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0000163805

Mail Station PAB221  
P.O. Box 52025  
Phoenix, AZ 85072-2025

**Laura Furrey**  
Senior Regulatory Analyst  
Regulatory Policy & Public Involvement  
Phone: (602) 236-2276  
Fax: (602) 236-3458  
Laura.Furrey@srpnet.com

July 29, 2015

Arizona Corporation Commission

DOCKETED

JUL 29 2015

Mr. Steve Olea  
Director, Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

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Re: Docket No. L-00000B-04-0126-00000, Decision Nos. 68093 and 68291

Dear Mr. Olea:

Pursuant to Condition No. 21 of the Certificate of Environmental Compatibility (CEC) for the Pinal West to Southeast Valley/Browning Transmission Project, Decision No. 68093 (August 25, 2005) and Decision No. 68291 (November 14, 2005), the Salt River Project (SRP), on behalf of the project owners, is filing the tenth annual self-certification letter. This report provides up-to-date information and documentation on the status of our efforts to comply with each condition in the referenced CEC decisions. As all conditions of the CEC have been met, this will be SRP's last compliance filing related to the Pinal West to Southeast Valley/Browning Transmission Project.

If you or your staff have any questions, please feel free to contact me.

Sincerely,



Laura Furrey  
SRP Regulatory Policy & Public Involvement

cc: Tom Chenal, Arizona Attorney General's Office  
Linda Brumm, Arizona Energy Office  
Brian Bozzo, Arizona Corporation Commission  
Docket Control (Original, plus 13 copies)

**Pinal West to Southeast Valley/Browning Project CEC – Case 126  
Decision No. 68093 dated August 25, 2005 and  
Decision No. 68291 dated November 14, 2005  
L-00000B-04-0126-00000**

**Annual Compliance Filing dated July 29, 2015**

**This Certificate is granted upon the following conditions:**

1. This authorization to construct the Project will expire twenty (20) years from the date the Certificate is approved by the Arizona Corporation Commission, unless construction is completed to the point that the line is capable of operating at its rated capacity by that time; provided, however, that prior to such expiration the Applicant may request that the Arizona Corporation Commission extend the time limitation.

**SRP has complied with this condition. SRP, on behalf of the Project participants, completed construction of the Pinal West – Duke – Pinal Central – Abel – Browning 500kV transmission line. The line became operational on June 12, 2014.**

**The current in-service date for the Abel 500kV substation is 2021.**

2. Applicant shall obtain all required approvals and permits necessary to construct the Project.

**SRP has complied with this condition.**

3. Applicant shall comply with all existing applicable laws, air and water pollution control standards and regulations, ordinances, master plans and regulations of the United States, the State of Arizona, Maricopa County, Pinal County and any other governmental entities having jurisdiction.

**SRP is in compliance with all existing applicable laws, air and water pollution control standards and regulations, ordinances, master plans and regulations of the United States, the State of Arizona, Maricopa County, Pinal County and any other governmental entities having jurisdiction.**

4. The Applicant will sponsor an intensive pedestrian survey for cultural resources of the previously un-inspected portions of the final right-of-way and will continue to consult with the State Historic Preservation Office ("SHPO") to identify and evaluate any cultural resources present.

**SRP has complied with this condition.**

5. The Applicant will continue to consult with SHPO to reach a determination of impact. If the result is a determination of negative impacts, the Applicant will consult with SHPO to resolve the negative impacts.

**SRP has complied with this condition.**

6. The Applicant will avoid and/or minimize impacts to properties considered eligible for inclusion in the State or National Register of Historic Places to the extent possible. Spanning over historic-period roads, canals and railroads is considered an acceptable form of avoidance.

**SRP has complied with this condition.**

7. If the Applicant decides that Register-eligible archaeological sites cannot be avoided, then the Applicant will consult with SHPO to plan and implement a mitigation plan.

