BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

LS-435

IN THE MATTER OF THE APPLICATION OF ARIZONA PUBLIC SERVICE COMPANY, IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES §§ 40-360, ET SEQ., FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE CONSTRUCTION OF A SECTION OF THE PINAL ELECTRICAL IMPROVEMENT PROJECT CONSISTING OF APPROXIMATELY 20 MILES OF A NEW DOUBLE-CIRCUIT 230KV TRANSMISSION LINE WHICH ORIGINATES AT THE MILLIGAN SUBSTATION AND TERMINATES AT THE CONNECTION POINT WITH THE SUNDANCE TO PINAL CENTRAL 230KV TRANSMISSION LINE (CEC 136) LOCATED NEAR THE PINAL CENTRAL SUBSTATION, ALL LOCATED WITHIN PINAL COUNTY, ARIZONA.	DOCKET NO. L-00000D-25-0154-00247 LS CASE NO. 247 EVIDENTIARY HEARING

At: Casa Grande, Arizona

Date: September 9, 2025

Filed: September 15, 2025

REPORTER'S TRANSCRIPT OF PROCEEDINGS

VOLUME II
(Pages 172 through 353)

GLENNIE REPORTING SERVICES, LLC
Court Reporting, Video & Videoconferencing
1555 East Orangewood Avenue, Phoenix, AZ 85020
602.266.6535 admin@glennie-reporting.com

By: Jennifer Honn, RPR
Arizona CR No. 50558

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BE IT REMEMBERED that the above-entitled and numbered matter came on regularly to be heard before the Arizona Power Plant and Transmission Line Siting Committee at Radisson Hotel Casa Grand, 777 North Pinal Avenue, Casa Grande, Arizona, commencing at 9:03 a.m. on September 9, 2025.

BEFORE: ADAM STAFFORD, Chairman

MICHAEL COMSTOCK, Arizona Corporation Commission
LEONARD DRAGO, Department of Environmental Quality
DAVID FRENCH, Arizona Department of Water Resources
NICOLE HILL, Governor's Office of Energy Policy
R. DAVID KRYDER, Agricultural Interests
SAL DICICCIO, Incorporated Cities and Towns
MARGARET "TOBY" LITTLE, PE, General Public
DOUGLAS FANT, General Public
GABRIELA SAUCEDO MERCER, General Public

APPEARANCES:

For the Applicant:

Matt Derstine
SNELL & WILMER
One East Washington Street
Suite 2700
Phoenix, Arizona 85004

and

Linda Benally
ARIZONA PUBLIC SERVICE COMPANY
400 North 5th Street
Phoenix, Arizona 85004

CHMN STAFFORD: Let's go back on the record.

Mr. Derstine, we're about to embark on our tour.

Anything you need to tell the committee before we get started?

MR. DERSTINE: Maybe just two things. One we'll do a safety minute once we're on the bus just to remind everyone of how to stay safe as we're getting on and off a bus and sometimes we're on active roadways and then how to be safe on the side of the road with our court reporter.

Beyond that, we have a handout to the members as we get on to the bus. We'll give it to you here in the room of the route tour itinerary. And then we have a map of the KOPs that are highlighted and that coincide with our tour stops.

And finally we have Member Little had requested this kind of callout sheet from that upper north. Now, that just as a reminder that area is going to be off our map, and we're not going to be driving into this area, but it sits north of what you'll see on the map and our tour area so you'll have it.

CHMN STAFFORD: All right. Thank you.

MR. DERSTINE: Witnesses, did I miss

anything? Is there anything else we need to alert the committee to before we get on the bus?

MR. PETRY: Let me remind that committee members bring with them the placemat that shows both the project corridor and the preferred route. That'll be a handy reference while we're out in the field as well.

CHMN STAFFORD: Never go on a tour without it.

All right. I would just admonish the members don't ask -- while we're on the buses, don't ask the applicant any questions or deliberate about the case. We will make several stops in which the court reporter will get set up, and it will be on the record, and we'll be able to ask any questions you have of the applicant at that time.

It's going to be warm, so I think let's try to minimize the time at the stops to get back out of the heat back into the air conditioning of the bus. So, I mean, you'll be able to come back and ask all the witnesses other questions. Let's just try to -- when we're out there in the field, just try to keep it limited to what we're looking at. If it's more general questions or things of that nature, we can ask those back here in the air conditioning.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I do have a question. The letter from RioSol that was filed in the docket a couple of days ago mentions that the corridor requested in this case overlaps RioSol's easement and that RioSol and APS are working together along Earley Road to coordinate the location of the transmission facilities.

I'm curious -- we didn't discuss this yesterday -- about how it might affect the siting of the line. I'm curious whether -- what the status of those negotiations are, if it will conceivably affect the siting of the line and I guess just kind of to find out where you stand in that area.

MR. EICH: Member Little, we didn't get into the details of that, but that is part of my testimony that I will be getting into. But the RioSol easement is limited to the Earley Road right-of-way. It's the entire limits of that right-of-way.

Our corridor extends 200 feet on both sides of that so that we did feel comfortable that there's enough allowance for us both to build our engineering, build our transmission lines through that corridor.

MEMBER LITTLE: Okay. So the likelihood of it changing the route of your line significantly seems like it's very small.

MR. EICH: Correct.

MEMBER LITTLE: If at all. Okay. All right. Perhaps you could point that out to us, kind of the area where we're talking about. You don't have to say anything. Just point.

MR. EICH: Sure.

CHMN STAFFORD: And we have -- currently we're scheduled for eight stops. I don't know if we're going to make all eight of those stops. I know I think toward the north end of the project is where it's -- it comes across both the RioSol project and also the Selma project.

There's a section where there's -- they're going to be -- because they also filed in the docket saying, hey, we're negotiating with -- working with APS to make sure that we can build all the lines.

I guess the negotiations are going pretty well because they didn't feel the need to intervene in this case and make sure that something gets put in the CEC that allows them to -- to make sure that it doesn't interfere with their project. So I think that's probably a good sign.

But that's two of the things that I want to see on the tour is where's the Selma Energy Project line going to be in relation to this project and then where's

RioSol. And they're talking about their current certificate and line, not the one that they just recently filed; correct?

MR. WILEY: Mr. Chairman, the location of this RioSol transmission project is not yet certificated, and the one they just filed is separate from the alignment that we're talking about along Earley Road.

CHMN STAFFORD: Okay. So that's because the -- because SunZia and El Sol, they got -- they split into two CECs, and so if they're talking about the existing one that they have, that's the right-of-way that they're talking about? It's not the new project that they filed that doesn't have a certificate yet?

MR. WILEY: My understanding, Mr. Chairman, and it's not either one of those, it's a future component not yet certificated for the RioSol project.

CHMN STAFFORD: And it's in addition to something that they -- a new project they just filed? I think it's line siting 250.

MR. WILEY: Yes, that's my understanding. It's separate from the one that was just filed in the last week or so.

CHMN STAFFORD: Wow. Okay. All right.

MR. WILEY: Yeah.

CHMN STAFFORD: I thought you were talking

about the existing right-of-way for the existing certificated line that has yet to be built.

MR. DERSTINE: Yeah. I think Mr. Wiley captured it that you have -- I think the case that you have upcoming with RioSol is that six-mile run that gets them into Saguaro. That -- that project and that application that the committee will hear is separate and apart from this Earley Road right-of-way, which is I think we've described it as we understand it's in their preliminary design, and that's I think they're looking at it as a new path to get into and possibly out of Pinal Central.

I can't speak for them. But that's -- I think that's the part of the reason behind that. So they have the right-of-way as Mr. Eich had mentioned. It covers its road right-of-way. I don't know what the distance is on either side of the road. We'll be on Earley Road and we can show you that run.

And then we have had one meeting with the good folks at the RioSol, and the engineers were able to discuss kind of what APS is seeking in the way of its corridor and what RioSol has in the way of its road right-of-way, and I think both parties are confident that we can accommodate each other and still build our lines in that area.

CHMN STAFFORD: Will you be able to point out where the certificated line is supposed to go? I guess because that's -- I guess they can begin construction on that sooner than this other right-of-way you're talking about that doesn't have a certificate.

MR. DERSTINE: Right.

CHMN STAFFORD: So I guess I'm curious to see how many -- because my understanding was that the RioSol was going to terminate at the Pinal Central Substation. They have another pathway they're looking at to get in there that's going to be different I'm hearing?

MR. DERSTINE: Do I have that right, Mr. Wiley?

MR. WILEY: Mr. Chairman, I believe the current project is scoped to have RioSol terminate into the APS Saguaro Substation, which is quite a ways south from the area that we'll be looking at.

There is potential that they'll add an additional connection, if you will, to the Pinal Central Substation.

CHMN STAFFORD: Okay.

MEMBER FANT: Mr. Chair.

CHMN STAFFORD: Yes, Member Fant.

MEMBER FANT: I just wanted to identify to APS that I was a contract attorney for the RioSol

project, and if that's a problem, then I'll step aside, but I wanted to make sure you were aware of that fact.

MR. DERSTINE: Okay. I appreciate it. I don't think it's a concern for this case. Thank you.

CHMN STAFFORD: All right. Any other things from members before we go off the record and get on the bus?

(No response.)

CHMN STAFFORD: Hearing none, let's recess and go on to the bus, and then we will reconvene at the first stop at the tour.

(TIME NOTED: 9:12 a.m.)

(Beginning of route tour.)

(TIME NOTED: 9:49 a.m.)

(Arrival at Stop No. 1)

CHMN STAFFORD: Let's go on the record. We are at Stop 1 of the tour.

Mr. Derstine, is -- Mr. Petry is going to be your witness for the stop?

MR. DERSTINE: I think for the stop Mr. Petry is going to be there, and there may be some support from Mr. Eich. They'll tag team it.

CHMN STAFFORD: All right. So we see the Orsted solar project to the west of us, and then over

east and to the north we see the Pinal Central Substation; correct?

MR. PETRY: That is correct. Yeah.

We are at KOP-1 -- I'm sorry, tour route Stop 1 at the intersection of Eleven Mile Corner Road, which runs north to south at this location and roughly the alignment of Earley Road. We've had some discussion around the Earley Road road alignment. That basically runs due east of us here where you would see the Earley Road alignment.

Also at this location we see as the Chairman pointed out the Orsted solar and battery storage project here to the west. We see the Pinal County Fairgrounds to our north. You can't quite see those facilities from here, but if you look to the north, north of the palm tree, that's the cell tower that looks like a palm tree, the Pinal County Fairgrounds are going to be located right to the north there.

We also have the SunZia converter station which is slightly visible from here beyond the Pinal Central Substation. We'll be able to see that a little more on our next route stop, but one of the most prominent features, of course, that you see here is the Pinal Central Substation, right?

From our location now if you look to the

northeast, that is the Pinal Central Substation and the affiliated transmission infrastructure around it. Along Eleven Mile Corner Road running north to south we also see much of that existing transmission structure that includes distribution lines, high voltage transmission lines, and other various infrastructure as well.

One of the things I wanted to point out too is some of the infrastructure that comes from the Orsted solar project and connects into Pinal Central we see some of the newer structures, transmission line structures from that project basically due north and east from here as well.

We can't quite see it very well, but, Member Little, you had a question around yesterday a canal that runs -- ran through this area. And that canal route runs through this vegetated area right here due west of us. The canal is somewhat circuitous as it runs through this area, but it does extend south of the Pinal Central Substation and to the west of us here at that location.

The other thing I'd like to point out is the residence that we had some discussion about yesterday. This is the residence that we've identified that will have a high visual impact, probably the biggest visual impact in the whole project. And that residence

is located to our east right here. It's the white structure you see due east of us here.

The structure as shown in the photo simulation completed from this location or if from that residence would be roughly as we indicated 150 or so feet to the south of that residence, so roughly aligned with the distribution infrastructure you see to our east here.

I'd like to point out also we have those visual simulations in the packets that have been provided to you today. So there are a couple other simulations that have been completed from near this location that I think are relevant for us to look at. The first one, of course, would be KOP-17, which is the view from the residence there. The second would be KOP-9, which is a view along Eleven Mile Corner Road from slightly south of us here looking south. And it illustrates what the project would look like from that travel route here. Those are in your packets if you care to take a look at them.

We also have a view from KOP-10, which is another residential view, a photo taken looking to the north from the residential development that is to our east southeast of us here. I think that might be the development you were asking about yesterday, Member Little. So KOP-10 is included there as well.

Just relevant materials to look at that correspond to this location.

CHMN STAFFORD: I have a quick question. The Selma Energy Project line, where will that be in relation to where we are now?

MR. PETRY: That would be further east of us.

CHMN STAFFORD: Okay.

MR. PETRY: We'll be able to see that location at Stop 2.

CHMN STAFFORD: Okay.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: What is this substation?

MR. PETRY: That is the substation affiliated with Orsted's solar project, that is their project substation.

MEMBER LITTLE: Is it ED-2?

MR. PETRY: That's a good question, Member Little.

MEMBER LITTLE: Probably.

MR. WILEY: Member Little, that's a project or the substation is associated with the project itself, not ED-2.

MEMBER LITTLE: So it's owned by Orsted?

MR. WILEY: That's correct.

MEMBER LITTLE: Okay. And what about the substation that we passed coming in further south?

MR. WILEY: I'm sorry, what was the question, Member Little?

MEMBER LITTLE: The substation that we passed coming in from the south.

MEMBER HILL: On Selma Highway.

MR. WILEY: Member Little, I believe that was with another solar plant, so their electric substation.

MEMBER LITTLE: Thank you.

MR. PETRY: Another thing I'd like to point out is as coordinated with the Chairman prior to this hearing we had notification signs placed throughout the project area, 13 of them, in fact. One of those signs is located right here to our east southeast on the west side of Eleven Mile Corner Road here.

CHMN STAFFORD: Anything further?

MR. EICH: One other point. We are in the alignment of the Earley Road where the RioSol easement that we were talking about was located. The RioSol easement does not come this far forward, though. It ends further east as it goes directly north into the Pinal Central Substation, so it would not continue this

distance here.

MR. DERSTINE: So for purposes of the record, though, what we're looking at is -- Earley Road is not a road, correct, at the time you had just an anticipated alignment that where our line will go and where the RioSol line will follow as well?

MR. EICH: At this portion of the project it is just the alignment that we can see here. Further east it is an actual developed road.

CHMN STAFFORD: And we'll see that at Stop 2?

MR. PETRY: We'll be south of the Earley Road alignment at Stop 2, so we'll be able to see a view to the north of the SunZia converter station, Pinal Central, as well as where that Earley Road alignment and that RioSol right-of-way would be located.

CHMN STAFFORD: Okay.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Yes, Member Comstock.

MEMBER COMSTOCK: There are a number of utilities out here. It looks like a single point of failure would cause a domino effect to cause failure to a lot of lines. Are you guys -- is APS confident that you have enough buffer in your design to avoid a single point of failure for bringing yours down?

MR. WILEY: Member Comstock, our project is not connecting into the infrastructure associated with Pinal Central Substation, and there is no single point of failure that will take out our infrastructure that we see on this location.

MEMBER COMSTOCK: So you don't think a large monsoon storm coming in here -- so you don't think a single pole failure would cause a problem to your current alignment if a hard storm came in and blew it down and started knocking the poles down?

MR. WILEY: No.

MEMBER COMSTOCK: I see a lot of wood poles out here.

CHMN STAFFORD: Well, the wood poles, aren't those the distribution lines? They're not part of the transmission system at all, are they?

MEMBER COMSTOCK: No. I get it, but I'm just saying that one wood pole starts to fail there tends to be a domino effect that goes with that, so I was just curious if the design brings you far enough away from that kind of failure.

MR. EICH: Member Comstock, one thing I will note where we are proposing to build the line would be on this side of the road heading south from our connection to the future Sundance to Pinal Central line,

which is just south of that building you see left of that palm tree.

So the line would come this way. This is a distribution line that we are working and coordinating with ED-2 to underground that line as well as working with them to underbuild our 69 -- their 69kV line through here.

But those wooden poles are distribution owned by another utility.

MEMBER COMSTOCK: Understood.

MR. EICH: And all our poles for this project would be very robust steel poles.

MEMBER COMSTOCK: Thank you.

MR. EICH: If I might add one more thing, and I know it's hot and I apologize, but as we head south moving on to the next stop, you'll notice some of the homes on the right and left that do cause some constrictions in this area, limits to where lines could go on the west side or the west side of the road there's several homes right up to the right-of-way.

And then on the east side there are multiple transmission lines that restrict us even to continue south with our line here along Earley Road. I'm sorry, let me correct that, Eleven Mile Corner Road and utilizing Earley Road instead.

CHMN STAFFORD: All right. Any other questions from members?

(No response.)

CHMN STAFFORD: All right. Let's go off the record and get back on the bus.

(TIME NOTED: 9:59 a.m.)

(Conclusion of Stop No. 1.)

(TIME NOTED: 10:09 a.m.)

(Arrival at Stop No. 2.)

CHMN STAFFORD: Let's go back on the record. We are at Stop Number 2. Correct me if I'm wrong, but it looks like we are in the corner of La Palma Road and Selma Highway; is that correct?

MR. PETRY: That is correct.

CHMN STAFFORD: So can you -- I see the sign across the street. So the preferred route would go north from Selma up along La Palma; correct?

MR. PETRY: That's correct.

CHMN STAFFORD: Okay. So I guess would you be on the east side of the street and they'd be -- where those distribution lines are, can you tell us about that?

MR. EICH: So the alignment of the preferred route, Mr. Chairman, it would be on the east side of La Palma Road. It would then head west on the

north side of Selma Highway initially -- I'm sorry. Thank you, Mr. Petry. It would head east on the north side of Selma Highway initially. It would jog to the south side at a point that we are working with Selma solar at that location as well as Saint Holdings on that location where it would jog approximately a mile or so and then continue on the south side of Selma Highway as we proceed east.

I will note we are standing on the Selma Energy solar location that extends a mile to the south, and it continues to the west just before you get to those cluster of homes.

CHMN STAFFORD: Okay. So both this area here to the -- what is this, the southeast corner of the intersection section we're at and the southwest that's all going to be Selma solar?

MR. EICH: It's all owned by Selma solar.

CHMN STAFFORD: Okay. So their gen-tie line, where is that going to be located, coming from -- it's going to be down at the other end of the field to the east of us?

MR. EICH: Correct. Their gen-tie line is roughly a half mile to a mile just on the south side of Selma Highway. Once we pass the gen-tie or the substation for Selma solar, that's where we would cross

to the south side of Selma Highway.

MEMBER KRYDER: Oh, I see.

CHMN STAFFORD: And they'll -- and they'll be coming -- their gen-tie will come west on Selma on the south side?

MR. EICH: Yes, it will head west and east on the south side of Selma, and then head north on I believe that's Highway 87.

CHMN STAFFORD: Okay. And then they head west again to tie into -- are they tying into the Pinal Central?

MR. EICH: I don't believe they are. I believe they're connecting to a substation further to the northeast.

CHMN STAFFORD: Okay.

MEMBER FANT: SRP?

CHMN STAFFORD: Is it an SRP one that they're tying into?

Now you said we should be able to see the SunZia converter station from here.

MR. PETRY: Yes. And it's blocked by a few bales of hay at this point, but if we look to the northwest from this location through these hay-holding structures, you can see some of the transmission infrastructure that runs east to west through this area.

And slightly west of there is where the SunZia converter station is. It's west of Pinal Central. And as we were driving from route tour Stop 1 to route tour Stop 2 as we were coming along Selma Highway if you looked to the north, you would have seen the SunZia converter station there as well.

