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ORIGINAL

March 17, 2015

Arizona Corporation Commission

DOCKETED

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SENT BY US MAIL

Mr. John Foreman, Esq.
Line Siting Committee Chair
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

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AZ CORP COMMISSION
DOCKET CONTROL

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RE: Docket No. L-00000B-15-0059-00170 Price Road Corridor 230kV Line CEC

Dear Mr. Foreman:

This office represents Fulton Homes regarding the above referenced Docket number for Salt River Project's ("SRP") Certificate of Environmental Compatibility application for its Price Road Corridor 230 kV transmission line project (the "CEC Application"). Prior to submittal of the CEC Application by SRP, Fulton Homes was an active participant in SRP's public and stakeholder outreach process, repeatedly making its concerns and preferences regarding potential transmission line routes known to SRP.

As an SRP ratepayer itself, and from the perspective of a local Arizona company constructing homes for thousands of SRP ratepayers, Fulton Homes is generally opposed to SRP's planned routing of the 230kV transmission line through the Gila River Indian Community ("GRIC"). The GRIC routing requires the construction of miles of additional transmission lines, as well as the acquisition of the associated rights-of-way from the GRIC allottees, the cost of which will be borne by SRP's ratepayers, all in an effort to avoid public backlash from property owners and residents located along more direct routes. However, should SRP be allowed to move forward with the GRIC routing, Fulton Homes wishes to make its position on the route alternatives contained in the CEC Application known to the Line Siting Committee (the "Committee") and members of the Arizona Corporation Commission ("ACC").

SRP's CEC Application proposes 2 route alternatives from the Schrader Substation south to the GRIC boundary; the first, identified as SRP's "Preferred Route", follows the existing railroad tracks (located approximately ¼-mile east of Arizona Avenue) south to the GRIC boundary, and the second, identified as the "Arizona Avenue Alternative Route," would follow Arizona Avenue south to the GRIC boundary.

Fulton Homes has recently developed, or is in the process of developing, three substantial and sizeable developments that are directly adjacent to the 2 route alternatives outlined in the CEC

Application (see **Exhibit "A"** attached hereto). Consequently, either route alternative will have significant impacts to these developments, the homeowners who currently live there, and those that will live there in the future. Therefore, Fulton Homes wishes to protect the value of these developments, and the value of the homes constructed therein, by advocating for the route alternative that results in the least detrimental impact. To that end, Fulton Homes hereby requests that the Committee and the ACC rule in favor of SRP's Preferred Route along the existing railroad tracks, and eliminate the Arizona Avenue Alternative Route.

Eliminate the Arizona Avenue Alternative Route

There are numerous reasons that the Arizona Avenue Alternative Route should be rejected:

1. Arizona Avenue is the main thoroughfare through this portion of the City of Chandler.

Arizona Avenue serves as the front door and marketing window to numerous existing and planned residential developments and commercial projects, and is the main thoroughfare through this portion of the City of Chandler. Locating the 230kV transmission line on such a critical roadway and marketing window would result in a significant visual and economic blight to the area. For Fulton Homes, it would greatly hinder the ability to market two of its developments and could result in the need to discount home prices, thereby resulting in economic losses for the company. Other developers and land owners would face a similar scenario.

2. The Arizona Avenue Alternative Route impacts more homes and businesses.

The Arizona Avenue Alternative Route will impact *more* homes and businesses than the Preferred Route along the railroad tracks. Using a route that is known to impact more homes runs counter to goals associated with transmission line siting. Furthermore, choosing an alternative that negatively affects more homes and business will be met with strong opposition that will needlessly complicate the line siting hearing process.

3. The Preferred Route has an existing 69kV line and the ability to co-locate.

The ability to co-locate new transmission lines with existing infrastructure is an important factor to be considered in any line siting case. The existence of an existing 69kV line along the Preferred Route provides the potential opportunity for co-location and cost savings for SRP and its ratepayers.

4. The Preferred Route consolidates "nuisance" uses in the area.

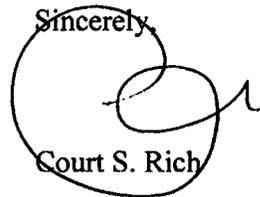
Given the existence of the railroad tracks and 69kV line along the Preferred Route, property owners along this route are already familiar with and accustomed to these "nuisance" uses at this location. Therefore, selection of the Preferred Route would effectively consolidate the "nuisance" uses into one corridor where such uses have already existed for many years. Selection of the Arizona Avenue Alternative Route would create

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a second "nuisance" use corridor, effectively sandwiching many property owners on both sides.

For the foregoing reasons, if SRP is allowed to move forward with the GRIC routing for the proposed 230kV transmission line, Fulton Homes hereby requests that the Committee and the ACC select SRP's Preferred Route from the Schrader Substation south along the railroad tracks to the GRIC Boundary.

