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BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

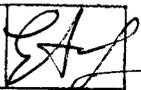
Arizona Corporation Commission

DOCKETED

AUG 19 2014

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CORP COMMISSION
DOCKET CONTROL

DOCKETED BY 

COMMISSIONERS

BOB STUMP, Chairman

GARY PIERCE

BRENDA BURNS

BOB BURNS

SUSAN BITTER SMITH

IN THE MATTER OF AJO IMPROVEMENT COMPANY, AND ITS APPROVED CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE CONSTRUCTION OF AN APPROXIMATE 47-MILE 230 kV TRANSMISSION LINE FROM GILA BEND TO AJO.

DOCKET NO. L-00000-97-0089⁶

NOTICE OF FILING

Ajo Improvement Company ("AIC") provides copies of certified letters that were sent to the U.S. Bureau of Land Management ("BLM"), Pima County, the Town of Gila Bend and the Barry M. Goldwater Range (via the 56th Range Management Office) ("BGR") notifying them of AIC's letter regarding its intent to construct the above-captioned project with steel monopoles. Only the BGR responded indicating no objection to the proposal; that response is also attached to this filing. AIC is not seeking any other change to its Certificate of Environmental Compatibility ("CEC") other than to use steel instead of wood structures.

RESPECTFULLY SUBMITTED this 19th day of August, 2014.

ROSHKA DEWULF & PATTEN, PLC

By 

Jason D. Gellman
Roshka DeWulf & Patten, PLC
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004
Attorney for Ajo Improvement Company

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ROSHKA, DeWULF & PATTEN PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 Original + 13 copies of the foregoing
filed this 19th day of August, 2014 with:
2
3 Docket Control
4 ARIZONA CORPORATION COMMISSION
1200 West Washington
5 Phoenix, Arizona 85007
6
7 Copies of the foregoing hand-delivered/mailed
this 19th day of August, 2014, to:

7 Lyn Farmer, Esq
Chief Administrative Law Judge
8 Hearing Division
Arizona Corporation Commission
9 1200 West Washington
Phoenix, Arizona 85007

10 Janice Alward, Esq.
11 Chief Counsel Legal Division
Arizona Corporation Commission
12 1200 West Washington
Phoenix, Arizona 85007

13 Steve Olea
14 Director, Utilities Division
Arizona Corporation Commission
15 1200 West Washington
Phoenix, Arizona 85007

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*AJO IMPROVEMENT COMPANY
P O DRAWER 9
AJO, ARIZONA 85321*

TELEPHONE: 520-387-2001 FAX: 520-387-7338

July 27, 2014

Certified Mail # 7009 2820 0002 7393 4569
Return Receipt Requested

Mr. James R. Uken
Director, 56th Range Management Office
7101 Jerstad
Luke AFB AZ 85309

RE: Ajo Improvement Company – 230 kV transmission line from Gila Bend to
Ajo. Docket No. L-00000G-97-0089

Dear Director Uken:

Ajo Improvement Company (“AIC” or “Company”) intends to construct the approximate 47-mile 230 kV transmission line from Gila Bend to Ajo (the “Project”) with steel monopoles. The original Certificate of Environmental Compatibility (“CEC”) approved the Project with the use of primarily wooden structures. AIC does not believe the change from wood to steel is a material change requiring a modification to the CEC, and requests that the Commission make that determination. The heights of the monopoles will not change from what was contemplated in the original CEC. To the extent, however, the Commission believes that this is a material change to the CEC, the Company has requested approval of the change under A.R.S. § 40-252. There are no other changes contemplated with the Project and there will be no increased environmental impact from the change.

You can retrieve a copy of the original CEC through the Commission’s eDocket function through the following link: <http://images.edocket.azcc.gov/docketpdf/0000125998.pdf>. There have been subsequent orders approving extensions of time to construct the CEC and adding conditions in the same docket, which can be accessed through eDocket.

The purpose of this letter is to notify you of the potential change in the Project. If you would like to submit any comments, you may submit those by filing a letter with the docket. The Commission’s street address is found at www.azcc.gov (make sure to include the docket number above). Or you may provide a response directly to me.

