

1 BEFORE THE ARIZONA POWER PLANT LS-413
2 AND TRANSMISSION LINE SITING COMMITTEE

3

4 IN THE MATTER OF THE APPLICATION OF) DOCKET NO.
RANEGRAS PLAINS ENERGY CENTER, LLC,) L-21344A-24-0273-
5 OR ITS ASSIGNEES, IN CONFORMANCE) 00243
WITH THE REQUIREMENTS OF)
6 A.R.S. § 40-360, ET SEQ., FOR A) CASE NO. 243
CERTIFICATE OF ENVIRONMENTAL)
7 COMPATIBILITY AUTHORIZING THE)
RANEGRAS PLAINS ENERGY CENTER 500)
8 KV TRANSMISSION LINE.) EVIDENTIARY
) HEARING

9

10 At: Phoenix, Arizona
11 Date: February 10, 2025
12 Filed: February 13, 2025

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14 REPORTER'S TRANSCRIPT OF PROCEEDINGS

15 (Pages 1 through 152)

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1 BE IT REMEMBERED that the above-entitled
2 and numbered matter came on regularly to be heard before
3 the Arizona Power Plant and Transmission Line Siting
4 Committee at 1200 West Washington, Phoenix, Arizona,
5 commencing at 10:00 a.m. on February 10, 2025.

6
7

8 BEFORE: ADAM STAFFORD, Chairman

9 ROMAN FONTES, Counties
(Via Videoconference)
10 DAVID FRENCH, Arizona Department of Water Resources
JON H. GOLD, General Public
11 NICOLE HILL, Governor's Office of Energy Policy
(Via Videoconference)
12 R. DAVID KRYDER, Agriculture Interests
MARGARET "TOBY" LITTLE, General Public
13 GABRIELA SAUCEDO MERCER, Arizona Corporation
Commission
14 DAVE RICHINS, General Public

15

16 APPEARANCES:

17 For the Applicant:

18 OSBORN MALEDON, PA
By: Meghan H. Grabel
19 By: Elias J. Ancharski
2929 North Central Avenue, 20th Floor
20 Phoenix, Arizona 85012

21

22

23

24

25

1 CHMN STAFFORD: All right. Let's go on the
2 record. Now is the time set for the hearing on the
3 application of Ranegras Plains Energy Center, LLC, Docket
4 Number L-21344A-24-0273-00234 [sic] or Line Siting Case
5 243.

6 Let's start by taking roll call of the
7 members.

8 Member Little?

9 MEMBER LITTLE: Present.

10 CHMN STAFFORD: Member French?

11 MEMBER FRENCH: Present.

12 CHMN STAFFORD: Member Gold.

13 MEMBER GOLD: Present.

14 CHMN STAFFORD: Member Kryder?

15 MEMBER KRYDER: Present.

16 CHMN STAFFORD: Member Mercer?

17 MEMBER MERCER: Present.

18 CHMN STAFFORD: And online we have Member
19 Fontes?

20 MEMBER FONTES: (No response.)

21 CHMN STAFFORD: Member Fontes?

22 MEMBER FONTES: (No response.)

23 CHMN STAFFORD: Member Fontes?

24 MEMBER FONTES: (No response.)

25 CHMN STAFFORD: I can see him online, but

1 I'm not hearing his voice.

2 MEMBER FONTES: (No response.)

3 CHMN STAFFORD: Can you hear us, Member
4 Fontes?

5 MEMBER FONTES: Yes, I can, Mr. Chairman.
6 Now I can.

7 CHMN STAFFORD: All right. There you are.
8 And we had Member Hill a second ago, but I appear to have
9 lost her.

10 MEMBER FONTES: Yes. She dropped off about
11 two minutes ago, if it's helpful for the audio team.

12 CHMN STAFFORD: Okay.

13 MEMBER FONTES: We're not used to using
14 WebEx, and I know I had to reinstall the app again today.
15 We're used to being on another platform, so that --

16 Oh, there she is.

17 CHMN STAFFORD: All right. Member Hill.
18 You're on mute.

19 MEMBER HILL: My apologies. I was messing
20 up with the software, but I'm here. Present. Thank you.

21 CHMN STAFFORD: All right. Thank you.

22 All right. Let's take appearances of the
23 parties, which it seems to be only the applicant.

24 MS. GRABEL: Thank you, Mr. Chairman,
25 Committee Members. Meghan Grabel, of the law firm Osborn

1 Maledon, on behalf of the applicant, Ranegras Plains
2 Energy Center, LLC, and with me from my law firm is my
3 colleague, Elias Ancharski.

4 CHMN STAFFORD: All right. And we have had
5 no applications or notices of intervention. Do all the
6 members have their exhibits for the hearing?

7 I'm seeing nods from the folks online.

8 Members, do we have their copies?

9 All right. Ms. Grabel, would you like to
10 make an opening statement?

11 MS. GRABEL: Yes, Mr. Chairman, I do.

12 If we could pull up the presentation.

13 Thank you.

14 As I said, my name is Meghan Grabel of the
15 law firm Osborn Maledon, representing Ranegras Plains
16 Energy Center, LLC, which is the applicant for a
17 Certificate of Environmental Compatibility in this
18 matter.

19 By way of a brief summary, the project
20 consists of the construction of a new single-circuit
21 500-kV transmission line, approximately 11 miles in
22 length between the proposed Ranegras Plains solar array
23 and battery energy storage system and the Ten West Link
24 Series Compensation Station Switchyard, all in La Paz
25 County, Arizona. The line will be owned and constructed

1 by Ranegras Plains Energy Center, LLC.

2 The project is required to support the
3 development of Ranegras Plains solar array and battery
4 energy storage system and connect the solar and battery
5 project to the grid. Specifically, the project will
6 connect to the Ten West Link Series Compensation Station
7 Switchyard, which will ultimately tap into the Ten West
8 Link transmission line. That's a regional asset designed
9 to transmit electricity and expand energy markets in the
10 Desert Southwest.

11 This map, which has been marked as Exhibit
12 RP-2, and also appears in the placemats in front of you
13 is an overview of the project location. The map
14 identifies the project route, as well as the connection
15 points for the project. As you will see, the green
16 dotted squares represent the structures along the
17 proposed route. While it is difficult to see on the map
18 due to the scale and relative size, the green outline
19 around those squares depicts the proposed 200-foot
20 right-of-way for the project.

21 The right-of-way begins at the substation
22 for the Ranegras Plains solar array, which is depicted in
23 the larger yellow square that's also been expanded on the
24 left side of the screen. The project then travels
25 approximately 11 miles in a west/northwest direction

1 until it connects to the Ten West Link Series
2 Compensation Station Switchyard, which is identified by
3 the purple diamond. The project parallels the existing
4 Ten West Link 500-kV transmission line for the entire
5 11-mile length.

6 The existing Ten West Link line occupies a
7 200-foot right-of-way within what's called a Section 368
8 corridor. And a Section 368 corridor is created by the
9 Energy Policy Act of 2005, as a preferred location for
10 electric transmission rights-of-way on BLM-managed lands.
11 The most direct and efficient path to the Series
12 Compensation -- Series Compensation Station Switchyard is
13 to construct the project in a parallel right-of-way along
14 the Section 368 corridor. By using this corridor, the
15 project can reuse the Ten West Link construction access
16 road, which would only require adding short spur roads to
17 access the project structure sites. The proposed route
18 was chosen for many reasons, which will be discussed
19 during the hearing this morning.

20 The primary need for the project is to
21 interconnect the proposed Ranegras Plains solar energy
22 and battery storage project to the regional electric
23 grid. The demand for electricity in Arizona is growing,
24 as evidenced by Arizona Public Service Company and Salt
25 River Project both setting peak demand records late last

1 August. The project will provide the connection that
2 allows the Desert Southwest to access critical energy
3 resources needed to serve that growing demand. In sum,
4 the evidence will show that the project well balances the
5 need for an adequate, reliable, and economical supply of
6 electricity with the impact to the environment and
7 ecology in Arizona.

8 With respect to the exhibits, each
9 committee members should have a binder with all of the
10 exhibits and materials that we're going to review during
11 the hearing. At the front of each binder is a list of
12 the exhibits and each binder also has a flash drive that
13 includes all of these exhibits, if you'd like to use
14 them, as well as a link to the virtual tour that we'll
15 review today.

16 For our witnesses, we intend to present
17 them in two panels. On the first panel, we will hear
18 from Ms. Patty Varra, sitting to my left, a development
19 manager with Savion Energy. As you will hear shortly,
20 Ranegras Plains Energy Center is a wholly owned
21 subsidiary of Savion. Ms. Varra will provide an overview
22 of the project and the applicant and testimony regarding
23 compliance with statutory notice requirements. She will
24 also provide testimony regarding the need for the
25 project, its reliability and other benefits, and the

1 project's physical infrastructure and facilities.

2 Finally, Ms. Varra will provide an overview of the
3 stakeholder engagement process related to the project.

4 Our second panel will focus on the
5 environmental aspects of the project. Mr. Christopher
6 Powers, sitting to Ms. Varra's left, is the senior
7 director of permitting and environmental with Savion, and
8 he will be joined by Mr. Richard Knox at the far end of
9 the table, who is a regulatory permitting consultant with
10 Tetra Tech. Mr. Powers will first discuss the
11 environmental aspects of the project and assess it
12 against the factors this committee routinely reviews
13 under ARS 40-360.06.

14 And, finally, Mr. Knox will cover the
15 visual aspects of the project, including the presentation
16 of the virtual tour prepared in this matter.

17 We believe that at the close of the
18 proceedings you will conclude that the Ranegras Plains
19 Energy Center 500-kV transmission line project will help
20 meet the need for an adequate, economical, and reliable
21 supply of power, with minimal impacts to the environment
22 and ecology of the state. And we respectfully ask that
23 you approve this CEC.

24 With that, we are ready to begin.

25 CHMN STAFFORD: All right. Well, call your

1 first witness and we'll get them sworn in.

2 MS. GRABEL: Thank you.

3 Yes, our first witness is Ms. Patty Varra.

4 CHMN STAFFORD: Ms. Varra, would you prefer
5 an oath or affirmation?

6 MS. VARRA: Oath.

7 (Patty Varra was duly sworn by the
8 Chairman.)

9 CHMN STAFFORD: Thank you.

10 Please proceed.

11 MS. VARRA: My name is Patty Varra, I
12 wanted to --

13 MS. GRABEL: Can I ask you a couple of
14 questions before you launch in?

15 MS. VARRA: Yes, you may.

16

17 PATTY VARRA,

18 called as a witness on behalf of the Applicant, having
19 been previously affirmed or sworn by the Chairman to
20 speak the whole truth and nothing but the truth, was
21 examined and testified as follows:

22 //

23 //

24 //

25 //

1 DIRECT EXAMINATION

2 BY MS. GRABEL:

3 Q. Ms. Varra, please state your name and business
4 address for the record.

5 A. Patty Varra. Business address is 422 Admiral
6 Boulevard, Kansas City, Missouri 64106.

7 Q. By whom are you employed and in what capacity?

8 A. I am an employee by Savion Energy as a project
9 development manager.

10 Q. And what is your role in this matter?

11 A. I am the development manager for the Ranegras
12 Plains project.

13 Q. And you have before you right there a book of
14 exhibits. Will you please take a look at Exhibit RP-1,
15 which identifies the CEC application that was submitted
16 in this matter.

