

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF MARICOPA ENERGY CENTER, LLC, OR ITS ASSIGNEES, IN CONFORMANCE WITH THE REQUIREMENTS OF A.R.S. § 40-360 et. seq., FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE MARICOPA ENERGY CENTER 500KV TRANSMISSION LINE PROJECT.

Docket No. L-21206A-22-0243-00207

AMENDMENTS TO APPLICATION FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY



Maricopa Energy Center, LLC ("Maricopa Energy" or "Applicant"), through undersigned counsel, hereby submits the following amendments to the Application for a Certificate of Environmental Compatibility seeking authority to construct the Maricopa Energy Center 500kv Transmission Line Project ("Application") that was originally filed on September 8, 2022. Pursuant to the Joint Stipulation between the Applicant and Intervenor Courthouse Ag Holdings, LLC, Maricopa Energy hereby withdraws its request for approval of Alternative A commencing at the proposed S13 switchyard area. Instead, Maricopa Energy seeks approval of Alternative A to begin only from the proposed switchyard S17. An amendment to the CEC Application effectuating this change is included as **Attachment A**. Alternative A is the Applicant's preferred route, although approval of Alternative B is still needed for the reasons that will be discussed at the hearing.

Additionally, Maricopa Energy submits a second amendment, unrelated to the Stipulation, that increases the requested maximum height of the supporting structures from approximately 190 feet to approximately 220 feet. As will be discussed at the hearing, various configurations will be necessary to ensure that the Project is compatible with existing infrastructure and terrain, and the Project may require a pole height in excess of 180 feet at the crossing of the existing Harquahala to Hassayampa

1	500kV transmission line south of the Delaney Substation. An amendment to the CEC				
2	Application reflecting this change is included as Attachment B .				
3	RESPECTFULLY SUBMITTED this 19th day of October, 2022.				
4	OSBORN MALEDON, P.A				
5	Meglanti. Gras				
6	Meghan Grabel Elias Ancharski				
7	2929 N. Central Ave 21st Floor				
8	Phoenix, Arizona 85012 mgrabel@omlaw.com				
9	eancharski@omlaw.com				
10	Attorneys for Maricopa Energy Center, LLC				
11					
12	ORIGINAL of the foregoing and 25 copies were filed this 19th day of October, 2022 with:				
13	Utilities Division-Docket Control				
14	ARIZONA CORPORATION COMMISSION				
15	1200 W. Washington Street Phoenix, Arizona 85007				
16	COPIES of the foregoing hand-delivered this day to:				
17					
18	Paul A. Katz Chairman, Arizona Power Plant and				
19	Transmission Line Siting Committee				
20	15 South 15th Avenue Phoenix, Arizona 85007-2926				
21	Paul.Katz@azag.gov				
22					
23	COPIES of the foregoing e-mailed this day to:				
24	Robin Mitchell, Director – Legal Division				
25	ARIZONA CORPORATION COMMISSION 1200 W. Washington Street Phoenix, Arizona 85007 rmitchell@azcc.gov Counsel for Utilities Division Staff				
26					
27					

1	Elijah Abinah, Director – Utilities Division
2	ARIZONA CORPORATION COMMISSION 1200 West Washington Street
3	Phoenix, Arizona 85007
4	eabinah@azcc.gov
5	Glennie Reporting Services, LLC
6	1555 East Orangewood Phoenix, AZ 85020
7	admin@glennie-reporting.com
8	Sean M. Carroll
9	CLARK HILL, PLC 14850 N Scottsdale Rd, Suite 500
10	Scottsdale, AZ 85254
11	scarroll@clarkhill.com
	Sheryl A. Sweeney
12	CLARK HILL, PLC 3200 North Central Avenue, Suite 1600
13	Phoenix, AZ 85012
14	ssweeney@clarkhill.com
15	By: Patricia D. Palmer
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	
	1

Proposed Amendments to Application for Certificate of Environmental Compatibility Maricopa Energy Center 500kV Transmission Line Project

CEC Application, Case Caption Page

DELETE

Alternative A: S1/2 S13 T2N R9W, S1/2 S18 T2N R8W, S1/4 S17 T2N R8W, N1/2 S20 T2N R8W, W1/2 S21 T2N R8W, SE1/4 S21 T2N R8W, NE1/4 S28 T2N R8W, W1/2 S27 T2N R8W, SE1/4 S27 T2N R8W, SE 1/4 S26 T2N R8W, N1/2 S35 T2N R8W, NW1/4 S36 T2N R8W

