ORIGINAL

0000164295

BEFORE THE
ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF SUNZIA TRANSMISSION LLC, IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES 40-360, ET SEQ., FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE SUNZIA SOUTHWEST TRANSMISSION PROJECT, WHICH INCLUDES THE CONSTRUCTION OF TWO NEW 500 KV TRANSMISSION LINES AND ASSOCIATED FACILITIES ORIGINATING AT A NEW SUBSTATION (SUNZIA EAST) IN LINCOLN COUNTY, NEW MEXICO, AND TERMINATING AT THE PINAL CENTRAL SUBSTATION IN PINAL COUNTY, ARIZONA. THE ARIZONA PORTION OF THE PROJECT IS LOCATED WITHIN GRAHAM, GREENLEE, COCHISE, PINAL, AND PIMA COUNTIES.	DOCKET NO. L-00000YY-15-0318-00171 Case No. 171

Arizona Corporation Commission
DOCKETED
OCT 15 2015
DOCKETED BY

SUNZIA TRANSMISSION, LLC'S NOTICE OF FILING ADDITIONAL EXHIBITS

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DOCKET CONTROL

SunZia Transmission, LLC, hereby files exhibits SUN-16 and SUN-17. Exhibit SUN-16 contains a series of presentation slides that provide a comparison of the SunZia Southwest Transmission Project and another proposed transmission project, the Proposed Southline Transmission Line Project ("Proposed Southline Project"). Exhibit SUN-17 is an excerpt from the Draft Environmental Impact Statement for the Proposed Southline Project.

For the reasons discussed in the following paragraph, these exhibits were not exchanged with all parties and potential parties by 5:00 p.m. of the day before the pre-hearing conference in accordance with Paragraph 17 of the Procedural Order. However, SunZia asserts that good cause exists to authorize the use of these exhibits at the hearing.

During the pre-hearing conference held October 14, 2015, SunZia raised the concern that at least two potential parties planned to introduce evidence concerning the Proposed Southline Project. It is SunZia's position that § A.R.S. 40-360.06 does not contemplate or authorize an analysis of asserted alternative projects to the Application that

is before the Line Siting Committee. Rather, the scope of inquiry under § A.R.S. 40-360.06 is the environmental compatibility of the proposed site for the Project. Additionally, other forums such as the Biennial Transmission Assessment and the Integrated Resource Planning process, provide proper venues to evaluate proposed projects in conjunction with and in comparison to other planned projects.

Notwithstanding SunZia's objection, the Chairman indicated during the pre-hearing conference that he anticipated that some testimony from intervenors concerning Southline would be allowed. To the extent that testimony concerning this other project is allowed during the hearing, SunZia would like the opportunity to present evidence as well.

SunZia submits these exhibits one day after learning that this line of inquiry may be allowed and two days before the hearing commences. Under these circumstances, SunZia submits that good cause exists to authorize the use of these exhibits.

Moreover, as required by Paragraph 12 of the September 11, 2015 Procedural Order, as amended, SunZia copied the parties and potential parties, of which it is aware, contained in its distribution list. The distribution list includes the following:

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RESPECTFULLY SUBMITTED this 15th day of October, 2015.

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CERTIFICATE OF MAILING

Pursuant to A.A.C. R14-3-204, the **ORIGINAL** of the foregoing and 25 copies filed this 15th day of October, 2015, with:

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COPY of the foregoing mailed this 15th day of October, 2015, to:

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EXHIBIT SUN-16

Scope of Southline Project

- **Composition:**
  - » 240 miles: new build double-circuit 345 kV transmission lines on a single tower from Afton Power Plan (NM) to Apache Power Plant (AZ)
  - » 120 miles: rebuild of Western's 115 kV transmission line to double-circuit 230 kV
  - » Upgrades to 12 Western substations from 115 kV to 230 kV, requiring expansion of the substation footprint
  - » No generation identified in project scope

Key Comparisons

Category	Southline	SunZia
Operating Voltage(s)	345 kV and 230 kV	500 kV
WECC Path Rating	Afton to Apache: 1037 MW Apache to Saguaro: 1000 MW	SunZia East-Pinal Central: 3,000 MW
Access to solar resources	Yes	Yes
Access to wind resources	No	Yes
Interconnection to 500 kV system	No	Yes
Issuance of FEIS	No	Yes
Issuance of ROD	No	Yes
Filing of CEC Application	No	Yes
Filing of 10 Year Plans (ACC)	2015	2009-2015