17 That's just a placeholder for it. This is the
18 actual CEC.

19 A. (MS. VARRA) Okay.

20 Q. Have you seen this document before?

21 A. (MS. VARRA) Yes, I have.

22 Q. Was it prepared by you or under your direction
23 and control?

24 A. (MS. VARRA) Yes, it was.

25 Q. Are that statements contained within Exhibit

1 RP-1 true and correct to the best of your knowledge?

2 A. (MS. VARRA) Yes, they are.

3 Q. Do you have any corrections that you would like
4 to make to Exhibit RP-1?

5 A. (MS. VARRA) No.

6 Q. Thank you. Let me take that back from you.

7 And if you'll please turn to Exhibit RP-2, which
8 is in --

9 MEMBER KRYDER: Excuse me, Ms. Varra.

10 MS. VARRA: Yes.

11 MEMBER KRYDER: Could you speak into your
12 microphone a little closer, please. Thank you.

13 THE REPORTER: And if you can slow down,
14 Ms. Grabel.

15 MS. GRABEL: I will.

16 Q. Are you there?

17 A. (MS. VARRA) I'm there.

18 Q. Was Exhibit RP-2 prepared by you or under your
19 direction and control?

20 A. (MS. VARRA) Yes, it was.

21 Q. Are the contents of Exhibit RP-2 true and
22 correct to the best of your knowledge?

23 A. (MS. VARRA) Yes, they are.

24 Q. Do you have any changes you would like to make
25 to Exhibit RP-2?

1 A. (MS. VARRA) No, I don't.

2 Q. Is the map marked as Exhibit RP-2 the same map
3 that is on the place mats in front of the committee
4 members?

5 A. (MS. VARRA) Yes, it is.

6 Q. Thank you.

7 And please turn to Exhibit RP-3, which is the
8 testimony summary of Patty Varra.

9 A. (MS. VARRA) Okay.

10 Q. Was Exhibit RP-3 prepared by you or under your
11 direction and control?

12 A. (MS. VARRA) Yes, it was.

13 Q. Are the contents of Exhibit RP-3 true and
14 correct to the best of your knowledge?

15 A. (MS. VARRA) Yes, they are.

16 Q. Do you have any changes you would like to make
17 to Exhibit RP-3?

18 A. (MS. VARRA) No, I don't.

19 Q. Thank you, Ms. Varra.

20 Finally, please turn to Exhibit RP-6, which is
21 the witness presentation prepared for this hearing.

22 A. (MS. VARRA) Yes.

23 Q. Ms. Varra, have you seen this presentation
24 before?

25 A. (MS. VARRA) Yes, I have.

1 Q. Was this presentation prepared by you or under
2 your direction and control?

3 A. (MS. VARRA) Yes, it was.

4 Q. Are its contents true and correct, to the best
5 of your knowledge?

6 A. (MS. VARRA) Yes, they are.

7 Q. And do you have any corrections you would like
8 to make to Exhibit RP-6?

9 A. (MS. VARRA) No, I don't.

10 Q. I believe you have one correction to the
11 outreach page, but we'll address that --

12 A. (MS. VARRA) We'll address that further.

13 Q. Thank you.

14 And with that, I will interrupt your
15 presentation a couple of times to lay additional
16 foundation, but please begin your presentation.

17 A. (MS. VARRA) Okay. Great.

18 Good morning, Mr. Chairman and Committee
19 Members, I want to thank you for your time today to hear
20 about our Ranegras Plains Energy Center 500-kV
21 transmission line project. My name is Patty Varra, and I
22 am the development manager with Savion.

23 Oh, there we go.

24 I received my bachelor's degree from
25 Metropolitan State University in Denver and have been

1 working in the energy industry for 17 years. Primarily
2 my experience is in project development, siting,
3 permitting, local government, and community relations.

4 Savion Energy. Savion Energy is a developer,
5 builder, owner, and operator of wind, solar, and storage
6 projects across the U.S. We were founded in 2019 and
7 based out of Kansas City, Missouri. We have about 200
8 employees across the U.S. that cover approximately 153
9 projects in various stages of development. And these
10 projects are located in 31 different states. Shell Group
11 acquired Savion in 2022, and we are now a Shell Group
12 portfolio company. Ranegras Plains Energy Center, LLC,
13 is a wholly owned subsidiary of Savion.

14 Purpose and need. The purpose of the project,
15 as Ms. Grabel was speaking to, is to interconnect the
16 solar array and batteries to the Ten West Link Series
17 Compensation Station Switchyard owned by DCR
18 Transmission, LLC, all are in La Paz County, Arizona.
19 The project would facilitate the interconnection of new
20 energy resources designed to meet growing demand in the
21 Southwest. The output from the solar and battery energy
22 storage system would make up for retired electrical
23 generation from coal in Arizona and New Mexico, as well
24 as future electrical generation needs.

25 The project balances the need for an adequate,

1 economical, and reliable supply of electric power with
2 the desire to minimize potential environmental and
3 cultural effects on the state, of which my colleague,
4 Mr. Powers to my left, will speak to in further detail in
5 his upcoming testimony.

6 We are requesting a Certificate of Environmental
7 Compatibility for the construction and operation of a new
8 single-circuit 500-kV line rated up to 2,135 megawatts
9 between the Ranegras Plains Energy Center project and the
10 Ten West Link SCS Switchyard. The route is approximately
11 11 miles from the project's substation siting area to the
12 Ten West Link SCS Switchyard, with a 200-foot
13 right-of-way, totaling about 260 acres that crosses
14 mostly Bureau of Land Management land at 76 percent,
15 Arizona State land at 22 percent, and a small piece of
16 private land at about 2 percent.

17 There will be a total of 72 structures, 68
18 monopoles and 4 tri-pole steel structures, approximately
19 160 to 180 feet in height, and spaced between 800 and a
20 thousand feet apart. The tri-pole structures will be
21 located at the dead-ends, both where the line connects to
22 the SCS Switchyard and leaving the project site
23 substation. There will be two additional tri-poles about
24 midway on the line that will provide additional span and
25 spacing for sensitive areas.

1 CHMN STAFFORD: Member Hill, you have your
2 hand raised?

3 MEMBER HILL: My apologies, Mr. Chairman.
4 Ms. Varra, I don't have the slides. I read the
5 application, so everything that you've shared so far,
6 like, I am familiar with, but usually the slides kind of
7 show up on the screen for us, and I didn't see
8 them -- oh, there they are. Wonderful.

9 Proceed. Thank you so much.

10 CHMN STAFFORD: All right.

11 MS. VARRA: You're welcome.

12 MEMBER FONTES: Mr. Chairman?

13 CHMN STAFFORD: Yes, Member Fontes.

14 MEMBER FONTES: Member Hill, check your
15 email, I'll forward you a link with the slides.

16 CHMN STAFFORD: Yeah, they were filed in
17 the docket. They are listed as Exhibit RP-6.

18 MEMBER HILL: Okay. I was looking at the
19 docket and I didn't see it, but thank you.

20 MS. VARRA: Okay. Tentative timing for
21 construction to begin is late 2026, early 2027. We are
22 CAISO queue number 2025, phase 1 and phase 2 System
23 Impact Studies are complete.

24 MEMBER KRYDER: Mr. Chairman?

25 CHMN STAFFORD: Yes, Member Kryder.

1 MEMBER KRYDER: Question for Ms. Varra.
2 Maybe you'll get to this later, and if so, I'm pleased to
3 wait. In Meghan's early presentation she spoke about
4 most of the corridor was going to be following a
5 current --

6 MS. VARRA: The existing Ten West Link,
7 yes.

8 MEMBER KRYDER: -- except for a small
9 number, a small piece. Are you going to address that
10 small piece?

11 MS. VARRA: Well, it's all following the
12 line. I don't believe there's a piece --

13 MEMBER KRYDER: I misunderstood then. Say
14 it again, it is all following the line.

15 MS. VARRA: It is all following the line.

16 MEMBER KRYDER: And what was the -- what
17 was the kind of conditional thing, Meghan, that you spoke
18 about in your presentation?

19 MS. GRABEL: I believe that you might be
20 referring to the access roads, that there were a couple
21 of access roads that would need to be constructed, but
22 the entire length of this project would follow the Ten
23 West Link transmission line, which is already built.

24 MEMBER KRYDER: And then you said except
25 for a small piece of something, and that's what I was

1 trying to address.

2 MS. VARRA: Maybe she's referring to the
3 small piece of private lands.

4 MS. GRABEL: I don't think that -- I said
5 the spur roads, but that was just relating to the
6 construction access roads.

7 MEMBER KRYDER: Okay. So the short version
8 is it follows the current line and uses the current
9 access road in its entirety --

10 MS. VARRA: Yes.

11 MEMBER KRYDER: -- is that correct?

12 MS. VARRA: That's correct, yes.

13 MEMBER KRYDER: Great. Thank you very
14 much.

15 MS. GRABEL: Thank you. Sorry for the
16 confusion.

17 MEMBER GOLD: Mr. Chairman?

18 CHMN STAFFORD: Yes, Member Gold.

19 MEMBER GOLD: Question for Ms. Varra.

20 MS. VARRA: Yes.

21 CHMN STAFFORD: Can you get closer to your
22 microphone, we can't --

23 MEMBER GOLD: Question for Ms. Varra.

24 MS. VARRA: Yes.

25 MEMBER GOLD: Savion Energy, what's the

1 proper name of the company?

2 MS. VARRA: Savion, LLC. Savion, LLC.

3 MEMBER GOLD: Sav- -- and where are they
4 located?

5 CHMN STAFFORD: I imagine everyone in the
6 office is very disappointed this morning.

7 MS. VARRA: Right. A lot of sad faces
8 today, I'm sure.

9 MEMBER GOLD: And Ranegras Plains project
10 is a LLC also --

11 MS. VARRA: A subsidiary of Savion.

12 MEMBER GOLD: -- of Savion. And they are
13 somehow licensed to do business in the state of Arizona?

14 MS. VARRA: It's a Delaware LLC, but yes,
15 we -- we can -- we can perform business in Arizona.

16 MEMBER GOLD: Okay. So Ranegras --

17 CHMN STAFFORD: So I guess -- so you're
18 asking are they registered as a foreign entity to do
19 business in Arizona with the Corporation Commission,
20 because that's typically what happens with foreign LLCs.

21 MEMBER GOLD: Exactly.

22 And since you're registered as a foreign
23 LLC, it's Ranegras Plains -- what's the whole name?

24 MS. VARRA: Ranegras Plains Energy Center,
25 LLC.

1 MEMBER GOLD: Energy Center, LLC.

2 And this is probably, you're going to bring
3 it up later on, for legal purposes who is your statutory
4 agent in the state of Arizona?

5 MS. VARRA: I'm sorry, "statutory agent,"
6 can you please explain further?

7 CHMN STAFFORD: Well, a statutory agent,
8 every corporation or LLC has to have one, it's who is
9 able to accept service of process on behalf of the
10 entity.

11 MS. VARRA: I believe that would be
12 Ranegras Plains Energy Center.

13 CHMN STAFFORD: That's the entity.

14 MS. VARRA: That's the entity, so Savion.

15 MEMBER KRYDER: It must be a person. It
16 cannot be a corporation.

17 CHMN STAFFORD: Well, I'm not sure that's
18 entirely true. I think -- because there are a number of
19 professional organizations that they serve as statutory
20 agents for other entities.