Alternative A-1: S1/2 S13 T2N R9W, S1/2 S18 T2N R8W, S1/4 S17 T2N R8W, N1/2 S20 T2N R8W W1/2 S21 T2N R8W, SE1/4 S21 T2N R8W, NE1/4 S28 T2N R8W, W1/2 S27 T2N R8W, SE1/4 S27 T2N R8W, S1/2 S26 T2N R8W, SW1/4 S25 T2N R8W

Insert:

Alternative A: S1/4 S17 T2N R8W, N1/2 S20 T2N R8W, W1/2 S21 T2N R8W, SE1/4 S21 T2N R8W, NE1/4 S28 T2N R8W, W1/2 S27 T2N R8W, SE1/4 S27 T2N R8W, SE 1/4 S26 T2N R8W, N1/2 S35 T2N R8W, NW1/4 S36 T2N R8W

Alternative A-1: S1/4 S17 T2N R8W, N1/2 S20 T2N R8W W1/2 S21 T2N R8W, SE1/4 S21 T2N R8W, NE1/4 S28 T2N R8W, W1/2 S27 T2N R8W, SE1/4 S27 T2N R8W, S1/2 S26 T2N R8W, SW1/4 S25 T2N R8W

CEC Application, Page 1:

DELETE

Alternative A (Approx. 5.7 to 7.5 miles) - S13 switchyard siting area or S17 switchyard to the Delaney Substation via the Flood Control District of Maricopa County (FCDMC) Saddleback Flood Retardant Structure (FRS). This alternative may be rated to up to 2,000 MWs of capacity and SC. A sub-alternative A1 is an option to Alternative A and would be sited entirely north of the Thomas Road alignment from the Saddleback FRS to the Delaney Substation. A distance of approximately 1.75 miles. Alternative A is approximately between 5.7 and 7.5 miles in length depending on where the Project switchyard is located. This alternative parallels existing linear features (e.g., roads, existing transmission lines, FRS) or land patterns (e.g., section or 1/2 section lines) for 100% of its length.

Insert:

Proposed Amendments to Application for Certificate of Environmental Compatibility Maricopa Energy Center 500kV Transmission Line Project

Alternative A (Approx. 5.7 miles) - S17 switchyard to the Delaney Substation via the Flood Control District of Maricopa County (FCDMC) Saddleback Flood Retardant Structure (FRS). This alternative may be rated to up to 2,000 MWs of capacity and SC. A sub-alternative A1 is an option to Alternative A and would be sited entirely north of the Thomas Road alignment from the Saddleback FRS to the Delaney Substation. A distance of approximately 1.75 miles. Alternative A is approximately 5.7 miles in length originating from the S17 switchyard. This alternative parallels existing linear features (e.g., roads, existing transmission lines, FRS) or land patterns (e.g., section or 1/2 section lines) for 100% of its length.

CEC Application, Page 1-2:

DELETE

Alternative A would originate either at the Project's 500kV S13 switchyard siting area that would be located between 507th and 491st Avenue north of Camelback Road, or at the S17 switchyard. From the S13 switchyard siting area this alternative would be sited south of the 1/2 section line of Sections 13 (T2R9) and 18 (T2R8) crosses Salome Highway where it would turn in a southeast direction and parallel the east side of Salome Highway to Camelback Road/Salome Highway. From here the alternative turns east then crosses to the south side of Salome Highway, then continues east within a Maricopa County Department of Transportation (MCDOT) 65-foot ROW to 483rd Avenue where it would cross the Harquahala Valley Irrigation District (HVID) canal, then head in a southeast direction and parallel the FCDMC Saddleback FRS on the west side of the FRS for approximately 2.5 miles within a 165-foot ROW to the Thomas Road alignment. From this point, the transmission line would cross the FRS and head east for approximately 1.25 miles on the north side of the Thomas Road alignment within either a 223-foot ROW (Alternative A) or a 150' ROW (sub-Alternative **A-1**) for approximately 1.75 miles to Delaney.

Alternative A is on private, FCDMC fee land and Arizona State Land Department (ASLD) owned land. It crosses over the existing Harquahala to Hassayampa 500kV transmission line and the proposed Harquahala Valley Sunrise 500kV transmission line (HV Sunrise) then at approximately 500-feet south of the Thomas Road alignment, the transmission line turns east for approximately 1.25 miles within a 165 foot ROW, crosses the Harquahala to Hassayampa 500kV transmission line a second time at Salome Highway before terminating at the

Proposed Amendments to Application for Certificate of Environmental Compatibility Maricopa Energy Center 500kV Transmission Line Project

Delaney Substation point of interconnect (POI) located in the southeast corner of the Delaney Substation. The Project may also originate at S17 switchyard, pending final design and engineering work, thus shortening the length of the transmission line by approximately 2 miles.

