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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

COMMISSIONERS

DOCKETED

2015 MAY 11 P 12:08

SUSAN BITTER SMITH, Chairman
BOB STUMP
BOB BURNS
DOUG LITTLE
TOM FORESE

DOCKETED BY 

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE APPLICATION OF)
SALT RIVER PROJECT AGRICULTURAL) DOCKET NO. L-00000B-15-0059-00170
IMPROVEMENT AND POWER DISTRICT, IN)
CONFORMANCE WITH THE) CASE No. 170
REQUIREMENTS OF ARIZONA REVISED)
STATUTES, SECTIONS 40-360, et seq., FOR A)
CERTIFICATE OF ENVIRONMENTAL) **ARIZONA COMMUNITY UNITED'S**
COMPATIBILITY AUTHORIZING THE PRICE) **REQUEST FOR ORDER OF CEASE**
ROAD CORRIDOR PROJECT, NON-GILA) **AND DESIST**
RIVER INDIAN COMMUNITY PORTION)
LOCATED IN THE CITY OF CHANDLER,)
ARIZONA OR WITHIN MARICOPA COUNTY.)

N. Laine Schoneberger personally and on behalf of Arizona Communities United, representing over 2000 individuals in South Chandler is requesting that the Arizona Corporation Commission issue a Cease and Desist order against Salt River Project (SRP) as it is our belief that SRP is engaging in deceptive practices and scare tactics.

Throughout the process of garnering the CEC from the Arizona Power Plant and Transmission Line Siting Committee (the "Committee") for the above referenced docket number, SRP has lead the public to believe that the cost to bury lines is somewhere between 10-12 times the cost of placing the power lines above ground. It has come to our attention per (EXHIBIT 1) that SRP is using deceptive practices and scare tactics to keep its customers in the dark and scared as to the real cost to bury the power lines.

Per Exhibit 1, as taken from the FAQ section of the SRP website, and as disseminated to the media through various sources.

1
2 **“Will SRP consider placing the lines underground?”**

3 SRP is not considering burying 230kV power lines for aesthetic reasons. At
4 approximately 11 times the cost of overhead construction, undergrounding is cost
5 prohibitive. Asking all SRP customers to share the costs of undergrounding to benefit
6 one area is not equitable. However, undergrounding is planned near Stellar Airpark for
7 safety reasons.

8 To evaluate the reasonableness of our original cost estimate for 230kV underground,
9 SRP recently obtained updated information from three cable/accessory manufacturers
10 (for cable, splices and terminations), two concrete firms (backfill material) and two civil
11 construction contractors (open trench and boring under intersections). We also
12 reviewed prints of the Chandler water project along Ocotillo Road to determine the
13 location of other underground utilities we would have to avoid. We concluded:

- 14 • Cable prices are a little lower than we had assumed because of competition
15 among new U.S. factories
- 16 • The degree of difficulty in the civil construction is a little higher than we had
17 assumed
- 18 • Our overall assessment of the total project cost did not change significantly

19 As a result of this new assessment, SRP has determined that the cost of
20 undergrounding remains at 11 times the cost of overhead construction. The cost of
21 overhead construction is still estimated at \$900,000 per mile and underground is
22 estimated at \$10 million per circuit mile.

23 Even though the Ocotillo Road Route has been removed from consideration
24 now for over a year, SRP continues to deceive the community by using the cost
25 estimate to bury the lines along a major roadway, whereby roads, landscaping and
26 infrastructure will need to be taken into consideration, increasing the cost to bury the
27 lines. As such, SRP should be required to cease and desist in the deceptive tactics
28 that they are continuing to engage in to scare its customer base into believing that the
cost to underground these lines is 10-12 times the actual cost.

Further, SRP should be made to publicly apologize for this deceptive practice
and until SRP garners a realistic appraisal for the cost of undergrounding along the

1 proposed route, the Union Pacific Rail Road Tracks, where no roads, landscaping and
2 infrastructure will need to be accounted for SRP shall admit that they were using an
3 inaccurate cost estimate from a previous route option and are working to get a current
4 cost estimate to bury the power lines along the Union Pacific Rail Road tracks.

5
6 Respectfully submitted,

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N. Laine Schoneberger

10 Individually and on behalf of AZ Communities United

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12 4555 S. Exeter St.