21 MS. GRABEL: We just looked it up. It's an
22 entity called the Corporation Service Company.

23 MEMBER GOLD: That's what I was looking
24 for.

25 MS. GRABEL: That's on the Commission's

1 e-corp page.

2 MEMBER GOLD: What's the correct name?

3 MS. GRABEL: The Corporations Service
4 Company.

5 MEMBER GOLD: Corporations Service Company.
6 Phoenix, Arizona?

7 MS. GRABEL: Tempe, Arizona.

8 MEMBER GOLD: Tempe, Arizona.

9 The reason I ask is if there are issues
10 that come up --

11 MEMBER KRYDER: A little closer, Jon.

12 MEMBER GOLD: The reason I ask is if there
13 are issues that come up and they cannot be resolved
14 amicably amongst the actual parties, if it comes into
15 litigation, the fact that you have a LLC in Arizona is
16 the point of contact at that point in time. Hopefully it
17 never comes to that, but you have one, and
18 Mr. Ancharski --

19 MR. ANCHARSKI: Ancharski.

20 MEMBER GOLD: Ancharski.

21 MR. ANCHARSKI: Yes.

22 MEMBER GOLD: You are an attorney?

23 MR. ANCHARSKI: Yes, sir.

24 MEMBER GOLD: Okay. So that's the one who
25 should have given the answer, I'm sorry I asked you

1 first.

2 MS. VARRA: No worries.

3 MEMBER GOLD: Thank you very much.

4 MS. VARRA: No -- no problem.

5 CHMN STAFFORD: Let the record reflect that
6 Member Richins has joined us and Member Fontes has his
7 hand raised.

8 MEMBER FONTES: Thank you, Mr. Chairman.

9 For the applicant, Ranegras Plains Energy,
10 LLC, is that going to be financed through a special
11 purpose entity or vehicle?

12 MS. VARRA: My understanding is our
13 intention is to build, own, and operate as Ranegras
14 Plains Energy Center, LLC.

15 MEMBER FONTES: That's not the question.
16 Is that going to be a stand-alone entity financed or is
17 it going to be financed at the corporate level? Is it
18 going to be corporate or project financed?

19 MS. VARRA: I don't know that that's been
20 determined at this time. I think --

21 MEMBER FONTES: Can you give me -- can you
22 give for myself and my fellow members a characterization
23 of how Savion finances entities? And let me give you
24 background. The issue here is we want to know where the
25 insurance policy is held. Is this a corporate-held

1 insurance policy or is it going to be held at the project
2 company? We're making a determination on a Certificate
3 of Environmental Compatibility, and in order to do that
4 we need to look at the full lifecycle. So to know where
5 the insurance is held is paramount to our information
6 intake so we can make an informed decision for you.

7 So two questions: One, where is it going to
8 be financed; and two, where is the insurance going to be
9 held?

10 MS. VARRA: So I believe --

11 MEMBER FONTES: And second question --

12 MS. VARRA: Okay. So I believe that it
13 will be fully financed through Savion or there may be a
14 partnership down the line. At this point in time it
15 hasn't been determined if there will be a partnership,
16 but it will be owned and operated in total by Ranegras
17 Plains Energy Center.

18 MEMBER FONTES: We would look for a
19 representation based on a previous financing, preferably
20 in the state of Arizona that you could make. It doesn't
21 have to be right now, but in these proceedings, just so
22 we can capture it for the record. And I'm just
23 dovetailing on what Member Gold's questioning was.

24 Again, who's the ultimate liability,
25 because if there is an environmental issue that's

1 unforeseen and we -- we -- we're making a decision, we
2 just want to kind of know where that is held within the
3 Savion hierarchy, is there a holding company, a project
4 company, or is it at the corporate level?

5 Again, the insurance policy and then on the
6 financing. Typically it's at the project company, but
7 that's yours to point us to --

8 MR. KNOX: Yes, it's financed --

9 MEMBER FONTES: -- in case --

10 THE REPORTER: I'm sorry?

11 CHMN STAFFORD: One at a time.

12 MS. VARRA: It is financed and insured at
13 the project level. So Ranegras Plains Energy Center,
14 LLC, is the financing, as well as the insurance.

15 MEMBER FONTES: Okay. That would be
16 unique. All other cases we've seen that they have a
17 rider on a corporate level of the insurance. I would ask
18 you to double-check that, because we've never seen that.

19 MS. VARRA: Okay. I will double-check.

20 MEMBER FONTES: On the insurance, what you
21 just said, and on the project level makes sense. But,
22 again, just capturing it for the record, not trying to
23 play gotcha here.

24 MS. VARRA: Sure.

25 MEMBER FONTES: Second question, what is

1 driving the construction into 2026 and 2027, is there a
2 Power Purchasing Agreement that is on the generation that
3 is driving that on the transmission lines?

4 MS. VARRA: There's not yet a Power
5 Purchase Agreement in place. The 2026, 2027 construction
6 is a result of timing really around we're in the process,
7 which Mr. Powers will testify to in his upcoming
8 testimony, but the NEPA process, and that we're
9 anticipating being approved late in 2025. And so
10 construction will take approximately three years, so we'd
11 begin late '26, early '27.

12 MEMBER FONTES: So your -- I guess I'll
13 look forward to his testimony, but I'll want to know if
14 you at least have a draft EIS and what is the timing
15 between public comment on the draft EIS and the final
16 EIS. And your construction manager will have to
17 backwards plan and talk to us about how you're going to
18 do control on that, as well as coordinate with the Ten
19 West Link on their SCS project, because I'm not sure
20 that's lining up.

21 But we'll get to that. I just want to make
22 sure we're linking between construction management, other
23 projects, the interconnect, and the NEPA. Sometimes they
24 do line up, sometimes they don't. But for clarity for my
25 fellow members, you will need to outline that. So you'll

1 get to that, appreciate it, just giving you a precursor
2 to something we need to look at.

3 Thank you.

4 MS. VARRA: Thank you.

5 CHMN STAFFORD: Thank you, Member Fontes.

6 BY MS. GRABEL:

7 Q. Please continue.

8 A. (MS. VARRA) Okay. So here's a map similar to
9 the one on your -- on your placemat indicating the
10 requested corridor. The red line indicates the 11-mile
11 transmission line. The star at the top left is the DCRT
12 Series Compensation Station Switchyard. The yellow
13 indicates federal lands. The blue, state lands. And the
14 pink strip indicates the 368 corridor. This was created
15 by the Energy Policy Act of 2005 as a preferred location
16 for electrical transmission right-of-way on BLM-managed
17 public lands.

18 MEMBER LITTLE: Mr. Chairman?

19 CHMN STAFFORD: Yes, Member Little.

20 MEMBER LITTLE: Thank you.

21 The application states that the distance
22 between the two right-of-ways [sic] between the Ten West
23 line and this project is 150 feet. Do you know or does
24 anybody on the panel know how tall the structures are for
25 the Ten West?

1 MS. VARRA: The Ten West Link structures?
2 I do not have that information. Is that something we
3 can --

4 MEMBER LITTLE: If we can find that out,
5 I'd appreciate it.

6 MS. VARRA: Okay.

7 MEMBER LITTLE: And I'm assuming that the
8 150-foot distance between the two lines --

9 MEMBER KRYDER: Little closer to your
10 microphone, please, Ms. Little.

11 MEMBER LITTLE: I'm assuming that the
12 150-foot distance between the two right-of-ways has been
13 approved by the Ten -- by Cal ISO.

14 MS. VARRA: We've gone through the stage 1,
15 well, let's see our series 1 and 2 process and so --

16 MEMBER LITTLE: That's -- the actual
17 physical construction distance --

18 MS. VARRA: Right.

19 MEMBER LITTLE: -- is different than the
20 system studies.

21 MS. VARRA: Okay. Right.

22 MEMBER LITTLE: I would like confirmation
23 of that for the record also, because I would guess that
24 the structures are taller than 150 feet.

25 MEMBER FONTES: Mr. Chairman?

1 CHMN STAFFORD: Yes, Member Fontes.

2 MEMBER FONTES: I would -- I was involved
3 in the financing of that project in a former life with
4 Western Area Power Administration and with Starwood. One
5 thing to note, we're looking for the actual constructed
6 not the plan ones that were represented in the CEC.
7 There were issues on particularly crossing the Central
8 Arizona Project canal and on some of those elbows that my
9 fellow member is referring to, Member Little.

10 MEMBER LITTLE: Thank you.

11 MEMBER FONTES: So actual heights.

12 CHMN STAFFORD: Thank you.

13 MS. VARRA: Okay. This next map, the
14 insert shows the vicinity map for this project area. The
15 nearest town is that of Hope, Arizona, which is about
16 seven and a half miles north -- northeast of the project
17 area.

18 CHMN STAFFORD: You're referring to which
19 slide of Exhibit RP-6?

20 MS. VARRA: I believe this is slide number
21 9.

22 CHMN STAFFORD: Okay.

23 MS. VARRA: Also on this slide, you can see
24 the solar array depicted in purple on the bottom right.
25 In red again is the proposed 500-kV transmission line.

1 And in blue, and parallel to that red line, is the
2 existing Ten West Link transmission line.

3 Some additional details on the route, the
4 transmission line will be located in an area that is
5 consistent with La Paz County's comprehensive plan and is
6 also consistent with the BLM -- BLM's Yuma Resource
7 Management Plan. It is also in an area already purposed
8 for multiple utility scale solar energy facilities. As
9 mentioned previously, the project is within the
10 Section 368 corridor and parallels to the south the
11 existing Ten West Link 500-kV transmission line for its
12 entire length. It is approximately 11 miles long, south
13 of Interstate I-10, with about a half mile to a mile
14 setback from the highway.

15 The requested corridor is a 200-foot
16 right-of-way, again totaling approximately 260 acres with
17 BLM, ASLD, and private land ownership. It will be
18 single-circuit from end to end, with up to 2,135
19 megawatts. The estimated cost is approximately
20 43 million. Construction of the transmission line would
21 utilize the existing Ten West Link construction access
22 road minimizing land use impacts.

23 The Department of -- the Department of
24 Defense aircraft lighting will be installed along
25 portions of the transmission line. And the transmission

1 line also spans over sensitive resources and avoids all
2 known cultural sites.

3 All right. As mentioned previously, the
4 tri-pole structures will be located at the dead-ends,
5 both where the line connects to the SCS Switchyard and
6 leaving the project site. On this map you can see poles
7 number 43 and 44. You can't see 43 and 44 called out
8 just because of the scale, but those are the pole
9 locations about midway on the line. And this will be
10 where the two additional tri-pole structures will be,
11 providing additional span and spacing for sensitive
12 areas. Also on this map is the location of the DOD
13 lighting and the temporary staging area for construction.

14 MEMBER KRYDER: Mr. Chairman?

15 CHMN STAFFORD: Yes, Member Kryder.

16 MEMBER KRYDER: Question. You pointed out
17 poles 43 and 44 there passing -- passing over some
18 sensitive areas.

19 MS. VARRA: Yes.

20 CHMN STAFFORD: You're going to touch what
21 the sensitive areas are and --

22 MS. VARRA: Yes, we will. That will be a
23 part of the environmental piece.

24 MEMBER KRYDER: Okay. Thanks.

25 MS. VARRA: Okay. Here's a rendering of

1 the pole structures to be installed.

