

ORIGINAL



0000175003

**INTERVENTION**  
RECEIVED  
AZ CORP COMMISSION  
DOCKET CONTROL

2016 NOV 23 P 4: 05

JACKSON & ODEN, P.C.  
3573 East Sunrise Drive, Suite 125  
Tucson, Arizona 85718  
Telephone: (520) 884-0024  
Fax: (520) 884-0025  
TODD JACKSON ASB NO. 012202  
TJACKSON@JACKSONODENLAW.COM  
LANE D. ODEN ASB NO. 012833  
LODEN@JACKSONODENLAW.COM

Attorneys for Mountain View Ranch  
Development Joint Venture, LLC

**BEFORE THE ARIZONA POWER PLANT AND  
TRANSMISSION LINE SITING COMMITTEE**

IN THE MATTER OF THE  
APPLICATION OF SOUTHLINE  
TRANSMISSION LLC, IN  
CONFORMANCE WITH THE  
REQUIREMENTS OF ARIZONA  
REVISED STATUTES 40-360, ET SEQ.,  
FOR A CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY  
AUTHORIZING CONSTRUCTION OF  
NON-WAPA-OWNED ARIZONA  
PORTIONS OF THE SOUTHLINE  
TRANSMISSION PROJECT,  
INCLUDING A NEW  
APPROXIMATELY 66-MILE 345KV  
TRANSMISSION LINE IN COCHISE  
COUNTY FROM THE ARIZONA-NEW  
MEXICO BORDER TO THE  
PROPOSED SOUTHLINE APACHE  
SUBSTATION, THE ASSOCIATED  
FACILITIES TO CONNECT THE  
SOUTHLINE APACHE SUBSTATION  
TO THE ADJACENT AEP CO APACHE  
SUBSTATION, AND  
APPROXIMATELY 5 MILES OF NEW  
138-KV AND 230-KV TRANSMISSION  
LINES AND ASSOCIATED  
FACILITIES TO CONNECT THE

Docket No. L-00000AAA-16-0370-00173

Case No. 173

**MOTION TO INTERVENE AND  
REQUEST FOR PARTY DESIGNATION**

Arizona Corporation Commission  
**DOCKETED**

NOV 23 2016

DOCKETED BY  
*[Signature]*

1 EXISTING PANTANO, VAIL, DEMOSS  
2 PETRIE, AND TORTOLITA  
3 SUBSTATIONS TO THE UPGRADED  
4 WAPA-OWNED 230-KV APACHE-  
5 TUCSON AND TUCSON-SAGUARO  
6 TRANSMISSION LINES IN PIMA AND  
7 PINAL COUNTIES.

8 Mountain View Ranch Development Joint Venture, LLC (“Mountain View  
9 Ranch”), by and through its counsel undersigned and pursuant to A.R.S. §40-360.05(A)  
10 and A.A.C. R14-3-202(A)(2) and 204, hereby moves the Committee to intervene in and  
11 be designated a party for any future proceedings in this matter.

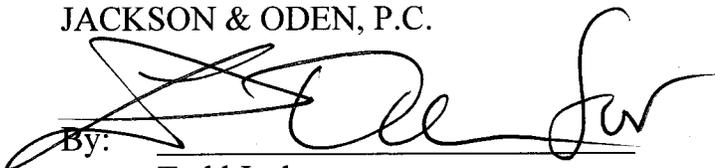
12 Mountain View Ranch is the owner of a 470-acre, platted residential subdivision  
13 transected by the Upgrade Section of the proposed Southline Transmission Project (the  
14 “Project”). Mountain View Ranch’s property is located at the junction of I-10 and Scenic  
15 Route 83, near Vail, Arizona. Southline’s proposed transmission line improvements  
16 exceed the scope of the existing utility easement and will have other material impacts on  
17 Mountain View Ranch’s property, as more fully described in its Notice of Limited  
18 Appearance, Statement of Interest, and Statement of Position, concurrently filed this date  
19 and incorporated herein by reference.

20 Accordingly, in addition to its limited appearance pursuant to A.R.S. §40-  
21 360.05(B), Mountain View Ranch also seeks by this motion to intervene and be  
22 designated as a party and intervenor in this matter pursuant to A.R.S. §40-360.05(A) and  
23 A.A.C. R14-3-202(A)(2). Mountain View Ranch does not intend to present or cross  
24 examine witnesses at the hearing scheduled to commence November 29, 2016, but has set  
25  
26

1 forth its position regarding the hearing issues in its Notice of Limited Appearance,  
2 Statement of Interest, and Statement of Position. Nonetheless, as Mountain View Ranch  
3 has significant interests affected or potentially affected by this Application, it seeks to  
4 intervene, receive notice to its counsel undersigned, and be designated a party for all  
5 future proceedings herein.  
6

7  
8 RESPECTFULLY SUBMITTED this 23rd day of November, 2016.  
9

10 JACKSON & ODEN, P.C.

11  
12 By: 

13 Todd Jackson  
14 Attorneys for Mountain View Ranch  
Development Joint Venture, LLC

15 ORIGINAL and 25 copies hand delivered for filing with Docket Control  
16 on this 23rd day of November, 2016.

17 Director of Utilities  
18 Arizona Corporation Commission  
19 1200 West Washington Street  
20 Phoenix, Arizona 85007  
21  
22  
23  
24  
25  
26

1 COPY of the foregoing mailed  
2 this 23rd day of November, 2016 to:

3 Janet Wagner  
4 Arizona Corporation Commission  
5 1200 W Washington Street  
6 Phoenix, Arizona 85007

7 Jeffrey M. Hatch-Miller  
8 Interim Director of Utilities  
9 1200 W Washington Street  
10 Phoenix, AZ 85007

11 Cedric Hay  
12 Deputy County Attorney  
13 Pinal County  
14 P.O. Box 887  
15 Florence, AZ 85132

16 James Guy  
17 Sutherland Asbill & Brennan LLP  
18 600 Congress Avenue, Suite 2000  
19 Austin, Texas 78701-3238  
20 [James.guy@sutherland.com](mailto:James.guy@sutherland.com)

21 Robert Lynch  
22 340 E Palm Lane, Suite 140  
23 Phoenix, Arizona 85004-4603  
24 [rslynch@rslynchaty.com](mailto:rslynch@rslynchaty.com)

25 Meghan Grabel  
26 Osborn Maladon, PA  
27 2929 N Central Avenue, Suite 2100  
28 Phoenix, AZ 85012  
29 [mgrabel@omlaw.com](mailto:mgrabel@omlaw.com)