Southline Project

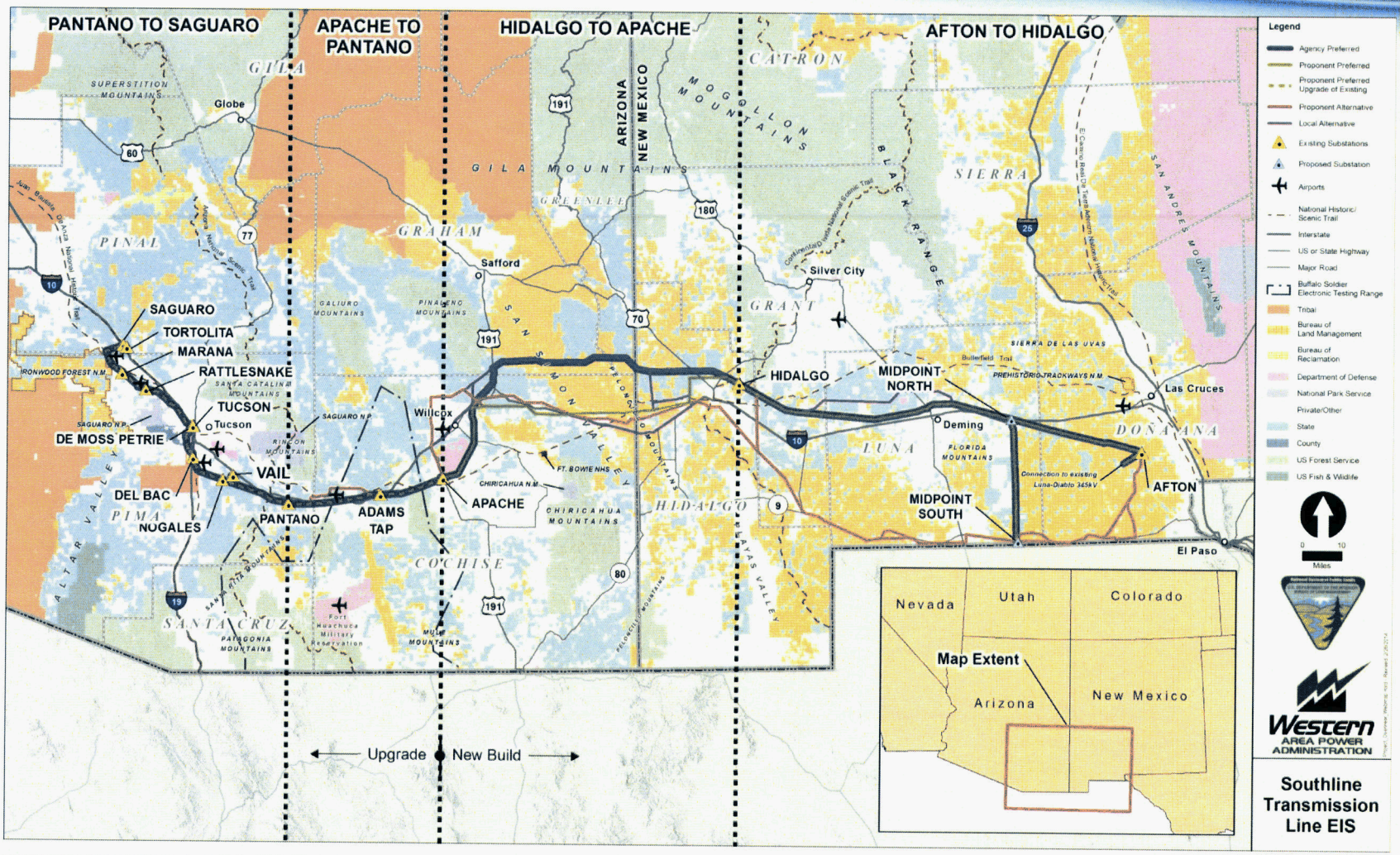

EXHIBIT SUN-17

Proposed Southline Transmission Line Project

Draft Environmental Impact Statement and Draft Resource Management Plan Amendment

Volume 1 of 4

Western
AREA POWER
ADMINISTRATION

National System of Public Lands
U.S. DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

March 2014

WESTERN

BLM

BLM/NM/PL-14-01-1610 · DOE/EIS-0474

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VOLUME SUMMARY

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TH2 option is a 2-mile alternative that relocates 2 miles of the existing Western line and follows an existing Kinder-Morgan buried pipeline through Tumamoc Hill. This route continues north at Anklam Road along North La Cholla Boulevard before heading northeast along a disturbed ROW to connect back to the TH1 alternative.