Insert:

Alternative A would originate at the S17 switchyard. From the S17 switchyard this alternative crosses to the south side of Salome Highway, then continues east within a Maricopa County Department of Transportation (MCDOT) 65-foot ROW to 483rd Avenue where it would cross the Harquahala Valley Irrigation District (HVID) canal, then head in a southeast direction and parallel the FCDMC Saddleback FRS on the west side of the FRS for approximately 2.5 miles within a 165-foot ROW to the Thomas Road alignment. From this point, the transmission line would cross the FRS and head east for approximately 1.25 miles on the north side of the Thomas Road alignment within either a 223-foot ROW (Alternative A) or a 150' ROW (sub-Alternative A-1) for approximately 1.75 miles to Delaney.

Alternative A is on private, FCDMC fee land and Arizona State Land Department (ASLD) owned land. It crosses over the existing Harquahala to Hassayampa 500kV transmission line and the proposed Harquahala Valley Sunrise 500kV transmission line (HV Sunrise) then at approximately 500-feet south of the Thomas Road alignment, the transmission line turns east for approximately 1.25 miles within a 165 foot ROW, crosses the Harquahala to Hassayampa 500kV transmission line a second time at Salome Highway before terminating at the Delaney Substation point of interconnect (POI) located in the southeast corner of the Delaney Substation.

CEC Application, Page 3:

DELETE

A Class III cultural pedestrian survey was completed for all of Alternative B and S17 switchyard. A Class III was completed for 80 percent of Alternative A.

Insert:

Proposed Amendments to Application for Certificate of Environmental Compatibility Maricopa Energy Center 500kV Transmission Line Project

A Class III cultural pedestrian survey was completed for 100 percent of Alternative B transmission line route and 12.5 percent (40 acres) of the S13 switchyard siting area. A Class III cultural pedestrian survey was completed for 100 percent of Alternative A and A-1 (i.e., S17 switchyard and transmission line route).

CEC Application, Page 5:

DELETE

Figure 1 – Study Area and Requested CEC Corridors

Insert:

Figure 1 – Study Area and Requested CEC Corridors¹

CEC Application, Page 7, Section 4.2.2.3.:

DELETE

Alternative A is between 7.5 miles and 5.7 miles...

Insert:

Alternative A is approximately 5.7 miles...

CEC Application, Page 7-8, Section 4.2.3.1.:

DELETE

Table 1: Specific ROW/Requested CEC Corridor

Insert

_

¹ Revised Figure 1 is attached to this amendment.

Proposed Amendments to Application for Certificate of Environmental Compatibility Maricopa Energy Center 500kV Transmission Line Project

Table 1: Specific ROW/Requested CEC Corridor*

Route Segment	Specific ROW	CEC Corridor			
Alternative A/A-1					
From S17 switchyard north of Camelback Road at 491st Avenue.	200-feet for transmission line and 40 acres for Project switchyard, O/M building, and BESS	2,640-feet			
From 491 st to 483 rd Avenue to Saddleback FRS	65-feet	500-feet			
From 483 rd Avenue to Thomas Road alignment along the Saddleback FRS	165-feet	1,000-feet			
From the Saddleback FRS to the Delaney Substation	150 to 223-feet	2,000-feet			
Alternative B					
From S13 switchyard siting area between 507 th Avenue and 499 th Avenue north of Camelback Road.	200-feet for transmission line and 40 acres for Project switchyard, O/M building, and BESS	2,640-feet			
From 507 th Avenue to 499 th Avenue (south of Camelback Road)	200 feet	500 feet			
From 499 th Avenue (west side) to Thomas Road (south side) to Harquahala Power Plant and Saddleback FRS	200-feet	500-feet			
From Saddleback FRS to the Delaney Substation	200-feet	2,000-feet			

CEC Application, Page 8, Section 4.2.5.:

DELETE

Alternative A would begin at either the S13 switchyard siting area or S17 switchyard then head east to the Saddleback FRS, southeast to Thomas Road alignment, then east to the Delaney Substation.

Proposed Amendments to Application for Certificate of Environmental Compatibility Maricopa Energy Center 500kV Transmission Line Project

Insert:

Alternative A would begin at the S17 switchyard then head east to the Saddleback FRS, southeast to Thomas Road alignment, then east to the Delaney Substation.