Please do not hesitate to contact me with questions or concerns.

Regards,

A handwritten signature in black ink, appearing to read "Roy Archer", with a long horizontal flourish extending to the right.

Roy Archer

President

Water & Electric Utilities

Phone: (520) 387-2010

Cell: (520) 955-4988

Fax: (520) 387-2012

E-Mail: Roy_Archer@FMI.com

cc: Jason Gellman
Mike McElrath

*AJO IMPROVEMENT COMPANY
P O DRAWER 9
AJO, ARIZONA 85321*

TELEPHONE: 520-387-2001 FAX: 520-387-7338

July 27, 2014

Certified Mail # 7009 2820 0002 7393 4538
Return Receipt Requested

Raymond Suazo
BLM State Director
One North Central Ave, Suite 800
Phoenix, AZ 85004-4427

RE: Ajo Improvement Company – 230 kV transmission line from Gila Bend to
Ajo. Docket No. L-00000G-97-0089

Dear Director Suazo:

Ajo Improvement Company (“AIC” or “Company”) intends to construct the approximate 47-mile 230 kV transmission line from Gila Bend to Ajo (the “Project”) with steel monopoles. The original Certificate of Environmental Compatibility (“CEC”) approved the Project with the use of primarily wooden structures. AIC does not believe the change from wood to steel is a material change requiring a modification to the CEC, and requests that the Commission make that determination. The heights of the monopoles will not change from what was contemplated in the original CEC. To the extent, however, the Commission believes that this is a material change to the CEC, the Company has requested approval of the change under A.R.S. § 40-252. There are no other changes contemplated with the Project and there will be no increased environmental impact from the change.

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Roy Archer

President

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Phone: (520) 387-2010

Cell: (520) 955-4988

Fax: (520) 387-2012

E-Mail: Roy_Archer@FMI.com

cc: Jason Gellman
Mike McElrath

*AJO IMPROVEMENT COMPANY
P O DRAWER 9
AJO, ARIZONA 85321*

TELEPHONE: 520-387-2001 FAX: 520-387-7338

July 27, 2014

Certified Mail # 7009 2820 0002 7393 4545
Return Receipt Requested

Mayor Steve Holt
Town of Gila Bend
P.O. Box A
Gila Bend, AZ 85337

RE: Ajo Improvement Company – 230 kV transmission line from Gila Bend to
Ajo. Docket No. L-00000G-97-0089

Dear Mayor Holt:

Ajo Improvement Company ("AIC" or "Company") intends to construct the approximate 47-mile 230 kV transmission line from Gila Bend to Ajo (the "Project") with steel monopoles. The original Certificate of Environmental Compatibility ("CEC") approved the Project with the use of primarily wooden structures. AIC does not believe the change from wood to steel is a material change requiring a modification to the CEC, and requests that the Commission make that determination. The heights of the monopoles will not change from what was contemplated in the original CEC. To the extent, however, the Commission believes that this is a material change to the CEC, the Company has requested approval of the change under A.R.S. § 40-252. There are no other changes contemplated with the Project and there will be no increased environmental impact from the change.

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Please do not hesitate to contact me with questions or concerns.

Regards,

A handwritten signature in black ink, appearing to read "Roy Archer". The signature is fluid and cursive, with the first name "Roy" being more prominent than the last name "Archer".

Roy Archer

President

Water & Electric Utilities

Phone: (520) 387-2010

Cell: (520) 955-4988

Fax: (520) 387-2012

E-Mail: Roy_Archer@FMI.com

cc: Jason Gellman
Mike McElrath

*AJO IMPROVEMENT COMPANY
P O DRAWER 9
AJO, ARIZONA 85321*

TELEPHONE: 520-387-2001 FAX: 520-387-7338

July 27, 2014

Certified Mail # 7009 2820 0002 7393 4552
Return Receipt Requested

Carmine Debonis Jr.
Director
Pima County Development Services
201 N. Stone Ave.
Tucson, AZ 85701

RE: Ajo Improvement Company – 230 kV transmission line from Gila Bend to
Ajo. Docket No. L-00000G-97-0089