**SRP has complied with this condition.**

8. Should an archaeological, paleontological, or historic site or object be discovered on state, county or municipal land during plan-related activities, the person in charge is required to notify promptly the Director of the Arizona State Museum and take reasonable steps to secure and maintain the resource's preservation pursuant to state law (*i.e.*, A.R.S. § 41-844). If human remains and/or funerary objects are encountered on private land during the course of any ground disturbing activities relating to the development of the subject property, Applicant shall cease work on the affected area of the Project and notify the Director of the Arizona State Museum in accordance with A.R.S. § 41-865.

**SRP has complied with this condition.**

9. Applicant shall consult an archeologist during construction activities in applicable areas, as determined by SHPO, to advise Applicant in connection with any additional archeological studies that may be required and any mitigation efforts for archeological sites that may be affected by the construction of the Project.

**SRP has complied with this condition.**

10. After construction, the Applicant, in conjunction with any applicable land managing agency, shall allow Arizona Site Stewards, a volunteer-staffed SHPO program, to periodically inspect archeological sites within the corridor for vandalism or other damage.

**SRP will comply with this condition consistent with any required approvals from property owners.**

11. The Applicant shall follow the Arizona State Land Department's instructions, if any, regarding the treatment of State Register of Historic Places-eligible properties situated on Arizona State Land Department land in consultation with SHPO.

**SRP has complied with this condition.**

12. In consultation with SHPO and the applicable land-managing agency, the Applicant will consider and assess potential direct and indirect impacts to eligible properties related to new access roads or any existing access roads that require blading.

**SRP has complied with this condition.**

13. Within 120 days of the effective date of the Commission's decision regarding the Certificate, the Applicant shall erect and maintain signs throughout the entire approved Certificate corridor providing public notice that the property is the possible site of a future transmission line or substation. Applicant shall place signs in prominent locations at reasonable intervals such that the public is notified along the full length of the transmission line. The signs shall advise: a.) the site has been approved for the construction of Project facilities including 500 kV lines, 230 kV lines and substations, as applicable; b.) the expected date of completion of the Project facilities; and c.) a phone number for public information regarding the Project.

**SRP has complied with this condition.**

14. Applicant shall monitor all ground clearing or disturbing activities that may affect sensitive habitat. If a special status species is encountered, Applicant shall retain a biological monitor to ensure proper actions are taken with regard to such species.

**SRP has complied with this condition. No special status species have been encountered, to-date.**

15. Applicant shall design the transmission lines so as to minimize impacts to raptors.

**SRP has complied with this condition. The transmission line was designed consistent with "Suggested Practices for Raptor Protection on Power Lines: The State of the Art in 1996" published by the Avian Power Line Interaction Committee, Edison Electric Institute and the Raptor Research Foundation.**

16. Where practicable, the Applicant shall use existing roads for construction and access. The Applicant shall minimize vegetation disturbance outside of the power-line right of way, particularly in drainage channels and along stream banks, and shall re-vegetate native areas of construction disturbance outside of the power-line right of way after construction has been completed.

**SRP has complied with this condition.**

17. A. The Applicant shall make every reasonable effort to identify and correct, on a case-specific basis, all complaints of interference with radio or television signals from operation of the line and related facilities.

**SRP will make every reasonable effort to identify and correct, on a case-specific basis, all complaints of interference with radio or television signals from operation of the line and related facilities. SRP has a process in place to address such complaints, including maintaining records of all interference-related complaints. No complaints of interference with radio or television signals have been received to-date.**

- B. The Applicant shall maintain written records for a period of five (5) years of all complaints of radio or television interference attributable to operation of the line, together with the corrective action taken in response to each complaint. All complaints shall be recorded and include notations as to the corrective action taken. Complaints not leading to a specific action or for which there was no resolution shall be noted and explained. The record shall be signed by the Project owner and also the complainant, if possible, to indicate concurrence with the corrective action or agreement with the justification for a lack of action.