13 Chandler, AZ 85249

14 602-292-6287
15
16

17 ORIGINAL and twenty-five copies of the foregoing

18 Filed this 11 day of May, 20 15, with:

19 Arizona Corporation Commission

20 Hearing Division - Docket Control

21 1200 W. Washington Street

22 Phoenix, Arizona 85007
23

24 COPY of the foregoing

25 sent via email or Federal Express

26 this 11th day of May, 2015, to:

27 John Foreman
28

1 Arizona Power Plant and Transmission Line

2 Siting Committee

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EXHIBIT

1

Frequently asked questions about the Price Road Corridor 230kV transmission project

Choose any link to get answers to your questions about the price process.

PROJECT DETAILS

- ▼ [What is the Price Road Corridor 230kV project?](#)
- ▼ [Why is SRP planning these electric system additions?](#)
- ▼ [When did SRP identify the PRC project?](#)
- ▼ [How will the project benefit the residents and businesses along the PRC?](#)
- ▼ [How tall will the proposed poles be?](#)
- ▼ [When does SRP expect to complete the project?](#)
- ▼ [How will this project affect SRP prices?](#)
- ▼ [If part of the project is already factored into SRP prices, doesn't that mean SRP has selected a route?](#)
- ▼ [Is SRP proposing this project to increase profits and stockholder dividends?](#)
- ▼ [What area does the Schrader Substation serve?](#)
- ▼ [Who supplies SRP with forecasting information for Chandler?](#)

PUBLIC PROCESS

- ▼ [How was the public be involved in determining power line routes and receiving station locations?](#)
- ▼ [How was public input used?](#)
- ▼ [Have final routes been determined?](#)
- ▼ [How will final power line routes and receiving station locations be selected?](#)
- ▼ [How can I find out about upcoming public meetings?](#)

SITING CONSIDERATIONS

- ❖ How does SRP determine the feasibility of route options?
- ❖ Is SRP pursuing routes on Gila River Indian Community land?
- ❖ Will the project affect safety around the local airports?
- ❖ Will SRP consider placing the lines underground?
- ❖ Has SRP evaluated undergrounding 230kV on any previous projects? If so, what were the results of this analysis?
- ❖ How does the Municipal Aesthetics Program work?
- ❖ Will this project send power to Pinal County?

PROPERTY QUESTIONS

- ❖ What will happen if SRP needs to acquire easements on my property?
- ❖ If SRP acquires an easement on my property, how will my property values be affected?

ELECTRIC AND MAGNETIC FIELDS

- ❖ What are electric and magnetic fields?
- ❖ What are typical magnetic field levels in a home?
- ❖ What are the magnetic fields of a 230kV transmission line, such as those being proposed for the PRC project?
- ❖ What types of studies have been done on the health effects of EMFs?
- ❖ What are the conclusions of the experts?
- ❖ Are there EMF public exposure standards?
- ❖ Are there special concerns associated with pacemakers and other implanted medical devices?

COMMENTS AND INFORMATION

- ❖ How can I submit a comment or find more details about the project?

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- ▼ Will the project affect safety around the local airports?
- ▲ Will SRP consider placing the lines underground?

SRP is not considering burying 230kV power lines for aesthetic reasons. At approximately 11 times the cost of overhead construction, undergrounding is cost prohibitive. Asking all SRP customers to share the costs of undergrounding to benefit one area is not equitable. However, undergrounding is planned near Stellar Airpark for safety reasons.

To evaluate the reasonableness of our original cost estimate for 230kV underground, SRP recently obtained updated information from three cable/accessory manufacturers (for cable, splices and terminations), two concrete firms (backfill material) and two civil construction contractors (open trench and boring under intersections). We also reviewed prints of the Chandler water project along Ocotillo Road to determine the location of other underground utilities we would have to avoid. We concluded:

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As a result of this new assessment, SRP has determined that the cost of undergrounding remains at 11 times the cost of overhead construction. The cost of overhead construction is still estimated at \$900,000 per mile and underground is estimated at \$10 million per circuit mile.

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- ▼ How does the Municipal Aesthetics Program work?
- ▼ Will this project send power to Pinal County?