Sincerely,

Court S. Rich

cc: ACC Chairman Susan Bitter Smith
ACC Commissioner Bob Burns
ACC Commissioner Tom Forese
ACC Commissioner Doug Little
ACC Commissioner Bob Stump
Mr. Norm Nicholls – Fulton Homes
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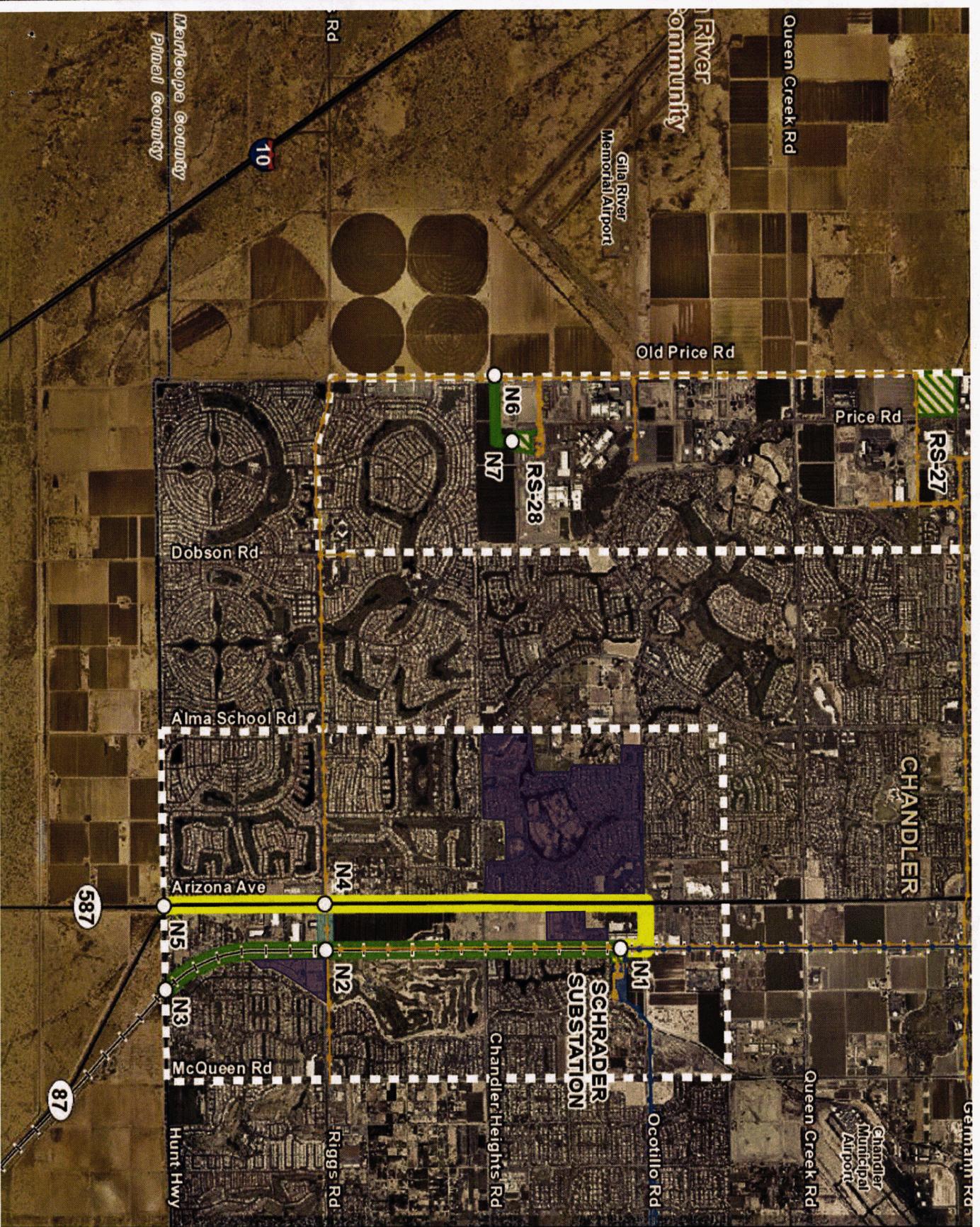
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Exhibit "A"



Leger

- Node (Origin o
- Knox Substatic
- Schrader Subs
- RS-27 and RS
- Existing 230KV
- Existing 69KV
- Preferred Rou
- Arizona Avenu
- Railroad to Ari
- Alternative
- Interstate, US
- Highway
- Road
- Railroad
- County Bound.
- Project Study A
- Jurisdictional Land Owne
- Gila River Indi
- Fulton Homes



State Plane Coordinate S
 NAD 83, Arizona Cen
 Linear Unit: Foot U



FIGURE 3
PREFERRED & ALTERNAT

Map Extent: Maricopa & Pinal