**SRP will comply with this condition. See Condition 17A above.**

18. The Applicant shall, to the extent feasible, minimize the destruction of native plants during the Project construction and shall comply with the notice and salvage requirements of the Arizona Native Plant Law.

**SRP has complied with this condition.**

19. The Applicant shall use non-specular conductor and dulled surfaces for transmission line structures.

**SRP has complied with this condition. Non-specular conductors and dulled surfaces for transmission line structures were used in the construction of all segments of the Project.**

20. The following condition is to ensure transmission system safety and reliability when a transmission structure is placed within one hundred feet of an existing natural gas or hazardous liquid pipeline, excluding distribution lines as defined by the Code of Federal Regulations, 49 C.F.R. § 192.3 (2001). Under such circumstances, the Applicant shall:

- (a) Provide the appropriate grounding and cathodic protection studies to show that the transmission line results in no material adverse impacts to such existing natural gas or hazardous liquid pipeline, whose right-of-way is a hundred feet or less from the transmission structure, when both are in operation. Additionally, Applicant shall use its best efforts to insure that future natural gas and hazardous liquid pipelines result in no material adverse impact to the transmission lines. A report of the studies shall be provided to the Commission by the Applicant as part of its compliance with the Certificate. If material adverse impacts are noted in the studies, Applicant shall take appropriate steps to ensure such material adverse impacts are mitigated. Applicant shall provide to the Commission written documentation of the actions that were taken and provide documentation showing that material adverse impacts were mitigated.

**SRP has complied with this condition.**

**ARK Engineering & Technical Services, Inc. was contracted to investigate alternating current (AC) electrical interference effects to both Kinder Morgan and Southwest Gas natural gas pipelines due to the proximity of certain sections of the Project. AC pipeline potential and current density calculations were performed on 14 pipeline sections along the 500kV transmission lines from Pinal West to Duke to Pinal Central to Browning. Only four pipeline sections, all parallel to Pinal West to Duke 500kV, require mitigation.**

**The proposed remedy was to install seven sections of gradient control wires (zinc ribbon). Direct current isolation was to be accomplished using solid state decoupling devices. Test stations are also included in the design to facilitate periodic inspections and verification that the mitigation is effective.**

**The mitigation plan will reduce AC interference effects to safe levels for pipeline integrity and personnel safety. As of June 9, 2015, SRP's contractor, Corrpro Inc., has completed the installation and placed all of the equipment in service.**

**Concurrent with this compliance filing, a copy of the final study report, which includes the recommended mitigation methods detailed above, has been provided to Commission Staff**

- (b) Adopt a written mitigation plan outlining all reasonable steps to be taken to protect all electric facilities associated with the transmission line as a result of this Project from any potential hazards that could occur whenever a transmission line structure is placed 100 feet or less from any such existing pipeline or its contents. The plan shall indicate the proposed corrective action to mitigate identified potential hazards. A potential hazard includes, but is not limited to, a rupture or explosion resulting from the pipeline. The written mitigation plan shall be provided to the Commission by the Applicant as part of its compliance with this Certificate and shall be subject to review and comment by Commission Staff. Applicant shall implement the written mitigation plan during a hazard as part of its compliance with this Certificate.

**SRP has complied with this condition.**

21. The Applicant shall submit a self-certification letter annually until construction is complete, identifying which conditions contained in the CEC have been met. Each letter shall be submitted to the Utilities Division Director beginning on August 1, 2006, describing conditions that have been met as of June 30 of that year. Attached to each certification letter shall be documentation explaining, in detail, how compliance with each condition was achieved. Copies of each letter, along with the corresponding documentation, shall also be submitted to the Arizona Attorney General and Department of Commerce Energy Office.

**Compliance with this condition is met by the submission of this filing.**

22. Before construction on this Project may commence, the Applicant must file a construction mitigation and restoration plan with ACC Docket Control.