CHMN STAFFORD: Okay. And where is the easement that El Sol was mentioning in their letter?

Is that space where that easement is can we see it from here?

MR. PETRY: You can't quite see it from here. That easement is roughly located to the south of and east of Pinal Central Substation, so, again, it runs along the Earley Road alignment and then extends to the north due south of Pinal Central Substation.

So across this area running along Earley Road alignment heading west and then south of Pinal Central go directly north into Pinal Central Substation.

CHMN STAFFORD: Okay. And I guess I can ask follow-up questions back at the hearing room.

Is there any other questions from members about what we're looking at?

MEMBER HILL: Yes.

CHMN STAFFORD: Member Hill.

MEMBER HILL: So the Selma Energy Project,

so you have a wider corridor through here to negotiate that with Selma Energy.

Does the Selma Energy Project take up all of the land in this corridor area or just part of it?

MR. EICH: They take up most of it.

MEMBER HILL: Okay.

MR. EICH: The first or the easterly most portion of that on this map. The --

MR. PETRY: It's our KOP map.

MR. EICH: -- KOP map --

MR. PETRY: Exhibit E-1.

MR. EICH: -- is the area in the -- I guess the white area is owned by Saint Holdings.

MEMBER HILL: Okay.

MR. EICH: And Saint Holdings and Selma solar are both on board with the corridor that we're proposing.

MEMBER HILL: Okay. So my recollection in the meeting yesterday when we were doing the flyover was that I called it a KPI but it's a KOP-18, there was what appeared to maybe be a residence in the bottom portion of this.

And my question is how if we wanted to make sure this residence was outside of that corridor area and wanted to push that line just a little further north to

avoid and back off from that residence, how does that constrain your project, I guess?

Because I was thinking that we might want to keep it at least 150 feet off of that residence basically.

MR. PETRY: Member, we received some further information on that.

MEMBER HILL: Okay. Good.

MR. PETRY: In response to the question that Member Little had yesterday with regard to that residential area in the southeastern portion of the corridor where it's at the 2800-foot width, as I tried to state in my testimony and didn't do a very good job of, we have coordinated with the landowners in that area.

That Saint Holdings and Pinal Land Holdings, essentially the same entity, they own all of that.

MEMBER HILL: Okay.

MR. PETRY: It's being farmed. The residences that are there today are intermittently occupied by farm workers who come occasionally to work on the land.

And so when that area is developed into an industrial use in the future, which is -- it is planned for, those residences would no longer be there.

MEMBER HILL: Okay. All right. That's helpful. Thank you.

MEMBER LITTLE: Thank you. That was very helpful.

CHMN STAFFORD: All right. Any other questions from members?

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I just -- that big huge mansion that's being built that we passed as we were coming along on the north side of this Selma Highway, that is a residence of the people that were very verbal expressing their dissatisfaction with the original route.

MR. PETRY: That is correct.

MEMBER LITTLE: And for whom you rerouted or in part for whom you rerouted the preferred route.

CHMN STAFFORD: And they remain in opposition to alternative Subroute A; correct?

MR. PETRY: As far as we understand, yes.

CHMN STAFFORD: That was -- that was their issue, and that's why it's no longer the preferred route?

MR. PETRY: Correct. That's one of the reasons.

CHMN STAFFORD: All right. Now we have, let's see, six more stops on the tour.

Members, do we feel like we need to make all six stops or are there any particular -- I guess the next issue should we go to Stop 3 or should we move on to, like, a different stop?

MEMBER HILL: Mr. Chair, I don't care to see anything until we get down to the railroad crossing, which is the area that I'd kind of like to look at and then the Milligan Substation.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes.

MEMBER LITTLE: I would like to stop at Stop 4, the future SunZia.

CHMN STAFFORD: All right. Okay. So no takers for Stop 3?

All right. That sounds excellent.

So we will -- the next stop will be Stop 4. Let's go off the record and get back on the bus.

(TIME NOTED: 10:18 a.m.)

(Conclusion of Stop No. 2.)

(TIME NOTED: 10:31 a.m.)

(Arrival at Stop No. 4.)

CHMN STAFFORD: Let's go back on the record. We're now at Stop Number 4 having foregone Stop 3.

Mr. Petry, this is the -- somewhere in this vicinity is where the substation would be and someplace along here where the new highway will be; correct?

MR. PETRY: That is correct.

Mr. Chairman, we are at route Stop 4, as you indicated, at the intersection of Vail Road, which runs north to south, and East Arica Road, which runs east to west.

We're very near the location of the anticipated future TS-25 Substation, which generally would be located to the east northeast of us from this location here.

We are also within the area we've spoken somewhat about, the IPAZ area, the Inland Port Arizona, that future industrial development area. This is that swath. That swath of future industrial development generally runs from Hannah Road about mile to our north to Houser Road, which is about 2 miles to the south. That official general IPAZ area but with additional industrial and employment development to the north and south of that as well.

And as you indicated, Mr. Chairman, this is also the location of that future ADOT north/south freeway. We were within along the Vail Road alignment here, that 1500-foot north/south freeway corridor that

would eventually be narrowed down to about a 400-foot width.

CHMN STAFFORD: And your requested corridor for that project is 1700 feet; correct?

MR. PETRY: Yes.

CHMN STAFFORD: And it overlaps that 1500 feet.

MR. PETRY: That is correct. With an additional -- additional coverage on either side, east and west.

CHMN STAFFORD: And that industrial development, is that going to extend east of here as well?

MR. PETRY: It will go some distance east of here. We don't know the total future limits of how far east it might go, but this whole area sort of centered along the Vail Road alignment is anticipated for that future industrial development.

CHMN STAFFORD: Okay. And then who will supply electricity to that development?

Would it be APS or would it be one of the district?

MR. EICH: My understanding, Mr. Chairman, is that that is going to be an APS substation to supply energy for the immediate area around including the IPAZ

area.

CHMN STAFFORD: Okay. Any other questions from members?

MEMBER KRYDER: I have some follow-up.

MEMBER LITTLE: Yes, Mr. Chairman.

CHMN STAFFORD: Yeah. I've got Member Kryder and then Member Little.

MEMBER KRYDER: Just a follow-up to that, the industrial park does not have their own connection to the solar farms or anything like that; is that correct?

MR. PETRY: My understanding is that they do not.

MEMBER KRYDER: Okay. So they would be buying it through APS where we all get it?

MR. PETRY: Per Mr. Eich's testimony that is also my understanding.

MEMBER KRYDER: Okay. Thank you.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Member Little.

MEMBER LITTLE: Should this industrial area not develop, would the substation then not be built?

MR. WILEY: Member Little, I can answer that question.

If the industrial development did not take place, there would need to be some other driver for that

project to commence, and the driver for that TS-25 Substation could be other load growth that's different from the industrial center that we've been discussing or potentially future resource interconnections to the transmission system.

MEMBER LITTLE: Thank you.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: David, do you know the approximate acreage or whatever of the industrial development back of the envelope?

MR. PETRY: Member Kryder, I believe I can answer that. We understand that's about a 1600-acre development roughly.

MEMBER KRYDER: 1600. Okay. So that would be about three square miles?

MR. PETRY: A pretty large area.

MEMBER KRYDER: Yeah. Okay.

MEMBER MERCER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Mercer.

MEMBER MERCER: Yes. I just want to understand this green area that is where -- I'm just asking about this area that is where the green line on our placemat.

CHMN STAFFORD: You're referring to APS 1,

Figure 1; correct? Oh, no, you're looking at the APS-2B.

MEMBER MERCER: So those are the transmission lines, the 115kV.

MR. PETRY: That is correct.

MEMBER MERCER: So --

MR. PETRY: Those are north of us at this location. We are on Arica Road. As indicated on APS-2B we're within a future TS-25 Substation siting area along Arica Road.

And so the 115-kilovolt transmission lines that you're referring to are to about a mile north of us. We can barely make those structures out -- well, you can definitely make those structures out a mile north of us running east to west.

CHMN STAFFORD: Any other questions from members?

Oh, Mr. Petry, do you have something to add?

MR. PETRY: Mr. Chairman, I have something else to add.

The first thing I wanted to mention is that if you look to the south from here, you can see the Lucid Coolidge manufacturing facility, one of the existing industrial operations that we see out here, one of the earlier industrial operations within this general area.

We also have the Arica 69kV substation west of us here two miles to the west of this location as well.

And then on our way here you may have seen the prison that we passed as well. It's to the northwest of us in this location.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: Does anybody know what that fenced off area is immediately to the west of us?

It's green on the inside and not on the outside and well fenced but nothing inside of it.

MR. PETRY: We do not know what that is. It seems to be an ex-closure of some sort to prevent something from getting in, but we are not certain about what that is.

CHMN STAFFORD: All right. Any other questions from members?

(No response.)

CHMN STAFFORD: All right. We have four more stops. Do we need to stop at all of them or do we want to skip some?

MEMBER HILL: I was willing to skip to 6 and just look at the railroad crossing there.

CHMN STAFFORD: All right. Is that

agreeable to everyone?

MEMBER LITTLE: That's good with me, yes.

CHMN STAFFORD: I'm seeing nods.

All right. We will skip Stop 5 and proceed to Stop Number 6. Let's go off the record and get on the bus.

(TIME NOTED: 10:37 a.m.)

(Conclusion of Stop No. 4.)

(TIME NOTED: 10:54 a.m.)

(Arrival at Stop No. 6.)

CHMN STAFFORD: Let's get back on the record. We are now at Stop 6.

Mr. Petry, can you let us know what we're looking at?

MR. PETRY: Yes. So, Mr. Chairman, as you indicated we are at route Stop 6. We are at the intersection of North La Palma Road, which runs north and south at this location and East Frontier Street or Casa Grande-Picacho Highway, which runs generally from northwest to southeast intersecting with North La Palma Road here.

We're at the location where the preferred route would travel south along La Palma Road. We would, from this location, see the preferred route on the west

side of La Palma Road, and it would travel south crossing over Frontier Street or Casa Grande Highway as well as the Union Pacific Railroad at this location. It would then extend further and cross over Interstate 10 from this location.

We're also very close by to where alternative Subroute B would extend west off of La Palma Road. That extension or alternative Subroute B would be located on the other side of the Casa Grande-Picacho Highway, the other side of the railroad, and then would extend west from this location.

Some things we wanted to point out here include, of course, the highway and railroad crossing to the south. We have residences here right to our east. And, again, the transmission lines proposed on the west side of the road on the west side of the existing distribution lines at this location.

CHMN STAFFORD: Now, would these distribution lines be undergrounded as part of installing the transmission line or would they stay where they are?

MR. WILEY: Mr. Chairman, I think the plan would be to leave the distribution lines where they are and build the 230 lines west of the distribution line.

CHMN STAFFORD: Okay. Thank you.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: So these transmission lines would not be put on the 230 poles? These are not the ones that would go on the poles? Okay.

CHMN STAFFORD: Yeah, these are like --

MEMBER KRYDER: I see Steve shaking his head.

MR. EICH: No. No, they won't. As Mr. Wiley said and I think it's reflected in the KOP, the poles would be further west of this distribution line.

MEMBER KRYDER: Okay.

CHMN STAFFORD: Now, are these distribution lines owned by the electrical district or are they APS's?

MR. WILEY: Mr. Chairman, I am unsure. I can go look at a pole and find out for you.

CHMN STAFFORD: Okay. And I have a question: What is this facility to our southwest that we're looking at?

MR. PETRY: That is the Gold Bond manufacturing facility.

CHMN STAFFORD: What do they make?

MR. PETRY: Powder.

CHMN STAFFORD: Powder.

MR. PETRY: Gold Bond powder, talcum powder.

MEMBER COMSTOCK: If it gets much hotter, we may have to stop.

CHMN STAFFORD: Doesn't that stuff cause cancer?

MEMBER HILL: We don't deal with misinformation here. Just facts.

Okay. I have a question about the railroad crossing. I know you've been working with DOT on right-of-way alignment and things like that.

How has the railroad crossing been negotiated or has it already been negotiated?

MR. EICH: The railroad crossing has not been negotiated at this time. We are still identifying locations exactly where our poles would go. We're still evaluating that.

But one of the reasons for the updated corridor, which I'll speak to later, was regarding the crossing. Some agencies do require a perpendicular crossing. We have had angled crossings with this railroad on past projects, so we believe it can still be at an angle. But in case it can't, that's why we are proposing extending at least to the north side of the railroad a ways to install one pole should they require it to be a perpendicular crossing before we jump to the west side of La Palma Road.

MEMBER HILL: But you have no reason to think the railroad won't give you permission?

MR. EICH: No.

MEMBER HILL: Okay.

CHMN STAFFORD: And then further south you'll also cross the I-10?

MR. PETRY: Yes.

CHMN STAFFORD: The preferred route. And then that was one of the distinctions you made between alternative Subroute B and the preferred route is the perpendicular crossing of the I-10 as opposed to an angular crossing with the alternate; correct?

MR. EICH: Correct. And not only the angle at which we cross, but generally speaking the preferred route does not have an existing overpass of the I-10 on any intersections at this location whereas the Subroute B has the Sunshine Boulevard overpass which creates concerns with ADOT sometimes regarding the road shutdowns and things of that nature during construction. So they typically prefer less busy areas such as this alignment.

CHMN STAFFORD: And I seem to recall testimony that the -- that the intersection of the -- was it the road -- which road is that? Is it Milligan Road and I-10, they're going to expand that intersection with an off ramp or something?

MR. EICH: Yes. There is an I-10 interchange at Milligan Road, so Milligan Road itself would have to be realigned is our understanding as they have explained to us.

CHMN STAFFORD: Now, does ADOT cover those costs, or are you expected to pay for that, putting the line in?

MR. EICH: My understanding is if we're in an easement at the time, that would likely be typically required by the other agency to do that. But if it's within their road right-of-way, it would be a cost to us.

CHMN STAFFORD: Any other questions from members?

(No response.)

CHMN STAFFORD: All right. We have two more stops. Do we -- is there any interest in stopping at either of those or do we conclude the tour early?

MEMBER LITTLE: Mr. Chairman.

MEMBER MERCER: Potty break?

CHMN STAFFORD: Oh, yes, that's another option is a restroom stop. I believe that's available too.

MEMBER LITTLE: I would like to stop at the Milligan Substation.

MEMBER HILL: Me too.

CHMN STAFFORD: Number 8?

MEMBER LITTLE: Yes.

CHMN STAFFORD: I think en route to there there is a -- there's a restroom available between here and there.

MR. EICH: Yes. We will stop at a restroom on the way.

CHMN STAFFORD: Okay. All right. So we will bypass Stop 7. We will make a pit stop and then proceed to Stop Number 8.

All right. We can go off the record and get back on the bus.

(TIME NOTED: 11:01 a.m.)

(Conclusion of Stop No. 6.)

(TIME NOTED: 11:28 a.m.)

(Arrival at Stop No. 8.)

CHMN STAFFORD: Let's go back on the record.

Mr. Petry, we are at the Milligan Substation. I presume.

MR. PETRY: That is correct, Mr. Chairman. We are at route Stop 8. We're at the intersection of Eleven Mile Corner Road, which runs north to south to our west at this location right south of Milligan Substation.

A couple things we wanted to point out here. First of all, of course, would be the Milligan Substation itself. This would be the point of interconnection of the project on the southern end.

We also wanted to point out we have had some discussion around the route alternatives. We have Subroute alternative B that would extend along Milligan Road east to west to our north from this location.

If we look further to our east on the east side of the Milligan Substation, that's generally the area as we move further east towards Interstate 10 where that future 400-unit mixed-use development will be located. It's also the location where Milligan Road would be redeveloped and the interchange with Interstate 10 would likely be redeveloped at some point in the future.

We do have a key observation point located very near to this route tour stop as well. That would be KOP-16. We show a simulation that showed where the proposed transmission line would run from the south heading north into the southern portion of the Milligan Substation here.

That represents what we would consider a low impact to visual -- to viewers from this location.

We also want to point out some of the

existing transmission infrastructure. And this was part of the reason this location north and south along Eleven Mile Corner Road was identified as a great opportunity because of all of the existing infrastructure within this general corridor, right? We see much both distribution voltage and transmission voltage transmission infrastructure within this area.

And the line itself would be located to the east of these existing facilities you see here today.

MR. EICH: And I'm going to speak to it later regarding the corridor. The corridor is entirely on the east side. It is rather wide through here, but that is to make sure it extends beyond these existing transmission infrastructure here.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: Do we know who owns these lines?

MEMBER KRYDER: State the question again, please.

MEMBER LITTLE: Who owns these two lines.

MEMBER KRYDER: Oh, okay.

MEMBER LITTLE: Two transmission lines.

MR. WILEY: Member Little, I believe there's a mixture of owners out here, including APS,

WAPA, and I believe ED-4 as well.

MEMBER LITTLE: Thank you.

MR. PETRY: One other point to add, Member Little, I believe -- well, I apologize. I believe it is you who had a question yesterday around the development east of Milligan Substation.

MEMBER LITTLE: Yes.

MR. PETRY: We indicated it's a track like a motorcycle or a BMX track. And that's what some of the seating -- the stadium seating and fencing you see to our east here I believe is affiliated with that track. It is no longer in use unfortunately, but it looks like a lot of fun.

MEMBER LITTLE: Thank you.

MEMBER HILL: When we came in, it looked like there was a smaller substation over there.

Is that a WAPA substation or is it part of this complex?

MR. WILEY: I believe that's an ED-4 substation.

MEMBER HILL: Oh, ED-4 substation.

Okay. Do you have to -- do you have to expand the footprint of the substation to accommodate this new transmission or will all of it be handled within the current footprint of the substation?

MR. WILEY: The connection for the line will be within the existing footprint of the substation.

MEMBER HILL: Okay. It's a lovely terminus.

MEMBER LITTLE: It is. It's a very nice substation.

CHMN STAFFORD: Any other questions from members?

(No response.)

CHMN STAFFORD: All right. Well, this is our final stop. I guess the next time we go on the record we will be back in the hearing room. Let's go off the record and get on the bus.

(TIME NOTED: 11:33 a.m.)

(Conclusion of Stop No. 8.)

(The tour concluded at 12:12 p.m.)

(The hearing resumed at 12:12 p.m.)

CHMN STAFFORD: Let's go back on the record.

We are back in the hearing room. We have completed our tour. It is almost a quarter after noon, so I think now would be the appropriate time to break for lunch. So we will stand in recess until we reconvene at 1:30. We're in recess.

(Recess from 12:12 p.m. to 1:34 p.m.)

CHMN STAFFORD: Let's go back on the record.

Mr. Derstine, are you prepared to proceed with your direct case?

MR. DERSTINE: We are. Thank you.

I guess as a first order of business was there any interest in having Mr. Petry do a quick run-through of the flyover? Sometimes we've done that. Sometimes the committee would like to reinforce what they saw on a route tour with the flyover, or is everyone --

CHMN STAFFORD: I think we're good.

MR. DERSTINE: You've seen enough? Got it.

CHMN STAFFORD: We've seen enough. Yes.

MR. DERSTINE: Okay. Very good.

DIRECT EXAMINATION (continued)

BY MR. DERSTINE:

Q. All right. Mr. Eich, we are back to you. It wasn't that long ago, but I was trying to remind myself where you and I left off.