2 CHMN STAFFORD: And this is slide number --

3 MS. VARRA: And that's slide number 12.

4 BY MS. GRABEL:

5 Q. Ms. Varra, before we turn on to the next set of
6 slides, which are regarding public outreach, will you
7 please turn to Exhibit RP-7, which is the summary of
8 public outreach conducted for this project.

9 A. (MS. VARRA) Yes.

10 Q. Have you seen this document before?

11 A. (MS. VARRA) Yes, I have.

12 Q. Was it prepared by you or under your direction
13 and control?

14 A. (MS. VARRA) Yes, it was.

15 Q. Was this document prepared in response to the
16 Chairman's Procedural Order, specifically paragraph 16?

17 A. (MS. VARRA) Yes, it was.

18 Q. Does this summary accurately convey the public
19 outreach performed by Ranegras Plains in this matter?

20 A. (MS. VARRA) Yes, it does. There's one small
21 change that I'd like to note, bottom right, dated
22 12/10/24, it's noted as a project overview presentation
23 for Quartzite Chamber of Commerce, this was actually
24 before the Quartzsite Town Council on December 10th.

25 Q. Thank you.

1 And if you'll please turn to Exhibit RP-8, is
2 this a summary of the social media communications posted
3 by Ranegras Plains Energy Center, including the social
4 media posts made subsequent to the filing of the CEC
5 application?

6 A. (MS. VARRA) Yes, it is.

7 Q. All right. Thank you.

8 Go ahead and please walk us through the outreach
9 efforts in the next portion of your presentation.

10 MEMBER LITTLE: Mr. Chairman?

11 CHMN STAFFORD: Yes, Member Little.

12 MEMBER LITTLE: Is -- what are we calling
13 that -- Exhibit 7 the same as the scoping report that was
14 given in Attachment J-1 to the application or have there
15 been changes between the two?

16 MS. GRABEL: It's the same.

17 MEMBER LITTLE: Thank you.

18 MS. VARRA: Okay. From the scoping report,
19 Exhibit J in the CEC application, you can see the public
20 engagement began in 2021, with the majority of
21 face-to-face meetings occurring in late 2024.

22 There have been five public meetings, two
23 presentations to local Chambers of Commerce, one
24 presentation to the Town Council of Quartzsite and one
25 booth at the Quartzsite Fall Festival. Nearly 90

1 stakeholders in total attended the five public meetings,
2 and 88 people filled out comment cards at the festival
3 booth. One public meeting was held as a part of the CEC
4 scoping efforts. It was publicized by a legal notice ad
5 in the Arizona Business Gazette. Informational sheets
6 that were mailed, as well as emails to stakeholders and
7 interested parties. There was one person who attended
8 that meeting.

9 December 16th, 2024, La Paz County Board of
10 Supervisors unanimously approved the project's
11 Conditional Use Permit and Major Comprehensive Plan
12 Amendment.

13 All right. I skipped a slide here.

14 All right. So public outreach and agency
15 coordination. Agency topics of interest, which my
16 colleague, Mr. Powers, will speak to in greater detail,
17 these topics included wildlife habitat and soil
18 conservation, consistency with management plans, land use
19 conflicts, Native American tribal values. Public topics
20 of interest were siting in compatible areas, economic
21 benefits, and recreational values.

22 Here is a copy of the informational sheet
23 that was mailed out for the CEC.

24 BY MS. GRABEL:

25 Q. And before we move on to the compliance

1 matters -- oh, Member Kryder, did you have a question?

2 MEMBER KRYDER: I got lost. Under which
3 tab are we here?

4 MS. GRABEL: We are going through the
5 presentation. So that is Exhibit RP-6.

6 MEMBER KRYDER: Okay. Thanks.

7 MS. GRABEL: Certainly.

8 Q. And before we move on to the compliance items,
9 just to go back and clarify the response you gave to
10 Member Little's question, I believe you testified that
11 the distance between the Ranegras Plains prop- -- Plains
12 poles and the Ten West Link poles would be 150 feet?

13 A. (MS. VARRA) Yes, that's correct.

14 CHMN STAFFORD: I thought that was the
15 distance between right-of-ways.

16 MS. GRABEL: Well, that's what I was just
17 going to ask.

18 Q. That's the difference between right-of-ways,
19 correct?

20 A. (MS. VARRA) Yes, it is.

21 Q. So the actual distance between structures is
22 going to be about 350 feet; is that correct?

23 A. (MS. VARRA) Yes, that's correct. Thank you for
24 calling that out.

25 MEMBER LITTLE: Thank you for clarifying

1 that for me.

2 CHMN STAFFORD: Thank you.

3 BY MS. GRABEL:

4 Q. Okay. I guess we can move on to the compliance
5 items. So Ranegras Plains directed the publication of
6 the Notice of Hearing in the Arizona Republic and the
7 Parker Pioneer, correct?

8 A. (MS. VARRA) Correct.

9 Q. And was notice published once in the Arizona
10 Republic and once in the Parker Pioneer within the time
11 frame specified by statute and regulations?

12 A. (MS. VARRA) Yes, it was.

13 Q. And, specifically, it was published for the
14 first time on December 27th in the Republic and a second
15 time on January 1st, 2025, in the Parker Pioneer,
16 correct?

17 A. (MS. VARRA) That's correct.

18 Q. And does this slide that you're looking at now
19 contain screenshots of the proof of publication in those
20 newspapers?

21 A. (MS. VARRA) Yes, it does.

22 Q. And if you look at Exhibit RP-9(B) --

23 CHMN STAFFORD: Go back a second. You're
24 referring to which slide in RP-6 which has the --

25 MS. VARRA: 16.

1 CHMN STAFFORD: 16, thank you.

2 MS. GRABEL: Actually, I think it's 17.

3 CHMN STAFFORD: 17.

4 MS. GRABEL: Yeah. And 17 has the
5 screenshots of the proof of publication that's in
6 RP-9(B).

7 Q. So is the Exhibit RP-9(B), Ms. Varra, the proof
8 of publication that we just discussed?

9 A. (MS. VARRA) Yes, it is.

10 Q. And is RP-9(C) actually the proof of publication
11 in the Parker Pioneer that we just discussed?

12 A. (MS. VARRA) Yes, it is.

13 Q. Thank you.

14 Please continue.

15 A. (MS. VARRA) Okay. This next slide are some
16 screenshots from our public -- our project website and
17 social media page.

18 Q. And were those posts made in compliance with the
19 Chairman's Procedural Order?

20 A. (MS. VARRA) Yes, they were.

21 Q. Thank you.

22 Continue.

23 A. (MS. VARRA) This is a copy of the Notice of
24 Hearing.

25 Q. And was this the Notice of Hearing that was

1 published in the newspapers we've just identified?

2 A. (MS. VARRA) Yes, it is.

3 Q. Continue. Thank you.

4 A. (MS. VARRA) This is the notice of public hearing
5 sign.

6 Q. And was the language contained in the signage on
7 the screenshot identical to that discussed with the
8 Chairman at the prefiling conference?

9 A. (MS. VARRA) Yes, it is.

10 Q. Thank you.

11 CHMN STAFFORD: Could you please refer to
12 the slide -- the presentation number slide when you're
13 discussing it, because that way it makes the transcript
14 read --

15 MS. GRABEL: Certainly.

16 CHMN STAFFORD: -- much more easily.

17 MS. GRABEL: So that what we were just
18 talking about was slide 20, which contains a screenshot
19 of the language of the notice of public hearings sign.

20 Q. And moving on to slide 21.

21 A. (MS. VARRA) This is the notification of sign
22 locations. If you look closely at the map, you can see
23 the green dots represent the locations. The one on the
24 farthest left, the sign one is along the Arizona Peace
25 Trail connector route for recreational users. And then

1 down on the right, those two postings are along Vicksburg
2 Road for traffic visibility.

3 Q. And, Ms. Varra, were the sign locations
4 identified on the slide the same as were discussed with
5 the Chairman at the prefiling conference?

6 A. (MS. VARRA) Yes, they are.

7 Q. All right. Thank you.

8 Moving on to slide 22.

9 A. (MS. VARRA) This is pictures of the signs in
10 place.

11 Q. Thank you.

12 And moving on to slide 23.

13 A. (MS. VARRA) These are the locations of the CEC
14 application posting, Arizona Corporation Commission, the
15 Centennial Public Library in Salome, Arizona, Quartzsite
16 Public Library in Quartzsite, Arizona, as well as the
17 project website and the Facebook page.

18 Q. And, Ms. Varra, if you will turn to Exhibit
19 RP-9(D).

20 A. (MS. VARRA) Okay.

21 Q. Are you there?

22 A. (MS. VARRA) Yup.

23 Q. And is Exhibit RP-9(D) contain proof that
24 Ranegras Plains mailed copies of the CEC application to
25 the locations just identified on slide 22?

1 A. (MS. VARRA) Yes, it does.

2 Q. Okay. Thank you.

3 Please continue.

4 A. (MS. VARRA) Alrighty. Notice to affected
5 jurisdictions included La Paz County, Arizona State Land
6 Department, and Arizona Department of Transportation.

7 Q. Thank you.

8 So this is slide 23. And with respect to slide
9 23, will you please turn to Exhibit RP-9 subpart E?

10 A. (MS. VARRA) B?

11 Q. E.

12 A. (MS. VARRA) Oh, sorry.

13 Q. E, as in elephant or egg, or whatever you're
14 supposed to say about E.

15 Is RP-9(E) proof that Ranegras Plains mailed
16 copies of the Notice of Hearing to the affected
17 jurisdictions, as required by the Chairman's Procedural
18 Order?

19 A. (MS. VARRA) Yes, it is.

20 Q. Did Ranegras Plains also direct the emailing of
21 a copy of the Notice of Hearing to the Board of
22 Supervisors for La Paz County?

23 A. (MS. VARRA) Yes.

24 Q. Why did it do that?

25 A. (MS. VARRA) Just confirmation of receipt.

1 Q. So just to clarify, the certified mail shows
2 that notification is still pending, and so the company
3 emailed to the board to ensure that they did receive a
4 copy and the email included within RP-9 confirms receipt
5 of the Notice of Hearing?

6 A. (MS. VARRA) (No audible response.)

7 Q. Okay. Going back to slide 25.

8 A. (MS. VARRA) Okay. Ten-year filing plans. The
9 initial plan was filed in January of '22, then again
10 filed in January of '23, February of '24, November of
11 '24, and again January 17th of 2025.

12 Q. Thank you. And are copies --

13 MEMBER LITTLE: Mr. Chairman?

14 CHMN STAFFORD: Yes, Member Little.

15 MEMBER LITTLE: I would like to express my
16 gratitude to the company for following the guidelines.
17 Thank you.

18 MS. VARRA: Thank you.

19 BY MS. GRABEL:

20 Q. Ms. Varra, are copies of the Ten-Year Plans
21 identified in this slide marked -- identified in this
22 slide, excuse me, contained in Exhibit RP-10, subparts A
23 through E?

24 A. (MS. VARRA) Yes, they are.

25 Q. Okay. Thank you.

1 Moving on to slide 26. What does this slide
2 depict?

3 A. (MS. VARRA) Oh, I don't have this slide in my
4 group.

5 There we go. Thank you.

6 This is the receipt of the CEC application
7 filing fee.

8 Q. And, thank you.

9 This receipt is also contained in Exhibit RP-11,
10 correct?

11 A. (MS. VARRA) That's correct.

12 Q. All right. Thank you.

13 Please continue.

14 A. (MS. VARRA) That is the end of my portion of the
15 testimony.

16 MS. GRABEL: Well, then that concludes our
17 first panel, unless the committee members have any other
18 questions for Ms. Varra.