CEC Application, Page 9, Section 4.2.6.:

DELETE

Landownership Chart

Insert:

	Alternative A	Sub Alternative A-1	Alternative B
County	66.88%	<u>75.10%</u>	8.94%
<u>Private</u>	18.21%	24.90%	<u>59.00%</u>
State	<u>14.91%</u>	<u>0%</u>	20.30%
BLM	<u>0%</u>	<u>0%</u>	11.76%

CEC Application, Page 12:

DELETE

Figure 2 – Alternatives Evaluated

Insert:

Figure 2 – Alternatives Evaluated²

² Revised Figure 2 is attached to this amendment.

Proposed Amendments to Application for Certificate of Environmental Compatibility Maricopa Energy Center 500kV Transmission Line Project

CEC Application, Page 13:

DELETE

Figure 3 – Opportunities and Constraints

Insert:

Figure 3 – Opportunities and Constraints³

CEC Application, Page 16:

DELETE

Figure A-1 – Land Use, Ownership, and Jurisdiction

Insert:

Figure A-1 – Land Use, Ownership, and Jurisdiction⁴

CEC Application, Page 39:

DELETE

Figure E-1 – Visual Resource Assessment

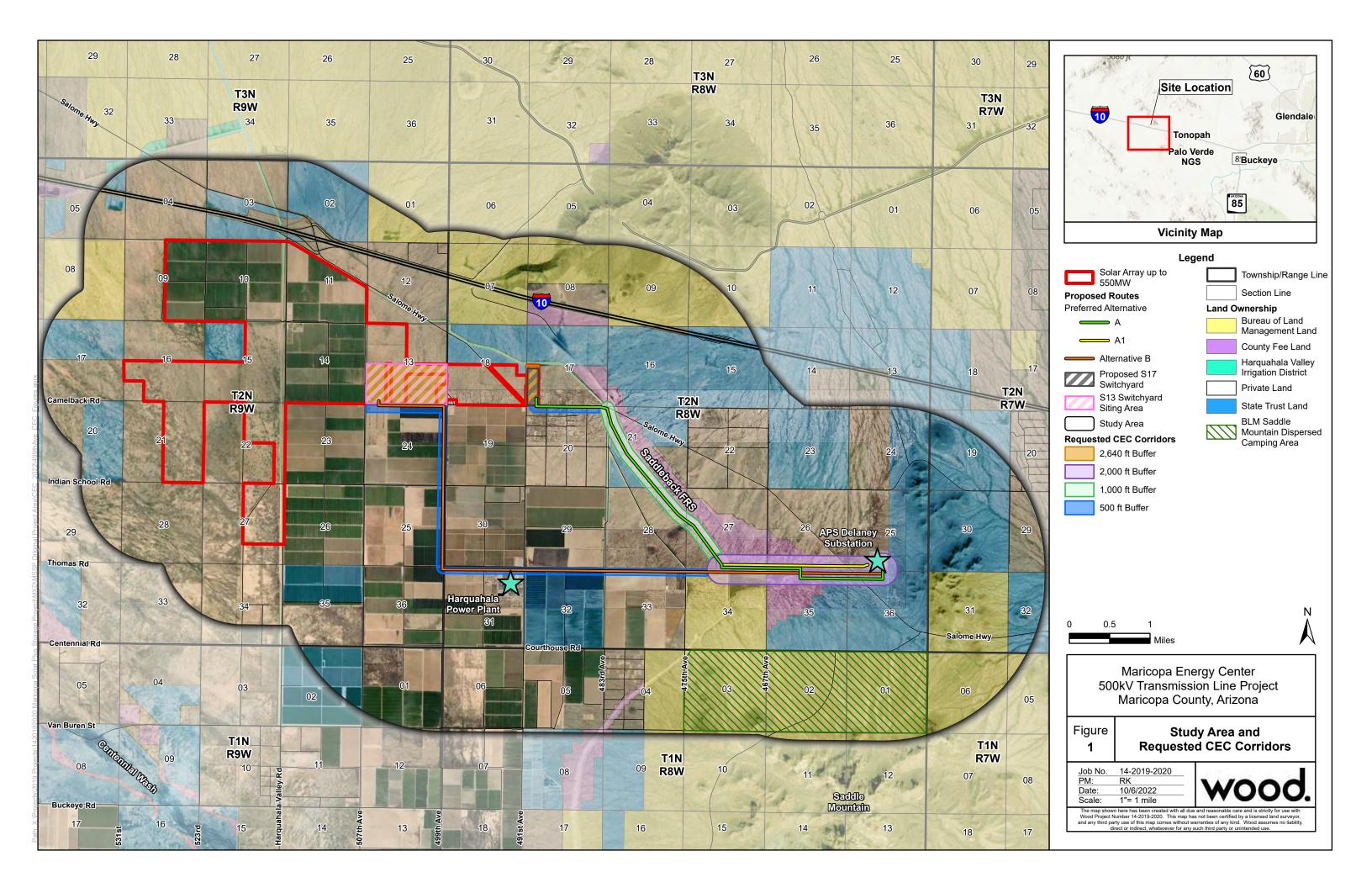
Insert:

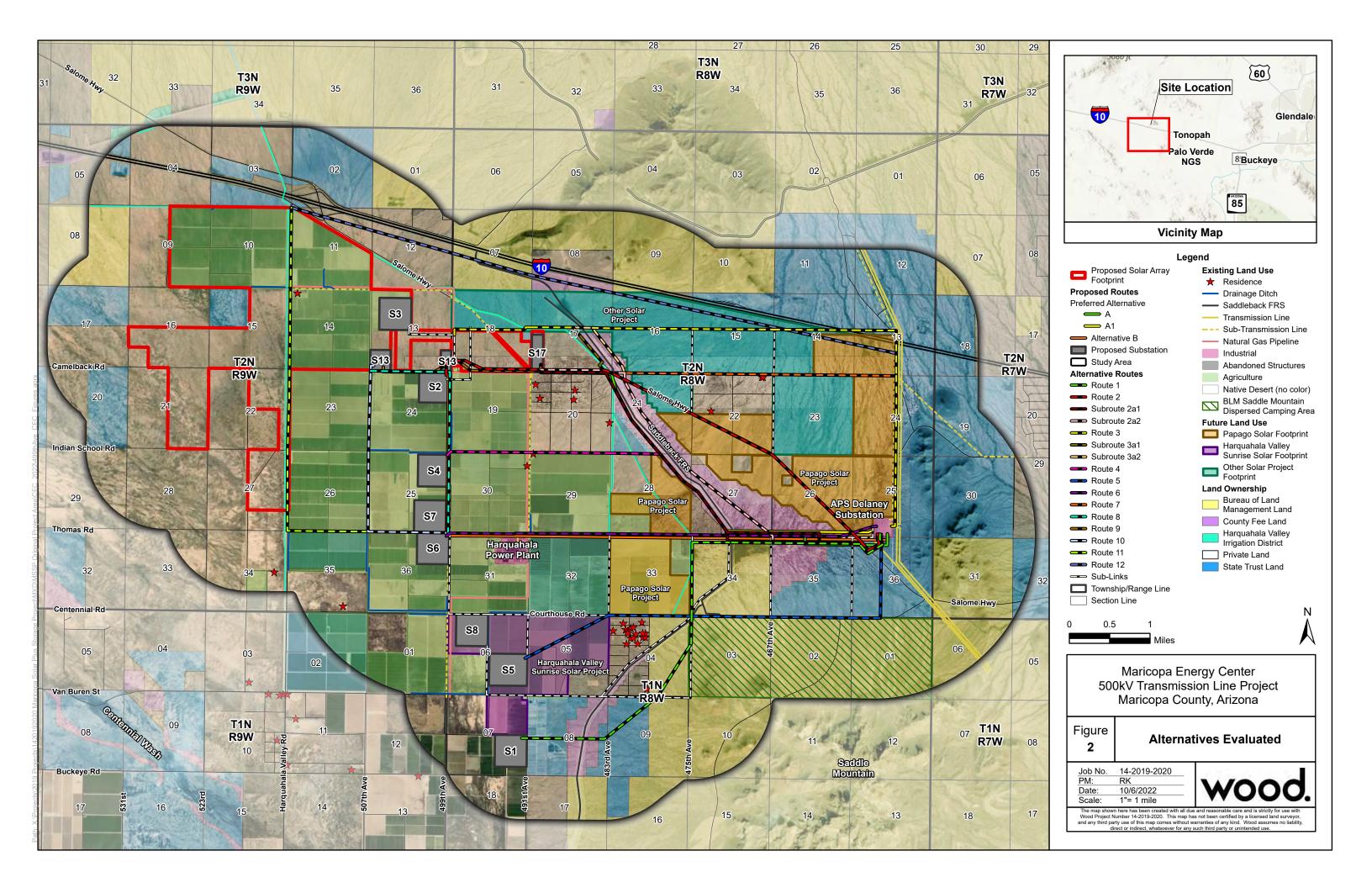
Figure E-1 – Visual Resource Assessment⁵