We went through the preliminary siting process. We went through the route development phase of the project and how we got to the preferred route. And the fact of the two Subroute A and Subroute B being kind of

artifacts of what was our original preliminary preferred that based on feedback that we received from landowners at those -- at the northern and southern location we made adjustments moving off of those subroutes to create the preferred route that's presented to the committee.

Do you want to just touch on some of the key characteristics or features of the preferred route in terms of length and land ownership, et cetera?

A. (Mr. Eich) Sure. So the preferred route, the total length of the preferred route is approximately 20 miles. Approximately 88 percent of that would be within private land. About 9 percent would cross state land, and the remaining 3 percent would be for lateral crossings, roads, and irrigation canals.

The preferred route meets the connection needs for the future TS-25 Substation as well and is supported by the cities of Coolidge, Eloy, Pinal County, the Arizona Department of Transportation and major landowners.

MEMBER HILL: Mr. Chair.

CHMN STAFFORD: Yes, Member Hill.

MEMBER HILL: I was looking through the application. Often we get letters of support when a government body support -- like, I think we had project in SRP territory, and the City of Phoenix sent a letter

of support for the preferred route.

I'm just curious did -- I didn't see a application. I also don't read every single page. I don't have capacity for that. But I was wondering if anyone had submitted that. I take you at your word that absence of intervening is attested approval, but I was just wondering if you had any of those.

MR. EICH: Yes, Member Hill. As far as official letters of support, we've received a couple but not from the jurisdictions, the cities and the county.

MEMBER HILL: Okay.

MR. EICH: But they did provide comment, written comments and e-mails.

MEMBER HILL: Okay.

MR. EICH: That the summary of those comments or actually the word-for-word of those comments are found in one of our exhibits.

CHMN STAFFORD: I'd be guessing Exhibit J.

MEMBER HILL: The spreadsheet.

MR. EICH: It's in Exhibit J as well.

MEMBER HILL: Okay. Got it. All right. Thanks.

MR. DERSTINE: And I guess on that point we had public comment from the City of Eloy last night during our public comment section where they -- wasn't

that the representative of City of Eloy or do I have that wrong? He was not or he was?

CHMN STAFFORD: I believe he was a developer.

MR. EICH: Yes, Mr. Chairman, that was a developer for that area along Milligan Road.

MR. DERSTINE: Okay. I missed it when he introduced himself.

BY MR. DERSTINE:

Q. So that's the developer who is at the southern end indicating their support for the preferred route and not adopting Subroute B?

A. (Mr. Eich) Correct.

Q. Thank you.

A. (Mr. Eich) Would you like me to continue --

Q. Did you want to do the callouts for the -- I see Subroute A and Subroute B?

A. (Mr. Eich) Yes. Again, alternative Subroute A is the orange and black dashed line in the north, and that would cross approximately two miles primarily along private and state lands. It would display some portion of the preferred route that is similar in distance and has previously mentioned it did bring forth concerns from nearby landowners when originally when presented as part of the preferred route. I think we've talked quite a bit

about those concerns, but that did through impacts to the solar development as well as proximity to the new home being built.

Alternative Subroute B is the black and red dashed line near the south end of the project. Again, that's along Milligan Road. It is also two miles. It would cross primarily private land. It would decrease the preferred route by about two miles; however, as previously mentioned, this alignment did bring forth concerns when originally presented as a preferred route regarding the planned residential development and mixed use area as well as the interchange for Milligan Road at the I-10.

Q. I think the committee has heard it, but do you want to reemphasize why you believe the preferred route is the best preferred route for this project?

A. (Mr. Eich) Yes. Again, we believe that the preferred route is the best alternative because it maximizes the place of employment of the line and locations of planned and linear facilities or industrial areas such as the north/south ADOT freeway that is being planned along Vail Road as well as IPAZ corridor.

It also minimizes impacts to the existing residential and other sensitive areas and planned development sites as recently described with Selma Solar,

the Pinal holdings locations, and the residential areas out there.

It also follows the alignment supported by the public and stakeholders such as the City of Coolidge, City of Eloy, Pinal County, and ADOT.

CHMN STAFFORD: I had a quick question. You mentioned it crosses a canal.

Which canal does it cross and who has to issue the permit for that?

MR. EICH: Mr. Petry might be able to speak to that better.

MR. PETRY: Mr. Chairman, we cross numerous canals throughout the project route. Most of those are under the ownership of either San Carlos Irrigation and Drainage District or Central Arizona Irrigation and Drainage District. And San Carlos Irrigation and Drainage District they would be under the jurisdiction of the Bureau of Indian Affairs San Carlos Irrigation Project whereas Central Arizona Irrigation and Drainage Project -- or irrigation and drainage district, excuse me, would be under the jurisdiction of the Bureau of Reclamation.

And so I mentioned yesterday some of the other permits that might be required related to those canal crossings. Those canal crossing permits would be

issued by those two agencies that I mentioned.

CHMN STAFFORD: All right. Now are those permits required to be signed off by the director of the -- I seem to recall there was an order that came out from the Department of the Interior that a lot of these -- a lot of approvals have to get approved by the director, not by the supervisor of the agency.

MR. PETRY: At a staff level?

CHMN STAFFORD: Right.

MR. PETRY: So these are crossings that are typically handled and processed as what's called a categorical exclusion under the NEPA process. They're an action or a class of action that is identified as not impactful and can be permitted through the NEPA process and categorically excluded from a full analysis.

And so the process we've seen to date in terms of these canal crossing permits don't require any sort of Department of Interior director signature. They're often and typically handled really at a local level based on the anticipated lack of impact associated with those actions.

CHMN STAFFORD: All right. And I guess you're waiting to have the route established before you approach them about the permits, then?

MR. PETRY: That is correct. Typically

that permitting process requires some detailed design in order to understand what the potential requirements might be. There's -- you want to make sure you're not impacting any of those canal facilities. There are certain distances that need to be set to ensure the clearance is required for their ongoing maintenance of those facilities, et cetera. So typically we want to have a fairly advanced design before that permitting can be finalized.

CHMN STAFFORD: Okay. I just want to make sure not getting held up for unfounded reasons.

MR. PETRY: That's right.

CHMN STAFFORD: Thank you.

BY MR. DERSTINE:

Q. All right. We've covered the preferred route. I think it's probably a -- based on your slide you want to talk about the corridor that you're going to use to final placement and siting over the preferred route and then touch on the right-of-way that you're going to request for the final construction of the line; right?

A. (Mr. Eich) That's correct. Now, in describing the corridor, what I'll do is first provide a basic corridor description. As I give that description, there will be some wider areas. I think we've already talked about many of those areas, so may not have as many

questions today, but I will kind of touch on why they are wider. And then also talk a little more about the El Sol -- or the RioSol easement that we've talked about as well and then provide details around the corridor update that we -- that we made to the corridor shortly after filing the application.

Again, referring you to the map on the left screen, the left side of the screen shows the entire corridor shaded or hatched in blue from north to south. And I'm going to begin in the north. And essentially what we've done is just instead of seeing the preferred route you now see the corridor in the same location.

CHMN STAFFORD: This is Slide 73 of APS-6; correct?

MR. EICH: Thank you, yes.

CHMN STAFFORD: Okay.

MR. EICH: There are some leaders with numbers. Those are distance or widths to those sections of the corridor as I give my narration.

So starting at the southwest corner of Eleven Mile Corner Road and Hackler Lane where we connect to our future Sundance to Pinal Central transmission line the corridor begins at 200 feet wide entirely on the west side of Eleven Mile Corner Road as it heads south about a quarter of a mile to the Earley lane alignment. This is,

again, where we had our first stop this morning on the tour.

The corridor widens to 400 feet as it heads east, and that would be 200 feet on both sides of the Earley Road center line, and it would head east about two miles to La Palma Road. La Palma Road it would then turn south maintaining that 400 width, 200 feet on both sides of La Palma Road heading south for about a mile to Selma Highway.

At Selma Highway the corridor would then widen to 2800 feet, and that would be 200 feet on the north side and about 2,550 feet on the south side of Selma Highway. Again, this is one of those wider areas we've had discussions about where the Selma Solar facility would be located.

We would then head east approximately one and a quarter miles to the Union Pacific Railroad. At which point the corridor would then narrow to 400 feet entirely on the south idea of Selma Highway where it would continue east about three-quarters of a mile to the Vail Road alignment.

At that Vail Road alignment the corridor would widen to 1700 feet. Again, this is the same alignment as the ADOT north/south freeway that they plan to build where they already have that 1500-foot-wide

corridor in which to build that highway. The purpose for that 1700 feet is to ensure we have that same area to work with them on as well as 100 feet on both sides of that corridor.

We would then head south along the Vail Road alignment at that same width for seven miles to Alsdorf Road. At Alsdorf Road the corridor would then narrow to 400 feet, 200 feet on both sides of Alsdorf Road.

We would then head west about two miles to La Palma Road where the corridor would slightly narrow to 350 feet, and that would entirely be on the west side of Alsdorf Road as we head south to a point.

CHMN STAFFORD: You mean the west side of La Palma?

MR. EICH: I'm sorry. Yes.

CHMN STAFFORD: Okay.

MR. EICH: Thank you, Mr. Chairman.

West side of La Palma Road. Sometimes I get going and I forget where I am. It would head south about just over a half mile about .68 miles, I believe, to a point on the north side of the railroad tracks and that Frontier Street where the corridor would then widen to 700 feet, which is 350 feet on both sides of La Palma Road.

Again, briefly touched on the reasons for that, but I'll explain further here shortly.

We would then continue south for about 1.32 miles to Phillips Road crossing both the Union Pacific Railroad and the I-10 in the process.

The corridor would then narrow to 500 feet at Phillips Road as we head west. We would head west for a mile to the Sunshine -- to Sunshine Boulevard where the corridor would then narrow to 250 feet on the north side only as it continues west for another mile to Eleven Mile Corner Road. The corridor would then widen to 700 feet entirely on the east side of Eleven Mile Corner Road heading north for about a mile to the Milligan Road where the corridor would terminate.

Again, I guess I combined the reasons of why those wider areas were there. I don't know that I would need to repeat all those reasons unless any of you have further questions regarding those wider areas.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I'm assuming that that inset, expansion there with the yellow is -- indicates something important.

MR. EICH: Yes, Member Little, that's a good segue to the next portion which I'll --

MEMBER LITTLE: Sorry.

MR. EICH: -- talk about. No, I appreciate that.

So, again, we're requesting a variable width corridor. This is one of those areas down -- down in the south end of the corridor map where we have updated the corridor. The image on the right is a zoomed-in version of that area. And just to orient you real quick to this map. This is the La Palma Road alignment. Alsdorf Road is on the north. And Phillips Road is on the south.

So the portions which we updated are shown in orange from the original corridor when we made the application originally. Again, at the time we defined the original corridor, we began with that 350 feet entirely on the west side of La Palma Road until we got to the south side of the railroad tracks. On the south side, we expanded to 700 feet because of underground transmission lines -- or distribution lines, I apologize, as well as other utilities that we knew were on the west side here to allow us some flexibility to get around those. But at that time it was limited primarily between the railroad and the I-10.

What we hadn't considered is the angle of the railroad and the possibility of some agencies

requiring a perpendicular crossing. And I think we spoke a little bit about this while on-site. Based on some of the -- what could happen during final engineering and where those poles need to be placed, we felt it would be important to expand that 700-foot width to the north side of the railroad and hence the north side of Frontier Street. So that was the purpose of that expansion, to provide that flexibility needed for final engineering and design.

We also at that time determined it would be best to continue that expansion on both sides of La Palma Road as we continued south crossing the I-10, and we just continued that to Phillips Road as well as along the south side of Phillips Road. However, we just duplicated what was on the north 250 feet to be on the south here until we get to Sunshine Boulevard where the corridor does narrow back to 250 feet as we head west.

And the purpose of that is there is a home on the southwest corner of Sunshine Boulevard and Phillips Road that we did not want the corridor to overlap, so that's the purpose for the narrowing of that corridor.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Yes.

MEMBER COMSTOCK: It would be helpful to me

to understand the difference in the definition between a corridor and a right-of-way as they're not defined as the same thing; is that correct?

MR. EICH: Mr. Comstock, that's correct. There are subtle differences, and sometimes we get used to using terms that we forget others may not understand clearly with what we mean.

So corridor in this sense we're defining the actual CEC corridor within which to build the much smaller transmission right-of-way.

MEMBER COMSTOCK: And then once you establish your right-of-way, that becomes the permanent record for where the line can exist?

MR. EICH: Yes. So once we work with the landowners to acquire easements, permits, whatever it may be, that would be the right-of-way that we're referring to when we say right-of-way.

MEMBER COMSTOCK: Okay. Two other questions to help me understand. When you construct the pole and put the arms out, what's the total width of a pole once you put that in the air? So arm to arm.

MR. EICH: We can follow up with that.

MEMBER COMSTOCK: I take it it's within 120 feet, though, right, because that's what you're looking for for a right-of-way is 120 feet?

MR. EICH: Certainly.

MEMBER COMSTOCK: And my last question is does your right-of-way extend vertically so that nobody can underbuild or come under you and build?

MR. EICH: I don't know the legalities of our right-of-ways as far as vertical goes, although I do know we often work with other utilities if they do have to cross at times whether over or under, and other utilities work with each other at those crossings.

MEMBER COMSTOCK: Thank you.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I don't recall any mention, discussion or comments with regard to that home that you were just describing there in that southwest corner. And I don't see any KOPs also for that area.

Have you any interaction at all with the people that live in that home?

MR. EICH: Yes, Member Little. We -- we did actually -- that is the one home along that alignment, that entire alignment there.

So at the time it was determined to relocate the preliminary preferred route to the south, we felt it would be important to make sure they knew of the change of the preferred alignment.

MEMBER LITTLE: Uh-huh.

MR. EICH: We did reach out to them. We talked to the resident. We provided her all the information, again, similar to the discussion we had earlier with the other resident providing her all the information as well and where we were anticipating the line to go on the north side of Phillips Road.

Again, she thanked us for the information, said she would discuss it with her husband and let us know if they had any further questions or concerns, and we have not heard back from her.

MEMBER LITTLE: Okay. Are there -- is there any other -- are there any other distribution lines or transmission lines or anything in that same area?

MR. EICH: Yes, actually there is a distribution line not only on the south side closer to her home but also on the north side of Phillips Road. And there's also a distribution line running north and south along Sunshine Boulevard.

MEMBER LITTLE: And do you know which direction the home faces? Does it face Phillips Road or does it face --

MR. EICH: I do know which -- generally how it's shaped. I'm not sure where the front door might be, but we can look into that.

MEMBER LITTLE: Okay. Just curious. Thank you.

BY MR. DERSTINE:

Q. So when we started out, Mr. Eich, we talked about updates to the application APS Exhibit 1. One of those changes was this update to the corridor, and you've just described using Slide 73 of APS-6, which shows the areas in orange, which were the areas of the expanded corridor that differ from what was the corridor that was shown in the application; is that right?

A. (Mr. Eich) That's correct.

Q. And then as to Member Little's questions about the change and the reason why the corridor narrows there on Phillips Road, your primary preferred route had to do on Milligan Road. You've testified about the feedback and the input you received from the City of Eloy and the developer who has -- who we heard from during public comment last evening. That is what drove the change from Milligan Road to Phillips Road, but I guess once we made that change in the alignment down to Phillips Road you realized we had home that you've just discussed, and that's the reason why the corridor narrows from 500 to 250 feet at that point almost in the middle of Phillips Road right at the alignment of Sunshine Road.

Do I have that right?

A. (Mr. Eich) Yes, that's correct.
Q. And the corridor width narrows to 250 because you're now rather than putting I guess that homeowner at potential risk for having the transmission line sited on their side of the road, the narrow corridor puts the line on the opposite side of the road, which would be the north side of Phillips Road.
Am I thinking about that correctly?
A. (Mr. Eich) Yes.
Q. Okay.
A. (Mr. Eich) If I may.
Q. Yes, please.
A. (Mr. Eich) To answer Member Little's question, it appears that the house faces east.
MEMBER LITTLE: Thank you.
MR. EICH: Okay. You're welcome.
MEMBER COMSTOCK: Mr. Chairman.
CHMN STAFFORD: Yes, Member Comstock.
MEMBER COMSTOCK: And I apologize for being slow on understanding this, but if you construct let's say in the area where it's 250 feet, you construct on one the north side or the south side if I'm reading the map right, does your right-of-way extend then beyond what the corridor was allowed or does it have to be with inside the corridor in order to construct if approved?

CHMN STAFFORD: Yes, the corridor are the absolute boundaries --

MEMBER COMSTOCK: That's the boundary.

CHMN STAFFORD: -- where the right-of-way can be.

MEMBER COMSTOCK: Okay.

CHMN STAFFORD: The right-of-way can be anywhere within the corridor.

MEMBER COMSTOCK: I understand.

CHMN STAFFORD: But they can't -- if they want to go outside of the corridor, they've got to go to the Commission and have them amend the certificate to expand the corridor.

MEMBER COMSTOCK: Thank you for helping me understand that. I appreciate that.

BY MR. DERSTINE:

Q. I guess those are all good questions from Member Comstock in terms of, you know, we throw these terms around, but the corridor is what the committee if they decide to grant us a CEC, we'll ask them to approve the corridor as we've requested or as they decide to modify it.

The corridor allows you to do the final engineering and design for the transmission line once -- and that has to occur within the corridor that the

committee grants us.

Do I have that right?

CHMN STAFFORD: Yes.

MR. EICH: Yes, that's correct.

BY MR. DERSTINE:

Q. And then once you've worked with your engineering and your system planners on where's the final placement of the preferred route within the corridor, you'll have to take the next step of securing the right-of-way or an easement, the legal right to construct the line within the corridor.

Is that right?

A. (Mr. Eich) That's correct.

Q. And what we're telling the committee is that ultimately when we get to the stage of negotiating with the appropriate landowners or cities or towns for our right-of-way, we will only be asking for 120 feet, and that gives us sufficient width for these planned double-circuit 230k structures and conductors; is that right?

A. (Mr. Eich) Yes.

Q. Okay. Anything else you want to talk about or you need -- you know, you feel like it's important for the committee to know concerning your corridor and the right-of-way?

A. (Mr. Eich) I don't unless the committee has other questions.

MEMBER HILL: Mr. Chair.

CHMN STAFFORD: Yes, Member Hill.

MEMBER HILL: I wanted to confirm I seem to recall from yesterday, so correct me, the in-service plan is 2027; is that right?

MR. EICH: Yes, that's correct.

MEMBER HILL: Okay. And you're pretty confident about that in-service time line?

MR. EICH: Yes.

MEMBER HILL: Okay. I thought so. But I just wanted to confirm. This whole conversation has me thinking about reserving a corridor like this for 10 years and maybe not building right away. In this case you're building pretty quickly, right?

But reserving a corridor for 10 years or 20 years might make it harder for someone else because this area is just growing so fast, and I want to reduce potential conflicts for other developers in the area.

So I don't think it's a problem with this case, but this whole conversation has been helpful for me to think through the terms of these and how long these corridors are reserved.

So I'll just leave it at that, but I wanted

to confirm the in-service date.

I guess the other thing I wanted to say is I know that we spent a lot of time talking about siting here, and I really nerd out on the siting pieces. And it's rare that you have for the most part a green field to do this work and be able to plan this far ahead. Like, I just feel like across the state development is outpacing us and we're not able to keep up with the grid improvements that we need.

