting and, therefore, decisions affecting the land upon which rosebushes are grown require a great deal of advanced planning.

We urge that extreme care be taken regarding the exact location and anticipated impact of the placement of the proposed 69kV substation near Glendale Avenue and the Loop 303. We believe we may be able to suggest a more suitable nearby location for the substation. For example, the Adaman Water District owns fee title to a 40 foot strip of land on the east side of the Loop 303, on which no crops are grown. In any event, we urge you to minimize any harm to the farming operations of Bickman Farms.

Approximately half of all the bareroot rosebushes sold in the United States each year are grown near the proposed location of the proposed power line. We hope you will give careful consideration to the potential impact of this project on a very significant local industry.

Sincerely yours,

GAMMAGE & BURNHAM P.L.C.

By   
Michael R. King

MRK:arr

cc: Bickman Farms (via facsimile and U.S. Mail)  
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