Dear Director Debonis:

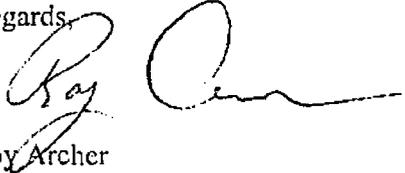
Ajo Improvement Company (“AIC” or “Company”) intends to construct the approximate 47-mile 230 kV transmission line from Gila Bend to Ajo (the “Project”) with steel monopoles. The original Certificate of Environmental Compatibility (“CEC”) approved the Project with the use of primarily wooden structures. AIC does not believe the change from wood to steel is a material change requiring a modification to the CEC, and requests that the Commission make that determination. The heights of the monopoles will not change from what was contemplated in the original CEC. To the extent, however, the Commission believes that this is a material change to the CEC, the Company has requested approval of the change under A.R.S. § 40-252. There are no other changes contemplated with the Project and there will be no increased environmental impact from the change.

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Regards,

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Roy Archer
President

Water & Electric Utilities

Phone: (520) 387-2010

Cell: (520) 955-4988

Fax: (520) 387-2012

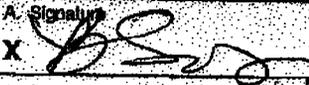
E-Mail: Roy_Archer@FMI.com

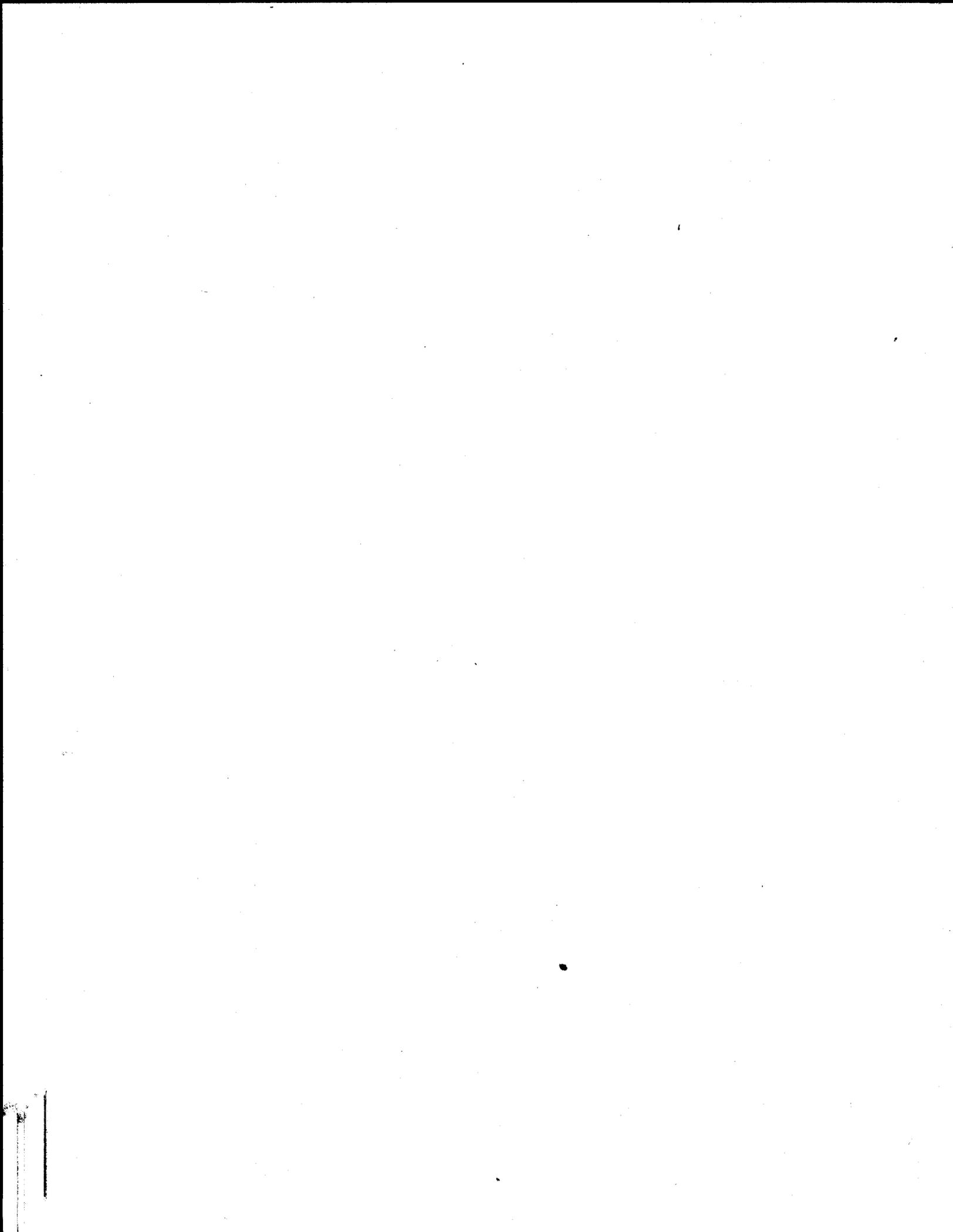
cc: Jason Gellman
Mike McElrath

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p>Raymond Suazo BLM State Director One North Central Avenue, Suite 800 Phoenix, Arizona 85004-4427</p>	<p>A. Signature x Rita L. Hunter <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) Rita L. Hunter</p> <p>C. Date of Delivery 6-30-2014</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input checked="" type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7009 2820 0002 7393 4538</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p>Mayor Steve Holt Town of Gila Bend P.O. Box A Gila Bend, Arizona 85337</p>	<p>A. Signature x B. Turner <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) B. Turner</p> <p>C. Date of Delivery</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p>7009 2820 0002 7393 4545</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