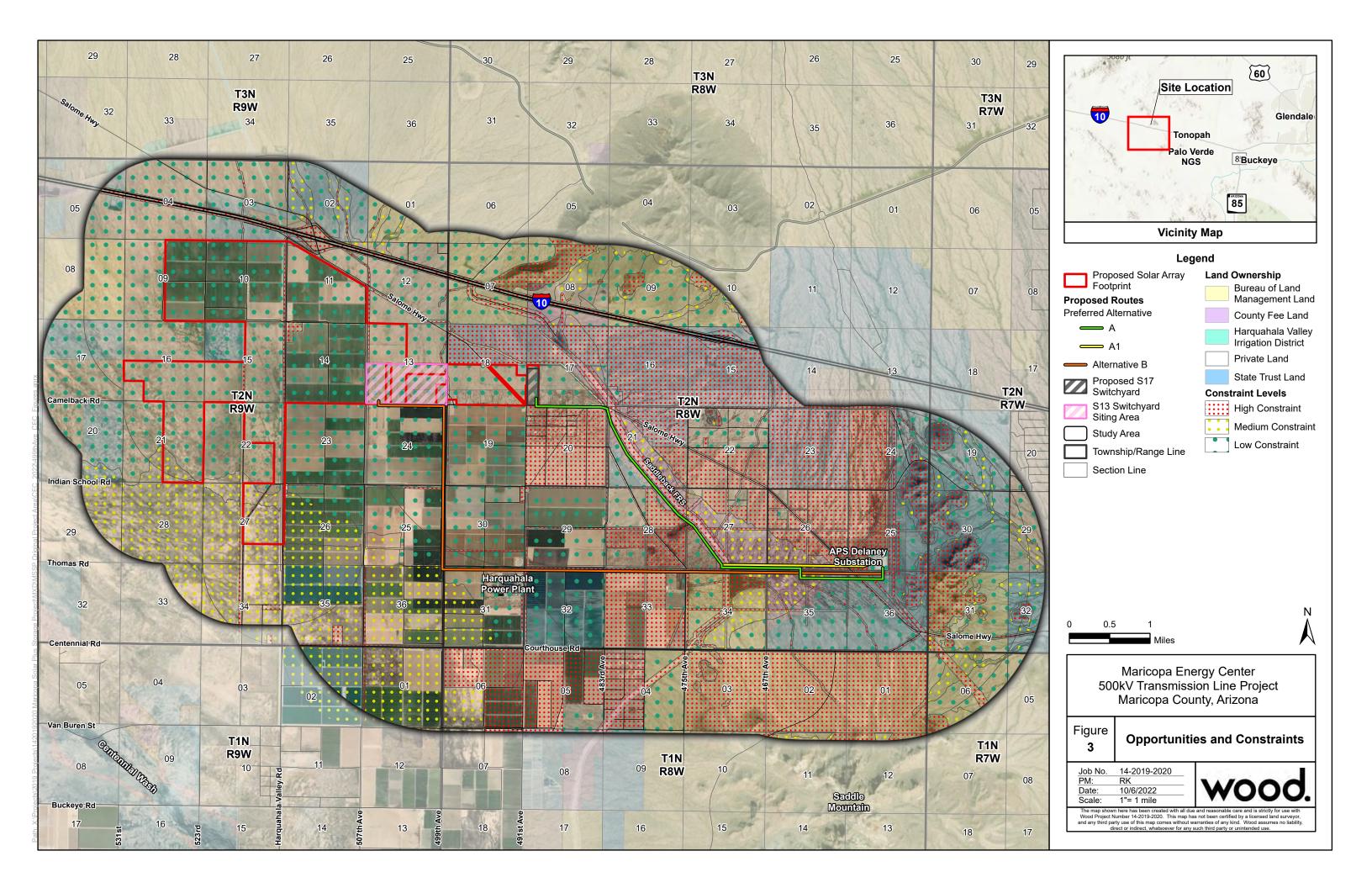
³ Revised Figure 3 is attached to this amendment.