TH2 in particular was developed to parallel, or follow, the existing Kinder-Morgan gas line that runs north-south across the west side of Tumamoc Hill. However, TH2 runs across an area within Tumamoc Hill that is topographically higher in elevation. Thus, it would be in a more prominent location and be more visible than the existing line. In a subsequent stakeholder outreach meetings, stakeholders unanimously agreed that the primary goal for alternatives around Tumamoc Hill would include relocating the transmission line off of Tumamoc Hill and consolidating transmission lines into a single utility corridor. Additionally, high-voltage transmission lines and pipelines typically do not overlap or share ROWs because of the safety standards, cathodic issues, and maintenance clearance requirements for their respective utilities.

This route does not resolve, minimize, or reduce resource conflicts and is not substantially different in terms of effects of the other local alternatives or the proposed Project across Tumamoc Hill. For this reason, this alternative was eliminated because it would have offered no environmental advantage over the action alternatives for Tumamoc Hill in route group 4.

Technical/Design Alternative

Section 503 of the FLPMA directs the BLM to minimize the proliferation of ROWs across public lands and to consider minimizing the environmental footprint of projects on public lands. As such, BLM management directed that a new technological/design alternative be considered for a portion of the Southline Project wherein Southline would acquire capacity on the proposed SunZia project rather than constructing a new adjacent ROW, as proposed in alternatives DN1 and LD4.

The SunZia project is a proposed new transmission line project currently in the NEPA process, with a ROD anticipated in the near future. The project consists of a proposal to construct an approximately 500-mile-long transmission line between a new substation in Lincoln County, New Mexico, and the Pinal Central Substation in Arizona, with up to four new substations between the two terminals. The SunZia FEIS (BLM 2013a) presents several different design alternatives; one would be the construction of two 500-kV AC lines; another would be one AC line and one 500-kV direct current (DC) line.

Both the SunZia project and the Southline Project are proposed to stretch between New Mexico and Arizona and in several areas are geographically very close. In New Mexico, the two projects would geographically close east of Deming, where the proposed SunZia project would turn west and continue to the Hidalgo Substation. West of the Hidalgo Substation, several of the SunZia project alternatives are in relatively close proximity to the proposed Southline Project route until they reach the San Pedro Valley in eastern Arizona, at which point the two proposed projects diverge, as the proposed SunZia project would head north and the Southline Project would continue west to the Tucson area.

For this technological/design alternative, new transmission line would still be constructed for the proposed SunZia project, but an additional two substations would be necessary where the Southline Project would enter and exit the SunZia project lines. Under this alternative, the Southline Project would begin at Afton Substation and extend along the Proponent Preferred route to a location north of Deming, New Mexico. At this point, the Southline Project would need to enter a substation before joining the SunZia project; this would be a new substation not currently proposed by either SunZia or Southline that would be shared with SunZia. Southline would then use SunZia's facilities for approximately 140 to 160 miles along alternatives DN1 and LD4, where it would enter another proposed new substation that would

also be shared with SunZia and is not currently proposed by either SunZia or Southline. From this point, the two proposed projects would then diverge and follow separate routes to their respective proposed termini.

Screening of this alternative involved examining the feasibility in detail on multiple levels: technically, commercially, economically, legally, and environmentally. Details of the feasibility screening are summarized below:

- **Technically.** The design for this alternative would need to be studied further for both the SunZia and Southline projects before it could be determined whether it is technically feasible. On the face of it, the proposal does not look reasonable or feasible. If Southline were to acquire 1,000 MW of capacity in the middle of SunZia's proposed line, this could create an operational "bottleneck" in the middle of SunZia's line and leave stranded capacity on either end. Also, because both SunZia and Southline would be merchant transmission projects, neither project could provide the ancillary service capability that would be needed for the line to operate.
- **Commercially**. This alternative would mandate that Southline relinquish sections of its proposed Project and instead become a customer of the yet-to-be-constructed SunZia project. SunZia involves multiple capacity holders, and as such, each owner and project participant would have specific rights to SunZia's capacity. Consequently, Southline would have to negotiate with each entity separately, on a piecemeal basis, in order to obtain 1,000 MW of capacity that would enter and exit in the middle of the proposed SunZia project. There is no guarantee that Southline could acquire this sort of capacity on the proposed SunZia project line at rates and terms that would be commercially viable, and no guarantee that the proposed SunZia project would be constructed to begin with.
- **Economically**. Because SunZia would have multiple capacity holders, as stated above, the rates and terms of negotiated capacity would likely be different with each holder and subject to periodic change. Southline would not necessarily be able to acquire the needed capacity at rates necessary to make the Project economically viable. This alternative would also force Southline to underwrite additional risk by taking on SunZia's risk, both of being constructed and of having viable transmission rates. Further, this alternative would require a substantial modification to both the Southline and SunZia projects in order to combine the two proposed projects onto one line. There would be added costs from additional substations, and from back-tracking Western's line to the Apache Substation, depending on the exit point. This would require detailed design and technical studies, as well as restarting the WECC approval process for both proposed projects; this would cost a considerable amount of additional time and money for both projects.
- **Legally.** The FERC regulates the allocation of interstate electric transmission line capacity and has imposed specific restrictions on the allocation of SunZia capacity rights in order to ensure open and non-discriminatory access to that capacity for all interested parties (FERC Docket No. EL-11-24-000) (FERC 2011). Therefore, it is unknown whether 1,000 MW of capacity would be available on the SunZia project, since FERC has authorized a portion of their capacity to be reserved for 'anchor' tenants, with the balance to be allocated through the formal 'open season' process. Additionally, the proposed SunZia project currently has an accepted WECC path rating of 3,000 MW for two 500-kV AC lines in the east-to-west direction; to date, no other plan of service study has been peer reviewed, as required by WECC (2011). The WECC plan of service, upon which SunZia's path rating is based, indicates connections directly to SunZia's Midpoint Substation and then to Luna Substation. The SunZia FEIS (BLM 2013a), however, does not show a connection to Luna Substation, without which their accepted WECC path rating is not supported. Southline could not acquire non-rated transmission capacity. In addition, the proposed SunZia WECC plan of service (WECC 2011) is for transmission in an east-to-west direction. Thus, obtaining capacity on the SunZia project would cause Southline to lose its bidirectional

rating and would not satisfy one of Southline's stated objectives, which is to provide bidirectional capacity.

- **Environmentally**. This alternative would require two new 500-/230-kV substations, which were not planned by either project, as well as a new 230-kV line segment back to the existing Western alignment. One of the new substations and the new 230-kV line segment would be located in the environmentally sensitive area of San Pedro Valley and adjacent to the BSETR, thus creating additional environmental impacts to both biological and military resources.

This route alternative is ineffective. It does not resolve, minimize, or reduce resource conflicts, and it could contribute to additional environmental disturbance, compared with other alternatives that would achieve the same purpose. It is also technically problematic and is economically infeasible. Further, it does not meet the applicant's stated objectives, and it likely would prevent Western from participating as a TIP project; funding and ownership would become too complicated and problematic. For these reasons, this technical/design alternative for Southline to acquire capacity on the proposed SunZia project line has not been carried forward for detailed analysis.

2.10 COMPARISON OF ALTERNATIVES

This section of the document provides a summary of the impacts of each subroute, by segment, as well as the local alternatives. This summary is based on the analysis in chapter 4. The BLM and Western Preferred Alternative description follows the route group summaries.

- Route group 1: Afton Substation to Hidalgo Substation
- Route group 2: Hidalgo Substation to Apache Substation
- Route group 3: Apache Substation to Pantano Substation
- Route group 4: Pantano Substation to Saguaro Substation

Tables 2-11 through 2-14 later in this chapter include a comparison of land ownership and estimated temporary and permanent ground disturbance, as well as comparison of resource impacts associated with each of the subroutes and local alternatives.

2.10.1 Route Group 1: Afton Substation to Hidalgo Substation

Route group 1 includes subroutes 1.1 and 1.2 (Proponent Preferred and Proponent Alternative, New Build Section) extending between the Afton and Hidalgo substations in New Mexico. Segments within each route group cross BLM, NMSLO, and private lands. Subroute 1.1 is 146.9 miles long, of which 44 percent is BLM land, 26 percent is NMSLO land, and the rest is private. Subroute 1.2 is 141.1 miles long; 58 percent of subroute 1.2 is BLM land, 19 percent is NMSLO, and the rest is private.

Subroute 1.1 follows an existing EPEC 345-kV transmission line near I-10 west of the Afton Substation, past the Aden Hills OHV area. The subroute then heads north around Deming; from the Deming area, the line follows the existing 345-kV line to the Hidalgo Substation. A portion of subroute 1.1 is located within an existing West-Wide Energy Corridor (segment 81-213). Subroute 1.1 crosses aplomado falcon (*Falco femoralis septentrionalis*) suitable habitat and a CDNST corridor designated as avoidance areas in the Mimbres RMP. In terms of cultural resources, subroute 1.1 could have potential direct and indirect impacts to the Butterfield Overland Stage Route (Butterfield Trail), the Mormon Battalion Trail, and the Janos Copper Road. Subroute 1.1 also has the potential to directly impact two known NRHP-eligible