And the ability to methodically go through this, actively work to put a plan in place that creates opportunity and also reduces conflicts, it's a really elegant design. I want to compliment you on all of the work that you've done around the siting piece. I wish all of our projects were just so straightforward because I do feel like this is straightforward even though it was complex, right. And so this is a great project. Thank you.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I concur. I also appreciate it.

I also wanted to remind us all that just because we have authorized the corridor does not give this applicant the sole right to use the land within the

corridor. If somebody else comes along and, you know, there's some -- they need to cross over the corridor or go someplace with it, the applicant does not have the right to say well, no, that's our corridor for 10 years, you can't do anything within our corridor. The right-of-way is different, but the corridor is we're just giving them the right to site their transmission line within that area within 10 years.

CHMN STAFFORD: Right. And this one it's going to be built much sooner than this. And once it's built, then the corridor won't be relevant anymore. It will just be the right-of-way that others have to deal with. And then the second circuit whenever that gets built in the future based on need, you'll know right where it's going to go. It's not going to expand the footprint of this project anymore because it's going to be hung on the same poles that already exist. So that's -- so that's one of the things -- to give them that long to put the second circuit on doesn't give me any heartburn at all because we know exactly where it's going to be. No one can be surprised by it.

Member Diciccio.

MEMBER DICICCIO: Who else could in this corridor, though? I mean, what other users could be there to service this area? I'm just curious.

MR. EICH: Again, I guess to Member Little's point the corridor just gives us the right to build within that.

MEMBER DICICIO: Right.

MR. EICH: And so it doesn't preclude anyone else from utilizing the same land that the corridor has.

MEMBER DICICCIO: But who else could be here that could service that area?

BY MR. DERSTINE:

Q. Mr. Eich, does your RioSol bullet give you an example of where we might be sharing the corridor with another transmission line?

A. (Mr. Eich) Yes. Thank you for that great lead-in.

This might be a great time to talk about the RioSol easement as an example. Within a portion of the corridor that we are requesting along Earley Road, which is I'm trying to trace that with my laser pointer here. RioSol is -- they already have an easement. That easement is limited to the Earley Road right-of-way. Pinal County granted them that easement specifically within their right-of-way, which if I'm remembering correct, it's around 66 feet wide.

Our corridor is 400 feet that we're requesting

there, so that would be approximately 200 feet on each side of the center of -- center line of early road.

And so, again, our corridor does not mean other utilities or whoever ends up needing land rights there can't build there or acquire easements. It is something that they can do as well.

CHMN STAFFORD: And then doesn't the -- your corridor where it's the 2800 feet and 400 feet when it's going east from La Palma Road that's shared with Selma Energy as well, isn't it?

That's another -- they have a certificate and a -- and I don't know if they've got the right-of-ways yet, but they have -- they have a certificate for that -- for their gen-tie, and I believe their plant is going to be in that area too. So your corridor covers land they control by those; correct?

MR. EICH: That's correct, Mr. Chairman.

And I believe they do have easements there as well. But we are coordinating with them on where that line is to be, but, again, our corridor would overlap that -- not only the CEC but their easement that they acquired.

CHMN STAFFORD: But the right-of-way for your line will not overlap the right-of-way for their line, though?

MR. EICH: Correct.

CHMN STAFFORD: Okay.

BY MR. DERSTINE:

Q. And I guess that's the important takeaway and the point to make here with regard to RioSol as well as when we're working through the larger easement or the larger corridor section you have set aside on the north end that 2800-square-foot area to accommodate the Selma Energy Project, the solar project that's being developed up there, we granted a corridor from this committee, but we still have to look with and look to accommodate other uses within our corridor, and we do that, and we've met with -- had an early discussion with the RioSol concerning their transmission line and how we -- just an early discussion about where we anticipate our line will be and does that allow us to allow them to still plan for and site their line.

The same with the Selma Energy Project, you're working with them, and that's why you've asked for that large corridor that runs along that solar project to accommodate and work with that developer to try to find the final placement of our line and ultimately obtain a right-of-way that accommodates their use, solar project, solar panels, as well as their gen-tie line; is that right?

A. (Mr. Eich) That's correct.

And I guess I could also add the ADOT north/south freeway corridor, that 1500-foot corridor on the east side, we are -- would be overlapping that corridor for the same reasons essentially. Not precluding each other but to work with each other.

Q. And even aside from saying try to accommodate another transmission line developer, the corridor is important to APS for this project and in all projects because it allows us to work with a landowner. Say, we're, you know, our preferred route moves along, you know, what's currently agricultural land. The corridor gives us the flexibility to work with that landowner, whether it's a home developer, whether it's a farmer, whoever it is and try to minimize the impacts to their land by giving us a planning area within which to finally site and engineer a line.

And I assume that APS always looks to minimize impacts to landowners and land uses. And one of our key tools for doing that is the corridor which is our kind of our planning tool for where we could place our line?

A. (Mr. Eich) That's correct.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Yes, Member Comstock.

MEMBER COMSTOCK: Is it too early to talk

about the substation?

Were you going to talk about that proposed substation?

MR. EICH: I don't think I had much to provide in that way, so feel free.

MEMBER COMSTOCK: Let me just ask then a couple of educational questions for me.

That's a separate issue from the CEC that we're considering; right?

That's up to you to provide the -- get the footprint for that in order to build it?

MR. EICH: Yes, that's correct.

MEMBER COMSTOCK: Does the interconnect stay within the right-of-way then of the finished line or does that stay inside the substation?

MR. EICH: If -- if I understand your question, are you asking if the interconnect stays within the corridor right-of-way?

MEMBER COMSTOCK: Yes.

MR. EICH: Or corridor or right-of-way?

MEMBER COMSTOCK: Yes.

MR. EICH: Yes. So when we acquire the site for the substation, we would acquire that from the landowner. Anything coming out of the substation would be -- would have to maintain -- be maintained within this

corridor.

MEMBER COMSTOCK: Thank you. Thank you.

MR. DERSTINE: And thank you, Member Comstock, because there were some questions yesterday around from Member Hill I think about understanding that substation siting is something that's separate and apart from the process that we're going through here for siting our transmission line but that there are separate typically county and/or city zoning and, yeah, entitlement processes that are used or that may require that we go -- you know, go through those local processes for obtaining approval to construct our substation.

BY MR. DERSTINE:

Q. And, Mr. Petry, did you -- I think one of the questions was is there a zoning or entitlement process for the proposed TS-25 Substation which we're currently looking to locate it on land owned by IPAZ or the IPAZ developer. Do I have that right?

A. (Mr. Petry) That is correct.

Q. Do you have anything you want to add to the discussion we had yesterday?

Can you shed any more light on that?

A. (Mr. Petry) I do and I can.

We discussed this question with the landowner -- well, one of the primary developers of the IPAZ, and what

they informed is that the IPAZ area itself has been subject to what they call a pre-annexation development agreement with the City of Coolidge for all the land associated with the IPAZ. And as individual developments come in within the IPAZ, they will be subject to additional specific development agreements between the city and each entity.

And each of those specific development agreements will be subject to city council approval, and thus would be part of a public process as well.

With the substation site itself, it is already zoned industrial. It's an I3 zoning, which would allow this type of use. And with most developers if they were to develop something further on that parcel, it would need to go through the city site plan approval process, which would also be subject to public input and require city council approval.

There may be some nuance with the need for that process given that this is being proposed by APS, a publicly regulated utility. Sometimes there are some special exemptions for who the applicant might be. And in a situation of a substation like this, they may not need to go through that site plan approval process once that moves forward.

We don't have certainty on that at this point,

but that's as much certainty as we could get in the limited time based on the discussion with the landowner who has gone through most of those development agreements already.

CHMN STAFFORD: Quick follow-up question. I seem to recall that the line will be constructed possibly before the substation. Is that correct?

MR. PETRY: That is my understanding as well, Mr. Chairman.

CHMN STAFFORD: Okay. Because you need this line for reliability of APS's system, but the substation addition is to serve that IPAZ when new load comes on; correct?

MR. PETRY: Correct.

CHMN STAFFORD: So I guess once that load is -- when they've got the plan approved to develop it by the city council, then you'll know the load is coming, and then you'll have to construct the substation to serve that load; is that correct?

MR. PETRY: That's correct.

CHMN STAFFORD: Okay. Thank you.

Just making sure I understood that correctly.

MR. WILEY: And, Member Hill, I believe yesterday part of your question was also outside of

zoning what other permits are required for substations. So since we're back on the topic, we'll just like to just circle back to that.

A couple permits that we found that are required are a SWPPP permit, stormwater pollution prevention plan. We also have ingress and egress permits that would be needed from either county or ADOT depending on the location, other construction permits such as dust control, and then potentially city building permits depending on the type of wall that is utilized. So for a CMU-type wall we would be needing a city building permit as well.

MEMBER LITTLE: Thank you.

MEMBER FANT: Mr. Chair.

CHMN STAFFORD: Member Fant.

MEMBER FANT: Thank you, sir.

In the movie Field of Dreams, if you saw that movie, in the opening portion of the movie and Kevin Costner is out in the cornfield and the voice keeps whispering build it and they will come. If they built IPAZ, my guess is that's probably going to generate interest in data center developers and AI folks to locate in the similar area.

So have you thought a further step forward about the possibility the load may exceed what you're

currently planning to put in there?

In other words, have you thought about upgrades beyond the upgrades?

Is that accommodated in what you're doing here or do you worry about that?

MR. WILEY: Member Fant, part of the reason that we're requesting this to be a double-circuit capable structure is for that future unknown. As we said previously, we don't have a definitive in-service date for that second line, but given the high likelihood of the development in the area, we believe that there is a likely need for additional infrastructure beyond this first 230kV line. Likewise, we're looking to also include the underbuild 69 for future load growth and service as well.

BY MR. DERSTINE:

Q. Before we move on to costs, Mr. Eich, is there anything you wanted to add on corridor or right-of-way?

A. (Mr. Eich) I've hit it all.

Q. All right. Let's talk numbers.

A. (Mr. Eich) All right. The anticipated right-of-way costs for the preferred route -- I'll try and point with my laser -- the right-of-way cost is approximately 10.5 million. Estimated construction costs at just under 77 million with a total estimated

right-of-way and construction cost at 87.25 million.

The estimated subroute costs include that portion of the preferred route that it would replace as well as the remaining preferred route costs. So costs for alternative Subroute A shown as, again, as that orange and black dashed line, that is estimated to essentially be the same as the preferred route. And Subroute B shown as the red and black dashed line in the south end of the project is estimated at approximately 84.5 million.

Q. We had a discussion yesterday -- Member Kryder is always good about doing his homework and reading ahead, and he immediately recognized that by moving off of Subroute B we are increasing the cost of the project. And we talked about briefly about the fact that there are trade-offs here in terms of, you know, we have a preferred route moves off of Subroute B to accommodate the development that's occurring there at the south, and in response to similar feedback and support from the City of Eloy to move off of Subroute B, but it comes at a higher cost.

Do you want to talk about kind of the trade-offs again that we're making there and the decision we made in terms of defying the preferred route as moving off of Subroute B the -- maybe the positives and negatives that

go along with that additional $2.7 million?

A. (Mr. Eich) Sure. Again, some of the more obvious concerns that we've talked about already is avoiding the future planned development site that I believe it was a 400-unit residential mixed-use site as well as the concerns of the Milligan Road alignment shifting due to the I-10 interchange there, which may pose some concerns of relocations of at least portions of that line.

The Sunshine Boulevard overpass at the I-10 as well as the Flying J I think we may recall driving by that area, there are certain areas of that crossing that would require additional structures and poles and heights that are not needed along the other alignment. It's more straightforward crossing at the La Palma Road alignment and a crossing that ADOT typically prefers rather than those busier intersections.

So, again, this would avoid not only the development and the concerns along Milligan Road but also is supported more fully by ADOT as well as the City of Eloy asking for that reroute.

Q. And this was, I guess, just to tease out that decision a little bit further. I mean APS doesn't take lightly, you know, changing a route, modifying a route, to increase costs. At the same time one of our primary

objections and goals is to minimize impacts of a project, and so we're left with the tradeoff of how do we keep the costs to a minimum and at the same time address and do our best to mitigate impacts.

And in this case the preferred route results in a higher dollar cost when you're combining the right-of-way and the construction cost. At the same time it better addresses in our view the impacts to those -- that landowner and which includes a residential development, which is planned for Subroute B.

Is there more you want to add to that, the math and that kind of balancing that we do?

A. (Mr. Eich) No. I think you summed it up well.

CHMN STAFFORD: And so those benefits, the trade-offs you're talking about, I just did the math, and that's less than -- it's approximately a 3 percent cost increase to the project to accommodate the city, ADOT, and the developer.

MR. DERSTINE: That sounds right to me.

CHMN STAFFORD: That seems like a pretty reasonably trite -- routinely priced mitigation measure.

BY MR. DERSTINE:

Q. Okay. Moving from costs, do you want to talk about the poles and the structures that we're going to use and how you're going to space and ultimately design

the line when we get to that phase of the project?

A. (Mr. Eich) Sure. So the preferred route will use the structures that are shown on the left screen. There are three structure types. Each structure type shows a front elevation and a side elevation.

The two that look similar I'll talk about first.

CHMN STAFFORD: That's Slide 79; right?

MR. EICH: Thank you, Mr. Chairman. Yes, Slide 79.

So the first or the furthest left structure is known as a double-circuit 230kV tangent monopole transmission structure. That type of structure would be used throughout the majority of the line. We also have a typical double-circuit 230 turning monopole structure which is very similar. They are a little for lack of a better term beefier, larger to handle the stress put on those angles and corners and end points of the line.

Both of those structure types would be capable of 69kV underbuild.

And then lastly, we are including a typical H-frame transmission structure on the very right. Those are typically used for locations that would cross other lines where we may need to get more clearance in those crossings that we couldn't get out of the typical type of structure, monopole structure.

At this time, we don't anticipate needing that, but, again, it's still early so we wanted to make sure that was part of the structure types in our application.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I'm curious if you've got four circuits line on the poles and then you reach a point where you need to use the H-frame, what do you do with the other circuits?

MR. EICH: That's a good question, Member Little. The -- yeah, the H-frame is set up to only carry one circuit at a time. So if that was the case to get another circuit over, we would have to build another H-frame structure nearby.

MEMBER LITTLE: Thank you.

CHMN STAFFORD: And that fit in a 120-foot right-of-way to have two H-frames side by side?

MR. EICH: I don't want to say every time. It depends on the situation, what's -- what's out in the -- you know, the terrain, what's out there already. But it may or may not fit in that 120 feet.

CHMN STAFFORD: If everything else is set up correctly, I mean, ideally you would be able to; correct?

MR. EICH: Yes.

CHMN STAFFORD: Barring unforeseen circumstances that throw a monkey wrench in your plans, you should be able to fit those both in a 120-foot-wide?

MR. EICH: Yes, you should.

CHMN STAFFORD: Okay. And then those H-frames, those are primarily for going under other lines because you could lash -- you could maintain the same level of ground clearance without additional height?

MR. EICH: I think they're more typically used to go over the top. Again, the typical monopole structure what we look at, for example, the very left side of the screen, those three we call them arms. On this side on the left side we'll say indicate one circuit. Those are hung vertically.

Sometimes if we can't get the height needed or the clearance needed in crossing the lines because of how much space that takes, we will transition historically to get that added clearance. So those H-frame structures are typically for crossing over the top of other lines.

CHMN STAFFORD: And so those -- under the terms of the CEC you guys requested those could be up to 20 feet tall; correct?

MR. EICH: Correct. Yes.

CHMN STAFFORD: Would the monopole structures be as tall or would they typically be more like 120 feet or something?

MR. EICH: I believe we have a range between 120 and 200 feet. Depending on the situation, it would only get to the higher end of that for typically for crossing other utilities, maybe a higher elevated road or very rough terrain. But it's -- it's usually somewhere between 120 and 160 most often is the height of those structures.

CHMN STAFFORD: Okay. And then the minimum height to the 230kV line above grade is typically what?

MR. EICH: I'm sorry?

CHMN STAFFORD: The minimum height of the 230kV line above grade, what's that height typically, 30-something feet?

MR. EICH: I believe it's in our application. We'll follow up. I believe it's somewhere around 24 feet.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Is that what it is, 24 feet?

MEMBER LITTLE: Yes.

CHMN STAFFORD: And the 69kV can be below that because that's -- you know, I don't think we talked

about that much in the application. It's more for letting us know it's part of what you're doing, but the 69kV can be lower than that; correct?

MR. EICH: I believe so, but I may need to get confirmation from my engineer on that.

CHMN STAFFORD: That's fine. You can follow up with that later, then.

BY MR. DERSTINE:

Q. I guess talking about the height of the structures I guess another reason why we might be at the upper end of our monopole structure height is if you're trying to increase the span length, and that may come into play when we're trying to minimize the pole placement, that may impact visually or accommodate landowners who when we're trying to span around a home or span around a particular use, you may use a series of structures at the higher end of your range, 200 feet to increase the span distance; right?

A. (Mr. Eich) Yes, Mr. Derstine, that's a good point.

The shorter the span typically the less sag in the wire is needed. So the longer the span the more of a sag, which means typically the pole itself needs to be taller if it's a longer span.

Q. And certainly one of the things we'd be looking

at with the -- the one KOP that we all look at and scratch our heads about with the monopole structure next to the home, is that what you're looking to in terms of your final engineering and design to try to see what can be done to move that structure as far away from that house and one of the things you may be looking at is spanning a larger distance to try to accommodate that homeowner?

A. (Mr. Eich) Yes. That all comes into play when considering how we can cross that area of those lines.

Q. Okay.

CHMN STAFFORD: Another question I'm curious. If you have to use the H-frame structures, how do you accommodate the 69kV underbuild? How does that -- what would you typically do to -- I guess you'd have to have separate 69kV towers at that point?

MR. EICH: Mr. Chairman, yes. We typically have to hop out off of the 230kV line and have separate 69kV structures installed for that section, which are typically much smaller.

CHMN STAFFORD: And then they would -- they would probably go under the line -- the 230kV line would be going over with the H --

MR. EICH: Most likely, yes.

CHMN STAFFORD: Okay. I'm trying to get a

picture in my head of what it would look like. Thank you.

BY MR. DERSTINE:

Q. Do you want to touch on the span length that you have on your slide and add any more to that issue?

A. (Mr. Eich) Yeah. Just to tie this one up, this span length is estimated to be between 400 and 1500 feet.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Yes, Member Comstock.

MEMBER COMSTOCK: What is the typical clearance required for going over, say, I-10 or a railroad?

MR. EICH: Mr. Comstock, we may have to look into that, but we can get back with you on that.

MEMBER COMSTOCK: So the only reason I'm asking is because when ambient temperature goes up and load goes up, wires get hot and they sag, so I take it the construct is high enough to take into account for that differential when you're headed over those too?

MR. EICH: Very good point, yes.

MEMBER COMSTOCK: Thank you.

BY MR. DERSTINE:

Q. We've already done the virtual tour. I think we're going to move on to the exciting topic of the day, which are all the environmental studies, at least the

topics that are near and dear to your heart, Mr. Petry; right?

Do you want to start us off with -- I know SWCA conducted the studies for the project. Why don't you provide an overview of the different resources that you evaluated in support of the application.

A. (Mr. Petry) Absolutely.

In support of the application we at SWCA completed environmental analyses that included land ownership, jurisdiction and land use analysis. Those are included in Exhibits A, B, and H of the CEC application. As well as biological, cultural, visual, and recreational resources. And those are all included in Exhibits C, D, E, and F of the application.