The goals of the Plan will be to:

- Avoid impacts where practical;
- Where impacts are unavoidable, minimize impacts; and
- Focus on site preparation to facilitate natural processes of revegetation and drainage.

Other key elements of the Plan, when not inconsistent with the respective land management agencies or local owners' requirements, are to:

- Emphasize final site preparation to encourage natural revegetation;
- Avoid (*i.e.*, preserve), where practical, mature native trees;

Stipulate a maximum construction corridor width;  
Reserve topsoil and native plant materials from right-of-way before grading, and respread over the right-of-way after construction is complete;  
Imprint the restored right-of-way to provide indentations to catch seed and water;  
Implement best management practices to protect the soil;  
Apply restoration methods that have been shown to work in the desert environment;  
and  
Prevent the spread of noxious weeds or other undesirable species.

**SRP has complied with this condition.**

23. The authority granted by this Certificate includes the authority to construct a 230 kV circuit on the 500 kV structures (authorized within this Certificate), between the Santa Rosa and SEV Substations. This authority is contingent on the following:
- (a) The Applicant will identify proposed use of the 230 kV facilities in a January 2006 filing of the annual ten year plan submittals. The Applicant will include the 230 kV facilities and the required technical study work in each subsequent ten year plan filing until the 230 kV facilities are constructed.

**SRP has complied with this condition.**

- (b) Prior to beginning construction of a 230 kV circuit on any portion of the route between the Santa Rosa and SEV Substations, Applicant shall submit to the Utilities Division of the Arizona Corporation Commission ("ACC Staff") a written study that describes the proposed 230 kV circuit and provides all available study results of a system reliability analysis relating to the proposed circuit, including but not limited to, studies demonstrating that the proposed 230 kV circuit meets NERC/WECC reliability criteria as well as any other criteria utilized by the Commission at the time of filing. The study will also identify the needs and objectives of the stakeholders, address how the 230 kV circuit will best meet the regional needs of the stakeholders and address how the 230 kV circuit will be incorporated with other long term 230 kV plans identified to meet the load serving needs of the region. The study will also address issues of reliability relating to consolidation of these lines on common structures, the use of common corridors and interconnection of facilities. The study work will be performed in an open and collaborative manner open to all stakeholders in a regional forum, such as the CATS-HV Technical Study Work Group.

**SRP has complied with this condition. On August 11, 2006, SRP submitted study work and sought authority to construct a 230 kV circuit on the 500 kV structures beginning at a point on Cornman Road in Casa Grande and continuing along the certificated route to the future Pinal Central substation.**

**SRP submitted additional study work and sought authority to construct a 230 kV circuit on the 500 kV structures for the remaining segments of line**

**between Duke (formerly Santa Rosa) and Abel (formerly Southeast Valley or SEV) substations. On June 30, 2008, SRP submitted the request to add the 230 kV circuit to the 500 kV structures from Duke substation to a point on Cornman Road, near the intersection with Thornton Road and from the Pinal Central substation to the Abel substation.**

- (c) Upon the submission of the study work described in subsection b (in the paragraph above) to the ACC Staff, the Applicant shall make a compliance filing with Docket Control documenting said study work submission. The ACC Staff shall then docket within 90 days a Staff Report with regard to the Applicant's study work. The Staff Report shall include a Staff recommendation as to whether a hearing should be held in the matter as well as Staff's recommendation as to whether the Commission should approve the Applicant's request to attach a 230 kV circuit line to the 500 kV structures. Regardless of whether the matter proceeds to hearing, the Commission shall make the final determination whether the Applicant is authorized to construct the 230 kV circuit on any portion of the common 500 kV line structures spanning from Santa Rosa to the SEV Substations. Only upon receipt of an affirmative determination from the Commission, may the Applicant construct the 230 kV circuit described in subsection a.