19 CHMN STAFFORD: Questions from members?

20 MEMBER RICHINS: Yeah, I know that
21 with -- oh, sorry, Chairman?

22 CHMN STAFFORD: Go ahead, Member Richins.

23 MEMBER RICHINS: I know that when you're
24 doing the federal process that there's a lot of
25 prescriptive outreach that you have to do. But hearing

1 that you had 80 or so folks participating in open houses
2 and other engagements is a pretty big number for an area
3 with a small population. So I just wanted to compliment
4 you on at least digging into that community enough to
5 ferret a few folks out. Hopefully you did it in the
6 winter when Quartzsite is really busy, but that's really
7 when your people are there. But anyway, I just want to
8 compliment the applicant on some good old-fashioned
9 outreach, you guys just -- you did fine. Thank you.

10 MS. VARRA: Thank you.

11 MEMBER GOLD: Mr. Chairman?

12 CHMN STAFFORD: Yes, Member Gold.

13 MEMBER GOLD: Along with Member Richins'
14 comment, are there any people in this area who live
15 there?

16 MS. VARRA: There were people that
17 attended, yeah, absolutely. It was -- initially we were
18 sited with a contentious project, and so the turnout,
19 yeah, it wasn't related to us at all, so some of the
20 turnout initially was in association with that other
21 project that they weren't happy with.

22 So we worked really hard to establish
23 ourselves separate from the project that they weren't
24 looking forward to, you know, becoming a part of the
25 community. And we successfully did that, I believe.

1 MEMBER GOLD: I think you did a great job.
2 And I was looking at the area from Google Earth, and it
3 looks like it's the middle of nowhere.

4 MS. VARRA: Right.

5 MEMBER GOLD: There are some service
6 stations along I-10. There's a whole bunch of solar
7 projects north of I-10. Yours is going to be south of
8 I-10. Yours doesn't exist at the moment, correct?

9 MS. VARRA: Correct, it does not.

10 MEMBER GOLD: And you're planning on doing
11 this project when?

12 MS. VARRA: Construction we anticipate late
13 '26, early in '27.

14 MEMBER GOLD: Okay. And the solar project,
15 what -- just out of curiosity's sake, what's the lifespan
16 today of a solar project?

17 MS. VARRA: We plan on 40 years.

18 MEMBER GOLD: Okay. And panels degrade at
19 a rate of?

20 MS. VARRA: Usually they will consider
21 replacing around 20, 25 years, depending on their level
22 of efficiency at that point in time.

23 MEMBER GOLD: Are there any federal
24 incentives for the solar project at present?

25 MS. VARRA: There's -- that's a tricky

1 question right now. That's a tricky question, but
2 there's, specific to the project, there are some
3 tax-based initiatives that are in place. But this
4 project isn't subject to any grants or anything of that
5 nature.

6 MEMBER GOLD: So this is a private project?

7 MS. VARRA: Yes.

8 MEMBER GOLD: And you need the transmission
9 lines to link your solar field to the substation?

10 MS. VARRA: Correct.

11 MEMBER GOLD: And you're putting it
12 parallel to another trans- -- a bunch of other
13 transmission lines in the same area?

14 MS. VARRA: That's right.

15 MEMBER GOLD: With no people in the area --

16 MS. VARRA: Correct.

17 MEMBER GOLD: Relatively speaking.

18 MS. VARRA: Uh-huh.

19 MEMBER GOLD: Do you foresee any roadblocks
20 to this project? Is there anything standing in the way
21 of this project being completed besides the CEC?

22 MS. VARRA: We're still in the process of
23 doing the federal permitting, but that's going well. And
24 we feel like we've got the support of the BLM behind us,
25 so we're confident that this project will move forward.

1 MEMBER GOLD: Okay. And are you also
2 confident that solar will be the most energy efficient or
3 dollarwise efficient with the new administration coming
4 in?

5 MS. VARRA: Well, that's, again, a tricky
6 question. But I do feel that technology is really
7 advancing a lot in the area of solar panels and their
8 efficiencies, so I think we're going to see nothing but
9 enhanced production from these sorts of facilities.

10 MEMBER GOLD: Okay. The reason I was
11 questioning is we have a lot of solar facilities, and
12 Arizona's a great place to put them --

13 MS. VARRA: Right.

14 MEMBER GOLD: -- because we do have a lot
15 of sunshine. And we've also got a lot of desert with
16 nothing in it, so it's a heck of a lot better than
17 putting them up in Minnesota.

18 MS. VARRA: Agreed.

19 MEMBER GOLD: So the fact that you're
20 putting it up in the right place is a good idea. My
21 question is, in the next two years before you actually
22 start construction or finishing this project as they
23 allow -- oh, how do you call it -- the fossil fuel-based
24 plants to come online, which I foresee coming -- well,
25 what's your guesstimate that this project will actually

1 be built and come to fruition in the next three,
2 four years with the technology and political situations
3 changing as they are now.

4 MS. VARRA: I think our energy demands are
5 going up. I happen to be an all-of-the-above kind of
6 thinker. I think we need the energy from all sources in
7 order to meet our increasing demands, so I feel confident
8 that we're going to still need solar, even as we're
9 producing more fossil fuels, assuming that is or will be
10 the case.

11 MEMBER GOLD: So it will -- you're
12 foreseeing -- you're suggesting it will be energy
13 efficient, even with the anticipated lower price of
14 fossil fuels coming onboard?

15 MS. VARRA: Yes, I do.

16 MEMBER GOLD: Thank you.

17 MEMBER KRYDER: Mr. Chairman?

18 CHMN STAFFORD: One second, Member Kryder.
19 Member Fontes's hand's been raised for quite a minute
20 here, so let's go to him and then I'll come to your
21 question.

22 Member Fontes.

23 MEMBER FONTES: Thank you, Mr Chairman.

24 The applicant represented that they had the
25 project at 40 years, however, the Bureau of Land

1 Management has only issued Records of Decision in
2 projects supporting 30 years, including the ROD issued
3 for the Jove Solar Project, which is adjacent to this,
4 and they issued the ROD on the 16th of January of 2025.

5 How does the applicant -- what's your plan
6 to have the additional 10 years? Did you file the 1099
7 for 30 or 40 years?

8 MS. VARRA: We've requested 40.

9 MEMBER FONTES: Okay. That will be unique.
10 We'll look forward to seeing that. Is that in the draft
11 EIS?

12 MS. VARRA: Yes, it is.

13 MEMBER FONTES: Okay. Thank you.

14 CHMN STAFFORD: Thank you.

15 Member Kryder.

16 MEMBER KRYDER: Take a pass.

17 MEMBER LITTLE: Mr. Chairman?

18 CHMN STAFFORD: Yes, Member Little.

19 MEMBER LITTLE: This information may be in
20 the application or in one of the huge amounts of pages of
21 things that were on that jump drive, but has the
22 applicant been working at all with El Paso Natural Gas?
23 Because of the fact that you're so close to their
24 pipeline?

25 MS. VARRA: No, there hasn't been any

1 conversations directly with the natural gas company.

2 MEMBER LITTLE: Okay. I would like to see
3 that happen.

4 CHMN STAFFORD: All right. You mentioned
5 previously that I think 76 percent of the land for the
6 gen-tie will be at BLM land and then 22 percent on state
7 land and then 2 percent of private land, approximately
8 five acres, how many -- who is the owner or owners of
9 that five acres?

10 MS. VARRA: They are Ronhawa [phonetic] is
11 their last name, and we've entered into an agreement for
12 that right-of-way.

13 CHMN STAFFORD: For an easement?

14 MS. VARRA: For an easement, excuse me,
15 yes.

16 CHMN STAFFORD: Okay. Thank you.

17 Any other questions from members?

18 (No response.)

19 MS. GRABEL: Before we leave this panel, I
20 was able to get an answer from the owners of the Ten West
21 line that the height structures of Ten West generally
22 range from 140 feet to 170 feet tall.

23 MEMBER LITTLE: Thank you.

24 CHMN STAFFORD: All right.

25 Ms. Grabel, would you like to call your

1 next panel.

2 MS. GRABEL: I will, yes. I'd like to call
3 Mr. Christopher Powers and Mr. Richard Knox.

4 CHMN STAFFORD: All right. Mr. Powers,
5 would you prefer an oath or affirmation?

6 MR. POWERS: Mr. Chairman, I'll take the
7 oath, please.

8 (Christopher Powers was duly sworn by
9 the Chairman.)

10 CHMN STAFFORD: And, Mr. Knox, oath or
11 affirmation?

12 MR. KNOX: Oath, please.

13 (Richard Knox was duly sworn by
14 the Chairman.)

15 CHMN STAFFORD: Thank you. Please proceed.

16 MS. GRABEL: Thank you. I'll start with
17 you, Mr. Powers.

18 CHRISTOPHER Powers and RICHARD KNOX,
19 called as witnesses as a panel on behalf of Applicant,
20 having been previously affirmed or sworn by the Chairman
21 to speak the truth and nothing but the truth, were
22 examined and testified as follows:

23 //

24 //

25 //

1 DIRECT EXAMINATION

2 BY MS. GRABEL:

3 Q. Please state your name and business address for
4 the record.5 A. (MR. POWERS) My name is Christopher Powers. And
6 my business address is 422 Admiral Boulevard, Kansas
7 City, Missouri 64106.

8 Q. By whom are you employed and in what capacity?

9 A. (MR. POWERS) I am employed by Savion, LLC. I
10 work for Savion as a senior director of permitting and
11 environmental. And for this matter I am the permitting
12 and environmental lead.

13 Q. Thank you.

14 You have before you both hearing exhibits. If
15 you'll please look at Exhibit RP-4, which is the
16 testimony summary of Christopher Powers.

17 A. (MR. POWERS) Okay.

18 Q. Was Exhibit RP-4 prepared by you or under your
19 direction and control?

20 A. (MR. POWERS) Yes, it was.

21 Q. Are the contents of Exhibit RP-4 true and
22 correct, to the best of your knowledge?

23 A. (MR. POWERS) Yes, it is.

24 Q. Do you have any changes you would like to make
25 to Exhibit RP-4?

1 A. (MR. POWERS) No, I do not.

2 Q. All right. Thank you.

3 I will now turn to Mr. Knox.

4 Mr. Knox, please state your name and business
5 address for the record.

6 A. (MR. KNOX) My name is Richard Knox. And the
7 business address is 2832 South 46th Street, Phoenix,
8 Arizona 85040.

9 Q. By whom are you employed and in what capacity?

10 A. (MR. KNOX) Tetra Tech, as a senior project
11 manager.

12 Q. And what is your role in this matter?

13 A. (MR. KNOX) I was the permitting project manager
14 for Savion.

15 Q. And if you could take a look at your hearing
16 exhibits and look at Exhibit RP-5, which is the testimony
17 summary of Richard Knox.

18 A. (MR. KNOX) Uh-huh.

19 Q. Was Exhibit RP-5 prepared by you or under your
20 direction and control?

21 A. (MR. KNOX) It was.

22 Q. Are the contents of Exhibit RP-5 true and
23 correct to the best of your knowledge?

24 A. (MR. KNOX) They are.

25 Q. Do you have any changes you would like to make

1 to Exhibit RP-5?