Q. Okay. And we typically define an area for your environmental study work.

Do you want to show the committee what area was studied and how you defined it?

A. (Mr. Petry) Yes. The map on the left is our jurisdiction and land ownership map. This is in the CEC application APS-1 identified as Exhibit A-1.

This shows, first of all, our project area. The project area is the black line that you've seen on the map before you. That's included on your placemat the black line we've seen on most all of the maps we've been

discussing today as well as the two alternatives. That would entail our project area.

Our study area is defined as a one-mile boundary off of the project area. So what you see on the map and Mr. Eich is highlighting that area right now is a dashed black line that outlines the border of our study area. That's the one-mile buffer off of all of the project area facility.

Q. So the different environmental studies analysis that you performed, you looked at an area -- a mile on either side of our preferred route which you said is the project area. So the preferred route or black line is the project area. The study area is the dashed buffer that goes around our preferred route that's shown on Slide 89.

And am I thinking about that correctly?

A. (Mr. Petry) You are with one addition.

Q. All right.

A. (Mr. Petry) The study area also includes a one-mile buffer off of the subroute alternatives.

Q. Okay. So I think the first area that you analyzed and it sits at the beginning of the exhibits to the application is jurisdiction and land ownership.

A. (Mr. Petry) That's right. I'm happy to provide an overview of that.

The same map is still shown on the left screen. This is Slide 93.

And, again, it shows the overall jurisdiction and ownership within the project study area. Our study area includes both private and publicly owned land. Public land within the study area is under the ownership of the Arizona Department of Transportation, the Arizona state trust land department, the Pinal County, the City of Coolidge, and the City of Eloy.

The City of Coolidge, the City of Eloy, and Pinal County all have jurisdiction within our study area. And those areas are identified, again, on the map on the left. The City of Coolidge generally covers the areas identified in blue, much of our northern and northwestern portion of your study area.

The City of Eloy is shown in sort of a purple color in the southern portion of our study area there.

And the remaining gray areas are areas with unincorporated Pinal County's jurisdiction.

We also have a couple or a few hatched areas. You can see some of the black hatching within our study area. Those are the Arizona State Land Department state trust parcels.

Q. Do you want to give us your findings, what you found, by analyzing the land use within your study area?

A. (Mr. Petry) Yes. In order to identify the land uses within the study area, we first completed a land use inventory within that one-mile buffer area. We did that to identify those existing land uses that we could see today, and as part of that we completed a field review.

Once that field review is complete and our initial mapping was complete, we coordinated with the relevant jurisdictions and agencies such as Pinal County, the cities, along with other stakeholders such as ADOT and the canal operators, and we requested information on their existing land uses, what's actually going on there today and what is planned for the future as well.

Overall, our analysis and our inventory showed that the study area can be categorized as a developing rural agricultural and industrial area. Those existing land uses primarily include agricultural, industrial, energy facilities, some areas of vacant land, residential areas, transportation, and, of course, utilities.

Those utility land uses include many high-voltage transmission lines that we saw out in the landscape today during our site visit. Those all range from between 69kV to up to 500kV as well as much of the distribution voltage infrastructure within the region.

For our identification of the future land uses or planned land uses, which can now be shown on the left

screen, this would be our future land use map, which is Exhibit APS-3 in the CEC application, we looked to a complete inventory of the study area that largely involved review of planning documents from these relevant jurisdictions, so that included the City of Coolidge's general plan, the City of Eloy's general plan, Pinal County's comprehensive plan, ADOT's north/south corridor tier 1 environmental impact statement or EIS document, as well as through direct coordination with these agencies and jurisdictions.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I'm sorry to interrupt you, Mr. Petry, but I have a couple of questions.

One, what is shown on the future land use as that dark green area on the upper right-hand corner and it's shown on the existing one as blue, is that by Picacho --

MR. PETRY: Reservoir.

MEMBER LITTLE: -- reservoir?

MR. PETRY: Yes.

CHMN STAFFORD: And you're looking at Slide 103; right?

MEMBER LITTLE: Yes.

And my other question was and perhaps

you're going to address this later, and if so just say so, but in coordination with relevant jurisdictions and agencies, I saw very little in the application about coordination with or notification of or work with the tribes in the area, and I really would like you to address that at some point.

MR. PETRY: Yes. We will have much testimony around the significant amount of public outreach we did, including the tribal coordination that was completed as part of this project.

MEMBER LITTLE: Oh, because I just didn't see much in the application about it at all.

MR. PETRY: Mr. Eich will provide much more input on the tribal coordination that was part of this effort, absolutely.

MEMBER LITTLE: Thank you.

MR. PETRY: So, again, the future land uses shown on the map on the left. This is Exhibit A-3. And when we look at the future land uses within the area here, as shown previous or discussed previously, we see in the central core I guess the central and more eastern portion of our siting area here or our study area here a lot of industrial and employment land uses. That's what a lot of shades of purple shades indicate, future industry and employment, which is another high intensity

use that's proposed for this area.

We also see the future ADOT north/south freeway corridor that extends north and south, of course, throughout central portion of your study area.

And then we see some of the industrial development that's proposed along the Interstate 10 and rail right between Interstate 10 and rail corridors down in the southern portion of our study area as well as some of the future planned residual development shown in the southern portion as well in the yellow and orange colors.

Those future land uses can really generally be characterized as, again, a developing rural industrial area. We have multiple planned industries, planned transportation facilities, mixed-use facilities as well as solar and other utility developments that are proposed there as well.

Just to give you a little more, there's been a little interest I think in the ADOT north/south freeway and to give you a little more background on where that stands. Again, that is a 1500-foot corridor that's identified today, and it was identified through ADOT's tier 1 environmental impact statement. That's the first step in their process of identifying a future alignment for this freeway.

And the next step will be the tier 2 EIS

study, and they'll be refining that corridor from the 1500-foot width down to a 400-foot corridor width. And, in fact, as part of that tier 2 study process, ADOT held meetings for that EIS as recently as August of this year for which APS provided comment.

MEMBER HILL: Mr. Chair.

CHMN STAFFORD: Member Little.

MEMBER HILL: I am curious does this corridor exist in the Coolidge or Eloy or county comprehensive plans at this point or is this just an ADOT plan?

MR. PETRY: This is conceptually identified in other cities' and communities' planning documents. And to that end what I -- we could have pointed out in the route tour today had we stopped at I think it's Stop 4 at the northern portion of the Vail Road alignment when you look to the north from there you can actually see a portion where Pinal County has set aside and actually acquired parcels for that future roadway width. There's a solar development that's located to the north of that route tour stop, and you can actually see where parcels were set aside through that solar development for the future alignment of the freeway.

MEMBER HILL: Interesting. Great. Thanks.

MR. PETRY: You bet.

Another, again, notable future of planned land use on the projects in that area we talked quite a bit about would be the IPAZ area. That's generally located between Hanna Road and Houser Road, but, again, the industrial development is proposed all through that north/south region parallel with the freeway -- or the future freeway, the existing highway, and the existing rail facilities there.

BY MR. DERSTINE:

Q. On our route tour today I didn't see a lot of development. I saw a lot of vacant or it may have been previously al cultural land. Yeah, there's a lot of dirt. And so my question is, you know, going on that route tour, if someone asked me what's going on out there I would have said not much.

But at the same time you're having to look to what is being planned for the future, what is happening with all of these land parcels out there, and what sort of development plans are underway because that's critical for us to understand that in terms of planning this line and this route; is that right?

A. (Mr. Petry) That's absolutely correct.

Q. And to -- and to figure out what's happening in the future with this future land use I think your previous slide indicated you had to dig into all of these

comprehensive plan documents, and then you also sent letters out asking private developers and others.

Do you have any plans for projects in this area? If you do, please let us know. And so that was part of your what you call your data collection in trying to discern what's happening in the future in terms of not only existing land use but future land use?

A. (Mr. Petry) That is correct.

Q. Okay.

A. (Mr. Petry) Yes. And I think a good example of that somewhat iterative process with coordination with the jurisdictions is what occurred down on Milligan Road near Milligan Substation where when we first sited this and had the preliminarily identified preferred route, there was no indication in any of the planning documents that a future development was planned in that area. We had not identified it in our inventory.

But once we coordinated further with the city and spoke with them directly and heard some input from the developer themselves, there was confirmation that there is, in fact, or was, in fact, a proposed future development in that area.

And so I think, Mr. Derstine, that's a perfect example, you know, of how we can look at the planning documents and learn one thing, but we need to go further,

and we did go further to learn more and understand what's planned in the future, particularly as Member Hill noted in a fast developing area like this.

Things change. Thing change quickly. And so keeping in contact with those stakeholders, with those developers, with the jurisdictions themselves to be on top of those future plans was very important and something we certainly did for this project.

Q. Is there more you want to add to your discussion of the existing and future land use?

A. (Mr. Petry) No, nothing more than my conclusion, I guess, with the existing and future land use.

Q. What is that?

A. (Mr. Petry) It's that the preferred route and the alternative subroutes themselves are not contrary to the zoning ordinances or master plans of these jurisdictions. The preferred route is aligned with the ADOT highway corridor in order to site these industrial facilities in a common alignment and minimize additional disturbance.

The preferred route also travels through the planned IPAZ area and will ultimately support providing power to the future potential industrial development within. The preferred route also avoids potential impact

to the future 400-unit mixed-use development near subroute alternative B, which, again, while not originally identified through local planning documents was something that was identified through the process.

Overall the preferred route and subroutes minimize overall land use impacts by preferentially siting adjacent to existing or planned linear facilities and minimizing impacts to sensitive existing or planned land uses.

Based on our land use assessment, the construction and operation of the project will result in overall low to moderate impacts to existing and future land use and is environmentally compatible.

Q. All right. Well, should we move on to evaluation and the studies you performed on the biological resources that would be contained in Exhibits C and D of the application APS Exhibit 1.

A. (Mr. Petry) Yes. To evaluate biological resources SWCA's biologist obtained information from the Arizona Game & Fish Department and the U.S. Fish & Wildlife Service.

We conducted field surveys. Through that coordination with Game & Fish they provided a response letter that provided input on suggested typical mitigation measures for transmission development

projects. Based on the evaluation, we determined that no Endangered Species Act listed species are likely to be present within the project or study areas, and therefore no impacts to those species will occur from the proposed project.

One -- one proposed threatened species, the monarch butterfly, may occur seasonally within the project area with only minor impacts to individuals expected to occur.

No impacts to areas of biological wealth are expected, and the project may impact vegetation in general wildlife temporarily during construction. However, much of the project area in the vicinity has been subject to prior disturbance.

The project will comply with the applicable mitigation measures and best management practices, including the APLIC guidelines and Arizona Game & Fish department recommendations.

Overall the project will have low impacts and is environmentally compatible with biological resources.

Q. I know that if we're siting a line in much more of a remote area or probably more environmentally sensitive areas the field survey component is important. In this case, as you said, this area is largely disturbed either as through agricultural for solar projects and

others, but you did perform some field surveys in addition to the desktop analysis that informed your conclusions on the biological impacts?

A. (Mr. Petry) That is correct. Over numerous days and times we had field surveys completed within various portions of the project region as part of a initial siting area study -- or, excuse me, the initial siting study and then as also part of the CEC analysis.

Q. Do you want to continue on with your I think these are largely your conclusions that you drew from your -- the desktop review as well as your field surveys; right?

A. (Mr. Petry) Yes.

Q. All right. Why don't you give us those and let the committee understand what your conclusions are.

A. (Mr. Petry) Well, I'd be happy to state those again.

Q. You did them all?

A. (Mr. Petry) I did them all.

Q. All of it? Maybe?

A. (Mr. Petry) Yeah.

Q. Okay. Maybe I missed the Migratory Bird Treaty Act.

Anything else, then, you wanted to add on the biological analysis?

A. (Mr. Petry) Nothing more to add unless committee members have any particular questions.

Q. Okay. And overall your conclusion is low impacts and it's environmentally compatible with biological resources in the area?

A. (Mr. Petry) Yes.

Q. Okay.

MEMBER HILL: Mr. Chair.

CHMN STAFFORD: Yes, Member Hill.

MEMBER HILL: I always ask the question.

I agree with your conclusions. I just wanted to confirm that there are several recommendations during construction that Game & Fish have identified as best practices and you're willing to stipulate to that as part of the CEC?

MR. PETRY: Yes.

MEMBER HILL: Okay. Great. Thanks.

CHMN STAFFORD: I think it may actually already be included in the draft CEC provided by the applicant.

MR. DERSTINE: I think it is in there, yes.

CHMN STAFFORD: You reference to the pages is it C-23 and 24 in Exhibit C to the application?

MR. DERSTINE: Ms. Benally tells me you are correct.

MEMBER HILL: Super. Thank you.

CHMN STAFFORD: Excellent.

BY MR. DERSTINE:

Q. All right. The next topic, historic site structures, archaeological sites, and scenic areas.

CHMN STAFFORD: I think this may be a good time to take a break. I think we're coming up on 90 minutes, and I'm certain the court reporter could use a break, so let's take a brief recess and come back at 3:10. We stand in recess.

(Recess from 2:56 p.m. to 3:12 p.m.)

CHMN STAFFORD: All right. Let's go back on the record.

Mr. Derstine, I believe you were about to have your witness cover the cultural resources section.

MR. DERSTINE: That's what the slide says and that's what we're going to cover.

CHMN STAFFORD: Excellent.

BY MR. DERSTINE:

Q. Do you want to take us through kind of the work you did in terms of analyzing the potential impacts to any sort of historic sites or archaeological sites for this project?

A. (Mr. Petry) Yes. SWCA's archaeologist completed what we call a Class 1 cultural resource survey

or a desktop cultural resources survey that reviews and identifies previously identified historic sites, structures, or archaeological sites within the study area.

And this review is completed by consulting the Arizona state museums, AZSITE database, the Natural Register of Historic Places, the Arizona Register of Historic Places, General Land Office plat maps, and United States Geological Service historical topographic maps.

We also have coordinated with the Arizona State Historic Preservation Office or SHPO. And through that coordination we followed the requirements of SHPO's 2022 ACC SHPO consultation checklist.

We provided the SHPO with a consultation letter on the project on June 3, 2025. SHPO representative Caroline Klebacha replied to that letter on July 3rd, 2025, providing clarifying questions, requests for combining some document sections, and noting the need to add one previously mentioned archaeological site to the list of sites noted for avoidance.

SWCA revised the project consultation letter in response to SHPO's comments and resubmitted a revised letter on July 11, 2025.

On July 29, 2025, APS filed the CEC application.

And on the following day, July 30, 2025, SWCA provided the SHPO with an electronic copy of that application.

On August 7, 2025, SHPO representative Caroline Klebacha replied to SWCA's July 30th e-mail submittal of the CEC application noting "I recently returned from being out of office and was not able to comment on your revised letter before July 25. I have since reviewed the revised letter and application. The changes in the revised letter are adequate, but the application retains the information from the June 3 letter and should be updated with previous SHPO comments."

Following receipt of Ms. Klebacha's e-mail, August 7 e-mail, at the request of SHPO, SWCA and APS updated portions of Exhibit E, the historic sites and structures and archaeological sites section of the CEC application for consistency with the information provided to SHPO in the now-approved July 11, 2025, SHPO consultation letter. That updated Exhibit E was docketed on August 15, 2025, and was subsequently provided to the SHPO on August 18, 2025.

No further input or response from the SHPO has been received.

Q. I -- is it just my failing memory or I don't recall a case where we've detailed this amount of back-and-forth dialogue with SHPO concerning our

consultation.

Is this an unusual project or were there issues here that drove this amount of, you know, communication back and forth with SHPO, or is it just maybe this is just an indication that SHPO is engaged, SHPO is going to read what we send them and they want us -- you know, feedback and follow-up from us and that's what we gave them in this case?

A. (Mr. Petry) I think it's an indication of the latter as well as the fact that we -- to step back.

SHPO is definitely engaged, and they're definitely reviewing the materials that we send them. And we very much appreciate the detailed and nuanced comments that they provide back with these materials.

And it allowed us to update our materials based on the edits they had provided us in the early letter. Those edits didn't make it into the application. They're there now. Thanks to the SHPO's coordination with us and their real -- not realtime but quick turnaround and in terms of their feedback and consultation.

Q. All right. Well, it sounds like the process works, and in this case we were able to incorporate and address their concerns, and we're waiting to see if there's any further response.

Is that how it was left I gather from your

slide?

A. (Mr. Petry) That is correct.

Q. Okay. So do you want to describe your findings concerning the review you conducted of historic sites and structures and archaeological sites?

A. (Mr. Petry) Yes. 15 previously recorded historic properties have been documented within the project area or the project corridor. Six of those 15 sites are Arizona Register of Historic Places eligible. In-use historic structures such as canals, roadways, a pipeline, and the railroad construction of the transmission line will introduce a visual element to these areas, but it will not diminish the integrity of the characteristics of these properties for which they're eligible for listing on the register of historic places.

Of the remaining nine sites, two of those sites are considered register-eligible archaeological sites and seven are potentially eligible sites. These include artifact scatters, resource-processing sites, lithic scatters, campsites, and a historic ranch house. Only two of those sites are within the preferred route.

APS will work to avoid direct impacts to these sites. If these sites can't be avoided through project design, the project would have the potential to adversely affect these sites. And in order to mitigate that, APS

will, again, prioritize avoidance of those sites through project design.

If the sites can't be avoided through design, ground disturbance within 50 feet of the site will be monitored by a qualified archaeologist. If ground disturbance within the site is necessary, additional data recovery will occur within the project footprint prior to construction.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Member Little.

MEMBER LITTLE: I noticed that a pretty small percentage of the project area had been previously surveyed. You know, I made a note that there are 49 archaeological sites within the study area that have been identified, and that's only in less than 20 percent of the study area survey.

I don't anticipate that it will be a problem because the applicant has agreed to survey the remaining areas. But is that common that so little of a project area -- is it because it's mostly private property or why is it that so little of that 20 miles has actually been surveyed in the past?

MR. PETRY: Member Little, Mr. Chairman, the distinction I'd like to make there is that it's a smaller portion of our overall study area that has been

subject to prior cultural survey, and that includes the one-mile boundary, the one-mile buffer off of the proposed project route and subroute alternatives.

And it is a relatively small portion, a minority of that area that has been subject to previous survey.

It's not unusual for areas like this to be unsurveyed. What we see with the project route, though, is that much of the project route and project corridor has been subject to survey. And the bulk of that area is within the eastern portion that is aligned with the north/south freeway corridor. No surprise that much of that has been surveyed because it's subject to analysis right now, an environmental analysis for the potential impacts of that freeway.

We also see many portions of the existing transmission lines, canals, and roadways and areas adjacent to those locations that have been subject to prior survey within our project area.

So you're right, not as much of the project corridor has been subject to survey, but much of the proposed project area has been, but not all of it, and there will be additional survey required.

And one of the recommendations that the SHPO makes is not only for us to survey areas that have

not been subject to survey previously but also areas that have not been subject to modern surveys.

And when we consider modern surveys these days, we're generally looking -- when we do our analysis, we're looking at about 20 years old. There may be some further insider input from the SHPO in terms of what may be considered a reliable modern survey and what might not be, but that would be part of the additional mitigation is completion of survey for those areas that have been unsurveyed and those areas that are not subject to recent survey.

MEMBER LITTLE: Thank you for the clarification. I appreciate that.

MR. PETRY: You're welcome.

