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*Friends of the  
Aravaipa  
Region*

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Mr. Thomas K. Chenal, Chairman  
Arizona Power Plant and Transmission Line Siting Committee  
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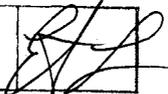
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SEP 16 2015

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

Dear Chairman Chenal:

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The Friends of the Aravaipa Region, a non-profit association of conservation activists that has actively participated in reviewing the SunZia transmission project proposal, supports the legal memorandum submitted by Cascabel Working Group (CWG) on September 14, 2015. This CWG memorandum was composed in response to your solicitation for memoranda related to whether a qualifying non-profit organization can participate as an intervener without being represented by an attorney (Item 31 of your Procedural Order of 9/11/2015).

With the deadline for filing an application to intervene falling on the same date as your deadline for response to Item 31 of your Procedural Order, October 9<sup>th</sup>, we request that Item 31 be resolved much earlier than that date, as requested by CWG. Agreeing upon the rules for participation is a critical path issue, and not resolving this well before the deadline for applying to intervene will put our group and others at a substantial disadvantage. Knowing that our participation as an intervener could be revoked after it is too late to make other arrangements will significantly hamper our ability to solicit potential witnesses in good faith, and to subsequently share this information with other parties in accordance with Items 10 and 11 in your recent Procedural Order.

We also note that Arizona Supreme Court Rule 31(d)(28) makes it clear that lay representation for qualifying non-profit organizations is allowed in order to accommodate legitimate stakeholder 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." We request that such a determination not be made in a pre-emptive manner.

Respectfully submitted on September 15, 2015,



Peter Else, Chair, Friends of the Aravaipa Region  
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ATTACHMENT: Email distribution list for this letter and statement of Docket submission.

**The preceding emailed letter with this Attachment will be submitted to Docket Control via courier. The email distribution list for the preceding letter includes all parties and potential parties known by me as of 9/15/2015:**

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