2 A. (MR. KNOX) I don't.

3 Q. All right. With that, go ahead, Mr. Powers. I
4 will kick it off to you to continue with the
5 presentation.

6 A. (MR. POWERS) Good morning, Mr. Chairman and
7 Committee Members. My name is Christopher Powers. I'm a
8 senior director of permitting and environmental with
9 Savion Energy. And I lead the entitlement for all of our
10 Savion projects in the western region, which includes the
11 Pacific Northwest, Mountain West, California, and the
12 Southwest, including the state of Arizona, as well as
13 Texas and Oklahoma.

14 I have a bachelor's degree in science and a
15 master's degree from Union College in Schenectady, New
16 York. I have over 23 years in this industry and my focus
17 in renewable energy and other development projects
18 involves environmental review and due diligence, the
19 siting of projects, leading environmental studies and
20 leading the various permitting and entitlement processes.

21 Also with me here today is our consultant
22 colleague, Mr. Richard Knox with Tetra Tech, and he'll be
23 providing testimony for visual resources as part of this
24 environmental panel.

25 I'm sorry, go ahead. Can you do next slide,

1 please.

2 So, for the record, this is slide number 21, in
3 Exhibit RP-6 -- I'm sorry 29, slide 29.

4 During my testimony, I'll lead you through a
5 summary of the environmental studies that were conducted
6 for this project and demonstrate that all the factors
7 that you need to consider in issuing a CEC under Arizona
8 Statute 40-360.06 were evaluated. I'll provide some
9 context of the project and its regional setting and how
10 it pertains to land use and existing plans, and I'll show
11 you how our project fits in with other developments in
12 the vicinity as well.

13 I'll summarize the studies that were prepared to
14 evaluate fish, wildlife, plant life, and their habitats,
15 and I'll also summarize our evaluation of historic and
16 archaeological sites. We'll review recreational
17 resources and existing scenic areas and provide a
18 detailed summary of our visual resources analysis. And
19 we'll present a number of simulations and then flyover of
20 our project area that shows the project in the landscape
21 context, and we have slides for all of those resources I
22 just outlined.

23 I will touch on one more for now. We don't have
24 a separate -- separate slide for noise emissions and
25 interference with communication signals, but I can touch

1 on that briefly now. We did conduct a noise evaluation
2 for this project, and under Arizona Statute we do not
3 exceed the 55 dba at the right-of-way that's outlined
4 under statute.

5 Next slide, please, Eli.

6 So this is the project setting, for the record
7 slide number 30. As you can see, much of the land in
8 this project area is managed by, predominantly, the
9 Bureau of Land Management or BLM. As Ms. Varra touched
10 on before, that's the yellow shading over a large part of
11 this figure. The blue shading represents State Trust
12 Land. And the unshaded areas are privately owned.

13 Regionally speaking, the New Water Mountains are
14 to the southwest and the Harquahala Mountains are to the
15 east. And this figure also shows the project area of our
16 700-megawatt solar plus storage hybrid project out
17 towards the eastern side of that figure. That is
18 comprised -- that is, the solar portion, is comprised of
19 approximately 4,745 acres of BLM-managed land, and then
20 Bouse Wash is seen passing along the eastern side of that
21 solar array.

22 As Ms. Varra mentioned, our 500-kV gen-tie would
23 originate at the project substation, located at the
24 northwest corner of our solar array and that project
25 substation is the yellow highlighted square in the

1 callout box on this slide. The gen-tie would then
2 traverse approximately 11 miles to the west, northwest
3 along the 200-foot-wide right-of-way. The gen-tie
4 right-of-way is comprised of -- I don't have the
5 percentages, I actually have the acres -- it's 198 acres
6 of BLM-managed land, 56 acres of Arizona State Trust
7 Land, and those 6 acres of private land, as Ms. Varra
8 touched on before.

9 The project gen-tie would parallel the Ten West
10 Link 500-kV transmission line south of I-10 and its
11 proposed interconnect to the grid at the Ten West Link
12 Series Compensation Station Switchyard. I also wanted to
13 point out again that the proposed route occurs within
14 portions of the federally designated Section 368 corridor
15 that Ms. Grabel mentioned before, and that's depicted as
16 the cross-hatching along the I-10 corridor in this
17 figure.

18 As was mentioned prior, Section 368 corridors
19 were created by the Energy Policy Act of 2005, and are
20 preferred locations for electrical transmission
21 right-of-ways on BLM-managed public lands. And then, as
22 mentioned before, our -- our route also parallels
23 existing features, including Interstate 10 and the Ten
24 West Link for 100 percent of its length.

25 Next slide, please.

1 For the record, this is regional projects in
2 slide number 31 in the presentation. As you know, one of
3 the factors that needs to be considered in issuing a CEC
4 is the project suitability with respect to existing plans
5 of the state, of local governments, as well as private
6 entities and other developments in and around the project
7 proposed site.

8 As you can see, there's several renewable energy
9 projects either proposed, under construction, or
10 operations in the region, with Atlas Main Solar, Bouse
11 Solar, Blue Water, and Jove Solar being the closest. And
12 although this project is sited primarily on federal land,
13 we also worked with La Paz County to obtain a Major
14 Comprehensive Plan Amendment and a Conditional Use Permit
15 for this project.

16 So the Major Comprehensive Plan Amendment, or
17 what they refer to as a MCPA, was needed to change the
18 future land use designation in La Paz County
19 comprehensive plan from open space to employment area to
20 allow for solar uses. And then we were subsequently also
21 applied for a Conditional Use Permit which would allow
22 solar within an employment area.

23 MEMBER KRYDER: Mr. Chairman?

24 CHMN STAFFORD: Yes, Member Kryder.

25 MEMBER KRYDER: Question for Mr. Powers.

1 MR. POWERS: Yes, sir.

2 MEMBER KRYDER: Following up on what Member
3 Gold asked a moment ago about the population, does anyone
4 live with -- is there anyone living near the line, and if
5 so, how close?

6 MR. POWERS: Mr. Chairman, Member Kryder, I
7 believe the closest developments are the truck stops
8 along the interchange at Vicksburg Road and I-10. I
9 believe there's a handful of residences just to the west
10 of the truck -- the Pilot truck stop on the south side of
11 I-10. I don't recall the exact distance from our project
12 to those residences.

13 MEMBER KRYDER: But back of the envelope,
14 it's -- so the residences are on the north side, and your
15 line is proposed on the south side --

16 MR. POWERS: Yes.

17 MEMBER KRYDER: -- of the 10?

18 MR. POWERS: Ms. Varra just advised me, we
19 believe it's, as the crow flies, about three and a half
20 miles from our line to the closest resident.

21 MEMBER KRYDER: Okay. And --

22 MR. KNOX: Three-quarters.

23 MR. POWERS: Oh, I'm sorry, correction,
24 three-quarters -- three-quarters of a mile. Sorry, my
25 apologies.

1 MEMBER KRYDER: Three-quarters of a mile.
2 And how many people are in that? I see you asked your
3 partner there, Mr. Knox, do you have information? How
4 many people are we talking about?

5 MR. KNOX: Yes, sir, there's a cluster of
6 three to five residents, trailers. It was difficult to,
7 without actually going up onto their property, it was
8 difficult to figure out which trailers were occupied and
9 which ones weren't, but there's a tire repair shop behind
10 the truck stop.

11 MEMBER KRYDER: Right.

12 MR. KNOX: Just behind the tire repair shop
13 there's a small cluster of trailers, and we believe
14 there's three, there could be five.

15 MEMBER KRYDER: Somewhere greater than
16 three less than six?

17 MR. KNOX: That's precisely right.

18 MEMBER KRYDER: Okay. And they appear to
19 be residences of employees or you don't know or
20 couldn't -- we've got no information or what is the
21 status on that?

22 MR. POWERS: Want me to reach out to them?

23 MR. KNOX: It seems to be a -- supporting
24 the truck stop, the tire repair shop --

25 MEMBER KRYDER: Okay.

1 MR. KNOX: -- and that's kind of back in
2 that area there.

3 MEMBER KRYDER: Okay.

4 MR. KNOX: They may support the
5 agricultural fields north of Interstate 10.

6 MEMBER KRYDER: Yeah, that's what was
7 concerning me.

8 Thank you very much.

9 CHMN STAFFORD: Clarification. You said
10 that the residents are north of the I-10?

11 MR. POWERS: No, they're south of I-10,
12 east of -- I don't recall the name of the truck stop on
13 the south side of I-10, I believe it's the Pilot. It's
14 kind of at the, I guess it would be the southwest corner
15 of I-10 and Vicksburg Road is where that truck stop and
16 those -- those residences would be.

17 CHMN STAFFORD: And then the line is south
18 of that?

19 MR. POWERS: From -- Mr. Chairman, you
20 would have those residences, there is a distance of about
21 three-quarters of a mile or so, Ten West Link, and then
22 further south would be our line.

23 CHMN STAFFORD: Okay. So they're about
24 three-quarters of a mile from the existing Ten West
25 Link --

1 MR. POWERS: Correct.

2 CHMN STAFFORD: -- and you're even further
3 south from that?

4 MR. POWERS: Correct.

5 CHMN STAFFORD: Okay. So they're already
6 looking at the Ten West Link looking south?

7 MR. POWERS: Correct.

8 CHMN STAFFORD: And yours would be behind
9 that one?

10 MR. POWERS: Correct.

11 CHMN STAFFORD: Okay. Thank you.

12 MR. POWERS: Yes.

13 CHMN STAFFORD: Member Fontes, you have
14 your hand up.

15 MEMBER FONTES: I do. Thank you,

16 Mr. Chairman?

17 What's the proximity from the -- to the
18 Kofa Wildlife Refuge?

19 MR. POWERS: I'm -- Mr. Chairman, I'm
20 sorry, Committee Member, I didn't get their name, I'm
21 sorry.

22 CHMN STAFFORD: Member Fontes.

23 MR. POWERS: Member Fontes, I don't know
24 off the top of my head, but we could -- we could look
25 into that and I can answer during a subsequent Q&A, if

1 that would be acceptable.

2 CHMN STAFFORD: Certainly.

3 I think my recollection is that the Kofa
4 Wilderness is further west of the substation that you're
5 tying into, and that the Ten West Link goes around the
6 Kofa Wilderness Area, whereas the Devers line cuts
7 through it; is that correct?

8 MR. KNOX: Yeah, that is correct, uh-huh.

9 CHMN STAFFORD: I'm seeing -- I'm seeing
10 nods. Can I get a witness on the record to say that's
11 correct?

12 MR. KNOX: That's correct.

13 CHMN STAFFORD: All right. Thank you.

14 Member Kryder, do you have additional
15 questions?

16 MEMBER KRYDER: Yes, I was following up on
17 the personnel that might be living somewhere nearby, did
18 any of these people show up at your hearings?

19 MR. POWERS: Mr. Chairman, Member Kryder,
20 not that we are aware of.

21 MEMBER KRYDER: Okay. So to the best of
22 your experience, you have had no physical contact with
23 these three or less than six dwellings?

24 MR. POWERS: We have not.

25 MEMBER KRYDER: Okay. Thank you.

1 MR. POWERS: Let's see. Okay. I got it.
2 I'm just going to back up one sentence, so I can get back
3 on track here.

4 So the MCPA was needed to change the future
5 land use designation in the La Paz County Comprehensive
6 Plan from an open space to employment area to allow for
7 solar uses. And then we subsequently applied for a
8 Conditional Use Permit to allow for that use, solar use,
9 in the employment area.