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<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p style="margin-left: 40px;">Mr. James R. Uken Director, 56th Range Management Office 7101 Jerstad Luke AFB, Arizona 85309</p>	<p>A. Signature X  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery Luke Deason 7/8/14</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p style="text-align: center; font-size: 1.2em;">7009 2820 0002 7393 4569</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. <p>1. Article Addressed to:</p> <p style="margin-left: 40px;">Carmine Debonis Jr. Director Pima County Development Services 201 North Stone Avenue Tucson, Arizona 85701</p>	<p>A. Signature X  <input checked="" type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery BETTY SANCHEZ 6/30/14</p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p> <p>3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p> <p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>2. Article Number (Transfer from service label)</p>	<p style="text-align: center; font-size: 1.2em;">7009 2820 0002 7393 4552</p>
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	





**DEPARTMENT OF THE AIR FORCE
AIR EDUCATION AND TRAINING COMMAND**

25 July 2014

Charles E. Buchanan
Director
56th Range Management Office
7101 Jerstad Lane, Bldg 500
Luke AFB AZ 85309-1420

Roy Archer
President
Ajo Improvement Company
PO Drawer 9
Ajo, AZ 85321

Subject: Ajo Improvement Company 230 kV Transmission Line from Gila Bend to Ajo,
Docket No. L-00000G-97-0089

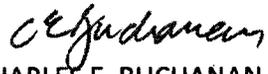
Dear Mr. Archer

We received your letter dated July 27, 2014 (which appears to have been erroneously dated July rather than June) regarding substitution of steel poles for wooden poles in this proposed project. If the steel poles would be the same height and at the same locations as the wooden poles, then we would agree with your statement that this is not a material change to the project design.

However, this spring we were working with your project designer and cultural resources consultant to minimize or avoid impacts to archaeological sites in vicinity of the Crater Range Mountains on the Barry M. Goldwater Range East. Options under consideration included changing some pole locations, height, and spacing. This planning effort ended some months ago when we were verbally advised the project was on hold, and the issue remains unresolved.

Please advise us of your intent. We prefer the avoidance of cultural sites so that these non-renewable resources are preserved in place. If you have any questions please contact Daniel F. Garcia at (623) 856-4265 or email daniel.garcia.23@usa.f.mil.

Sincerely,


CHARLES E. BUCHANAN, GS-14, DAF
Director, 56th Range Management Office