**The ACC, in Decision No. 69183, dated December 8, 2006, found that SRP's August 2006 compliance filing fulfilled the requirements of Condition 23 and granted SRP the authority to construct the 230 kV line pending the approval of a CEC for the Desert Basin 230 kV Project. A CEC for the Desert Basin Project was granted on June 6, 2007 in Decision No. 69647.**

**On November 19, 2008, in Decision No. 70610, the ACC determined that SRP had met the requirements set forth in Condition 23 and granted SRP the authority to construct the 230 kV line from Duke (formerly Santa Rosa) substation to a point on Cornman Road, near the intersection with Thornton Road and from the Pinal Central substation to the Abel (formerly Southeast Valley or SEV) substation.**

- (d) A request for approval of a particular 230 kV circuit shall not preclude subsequent requests for other 230 kV circuits.

**SRP has complied with this condition as evidenced by its separate submittals in 2006 and 2008, requesting additional 230 kV circuits.**

With respect to the Project, Applicant shall participate in good faith in state and regional transmission study forums, and shall coordinate transmission expansion plans related to the Project to resolve transmission constraints in a timely manner.

**SRP continues to participate in good faith in state and regional transmission study forums, such as WestConnect, CATS, SWAT and others.**

24. Applicant shall provide copies by certified mail of this Certificate to appropriate city and county planning agencies, to the county board of supervisors, mayor and town council of appropriate cities, the Arizona Department of Real Estate, The Attorney General's Office, SHPO, AGFD and ASLD.

**SRP has complied with this condition.**

25. Prior to the date this transmission line is put into commercial service, the Applicant shall provide homebuilders and developers within one mile of the center line of the certificated route the identity, location, and a pictorial depiction of the type of power line being constructed, accompanied by a written description, and encourage the developers and homebuilders to include this information in the developers' and homebuilders' homeowners' disclosure statement.

**SRP has complied with this condition.**

26. Applicant shall publish a copy of this certificate and the attachments on Applicant's project website within 10 days of approval by the Corporation Commission. Such publication shall continue until all necessary right-of-way has been obtained.

**SRP has complied with this condition.**

27. Upon the start of construction for each of RS-19, Pinal South and Southeast Valley substations, Applicant shall work with the applicable jurisdictions to determine appropriate landscaping/visual mitigation for the particular site.

**SRP has complied with this condition.**

28. Applicant shall work in good faith with homeowners, homeowners associations and potential developers to avoid existing and future homes along the approved route.

**SRP has complied with this condition.**

29. Within three (3) years of the effective date of the Commission's decision for the Project, the Applicant shall determine a tentative center line for the transmission line and location of the substations and shall erect and maintain signs providing public notice that the property is the site of a future transmission line or substation. Applicant shall place signs in prominent locations at reasonable intervals such that the public is notified along the

full length of the transmission line. The signs shall advise: a.) the site has been approved for the construction of Project facilities including 500 kV lines, 230 kV lines and substations, as applicable; b.) the expected date of completion of the Project facilities; and c.) a phone number for public information regarding the Project.

**SRP has complied with this condition.**

30. Within 90 days of securing all or any portion of the easement for the transmission line, the Applicant shall record such easement with either the Pinal County Recorder's Office or the Maricopa County Recorder's Office, as appropriate.

**SRP has complied with this condition.**

Conditions from Decision 68291 dated November 14, 2005:

31. For the segment of the approved corridor lying between Node 81/UPRR on the North and a point approximately 10,800 feet south along the north bank of the Gila River, the approved corridor shall be 1,000 feet along the centerline unless by November 1, 2006, Pulte Home Corporation, Vanguard Properties, SRP, and the Town of Florence agree on a specific alignment within the wider corridor approved by the Commission. The alignment shall not interfere with the Applicants' proposed crossing of the Gila River.

**SRP has complied with this condition.**

32. All project-related costs that would not be incurred but for the expansion of the certificated corridor width that is approved by this Decision shall be borne by the parties who supported the expansion.

**SRP has complied with this condition.**