10 As Ms. Varra mentioned before, we finished
11 those local discretionary entitlements with the unanimous
12 recommendation for approval by the Planning and Zoning
13 Commission on December 5th of 2024, and then a unanimous
14 approval by the Board of Supervisors on December 16th of
15 2024.

16 Again, our project is almost entirely on
17 BLM land, so we're also working our way through the NEPA
18 process. The notice of availability for the draft EIS
19 was published in the Federal Register on January 13th of
20 2025. The comment period for the draft EIS will close on
21 February 28th. What's been alluded to in some of the
22 prior questioning, too, even with the recent Executive
23 Orders, we are still anticipating the final EIS to be
24 published in the early fall of 2025, and that's through
25 consultation with our BLM project managers and their

1 State of Arizona management. And so we're looking around
2 the September time frame -- time frame for the final EIS
3 to be published, with the Record of Decision, or ROD,
4 coming in October or November of this year, 2025.

5 When we developed the proposed Plan of
6 Development, or POD, for the NEPA process for the EIS, it
7 fully incorporates all BLM direction, including the 2013
8 Restoration Design Energy Project, or RDEP, and the 2012
9 Western Solar Plan.

10 The proposed POD incorporates the RDEP and
11 Western Solar Plan's specific design features. The
12 numerous BMPs and required plans and studies associated
13 with the siting, design, construction, operations, and
14 maintenance, and eventual decommissioning of renewable
15 projects -- renewable energy projects in the state of
16 Arizona.

17 CHMN STAFFORD: You said "BMPs," can you --

18 MR. POWERS: Yes, Mr. Chairman, BMPs stand
19 for best management practices. So there's certain
20 engineering considerations, construction, best management
21 practices for dust suppression, water conservation,
22 natural and cultural resource protection, that sort of
23 thing.

24 CHMN STAFFORD: Thank you. I just wanted
25 to -- these acronyms in these -- these proceedings are

1 full of them. I like to get them stated at least at one
2 point in the transcript.

3 MR. POWERS: Yeah, Mr. Chairman, I'm sorry,
4 I didn't define that one. I'm -- I'm trying to define
5 them all, I'm sorry I missed that one, but you're right.
6 BMPs is a standard best management practice.

7 For the record, the purpose of the RDEP or
8 the Restoration Design Energy Project, when it was
9 developed in the state of Arizona was to conduct the
10 statewide planning process that fosters environmental
11 re- -- environmentally responsible development of
12 renewable energy and allows for the permitting of future
13 renewable energy development projects to proceed in a
14 more efficient and standardized manner.

15 The Western Solar Plan in 2012 established
16 a process for permitting utility scale solar energy
17 projects on BLM-managed lands in six southwestern states
18 including Arizona, California, Colorado, Nevada, New
19 Mexico and Utah. And the Western Solar Plan process
20 facilitates, again, the permitting of solar energy
21 development projects on these public lands for the same
22 efficiency.

23 I do want to point out, the Western Solar
24 Plan was just recently updated in 2024 and the BLM is
25 cross-referencing all of the design considerations that

1 we have proposed in our project, to make sure it also
2 complies with the new 2024 Western Solar Plan that was
3 recently approved. And I just want to point out that our
4 project is consistent with all of these plans.

5 Next slide, please, Eli.

6 So biological and hydrological resources,
7 for the record, this is slide number 32. We included the
8 biological evaluation, the native plant inventory, air
9 resources analysis and soils, geology, and minerals and
10 mining baseline reports as attachments B-2 through B-5 in
11 our application for a CEC.

12 For biological resources we conducted
13 numerous field reviews and we've been coordinating with
14 the Arizona Game & Fish, U.S. Fish and Wildlife Service,
15 and the BLM for close to four years now.

16 Formal Section 7 consultation with the U.S.
17 Fish and Wildlife Service is ongoing, and we're
18 anticipating that the biological opinion and take
19 authorization will be approved this summer or early fall
20 ahead of the BLM's Record of Decision on the EIS.

21 MEMBER LITTLE: Mr. Chairman?

22 CHMN STAFFORD: Yes, Member Little.

23 MEMBER LITTLE: Could the applicant clarify
24 what a Section 7 review is, please?

25 MR. POWERS: Mr. Chairman, Member Little,

1 so Section 7 consultation is -- it's Section 7 under the
2 Endangered Species Act, and it provides a framework for
3 federal agencies to consult on endangered species matters
4 on projects that have a federal nexus. So it's
5 essentially the federal framework that allows the Bureau
6 of Land Management to consult with Fish and Wildlife
7 Service for effects of biological resources or listed
8 species and their habitats on projects that they would
9 authorize a right-of-way grant or a decision on.

10 MEMBER LITTLE: Thank you.

11 MR. POWERS: You're welcome. So the five
12 species that are part of our Section 7 con- -- I
13 shouldn't say ours -- the BLM's Section 7 consultation
14 are the Yuma's Ridgway rail, the Sonoran pronghorn, the
15 yellow-billed cuckoo, the Southwestern willow flycatcher,
16 and the Monarch butterfly. I do want to point out that
17 these species -- the Section 7 consultation between the
18 BLM and the Fish and Wildlife Service is really focused
19 on the solar array and not the gen-tie. Because of the
20 size of the -- and scale of the solar project and the --
21 the gen-tie is part of the project, because it's a
22 connected action with our solar plus storage project. So
23 it gets included in that Section 7 consultation.

24 MEMBER LITTLE: Mr. Chairman?

25 CHMN STAFFORD: Yes, Member Little.

1 MEMBER LITTLE: Just to clarify, it is
2 included in the Section 7?

3 MR. POWERS: Mr. Chairman, Member Little,
4 yes, it is included in the Section 7. Because Section 7
5 in the NEPA process looks at the entirety of the project,
6 which includes the solar array, the substation, the BESS,
7 the battery energy storage system, the project
8 substation, the 11-mile gen-tie.

9 MEMBER LITTLE: Thank you.

10 MR. POWERS: You're welcome.

11 CHMN STAFFORD: And the entirety of the
12 solar and battery project are on BLM land, correct?

13 MR. POWERS: That is correct.

14 As part of the Section 7 consultation with
15 the Fish and Wildlife Service and coordination with
16 Arizona Game & Fish as well, we developed an integrated
17 vegetation management plan, an ecological resources
18 mitigation and monitoring plan, and a wildlife corridor
19 fencing plan for the project.

20 For hydrological resources, we conducted
21 field delineations and requested formal jurisdictional
22 determination from the U.S. Army Corps of Engineers. No
23 wetlands, waters of the U.S., or riparian areas will be
24 affected by the project. And this is based on the U.S.
25 Army Corps of Engineers' determination that we received

1 on October 29th, 2024.

2 This is applicable to these proceedings, as
3 we designed around and spanned any and all washes and
4 drainage features that may be out on the landscape. For
5 the record, Attachment B-6 in the application of the CEC
6 is the approved jurisdictional determination from the
7 U.S. Army Corps of Engineers. Attachment B-7 in the CEC,
8 included a conceptual hydrology study. And attachment
9 B-8 includes the groundwater availability report.

10 Next slide, please.

11 For the record, this is slide number 33 in
12 the presentation. For cultural resources, we conducted
13 Class 1 and Class 3 studies, and we've been coordinating
14 with the Arizona SHPO or the State Historic Preservation
15 Officer for just about four years as well, no historic or
16 prehistoric sites identified as eligible for listing in
17 the National Register of Historic Places will be affected
18 by the project.

19 Two sites were found along this project
20 that's subject of these proceedings. There's a large
21 site around structures 43 and 44, and this was referenced
22 in prior testimony from Ms. Varra that we have two,
23 three-pole structures in that vicinity, so we have
24 designed that to have a 1600-foot span using those
25 three-pole structures on either side to span this

1 cultural resource site.

2 There's also a cultural resource site
3 around the structures 1 and 2, that were -- was
4 identified during surveys and during construction of the
5 Ten West Link. And so we're working with SHPO to avoid
6 that as well.

7 MEMBER GOLD: Mr. Chairman?

8 CHMN STAFFORD: Member Gold.

9 MEMBER GOLD: Just a quick question. What
10 is it called -- what specifically are these cultural
11 resource sites? What are they?

12 MR. POWERS: Mr. Chairman, Member Gold, I'm
13 not at liberty to say, because the sites themselves are
14 confidential, so the contents of the sites I don't know
15 if I can share in open hearing.

16 MS. GRABEL: I believe that's true. They
17 are confidential, so we cannot state them on the record.
18 However, you can probably give examples, of, like,
19 genericized examples of what we found.

20 MEMBER GOLD: That would work.

21 MR. POWERS: Thank you. Mr. Chairman,
22 Member Gold, further down in my presentation I will have
23 some pictures of sites that are generally found in this
24 area, in and around our project site. They include
25 things like potential trail sites that were of importance

1 to Native American tribes in this area. There are
2 grinding stones, there's flake sites, lithic scatter,
3 being like rock pieces that get chipped off from
4 arrowhead making, and that sort of thing.

5 MEMBER GOLD: Oh, so --

6 MR. POWERS: I be- -- some other large
7 sites in this portion of the state of Arizona also
8 include things like potential, like, stopover sites or
9 campsites, that sort of thing.

10 MEMBER GOLD: So there are prehistoric
11 sites in the area and --

12 MEMBER KRYDER: Little closer.

13 MEMBER GOLD: I'm sorry. There are
14 prehistoric sites in the area, and you're making every
15 effort not to disturb them?

16 MR. POWERS: That is correct.

17 MEMBER GOLD: Thank you.

18 MR. POWERS: You're welcome.

19 MEMBER GOLD: One other -- I'm just
20 curious, partly for Ms. Grabel, who makes these things
21 confidential?

22 MR. POWERS: It's the state SHPO and the
23 tribes that we're consulting with -- that we're
24 coordinating with.

25 MEMBER GOLD: So when they say

1 "confidential," they don't mean, like, classified
2 documents?

3 MR. POWERS: No, they're -- they -- they --
4 they make them confidential so they're not available to
5 the general public, so people go and raid the cultural
6 resource sites.

7 MEMBER GOLD: Oh, that's what I was curious
8 about. Thank you.

9 MR. POWERS: Yes.

10 CHMN STAFFORD: And what's the -- what's
11 the statutory basis for that?

12 MR. POWERS: I -- Mr. Chairman, I don't --

13 CHMN STAFFORD: I'm looking at your
14 attorney.

15 MR. POWERS: Okay.

16 MS. GRABEL: I don't know that off the top
17 of my head, Mr. Chairman, but I'll get it for you.

18 MR. POWERS: It may be Section 106 under
19 the National Historic Preservation Act.

20 CHMN STAFFORD: We have -- there's a
21 statute, I think in -- I can't remember what it's titled.
22 I was just hoping to get some more clarification from,
23 you know, both at the federal and the state level from
24 Ms. Grabel on what's -- because my recollection seems to
25 be it's not -- it wasn't what it was, it's the exact

1 location that's kept confidential.

2 And I was going to wait to get to this
3 until after you got through your presentation, but yes,
4 your Exhibit D-10 is confidential. Typically, when you
5 see those there's -- with portions redacted, which is
6 not, in my recollection, that's why I'm asking -- so I'm
7 asking for the statutory authority both at the federal
8 and the state level that requires the confidentiality,
9 because I'm pretty certain it's about the location, the
10 exact location, so that they don't get raided, but I
11 don't recall the nature of the -- if it requires not
12 revealing the nature of the artifact.