In response to our project mailings, the SHPO to our point here, Member Little, did recommend a Class 3 pedestrian survey for those unsurveyed portions of the project area or those areas that have not been surveyed to modern standards, which, again, APS commits to completing prior to construction.

CHMN STAFFORD: But that would be for the final right-of-way?

MR. PETRY: That's correct.

CHMN STAFFORD: Okay.

MR. PETRY: Based on SWCA's analysis, the

project may have an adverse effect on two known eligible archaeological sites and seven potentially eligible archaeological sites if they cannot be avoided by spanning the transmission towers between the sites.

APS, again, will prioritize avoidance of the sites, and through this avoidance and/or additional mitigation the project's preferred route and alternative subroutes are not expected to have adverse impacts on cultural resources, and the project would be environmentally compatible with cultural resources.

BY MR. DERSTINE:

Q. I guess the key pieces of that looking at your slide are that our key objective is to avoid impacting those sites, and to the extent we can't then we will do our best then -- we don't do our best. We will monitor and perform whatever sort of studies are required in order to ensure that we're preserving those affected sites. Is that the gist of it?

A. (Mr. Petry) Yes.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Member Little.

MEMBER LITTLE: Just to clarify, that includes private property; correct?

MR. PETRY: Yes.

MEMBER LITTLE: Thank you.

BY MR. DERSTINE:

Q. All right. We're going to move on now to your -- the analysis you did of visual resources, your simulations. The committee has already seen some of the simulations, but now you're going to, I guess, start us off with on overview of the analysis that you performed and then get into your simulations; right?

A. (Mr. Petry) That's right.

Q. Okay. Tell us about how you went about it, and then we'll look at the -- what those poles look like on the landscape.

A. (Mr. Petry) Sure. SWCA completed a visual resource study which involved characterizing the existing scenery, scenic quality, and sensitive viewers within the study area and then describing the project's potential for modifying that landscape.

SWCA completed this study by first collecting the publicly available land use and GIS data and aerial photography as well as on-site field version and photo documentation in order to develop an understanding of the existing landscape and the associated visual resources.

Existing scenery near the project is consistent with the rural, agricultural, and scattered residential and developing industrial nature of the study area. Land nearest to the project is dominated by existing

agricultural fields, industrial areas, and scattered residential areas.

In addition to the above land uses the study area included Union Pacific Railroad, regional transportation corridor such as Interstate 10 and State Route 87, as well as the Pinal Central and Milligan Substations and associated transmission line infrastructure.

The heights of these features along with a collocated density of the infrastructure make them highly visible and dominant features in many portions of the landscape as they intersect the study area.

The scenic quality within the study area is considered relatively low based on the general lack of visual variety, land forms, vegetation and the clustering and scattered rural agricultural development within the landscape.

For the purpose of visual impact analysis, we considered various categories of sensitive viewers. These include three different viewer types. Sensitive viewers include residential viewers, recreation viewers, and travel route viewers.

Our analysis found that views from the residences within the study area vary from unobstructed to partially or fully obstructed based on the viewing

location. However, most views of the project will be partially obstructed by existing features within the landscape.

Views of the project from recreation areas within the study area may vary from partially obstructed to fully obstructed. Most views will be partially obstructed by existing features.

Views from the travel routes within the study area vary, again, from unobstructed to partially or fully obstructed based on the viewing location. And the variability in views is a result of the degree of screening that could or would be caused by those existing features again.

We used this information to help determine the degree of visual contrast and change to the project that the project would introduce to the existing setting.

Q. All right. I guess the application contains 12 simulations from these observation points.

Do you want to talk about how you -- how those simulations were created and what sort of modeling you used and then how you selected those observation points?

A. (Mr. Petry) Yes. Now to illustrate the project's visual characteristics these visual simulations were developed from 12 key observation points all within the study area. These simulations are based on the

project location and existing site data and were developed using 3D modeling software. These simulations can all be found in Exhibit G of the CEC application.

We determined locations for the key observation points really by trying to find representative views that would represent typical views or views of sensitive viewers closest to the project where maximum impacts might be experienced. Those locations are shown on the map on the left of your screen right now. These are the key observation points also included in Exhibit E-1.

I want to point out that the numbering system we use on these KOPs is not necessarily consecutive. That's a result of our numbering system and our numbering convention retaining the numbers we used with the initial siting that including 69kV facilities as well that have not been included as part of this application.

It also is representative of some of the initial photo points that we had identified but didn't necessarily complete simulations for.

So I now move forward and have Key Observation Point 6 shown. And before I go into detail around what we took away from this simulation, I want to point out a few of the things you actually see on the simulation itself. And I want to start by the image up top.

And we're looking at Slide 133 right now, the

left screen in the room here today, and image on the top is representative of the existing condition. The image below would be representative of the proposed future condition.

And I'll get into further detail about what exactly what we're looking at and where we're looking from. I just want to orient the committee with what these simulations include.

We also have a map in the upper right portion of the simulation that gives the location of the key observation point itself relative to the project as well as the viewing cone or viewing area that is shown in the photos themselves. That viewing cone is shown as a blue triangular shape that illustrates the field of view.

Below that map we have the diagram that shows the typical 230kV structures as proposed or shown in that simulation. So we have some example heights of the structures that would be included in this simulation.

Q. So is there a software program that you use to develop these simulations that where you're inputting whatever the proposed height of the structures are and I guess their -- how many conductors and that sort of thing, and then that helps you -- that software helps you then develop and create the simulation that we're seeing for example in --

A. (Mr. Petry) Basically. The software that's used basically we bring in a model of the proposed project design that includes potential structure locations, individual structures that would be used at those specific locations and drape those on to the existing landscape.

Q. Okay. All right. Very good.

A. (Mr. Petry) So I'll move forward now in discussion around the key observation point that you see on your screen right now. This is Key Observation Point 6, and this illustrates the proposed subroute alternative.

This represents a view from East Selma Highway facing west towards subroute alternative A. The upper image you can see what the landscape looks like -- similar to what the landscape looks like today. Though the house and the image is a little further developed.

The lower image represents what the view would be with the project facilities constructed. And what you see in that lower image as Mr. Eich is highlighting that right now one of those structures in the right of the image with the conductors running cross the upper portion of the image north to south.

This viewing location is representative of travel route viewers along East Selma Highway, and in our

analysis we identified this as a moderate impact to visual resources to travel route viewers.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: A quick question, Mr. Petry.

On the 133 slide up here, we see the simulated structure here. Where is the next one going to -- where is the next one from there?

MR. PETRY: The next one to the south would be right out of your field of view at this location --

MEMBER KRYDER: Okay.

MR. PETRY: -- and south of the roadway essentially to the left of the image you see.

MEMBER KRYDER: Okay. So it would be on the left side of the highway that we have?

MR. PETRY: That would be the left side or south side of the highway.

MEMBER KRYDER: Okay. Okay. Thank you.

MR. PETRY: You're welcome.

CHMN STAFFORD: And this portion of the line that's being represented in the simulation for KOP-6, that's the line running north/south along Sunshine Road as visible from Selma Highway?

MR. PETRY: Yes, Mr. Chairman.

CHMN STAFFORD: Okay. And this house in the picture, this is the one where you received substantial feedback from the multiple generations that are planning on living there when it's constructed; correct?

MR. PETRY: That is correct.

CHMN STAFFORD: Okay.

BY MR. DERSTINE:

Q. That house is the -- to use Member Little's term, the mansion that we saw being constructed. Is that the same one?

A. (Mr. Petry) Yes, it is.

Q. Okay.

A. (Mr. Petry) From there I'll move forward to Key Observation Point 8. Key Observation Point 8 is down in the southern portion of our project study area, and it represents or is a simulation of the proposed subroute alternative B.

This is included in the application as Exhibit G-5, and it's representative of views from travel routes along Interstate 10 near exit 206 facing west forward the project. This location represents, again, a moderate impact to the travel route views along the roadway.

You can see in the upper image is the existing

condition photograph along Interstate 10, and, of course, in the lower image you can see the same with the project transmission structures crossing the roadway and then essentially running west along the Milligan Road alignment. This is again alternative Subroute B.

Q. So the first two simulations dealt with the subroutes that are no longer part of the preferred route but are included in the application, and we've had a fair amount of testimony about why we moved off of those subroutes, but we have presented the simulations and what the structures would look like on the landscape in both Subroute A and Subroute B?

A. (Mr. Petry) That's correct.

Q. And I think your next simulation now takes us back to the preferred route?

A. (Mr. Petry) It does. And that would be Key Observation Point 9. And KOP-9, again, shows the preferred route and is provided as Exhibit G-6 in the CEC application. It's representative of travel route views from Eleven Mile Corner Road looking south near Hackler Lane. This is very close to where our route tour 1 was this morning.

This is, again, representative of travel route viewers, and we assess this as a low to moderate impact to travel route viewers along Eleven Mile Corner Road.

What you see in these images it would be in the upper image the existing conditions with much of that existing transmission and distribution infrastructure running north and south and in some distance east to west.

And in the lower image you see the same but with the project facilities crossing over that infrastructure added in.

I'd also note in this -- in this image on the left you can identify the location of the home that we talked about today during route Stop 1. It's really to the left of the picture or to the east of where we're looking right now. We have another simulation we'll look at, again, of course, from that home.

MEMBER COMSTOCK: Mr. Chairman.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Comstock and then Member Kryder.

MEMBER KRYDER: Member Comstock.

MEMBER COMSTOCK: If I may, and I appreciate the graphics, and, you know, looking 100-some feet in the air it's probably hard to, you know, find something that would visually impair the scenery around there.

What I'm most concerned about is, you know, the 10 or 12 feet above the ground that's in your

right-of-way. How often does the right-of-way get cleaned up so that it doesn't visually impair what's at most people's eye level?

MR. PETRY: I think that would be a question for one of our APS witnesses, Member Comstock.

MR. DERSTINE: It sounds like Member Comstock's question goes to does APS maintain in terms of vegetation and growth and that sort of thing under the -- our the structures. Once we've constructed our line, what sort of efforts are there to maintain that and manage vegetation and growth. I assume there's safety considerations that go into that.

Is that -- do I have that right, Mr. Eich?

MR. EICH: Yes, you do. We do have a vegetative maintenance team that does regularly maintain our transmission lines, make sure we have those clearance needs from vegetation.

MR. DERSTINE: And how extensive is that in terms of do you allow anything to grow under our lines or what's -- or what are kind of the objectives and what do you look for in terms of that vegetation management?

MR. EICH: My understanding -- not being in that department, but my understanding is that there may be some allowances for some low-lying vegetation, but there are certainly larger types of vegetation that would

need to be removed that could endanger those clearances, and that extends to the width of the easement itself or the right-of-way itself.

MR. DERSTINE: Did that address your question?

MEMBER COMSTOCK: It did. And I wish I would have said it like you did, though. You did it better.

Yeah, if I could just look at the picture that's up there, if you look at the other side of the street or roadway, see the growth on the ground, the bushes under the other -- is that -- would that be under APS's consideration overgrown?

Would that be cleaned up or would it meet standards?

MR. EICH: I think it to me it looks somewhat low enough but, again, I would kind of defer to our vegetative maintenance team, but that does seem pretty low to me.

MEMBER COMSTOCK: Okay. But I think I'd like to know what does that look like in terms of maintenance for your folks, how that goes. I appreciate that.

MR. EICH: I would add specifically around poles I know that clearance is probably more needed

around those poles for our structures set up around those poles.

MEMBER COMSTOCK: Fire prevention, you know, the whole bit. Okay. Thank you.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: One minute. Member Kryder was up next.

MEMBER KRYDER: I'll take a pass on it.

CHMN STAFFORD: Member Little.

MEMBER LITTLE: I just wanted to address the subject that was just talked about.

I live in rural northern Arizona, and there's a pole in my -- on my property. And APS gets very unhappy with anything that grows around the base of the pole. They're not too concerned about anything else as long as long as it isn't getting close to the wires, but the pole, they want it cleared. They get kind of snarky with us.

MR. DERSTINE: I'm sorry, for the record, you said snarky?

MEMBER LITTLE: I did.

MR. DERSTINE: Okay. Well, I guess that's maybe a point to take home to the office that maybe we can do our vegetation management without being snarky.

Anything else on KOP-9, Mr. Petry?

MR. PETRY: Nothing from me unless there are any more questions from the committee.

BY MR. DERSTINE:

Q. Okay. The next one is KOP-10, and that's also a simulation that shows a portion of the preferred route.

Do you want to talk about that?

A. (Mr. Petry) Yes. This, again, as you noted is KOP-10. This shows the preferred route. It's included in the CEC application as Exhibit G-7.

And this represents residual views from East Dakota Drive south of the Pinal Central Substation. These are the residences, Member Little, I think you had some questions about, that residential development further south from Pinal Central. And this is a view from the northern portion of that residential development as well looking to the northeast.

This location represents what we would call a moderate impact to residential views from this area. And that's largely because of the existing contrast we see within these images. When you look to the north, you can see much of the existing transmission infrastructure as well as some of the infrastructure at and around Pinal Central Substation. And those transmission structures, that infrastructure, introduces the initial contrast from this view.

Whereas with the project facilities added in, there is a slight additive impact in terms of visual resources, but most of that initial contrast was created by the Pinal Central Substation. So we would consider this a moderate impact to residential views from this location.

Q. And, Mr. Petry, when you're using those terms you're categorizing say the -- on this one KOP-10 in particular whether you're grading the visual impact as moderate, that kind of designation, there is a recognized or accepted methodology for how you grade these visual impacts, and I don't know if that comes from NEPA or other sort of recognized methodology and grading visual impacts.

Can you just touch on the labels you're attaching to these impacts?

A. (Mr. Petry) I can, yes. Those impact levels essentially are identified in our application and really the definitions behind each of those impact levels are included as well.

And those impact thresholds or levels are defined through a systematic process. It largely follows the process that the Bureau of Land Management and the United States Forest Service uses in terms of identifying the existing scenery, the scenic quality, and then

identifying potential contrast and impacts to those sensitive viewer types.

So it is an established methodology, and although we're not in any sort of NEPA process being led by either of those agencies, it's a general recognized practice and methodology that can be applied within the visual resources industry.

Q. And so these are your judgments using that methodology for grading visual impacts, but the committee is certainly free to look at the existing condition and the simulation and make its own judgments about, you know, whether that looks low to moderate to high. I mean, we have the -- they have the benefit of seeing themselves and they can make their own judgments regardless of how you're -- you're framing the impact; right?

A. (Mr. Petry) Absolutely. And I've heard it said beauty is in the eye of the beholder.

Q. Right.

A. (Mr. Petry) All right. So it can very much be somewhat subjective in terms of what you like to see and what you don't like to see.

Q. Thank you. KOP-11?

A. (Mr. Petry) KOP-11, again, shows the preferred route, and it's included as Exhibit G-8 in the CEC

application. And it represents residential views from the residence on Earley Road facing southwest toward the project. This location represents a high to moderate impact to residential views from Earley Road.

Q. And we were at a portion of Earley Road that was not a road. And I think we termed it as the Earley Road alignment. So this is a different segment of Earley Road where it is actually a road.

Am I thinking about that correct?

A. (Mr. Petry) That is generally correct.

The Earley Road alignment as we get further to the east does actually turn into a road at some point. And from where this photo was taken further to the east of the preferred routes alignment along Earley Road we can see an actual roadway in the foreground view.

Q. Okay.

A. (Mr. Petry) We are looking to the west and can see that roadway. As the roadway continues to the west it ceases to exist, and that's where we pick up generally the alignment of Earley Road.

Q. Okay.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: A question, Mr. Petry.

You said this was moderate or high? I

missed that.

MR. PETRY: We consider this impact high to moderate, so sort of on the threshold between moderate and high.

MEMBER KRYDER: And the previous one was?

MR. PETRY: Considered moderate. And that was largely because of the existing contrast that is shown with Pinal Central Substation and existing infrastructure that's there already.

MEMBER KRYDER: It truly is in the eyes of the beholder. Thank you.

BY MR. DERSTINE:

Q. Now, I guess, to Member Kryder's point when I'm looking at the simulated condition in KOP-11, which is on Slide 141, maybe I just need to update the prescription on my glasses, but I have a hard time even seeing those structures, but you've graded that high to moderate. So the simulated structures are way off in the distance in the simulated condition for KOP-11, but at the same time you've considered that the high to moderate impact?

A. (Mr. Petry) Yes. And, again, part of the reason for that is a lack of existing contrast. While we do have some distribution infrastructure in the fore and middle ground view, we're largely lacking much of the contrast that was shown in the prior image, right, much

of that large-scale, dominate infrastructure.

For this image, you don't see as much in the existing condition photograph. And with the project facilities modeled in below, while they may not show up as well in the screen before us, the north-to-south segment is quite visible from this location, and because these are residences and we have a longer duration of view, we consider that a slightly higher impact in this area.

Q. All right. KOP-12?

A. (Mr. Petry) KOP-12 represents one of our recreation views from the project area. This shows, again, the preferred route, and it's identified as Exhibit G-9. It's a -- it is a view from Picacho Reservoir in the northeastern portion of our study area. It's facing northwest toward the project. And this location, again, represents a high to moderate impact this time to recreational views from the Picacho Reservoir.

In the upper image you can see some of the existing vegetation, the landscape around Picacho Reservoir. And in the very distance you can see some of the existing buildings and transmission infrastructure.

In the lower image you can see the same but with the project facilities added in, and what you see at this

location is where the project would extend from east to west along Selma Highway and then run south along the Vail Road alignment in the area that will be the future ADOT north/south freeway corridor as well as the future industrial areas.

Q. And then, I guess, part of the grading on this visual impact is that it's not a travel route where you have a short duration of the view. These would be people who are doing whatever they do at the reservoir, and so they would have longer duration of views, and those structures would be visible for longer periods of time if you were hiking or whatever you do there?

A. (Mr. Petry) That's correct.

Q. Okay.

CHMN STAFFORD: But, again, the simulation condition doesn't show the highway that's going to be constructed --

MR. PETRY: That's correct.

CHMN STAFFORD: -- approximately at the same time as the line; correct?

MR. PETRY: Yes. I apologize for speaking over you, Mr. Chairman. That is correct.

CHMN STAFFORD: Okay. All right. So then, I'm sorry, you said this was moderate to high for this one?

MR. PETRY: Yes.

CHMN STAFFORD: Okay. I guess, yeah, I mean, the highway will be visible. I mean, perhaps even audible from this location. So I think, I guess, that kind of mitigates the impact of the line from my perspective somewhat seeing how there's going to be a new highway located there. It seems like the best place to put the line would be near something else that we don't have control over that's going to be potentially even more destructive to the views and character of the area.

So just my two cents. Please continue.

MR. PETRY: Mr. Chairman, I appreciate that and agree.

In the interest of really showing a conservative analysis here and what the potential highest feature impact might be and with a lack of extreme certainty around the specific location on that future highway, that future freeway infrastructure, we didn't model that in terms of the simulated feature condition.

But you are correct the expectation is that there will be a future highway here as well as industrial facilities that will likely impact the view from Picacho Reservoir potentially even to a greater degree than what the project facilities we're showing here today might.

//

BY MR. DERSTINE:

Q. KOP-13, I think you're modeling the views from State Route 87?

A. (Mr. Petry) That's right. KOP-13, again, shows the preferred route, and this is included as Exhibit G-10. And it represents the travel route views from State Route 87 facing south toward the project. This is what we would consider a moderate impact to the travel route used from State Route 87.

In the upper image, again, you can see the view from SR 87 looking south, see some of the existing distribution infrastructure.