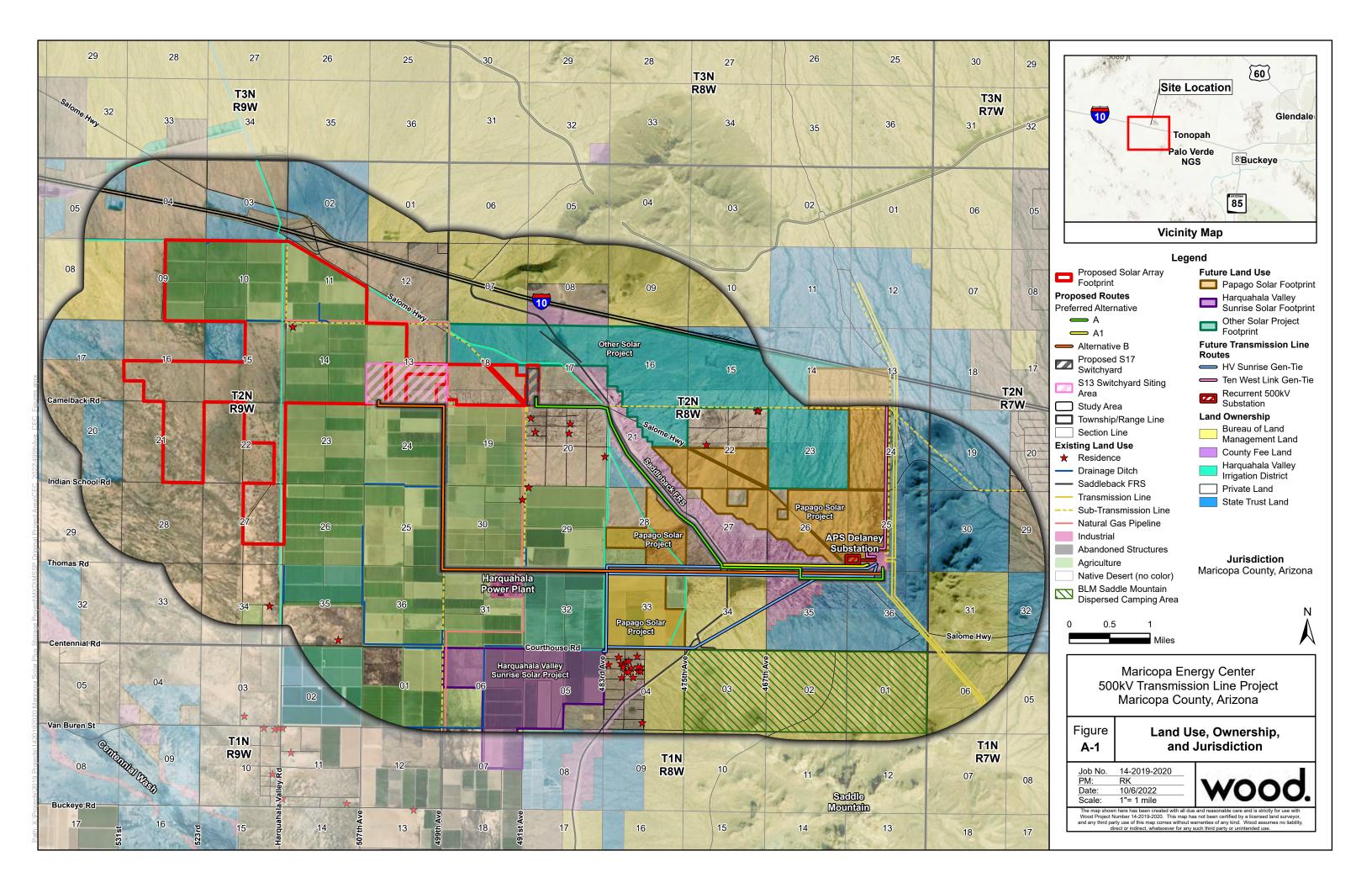
⁴ Revised Figure A-1 is attached to this amendment.

