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Arizona Corporation Commission
DOCKETED

SEP 16 2015

September 16, 2015

DOCKETED BY 

Mr. Thomas K. Chenal, Chairman
Arizona Power Plant and Transmission Line Siting Committee
1275 W. Washington Street
Phoenix, Arizona 85007
thomas.chenal@azag.gov

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Regarding: SunZia Transmission, LLC, Docket No. L-00000YY-15-0318-00171

Dear Chairman Chenal:

Sierra Club's Grand Canyon (Arizona) Chapter submits these comments on behalf of our 35,000 members and supporters in Arizona.

Sierra Club's mission is "to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environments." Sierra Club and our members have a significant interest in the proposed siting of the SunZia Transmission Line and in ensuring that the process to consider it is inclusive and provides the Arizona Power Plant and Transmission Line Siting Committee ("Committee") with a full picture of the proposed line and the best information possible.

Sierra Club supports the memorandum submitted by Cascabel Working Group dated September 14, 2015 in response to your solicitation for memoranda related to whether or not a qualifying non-profit organization can participate as an intervenor without being represented by counsel (see Item 31 of Chenal Procedural Order dated 09/11/2015). It is impractical and could create a considerable hardship for smaller organizations to be required to have an attorney in order to participate in the Committee's process. We appreciate you moving up the deadline for a response to Item 31 of the Procedural Order.

We ask that you allow organizations to be represented by designated individuals rather than require that they engage counsel. Limiting the intervention to organizations with counsel will likely limit the amount and the quality of information presented to the Committee and mean the Committee will not get a comprehensive view of the proposal and it will limit the Committee's ability to make an informed decision.

As was noted by the Cascabel Working Group, the Arizona Supreme Court Rule 31(d)(28) makes it clear that lay representation for qualifying organizations is allowed in order to accommodate legitimate groups in the public review process and should only be restricted if the Commission or presiding officer "...determines that lay representation is interfering with the orderly progress of the proceeding, imposing undue burdens on the other parties, or causing harm to the parties represented." In this case, allowing it will help facilitate the proceeding, not impede it.

Please allow organizations to participate as intervenors in this proceeding without counsel.



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Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Sandy Bahr". The signature is written in dark ink and is positioned above the printed name.

Sandy Bahr
Chapter Director
Sierra Club - Grand Canyon Chapter