In the lower view you can see the same, but with the project facilities as proposed running east to west along Alsdorf Road going left to right within the view. Again, this is a location we would consider a moderate impact to travel route views.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: Another question for Mr. Petry.

Within the profession, if you were to hand this same set of observational points to 10 of your colleagues, is there a -- is there a template of some sort that they would all come in similarly grading these?

I'm fascinated by it. It truly appears to me in the eyes of the beholder, but I know you and I know you to be a man of integrity, and so there must be some professional modeling in your mind or in your experience. Help me understand some of that, would you, please.

A. (Mr. Petry) Yes, Mr. Kryder. And I appreciate the comment.

I would direct you to Exhibit E in the CEC application, and that can be found on E-1 under the --

MEMBER KRYDER: Which one?

MR. PETRY: Exhibit E.

MEMBER KRYDER: E-1?

MR. PETRY: Yes. And on the first page there on Exhibit E there's some information around the methodology that is employed, the visual resources methodology that is employed and is consistent with the industry standard.

It's something that, again, is used with BLM and -- Bureau of Land Management and Forest Service analyses and something created through those agencies in order to have a systematic methodology for visual resource analysis like this.

And there's a little further information as you go on, some particular information on page E-5 around what we call the impact thresholds. So those are the

high, moderate, and low impact thresholds that have been identified for these various KOPs and that were used on this project and are commonly used within the industry.

MEMBER KRYDER: Okay. Thank you very much. I got through some of the reading, but I didn't get that far in the notebook.

MR. PETRY: You're very welcome.

MEMBER KRYDER: It will give me something to do in case I can't get to sleep tonight.

MR. PETRY: I won't take that personally.

MEMBER MERCER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Mercer.

MEMBER MERCER: Mr. Petry, the Picacho Reservoir, how far is it from Picacho Peak?

MR. PETRY: I don't know how far that is from Picacho Peak offhand, but that is certainly something we can look up and give you a distance in just a moment, and we can circle back on that one, Member Mercer.

MEMBER MERCER: And this area is considered recreational?

MR. PETRY: It is, yes.

MEMBER MERCER: So there's water there?

MR. PETRY: There is water there occasionally varying levels and depths.

MEMBER MERCER: Occasionally. Okay.

MR. PETRY: During my recreation testimony, I'll give some additional detail around, you know, what sort of recreation occurs there, but it's generally bird watching, some hiking. Sometimes I think there's some fishing availability there as well.

MEMBER MERCER: Thank you.

MR. PETRY: You're welcome.

BY MR. DERSTINE:

Q. So we're on to KOP-14?

A. (Mr. Petry) So now we see a simulation from KOP-14. This, again, shows the preferred route as modeled provided as Exhibit G-11.

It represents residential views from the residences along La Palma Road facing north towards the project. This location represents moderate impact to residential views from La Palma Road and is also right near the location where we had route tour Stop 6 today.

So when we look to the north from route tour Stop 6, this was our view. We would have seen the existing distribution lines there today. The residences that we were finding shade in front of were right to the right of this view on the east side of the roadway here.

CHMN STAFFORD: I believe I think we -- someone -- either I or someone else asked the question

whose distribution lines were those. I think it was -- it was either yours or one of the electrical districts, I believe. ED-4?

MR. PETRY: Mr. Wiley confirmed that that is ED4's, Electric District 4's.

CHMN STAFFORD: And I seem to recall there was some talk about the some of these lines being -- these distribution lines being undergrounded.

Was that -- I thought you were working with one of the districts. Was that -- is this one of those or was that ED-2?

MR. EICH: Mr. Chairman, that was ED-2, and that was right as we leave the connection point to our future transmission line where we'll be connecting to get out of that congested bottleneck area.

CHMN STAFFORD: Okay. And then so that ED-2 was going to underground their distribution lines to work with you to clear those up?

MR. EICH: Yeah, we would work with them on undergrounding those as well as a future underbuilt line for them on the 230 structures.

CHMN STAFFORD: Right. Okay. And then so -- right, because they would be using the 69kV underbuild for that -- for their system; correct?

MR. EICH: Correct.

CHMN STAFFORD: Okay. But in this case we're looking at here at KOP-14, those distribution lines will remain in place?

MR. EICH: Those will stay as they are.

CHMN STAFFORD: Okay. Thank you.

MR. PETRY: Now we'll look at Key Observation Point 15. KOP-15 again shows the preferred route. It's included as Exhibit G-12. And it represents travel route views from Interstate 10 of the preferred route this time. We're facing east toward the project on Interstate 10. And this location represents a moderate impact to views from Interstate 10.

We saw previously KOP-8, which showed subroute alternative B as it travels over Interstate 10, and this is just a little ways down the road on Interstate 10 where the preferred route would cross over Interstate 10, so just an opportunity to juxtapose those views.

Now we have KOP-16 or Key Observation Point 16 again showing the preferred route included as Exhibit G-13. It represents travel route views from Eleven Mile Corner Road near the Milligan Substation. This location represents what we would consider a low impact to travel route views at this location.

Again, at this location you can see very

near where we were on route tour Stop 8 today the view from the south side looking north of the Milligan Substation. In the upper image you see some of that existing transmission infrastructure, and in the lower image you see the same, but with the preferred route on the east side of that existing infrastructure traveling north in this location interconnecting into the southern side of the Milligan Substation.

CHMN STAFFORD: Are those H-frame structures where the 230's going into the substation?

MR. PETRY: They are.

CHMN STAFFORD: Okay. I can't tell. Where's the 69kV going? Is it also going into that substation or is it going someplace else?

MR. EICH: Member -- Mr. Chairman, the 69 will be going into that but not at that location. It would be a different location, so that would be my understanding is wrapped around to the east side of that substation.

CHMN STAFFORD: Okay. So what we're looking at here is H-frames where the 230's coming into the substation, and that 69kV is going to go to a different set of poles and loop around from the east you said to feed into it a different way?

MR. EICH: That's how it's preliminarily

understood today. So at this point we just had the 69 just end right there because we weren't quite sure exactly which direction. But the 230 would be dropping into those A-frame structures in the substation.

CHMN STAFFORD: Okay. Thank you.

MEMBER FANT: Mr. Chair.

CHMN STAFFORD: Yes, Member Fant.

MEMBER FANT: Thank you, Mr. Chair.

Question for Mr. Eich.

When you stack electric lines, buried or overbuild/underbuild, is there a corrosive effect caused by those -- interaction of those currents or not really? Is that more just an electric current pipeline issue?

MR. EICH: I'm sorry, Member Fant, is there a corrosive effect or what exactly?

MEMBER FANT: If you stack your transmission lines, 230, 69, bury one, is there a corrosive effect on any nearby metal or not really?

MR. EICH: I am not aware of any.

MEMBER FANT: Okay. Thank you.

CHMN STAFFORD: Mr. Petry, please proceed.

MR. PETRY: Before I move on to KOP-17, Mr. Wiley provided some information to help us answer Member Mercer's question around the distance between Picacho Reservoir and Picacho Peak, and the information

is that as the crow flies that distance is approximately 16 miles.

MEMBER MERCER: Thank you.

MR. PETRY: You're welcome.

So this is Key Observation Point 17. Again, we saw this in the flyover yesterday in the virtual tour. This is representative of the preferred route. It's included in the application as Exhibit G-14, and it represents a residential view from the residence on Eleven Mile Corner Road south of the Pinal Central Substation.

This view is facing west southwest towards the project, and it represents a high impact to residential views at this residence along Eleven Mile Corner Road.

Based on the current preliminary design and as illustrated in this simulation image, the nearest structure would be approximately 150 feet away from the structure here. And, again, this was near Stop 1 where we were on the route tour today.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: So does Eleven Mile Corner Road run between those two structures?

MR. PETRY: Yes.

MEMBER LITTLE: So this is where it crosses, comes down, and then we've got turning -- these are turning structures, the one on the right maybe?

MR. PETRY: I believe -- and Wiley, correct me if I'm wrong here. I believe the structure you see in the foreground, the one closest to your view here, would not be a turning structure.

MEMBER LITTLE: Correct.

MR. PETRY: But the one in the distance --

MEMBER LITTLE: Right.

MR. PETRY: -- would be a turning structure. And it's on the east side -- or, I'm sorry, the west side of Eleven Mile Corner Road where then the project would go north to south on the west side and then travel east to west as we get further over here and closer to this residence.

MEMBER LITTLE: And do we know what direction this home faces?

MR. PETRY: I believe, Member Little, and I'm not speaking with certainty here. I believe it generally faces to the northeast -- or, I'm sorry, the east southeast. We can look to confirm that, but my recollection is that from this view as we're looking to the west that the entrance to the home was to the right of your view essentially on the east side of the

residence, and the residence is at a bit of an angle. It's not north, south, east, west, right?

MEMBER LITTLE: So this is kind of in their backyard?

CHMN STAFFORD: Or side yard depending on --

MEMBER LITTLE: Right.

CHMN STAFFORD: -- which direction it's oriented.

But this is the house if they look north, they have an excellent view of the Pinal Central Substation, don't they?

MR. PETRY: They do.

CHMN STAFFORD: It dominates their northward view.

MR. PETRY: They do. And a view to the northeast of the SunZia converter station as well.

MEMBER LITTLE: And just to confirm that you have been in touch with them, informed them, and have not had any comments or concerns expressed by that homeowner to you?

MR. EICH: Member Little, that's correct.

MEMBER LITTLE: Thank you.

MR. PETRY: I'll now move on to Key Observation Point 18. This is the simulation of the

preferred route. It was originally provided in the application, but we've updated it since then, and so it's now identified as Exhibit APS-19.

And this represents the travel route views from State Route 87 near Selma Highway facing north towards the project. It represents a moderate impact to travel route views at this location, and, again, as mentioned and as discussed in the virtual tour yesterday, this was initially included in the application, but it's been updated to include the proposed Selma solar project's gen-tie transmission line structures as well.

In the upper image you see that existing view looking north on Selma -- on State Route 87. And in the lower image you see the same, but with both the proposed project facilities and Selma Solar's gen-tie added in.

And at this location the project facilities that Mr. Eich is highlighting run east to west and would be crossing over State Route 87. The Selma solar project certificated gen-tie would also cross over State Route 87, but once it gets to the east side would then extend to the north.

That does it for key observation points and the visual simulations.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I notice that a couple of places in the description of the key observation point results, I guess, in Exhibit E you mention that there is scale and difference of material and color of proposed structures which adds to the contrast with the existing structures.

I'm wondering -- it kind of looked to me like it's a mishmash out there. There's some that's dark and some that's silver, and so my initial reaction was would it be possible to modify whatever it is you install so that it matches what's there? But for the most part it appeared to me that you matched one and it would not match others.

Am I correct in that?

MR. PETRY: You are correct, Member Little. In addition to the various colors of the metal structures, there are numerous wooden transmission structures and distribution-level structures as well.

MEMBER LITTLE: Okay. Thank you.

BY MR. DERSTINE:

Q. Do you want to wrap up your conclusions concerning the visual impacts of the project?

A. (Mr. Petry) Yes. We found that overall the project structures will be similar in form, line, colors,

texture, and scale as compared to the existing transmission lines and infrastructure associated with the existing Pinal, Central, and Milligan substations as well as the existing transmission infrastructure throughout the study area, which will result in overall moderate to low impacts to scenery.

The scale of the project's transmission structures would increase the visual contrast introduced by the project. As such impacts to sensitive viewers will range from low to high as we've discussed in some of these locations, and that's as a result of the perceived contrast introduced by the structures as well as the similarities or differences with the existing transmission infrastructure and importantly the duration of that view as well.

Based on our assessment, the preferred route and alternative subroutes will result in a range of low to high impacts to visual resources depending on the viewing location and duration of the view.

Due to the similarities, again, in the form, line, color, texture, and scale as compared to existing transmission lines, the project is considered environmentally compatible with scenic and visual resources.

CHMN STAFFORD: Thank you. Before you move

on to recreation, which I think is next, I had asked earlier about what the minimum height of the 69kV line would be. I know the application says that the minimum height of the conductor above grade is going to be 24 feet, and that's talking about the 230kV.

I guess what I wanted to find out was does that mean that the 69kV will be lower than 24 feet or that the 230kV will have to be higher because the 69kV will have to be 24 feet or some other distance?

MR. WILEY: Mr. Chairman, we do have a couple answers to the questions that you and Mr. Comstock had asked.

For the ground clearance for 69kV that is 24 feet. The 230kV would be above that. So the minimum clearance would be the lowest point of the 69kV, which would be 24 feet for these structures.

That is the same for the I-10 crossing as well. That was another question I think that was raised. And that is because APS plans for full semitrucks to come under anywhere in our right-of-way because that is a potential, so we have the same clearance for the I-10 as we do anywhere else on a right-of-way.

The railroad does have slightly different requirements for 69kV. They have a 27-foot, 8-inch clearance requirement. Our plans right now from where

we're at in I think our 60 percent design is a 38 foot, 8 inches, so well above the minimum requirement of the railroad.

CHMN STAFFORD: And that's all from the 69kV, which is the lowest hanging conductor, so the 230's all going to be above that, then?

MR. WILEY: That is correct.

CHMN STAFFORD: And what's the -- and there's a -- was it WECC has a certain -- doesn't WECC have a requirement for distance between conductors on the same pole? I believe there is, but I don't know what it is off the top of my head.

MR. WILEY: I'm not sure of any WECC requirements around spacing. There are some spacing for phase to phase.

CHMN STAFFORD: No, not WECC. It would be NERC. It would be a NERC requirement, the spacing of the conductors; right?

MR. WILEY: There are certain requirements that phases have to be so far apart. I don't have that available in front of me.

There was one other question about the structures themselves and the arms and how wide they are from arm to arm, and that would be 24 feet from one phase of 230 to the second phase of 230kV.

CHMN STAFFORD: Thank you very much.

BY MR. DERSTINE:

Q. All right. SWCA also analyzed the recreation resources in the area and analyzed what sort of impacts the project may have on those resources; correct?

A. (Mr. Petry) That's correct.

And as part of that, we completed an inventory much like I described in the land use discussion earlier. We looked at relevant general and comprehensive plans, recreation open space and trails plans, and aerial photographs to identify recreation facilities.

Existing recreation uses that were identified within the study area include designated trails, a City of Eloy park as well as fairgrounds, a golf course, and other active and passive recreation uses.

Two of the larger recreation facilities in the study area include the Pinal County Fairgrounds and the Tierra Grande golf course. The Pinal County Fairgrounds we saw -- we passed near route tour Stop 1. We indicated that was located to the northwest of that route tour stop.

The Tierra Grande golf course is located west southwest of the Pinal Central Substation.

We also have the City of Eloy's Jones Park, which is located in the southern portion of the study

area within the central core of the City of Eloy. It's a little less than one mile northwest of the preferred route.

And as we've talked about a bit already, the Picacho Reservoir provides some passive recreation activities within the area. That includes bird and wildlife watching, hiking trails, and occasionally some fishing opportunities as well. And, again, that's located in the northeastern portion of our study area.

According to Pinal County's open space and trails master plan, there are three planned trails within the study area largely following existing roadways and canals.

Q. And based on your inventory, have you reached any conclusions concerning the impact of the project on those resources?

A. (Mr. Petry) Yes, we have. And that is that the project may have negligible and minor short-term access impacts to some of those recreation facilities during construction. For example, you know, disbursed recreational opportunities along trails may be temporarily restricted during construction but would be reinstated after completion.

Active recreation facilities such as Pinal County Fairgrounds, Tierra Grande golf course, and Jones

Park would not be directly affected by the project.

Indirect impacts, if any, would, again, be minimal and short term related to access.

APS will continue to coordinate and cooperate with the appropriate planning authorities and communities as needed in regard to recreation uses within the project area with due consideration for the operation, maintenance, and safety requirements of the project and the local recreation facilities themselves.

With that, we determined that the project's preferred route and subroutes are environmentally compatible with existing and planned recreational resources.

Q. All right. One of the areas that we're to consider and analyze are noise impacts. SWCA was the environmental consultant for this project, and SWCA hired its own noise expert, I understand. And that would be Mr. Wiley.

Are you ready to discuss the -- how much noise is going to be generated by this project, Mr. Wiley?

A. (Mr. Wiley) Yes. APS did perform a noise analysis considering various weather conditions that might affect the amount of noise experienced.

On the left-hand screen that is Slide 169 you will see a plot of the expected noise under these various

conditions. Under fair weather conditions, the audible noise generated by this line is approximately 17 decibels. Under light rain conditions the audible noise is expected to be approximately 42 decibels.

According to the occupational and health -- the Occupational Safety and Health Administration, or OSHA, 40 decibels would be equivalent to a soft whisper.

This line is largely located in agricultural and future industrial areas with existing power lines. The new lines are expected to be consistent with the noise levels of the existing lines, and minimal noise impacts are expected due to this project.

Q. So if it's not raining and I'm standing under the conductor, you're telling me I wouldn't hear anything because the anticipated noise level is 17 decibels, but in a light rain, I would hear someone whispering in my ear or noise to that effect?

A. (Mr. Wiley) Yes, that is correct.

Q. Okay.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I would like to commend the applicant. We often get a bunch of information just dumped on us in this particular category, and the fact that you actually did model the lines I thought was very

commendable.

I also would like to mention that, you know, we stood under some transmission lines today, and I don't recall there being any objectionable noise. Thank you.

BY MR. DERSTINE:

Q. Separate and apart from noise does APS anticipate -- you know, I want to make sure that we're not interfering with any communication facilities. Have we analyzed and do you have an opinion on whether there will be any interference with communication facilities once this line is constructed?

A. (Mr. Wiley) I do not. We are not anticipating any interference with cell towers or radio communications with the addition of this project.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I have a question. And you don't have a slide here for the radio interference and the television interference, but this is just because I'm curious.

In the application, it shows where as the noise peaks under the transmission line center line and drops pretty much equivalently on either side, with the radio interference and the television interference it

does not peak right at the center line. And I'm curious why. There's a little dip on one side.

Do you know the answer to that question?

MR. WILEY: Member Little, I believe you're referring to Exhibit I, I-6 and I-7.

MEMBER LITTLE: I am.

MR. WILEY: I don't have an exact answer for that. I believe it has to do with the phasing and having three phases for each circuit and some unbalanced impedances that come out from that, and that leads into some of the interferences, so you do have a slight offset for where those minimum impacts would occur.

But as noted on those plots, they are still very close to the center line of the structure.

MEMBER LITTLE: They are definitely.

But I was wondering whether these were models for a single-circuit transmission line that maybe have two phases on one side and one phase on the other side perhaps?

MR. WILEY: I believe all of these studies are reference for the full build-out of the line, so inclusive of both circuits.

MEMBER LITTLE: Okay. Thank you.

BY MR. DERSTINE:

Q. All right. With that key testimony on the noise

from the project, Mr. Petry, are you ready to give us some of your overall conclusions on the environmental compatibility of the project?

A. (Mr. Petry) I am.

The project conforms with the applicable management plans including the City of Coolidge and City of Eloy general plans and the Pinal County comprehensive plan.

The project is located in a developing area among existing large-scale utilities and planned industrial facilities such as transmission lines, substations, manufacturing facilities, and it's proposed to be in a common alignment with the planned future ADOT north/south freeway as well as the Inland Port Arizona infrastructure.

The project will have minimal effects to existing and future land uses and biological, cultural, visual and recreation resources resulting in an overall minimal environmental impact.