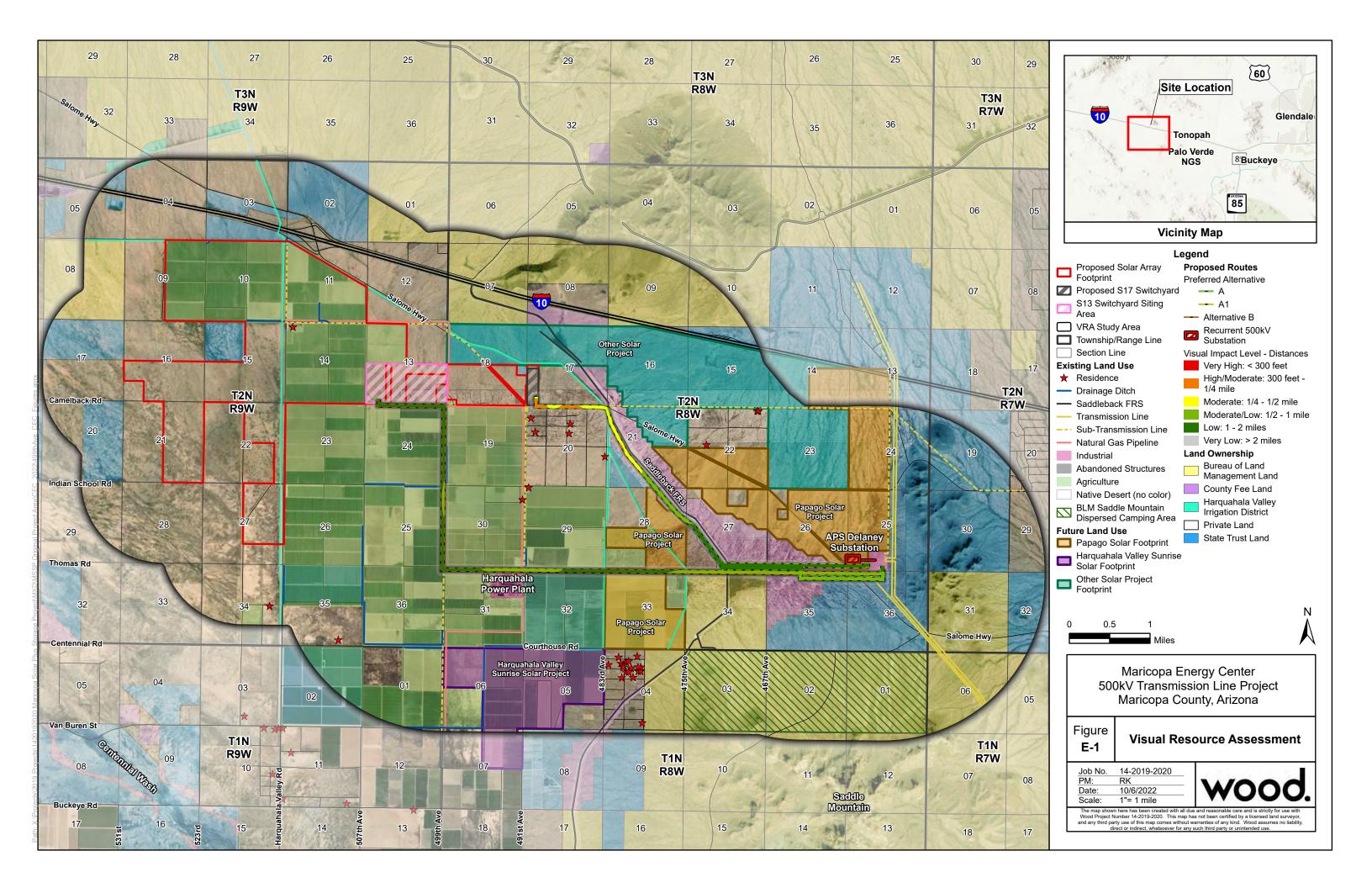
⁵ Revised Figure E-1 is attached to this amendment.











Proposed Amendments to Application for Certificate of Environmental Compatibility Maricopa Energy Center 500kV Transmission Line Project

CEC Application, Page 2:

DELETE

If **Alternative A** is selected, the transmission line would be constructed on steel monopoles approximately 160- to 190-feet in height with a ruling span of between approximately 600- and 1,000- feet. Several conductor tensioning and pulling sites (approximately 100-feet x 600-feet each) will be required along the Project spaced approximately 10,000-feet apart. Project construction is estimated to begin in the Summer of 2024 and be completed by October 2025.

If **Alternative B** is selected the transmission line would be constructed on steel monopoles approximately 160- to 190-feet in height. The first approximately 4 miles from the S13 switchyard siting area to Harquahala Power Plant would be SC, with a ruling span of between approximately 600- and 1,000-feet. At the Harquahala Power Plant switchyard, the next approximately 4.5 miles would be DC and with a ruling span of approximately 600- and 800-feet.

Insert:

If Alternative A is selected, the transmission line would be constructed on steel monopoles approximately 160- to 220-feet in height with a ruling span of between approximately 600- and 1,000-feet. Several conductor tensioning and pulling sites (approximately 100-feet x 600-feet each) will be required along the Project spaced approximately 10,000-feet apart. Project construction is estimated to begin in the Summer of 2024 and be completed by October 2025.

If Alternative B is selected the transmission line would be constructed on steel monopoles approximately 160- to 220-feet in height. The first approximately 4 miles from the S13 switchyard siting area to Harquahala Power Plant would be SC, with a ruling span of between approximately 600- and 1,000-feet. At the Harquahala Power Plant switchyard, the next approximately 4.5 miles would be DC and with a ruling span of approximately 600- and 800-feet.

CEC Application, Page 6, Section 4.2.1.2.:

DELETE

approximately 160-190 feet...

Proposed Amendments to Application for Certificate of Environmental Compatibility Maricopa Energy Center 500kV Transmission Line Project

Insert:

approximately 160-220 feet...

CEC Application, Page 8, Section 4.2.3.3.:

DELETE

Approximately 190 feet

Insert:

Approximately 220 feet