Based on our analysis and reporting, the project is environmentally compatible with the factors set forth in Arizona revised statute Section 40-360.06, and is consistent with previous projects approved by this committee.

The preferred route was developed through a

robust and systemic public siting process that prioritizes siting near existing or planned linear facilities or industrial facilities. As such the preferred route minimizes residential and recreation land use impacts, it minimizes variable impacts to sensitive recreation and residential areas, and is supported by City of Coolidge the City of Eloy, Pinal County, and the Arizona Department of Transportation.

Q. Well, thank you for that, Mr. Petry.

I think we're going to move on to Mr. Eich who's going to cover our public and stakeholder outreach efforts.

Is that right? Is that where we're at, Mr. Eich?

A. (Mr. Eich) That's correct.

Q. Do you want to start us off with a summary of the different types of outreach methods that were used for the project?

A. (Mr. Eich) Yes. The different types of outreach that were used include open houses both in person and virtual, project newsletter mailings and e-mails, newspaper advertisements, a project website, a project telephone information line, digital outreach that includes both social media and customer e-mails and as well as stakeholder briefings.

Q. Do you want to start with describing the in-person and the virtual open houses, tell us when those occurred, and how many people you got out to visit your open house?

A. (Mr. Eich) Sure.

We held two rounds of in-person open houses for this project. Both rounds were held at the Pinal County Fairgrounds for two nights each. Our first round was held April 16 and 18, 2024, from five to seven p.m. where we had 19 attendees. Our second round was held November 19 and 20, 2024, from five to seven where we had 18 attendees.

We also launched a virtual open house on April 16, 2024, alongside our in-person open house allowing visitors to sign in, access project details, view printable maps, and learn about the siting process as well as ways to provide feedback.

The virtual open house site received about 525 visits from the launch until its update in November 2024 aligning with our second round of open houses.

And the analytical data shows approximately 885 total visits to the virtual open house site through June 2025. The link to this virtual open house can be found on our project web page.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: A quick question on that. Were those unique visits? If you go back a slide. That one. Where you have 525 and 885 were those unique visits or did you collect that data?

The reason for my question was in one of the other hearings as we looked at this, they found out that some of the Staff had been visiting it regularly as they were building it and it inflated the numbers. And I was just wondering.

MR. EICH: Member Kryder, I am not certain, but we will look into it and let you know.

MEMBER KRYDER: Sure.

BY MR. DERSTINE:

Q. So you used newsletters to publicize these open houses. Do you want to walk us through the newsletter outreach efforts?

A. (Mr. Eich) Yes. Four newsletters were sent to about 14,000 recipients announcing the project and sharing updates, details surrounding the open houses and public hearing, contact information, and website links.

Q. Can you -- I guess I'm struck by that number, 14,000 recipients. Just based on our route tour today, I have a hard time where 14,000 people live in the project area just based on our tour.

Can you use the map on Slide 181 and show the area that you used to collect addresses and used for your mailing efforts?

A. (Mr. Eich) Yes. We -- I'll point to this map on the left. I just want to point out the notification area that I'm trying to trace with my laser pen right here. It's this black line. So that notification area includes the 14,000 recipients.

Again, this is inclusive of the study area and notification area that we identified from the very beginning. Our communication continued to go out to all these recipients from the beginning to the end. Even though routes began to merge more on the east side of the project we felt it important to continue to notify the original public from the beginning to the end.

Q. And you used that much larger notification area in part because as we've talked the PEIP project included not only the new 230kV pole line but also a 69kV pole line, and so in looking at what's the starting point for an appropriate location for the separate 69 and the 230 facilities, you thought it made sense to use a much larger area, and you sent newsletters out to that broader area throughout the history of the project?

A. (Mr. Eich) Yes, that's correct.

Q. Okay.

CHMN STAFFORD: Member Hill, you have a question?

MEMBER HILL: Thank you, Mr. Chair.

These 14,000 recipients, is this based on tax parcel data, mailing addresses, so where people receive their tax bills, or did you mail this directly to addresses? How did you -- did you sort that?

MR. EICH: So I can try to answer this, but Mr. Petry is -- SWCA is who helped us acquire this. But he just whispered to me it's the assessor records that are pulled from the assessor's site. So that would include property addresses within the boundary as well as owner addresses that may be in some other state or location.

MEMBER HILL: So my understanding was that assessor records is where the property tax bills are sent?

Do you have a different understanding of that, Mr. Petry?

MR. PETRY: No, I don't.

MEMBER HILL: Okay. So it's -- so the 14,000 addresses were to where people receive their property tax bills, not necessarily to tenants or others that live in a home?

MR. PETRY: They're to the identified

owners of all the parcels within the --

MEMBER HILL: Okay. So the ownership.

MR. PETRY: -- preliminary siting area.

MEMBER HILL: Okay.

MR. PETRY: We also had a stakeholder list that Mr. Eich will get into some detail on.

MEMBER HILL: Okay.

MR. PETRY: Just the individual stakeholders that were identified throughout the area as well as the opportunities for people to add themselves to mailings lists whenever possible, which we had a number of people who asked for that as well who maybe received some of the notifications in various ways or maybe outside of our siting area that requested to be added to the list as well.

MEMBER HILL: Okay. Thanks.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Yes, Member Comstock.

MEMBER COMSTOCK: At your open houses and/or your mailers were any of them produced or had translators at the events where English may not be the primary language?

MR. EICH: Member Comstock, yes, we made sure we had Spanish-speaking interpreters at the open houses. We also included a note on each newsletter in

Spanish. APS does also host a Spanish portion of the APS site that each of our projects do include that operation for Spanish speaking.

MEMBER COMSTOCK: Thank you.

MR. EICH: I guess just to finish up here, each of these newsletters were sent prior to each open house as well as an additional update between the last open house and the hearing and then as well as this hearing. So that's why there are four newsletters that we see here.

The first newsletter was sent April 8, 2024, to announce that first open house. Again, to provide the project -- announce the project and as well as provide ways to contact us, ways to get to our project website, QR codes. We also sent a second newsletter November 5, 2024, in announcing our second open house as well as provide those updates.

That second newsletter included a map showing those preliminary preferred routes and subroute alternatives that we spoke to early also directing customers to the web page to continue to learn more and announce the open house.

The third newsletter was sent out May 20, 2025, to announce the preferred route for the project and then as well to solicit any feedback that customers may

have and provide project updates.

The fourth newsletter was recently sent out August 19, 2025, to announce this hearing and provide information on how the public could participate in this hearing as well as another project map showing the preferred route.

CHMN STAFFORD: Now, that August 19 newsletter, that's included as Exhibit APS-16; right?

MR. DERSTINE: That's correct.

MR. EICH: Yes, that's correct. Thank you, Mr. Chairman.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: A question. Is the 14,000 recipients here times four for the four newsletters, or is that the composite of the four newsletters?

MR. EICH: It's 14,000 every time.

MEMBER KRYDER: Each time, okay.

And was the newsletter in an envelope?

What was the shape or form of it in the sense did it come in a postcard, et cetera, et cetera?

How was it?

MR. EICH: It's printed on -- well, this version was printed on a 11-by-17-sized sheet that was then folded a couple of times and then taped on one edge.

MEMBER KRYDER: Okay. So in lieu of an envelope it was an 8 by 14 -- 8 and a half by 14 folded?

MR. EICH: Yes.

MEMBER KRYDER: Thank you. That's very helpful.

MR. EICH: We do plan on sending a fifth newsletter following this hearing and a subsequent ACC decision to announce that decision and provide expected project dates and things of that nature.

MEMBER KRYDER: One further question on this. Are all 1400 -- 14,000, excuse me, recipients APS customers?

MR. EICH: No, they aren't. APS does cover a portion of this notification area, but other utilities such as ED-2 do cover quite a bit of this area.

MEMBER KRYDER: Okay. So it's not a possibility of hitting the same ones by putting it in a monthly billing or something like that?

So that was what I was getting at.

MR. EICH: Correct.

MEMBER KRYDER: Thanks.

BY MR. DERSTINE:

Q. All right. In addition to newsletters you also used ads that you published to try to generate interest in the open houses?

A. (Mr. Eich) Yes. Ads were placed in two newspapers before each open house. Similar to the newsletters the newspaper ads provided details about the project, information about the open houses, contact information, including project phone line and e-mail as well as links and QR codes to the website.

These ads were published in the Casa Grande Dispatch on April 9 and November 12, 2024, as well as a Trivalley Dispatch on April 11 and November 14, 2024, to announce the open houses. And we also utilized these same newspapers to place the notifications for this hearing.

Q. You also used a project website and e-mails to APS customers; correct?

A. (Mr. Eich) Yes. We managed a project website under the APS.com banner for customers to access project updates, newsletters, and links to the siting and CEC documents.

We also included a project telephone information line, which was maintained to allow customers another avenue to learn about the project, leave comments, or request a follow-up call from a project team member.

E-mail notifications were also sent to customers within the notification area whose e-mail addresses are found within the APS customer information system. These

notifications contained a brief description of the project, the open house information, and how to provide input. It also had links to the project website.

A notification was also sent with information for this hearing.

This green table on the right shows the metrics of those e-mail notifications, including the dates that the e-mails were sent, the number of recipients that received those e-mails, how many of those recipients actually opened the e-mails, and then how many clicked on a link within those e-mails.

Q. You also used social media. The Chairman's procedural order requires to use social media to publicize this hearing, but we also use social media to publicize the open houses and our project; correct?

A. (Mr. Eich) That's correct.

We implemented a social media strategy that involved placing advertisements against Facebook and Instagram platforms, including their video feeds, profile, and explore sections, stories, reels, and marketplace. This approach served as an additional avenue for engaging with our customers.

And the ads were directed at customers throughout the notification area. This map on the left shows the radius within which those social media ads were

placed. And, again, those ads coincide with each open house as well as this hearing.

The green table on the right shows the metrics of those ads including the date ranges that they were placed and the number of reaches and clicks from each of those.

Q. Now, the first column you and I have -- well, when I saw that slide and I said, Stephen, how did we send this out to 67,000 -- or what's 67,000 reaches initially and then it drops down to 13,000 and 9,000. My understanding is that a reach is a unique individual who had seen or viewed your social media ad.

And it's my understanding, and correct me if I'm wrong for the record, that initially you used a much larger or your social media team had a much larger area that the social media posts went out to, and then it was tailored as we moved forward.

Is that your understanding as well?

A. (Mr. Eich) Yes, that is my understanding.

Originally the radius was much larger. Our social media analyst said that was because of the meta required or the platform used by Facebook to acquire the data. The meta means the minimum reach number that it has to go out to, and at the beginning that was larger, but then they continued to update that meta to be able to

narrow down the focus, which this image on the left shows that that focus that it was able to get narrowed down to, which may explain the reason for the difference in the numbers of reaches.

Q. So meta is the name of Facebook and Instagram platform, but it's also a term that you understand that they use to, I guess, quantify how many or the larger the area that you use to send out your social media ads?

A. (Mr. Eich) That's how I understood it.

Q. Okay. All right. Well, we're all learning in the social media world, I guess.

Anything else you wanted to add on the social media campaign?

A. (Mr. Eich) I will say I did get an updated number for when this ended on the 8th. We had almost 13,000 reaches and over 530 clicks.

Q. And so the unique open is -- the reach is how many people saw it, and then the unique open is if they actually did something in response to seeing the post, and that is clicking on a link you had that would take the viewer to the project website; is that correct?

A. (Mr. Eich) That is correct.

And that was specific to information regarding this hearing --

Q. Okay.

A. (Mr. Eich) -- on this latest number.
Q. On the latest number. Okay.
And the prior social media post, if I clicked on it what would that do for me?
A. (Mr. Eich) It would take you to the project website.
Q. All right. Well, you used the social media newsletters, good old-fashioned newspaper ads, open houses both virtual and in person.
Did you also spend time briefing cities, state agencies, and other stakeholders concerning the project?
A. (Mr. Eich) Yes, we did.
Project stakeholder briefings were held multiple times as shown on the table on the left of the left side of the -- of the left screen.
Project stakeholders are shown over on the left side of this table. And they include the City of Casa Grande, City of Coolidge, City of Eloy, Pinal County, Arizona Department of Transportation, Arizona State Land Department, the irrigation and drainage districts, the Electric District 2, Saint Holdings or Pinal Land Holdings and Skydive Arizona.
We also corresponded with and received a written response from the Arizona Game & Fish department regarding their environmental review of the data provided

to them, which Mr. Petry spoke to.

We also met with the State Historic Preservation Office to discusses the upcoming large transmission projects across the state including PEIP and to ensure alignment and gather their input and share our tribal outreach strategies with them, to which they appreciated hearing and supported.

We have provided SHPO and the PEIP cultural studies for their review receiving written feedback as Mr. Petry spoke to earlier.

Q. So when you said the table on the screen, I'm sorry, I just want to make sure for the record that's Slide 189 of APS Exhibit 6, that's the table you're referring to?

A. (Mr. Eich) Yes.

MR. DERSTINE: Okay. Sorry.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I notice that the stakeholder briefings, some of them were almost two years ago. I'm assuming that all of those people got all of this -- the letters and updates and all of that since then, so that was not -- that was a meeting, but they've gotten information since then; is that correct?

MR. EICH: Yes, that's correct.

MEMBER LITTLE: Okay. And my question about the tribes, it looks like mailings were sent, e-mails were sent, and phone calls were also made; is that correct?

MR. EICH: Correct. And I can get into a little more detail about our tribal outreach now.

MEMBER LITTLE: Thank you.

MR. EICH: Okay. And that began with contacting all the tribes related to all our large APS transmission projects throughout the state. Then narrowing the focus to those tribes relevant to each specific project.

Using the SHPO's Government-to-Government Consultation Toolkit, we identified 21 tribes involved in all our upcoming projects throughout the state, which includes PEIP. We then notified the designated tribal representatives through certified mail and e-mail, which provided details regarding the projects, project maps, and contact information, and offers to meet for further discussion.

We then followed up that with phone calls to ensure that they did receive that -- those mailings and e-mails and were able to confirm that with all 21 tribes.

Although the Government-to-Government

Toolkit found no tribal boundary geographically within the PEIP notification area, it did identify 11 of the 21 tribes that were affiliated with the area as shown on the right side of the left screen here. These are the 11 tribes that it did identify as being affiliated with the notification area.

We -- two tribes, the Salt River Maricopa -- the Salt River Pima Maricopa Indian community and the Gila River Indian community's utility authority did request meetings. And we continued to inform all 11 tribes through three additional certified mailings and e-mails sharing project updates and, again, inviting feedback.

All methods of outreach and corresponding dates are also listed on that table as you identified, Member Little.

CHMN STAFFORD: And that's the table on Slide 189; correct?

MR. EICH: Yes. Slide 189 has that table on the right.

Earlier this year I just also wanted to add APS Staff presented our tribal outreach strategy to Maria Dadger. She is the executive director of the intertribal council of Arizona. Ms. Dadger responded favorably to the plan and indicated interest in future collaboration

as we work to strength our engagement with tribal communities across Arizona.

And engagement with tribal communities will be maintained throughout the construction phase, and all archaeological studies undertaken will be made available for their review.

Feedback from the tribes from the tribal representatives have been positive with some expressing appreciation for our outreach and engagement initiatives.

Exhibit APS-17 includes copies of these outreach letters.

BY MR. DERSTINE:

Q. Do you want to turn to -- do you have the APS-17 in front of you?

And can you kind of just walk through what's included under APS-17 and describe what how that fit into our tribal outreach effort.

A. (Mr. Eich) So beginning with the first letter, this January 14, 2025, letter on page 1, that was our outreach to all 21 tribes providing information regarding the number of large transmission projects at that time known throughout the state and, again, explaining a little bit about each project and requesting opportunities to meet with them for further discussion and contact information.

It also included a map showing the general locations of those throughout the state in relation to the different geographic tribal boundaries throughout the state.

It also includes the follow-up letter on February 3 as a follow-up to the PEIP-specific project, again, providing some details about the project and referencing our initial outreach -- this is in relation to that -- and ways for them to be able to provide input and further contact information given to them.

It also provided a map of the location. This map looked a lot like the map I spoke to early with the different colored segments.

The May 23 update was also sent out to these same 11 tribes providing an update again to the project with a cover letter as well as a copy of the newsletter. We -- this is besides -- beside the newsletter that was sent out to them as part of the overall effort. This was more a more focused effort for them.

And, again, e-mails went along with these certified mailings as well.

And I believe there are three of those PEIP project-specific letters. Yes, there is. There's this last one on August 21 that went out to them as well providing a copy of the newsletter again with information

for this hearing.

CHMN STAFFORD: Thank you, Mr. Eich.

I think our court reporter needs a break. We've been -- I think we've gone over 90 minutes, so let's take a brief recess and come back in about 10 minutes. I think at that point we'll talk about where we are and then decide whether we want to continue or break for the day and come back in the morning.

With that let's take a recess. We stand in recess.

(Recess from 4:53 p.m. to 5:06 p.m.)

CHMN STAFFORD: Let's go back on the record.

Mr. Derstine, we're getting close to the end of your direct. Approximately how much longer do you think you have to finish all the testimony and covering the exhibits?

MR. DERSTINE: Well, Ms. Benally was nudging me and saying you can do this in 10 minutes. I hate to say 10 minutes and it takes me 30 minutes, so I'm going to say in 30 minutes we should be able to get through the remaining testimony from Mr. Eich, and I think Mr. Wiley and maybe other members of the panel have been doing some research to follow up on some of the questions the committee members had, so we want to

address those, and then we would rest our case and be done.

CHMN STAFFORD: All right. So I'm looking to the members. Do you want to continue now after 5 and try to get through the direct and then come back tomorrow and deliberate or do you want to call it a day and then come back and have them finish up in the morning and then deliberate?

MEMBER KRYDER: Let's finish in the morning.

MEMBER HILL: I think we can finish today.

I'm with Ms. Benally. I think we can do it.

MEMBER LITTLE: Finish in the morning, please.

MEMBER HILL: All right. I have been out voted.

MEMBER KRYDER: How about, Member Hill, you could finish today and I'll finish tomorrow?

MEMBER HILL: I'm out voted.

CHMN STAFFORD: All right. Well, then I guess we will adjourn -- we will recess for the evening and come back at nine a.m. Hopefully 30 minutes to complete the direct case and get all the exhibits covered, and then we'll move on to deliberations. I'll

have the Chairman's exhibits e-mailed out in the morning, so they're ready to go when we start. And then once you do your closing, you can proceed to the deliberations on the certificate.

All right. With that we stand in recess until nine a.m. tomorrow.

(Proceedings recessed at 5:08 p.m.)

STATE OF ARIZONA)
)
COUNTY OF MARICOPA)

BE IT KNOWN that the foregoing proceedings were taken before me; that the foregoing pages are a full, true, and accurate record of the proceedings, all done to the best of my skill and ability; that the proceedings were taken down by me in shorthand and thereafter reduced to print under my direction.

I CERTIFY that I am in no way related to any of the parties hereto nor am I in any way interested in the outcome hereof.

I CERTIFY that I have complied with the ethical obligations set forth in ACJA 7-206(F)(3) and ACJA 7-206(J)(1)(g)(1) and (2).

Dated at Phoenix, Arizona, September 14, 2025.

JENNIFER HONN, RPR
Arizona Certified Reporter
No. 50885

I CERTIFY that GLENNIE REPORTING SERVICES, LLC, has complied with the ethical obligations set forth in ACJA 7-206(J)(1)(

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