13 Or, typically, they'll even have a number
14 in SHPO that says here this is the artifact site and
15 they'll have a number for it to reference to what you're
16 talking about, but they won't disclose the exact location
17 of it, to discourage the raiding. So if you could follow
18 up on that, Ms. Grabel, and get me the legal basis for
19 the confidentiality it requires at both the state and
20 federal level, that would be appreciated.

21 MS. GRABEL: Will do.

22 MEMBER GOLD: Thank you, Mr. Chairman.
23 That was the other half of my question.

24 CHMN STAFFORD: Thank you.

25 MEMBER LITTLE: Mr. Chairman?

1 CHMN STAFFORD: Member Little.

2 MEMBER LITTLE: Did I read that the sites
3 will be fenced?

4 MR. POWERS: Mr. Chairman, Member Little,
5 that is correct.

6 MEMBER LITTLE: Both of them? The one that
7 is under the transmission line --

8 MR. POWERS: There -- we have a fencing and
9 protection plan. I don't recall -- they will be fenced
10 during construction. We have the fencing and protection
11 plan also includes permanent fencing for sites that were
12 within the array that are not subject to proceedings
13 here, but those will be protected.

14 The two large sites that are along our
15 gen-tie project, they will be fenced during construction
16 to protect those resources. After construction, those
17 fencing -- that fencing will be removed.

18 MEMBER LITTLE: Thank you.

19 CHMN STAFFORD: I think my -- looking at
20 the application, my recollection is that there's 17 sites
21 in the project area with eight in the footprint of the
22 RPEC facilities, and three within the footprint of the
23 gen-tie.

24 MR. POWERS: I believe there's two --
25 there's two in the gen-tie, and I believe nine in the

1 array.

2 CHMN STAFFORD: I'm looking at page 603 of
3 the PDF, because it lists a different number.

4 MR. KNOX: So that's correct, so there are
5 three. And one occurs just on the western edge of the
6 solar array fence, and that will be fenced and avoided.
7 The second site occurs between structures 43 and 44, and
8 then the third site occurs near the Series Compensation
9 Station.

10 CHMN STAFFORD: Okay.

11 MEMBER KRYDER: Mr. Chairman?

12 CHMN STAFFORD: Member Kryder.

13 MEMBER KRYDER: Just to follow up a bit,
14 the fencing during construction is what, just portable
15 fence that's brought in, like a construction fence?

16 MR. POWERS: Yeah, Mr. Chairman, Member
17 Kryder, yes. Typically during construction the fencing
18 material is, like, the orange construction fencing that's
19 typically placed with a 50-foot buffer around the site
20 itself to prevent construction crews from entering those
21 sites, and we'll have signage up that says, you know,
22 environmentally sensitive areas, keep out. The -- prior
23 to the start of construction, we will also have what we
24 refer to as a WEAP, a worker environmental awareness
25 program, that every worker will be required to attend for

1 training. Essentially, please stay out of these areas,
2 but we'll also go through biological resources and the
3 drainage features that we need to stay out of as well.
4 It will all be part of the process -- the
5 pre-construction process prior to -- prior to turning
6 dirt.

7 MEMBER KRYDER: And the existing access
8 road avoids these -- they're within the -- they're
9 outside of the 50-foot boundary that you're building the
10 fence?

11 MR. POWERS: That is correct.

12 MEMBER KRYDER: It's pretty exciting in the
13 sense that it's confidential, and so the best place I
14 would look for is son of a gun --

15 MR. POWERS: Yes. As Mr. Chairman pointed
16 out, I believe the confidentiality really drives to the
17 specific locations of the individual artifacts that are
18 found within the larger district -- not districts,
19 but the larger --

20 MEMBER KRYDER: Regions.

21 MR. POWERS: -- regions that are found for
22 fear of looting of the sites.

23 MEMBER KRYDER: Understood. Thank you very
24 much.

25 MR. POWERS: The fencing plan for the

1 permanent protection in the array is going to be within
2 the fence line of the array. So that's an internal
3 protection from our on-site workers. And so although,
4 yes, it would be easy for somebody to find those and, you
5 know, see those sites, they're going to be within the
6 boundaries of our solar array, so you'd need clearance to
7 get in there.

8 CHMN STAFFORD: And my recollection of the
9 application is that there will be 24-hour security at the
10 actual solar array facility.

11 MR. POWERS: That is correct.

12 CHMN STAFFORD: So basically you're going
13 to guard the cultural resources that are on your site
14 that you have control.

15 MR. POWERS: It's an ancillary benefit to
16 solar security, I suppose.

17 Formal -- and just to back up a bit, formal
18 Section 106 consultation with Native American tribes is
19 ongoing. The HPTP, or Historical Properties Treatment
20 Plan, and the Moratorium of Agreement, or MOA, have been
21 drafted and reviewed by Savion and the project entity,
22 Ranegras Plains Energy Center, and now they are back with
23 the BLM and SHPO and currently being reviewed by the
24 tribes.

25 15 tribal communities, in total, were

1 contacted through this process, with consultation
2 primarily occurring with the Ak-Chin, the CRIT, or the
3 CTIR [sic], the Colorado River Indian Tribes, the
4 Quechan, and the Gila River Communities.

5 Next slide, please.

6 For the record, this is slide number 34.
7 I'm not seeing it on the screen, but do you all see the
8 slide?

9 (No response.)

10 MR. POWERS: Do you all -- do you all see
11 the slide?

12 Okay. I can wait a minute. There it is.
13 We got it. Again, this is slide number 34, in the
14 exhibit.

15 This slide shows some characteristic
16 photo -- characteristic photographs of the biological
17 resources on-site. The project's landscape is
18 predominantly creosote, bursage, and mesquite, and
19 surrounding the solar array and the eastern portion of
20 the gen-tie project. Towards the western end of the
21 project, the vegetation is a bit more diverse, consisting
22 of saguaro, ocotillo, and palo verde, as the topography
23 gains slightly in elevation.

24 Next slide, please.

25 MEMBER KRYDER: Mr. Chairman?

1 CHMN STAFFORD: Yes, Member Kryder.

2 MEMBER KRYDER: A quick question,
3 Mr. Powers. I recall, I think it was in your testimony
4 earlier, about the Monarch butterfly. I have a little
5 bit of experience with milkweed, and I don't see any
6 milkweed growing here. And I can't possibly imagine it
7 growing here. Is -- fill me in a little bit here.

8 MR. POWERS: Mr. Chairman, Member Kryder,
9 so the Monarch butterfly -- the consultation of the
10 Monarch butterfly was included in our project, because
11 it's proposed listed, and it could be potentially listed
12 within the operational period of our project. So the
13 Fish and Wildlife Service and the BLM included that in
14 the Section 7 consultation as a conference. So it's not
15 an official consultation for the species and the take of
16 that species, it's a conference to determine potential
17 best management practices through the project.

18 MEMBER KRYDER: Okay.

19 MR. POWERS: I believe there is one
20 milkweed plant that was identified in our solar array.

21 MEMBER KRYDER: No shit?

22 MR. POWERS: And there's a few other plants
23 within the general study area. We don't anticipate the
24 Monarch butterfly --

25 MEMBER KRYDER: Flying through.

1 MR. POWERS: -- flying through our project
2 area.

3 MEMBER KRYDER: Thank you.

4 MR. POWERS: But it was included
5 nonetheless.

6 CHMN STAFFORD: And you'll cover that one
7 further when you get to the environmental portion after
8 the cultural resources portion?

9 MR. POWERS: No, I don't -- I don't cover
10 any more of the Section 7 consultation further on. And
11 so if there's other questions, I'm happy to stand for
12 questioning.

13 CHMN STAFFORD: Okay. Well, we've been
14 going for about 90 minutes, so I --

15 MR. POWERS: I have -- I think I have one
16 more slide and then I'm going to turn it over to
17 Mr. Knox.

18 CHMN STAFFORD: All right. Well, I think
19 I'm looking at the court reporter, we can do one more
20 slide and then we'll take our break.

21 MR. POWERS: Okay. Thank you.

22 And for the record, cultural resources,
23 this is slide number 35 in the record. And so this kind
24 of calls back to the question prior regarding the types
25 of sites in and around this project area. And so this

1 slide does show some characteristic photographs of the
2 types of cultural resources found throughout this area,
3 the state of Arizona. I can't show exactly what we found
4 or where these were found, as we discussed prior, but I
5 did want to show some examples of the sites that we are
6 avoiding and protecting.

7 This slide shows example rock rings,
8 fragmented metate, which are grinding stones where folks
9 would grind beans and seeds, and potential trail sites.
10 But, again, all sites on our project are going to be
11 avoided and protected.

12 Next slide, please.

13 I'll now turn it over to my colleague,
14 Mr. Richard Knox with Tetra Tech, and he's going to walk
15 you through the visual -- visual resources for --

16 CHMN STAFFORD: All right. Well, I think
17 this is a good stopping point to take a break and give
18 our court reporter a rest.

19 Before we do, my review of the application
20 so that there was, like you said, there was a -- it
21 didn't list the number of plants found, but you said
22 there was one or two at the actual site of the solar
23 array, but it was along a wash at the west end of the
24 gen-tie, it said that there was more. But I just -- I
25 need -- if during the break if you can figure out how

1 many -- how many plants there were of the milkweed in
2 that wash towards the west end of the gen-tie that were
3 mentioned in the environmental report.

4 MR. POWERS: Mr. Chairman, I can look into
5 that.

6 CHMN STAFFORD: All right. Thank you.

7 Okay. And with that, let's take an
8 approximately 15-minute recess.

9 (Recessed from 11:34 a.m. until 11:52 a.m.)

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

12 All right. Ms. Grabel.

13 MS. GRABEL: Thank you, Mr. Chairman. We
14 have a couple of updates with answers to the questions
15 the committee has asked in the earlier session. So with
16 respect to the federal and state laws governing the
17 confidentiality of the sensitive cultural and
18 archaeological sites, the applicable federal laws include
19 Section 304, and that's 54 USC Section 307.103 of the
20 National Historic Preservation Act and the
21 Archaeological --

22 CHMN STAFFORD: Say that again slower.

23 MS. GRABEL: Okay. So it's Section 304,
24 and then in parens, that is 54 USC Section 307.103, end
25 parens, of the National Historic Preservation Act.

1 Another applicable federal law is the Archaeological
2 Resources Protection Act, and that is found at 16 USC
3 Section 470hh. And then the applicable state law is ARS
4 Section 39-125.

5 CHMN STAFFORD: Thank you.

6 MS. GRABEL: You're welcome.

7 And then with req- -- excuse me -- respect
8 to Member Fontes's question about the insurance, I think
9 Ms. Varra has an update.

10 MS. VARRA: Is this on? Nope.

11 Okay. The project LLC is insured during
12 construction and operations, and I believe there was
13 another question regarding finance and the project will
14 be project financed not corporate financed, just to
15 clarify.

16 MS. GRABEL: And I think the final question
17 asked was the distance from our project to the Kofa, and
18 I think Mr. Knox had an answer to that.

19 MR. KNOX: Thank you. That's correct.
20 That's correct. It's approximately four and a half to
21 five miles south of the project.

22 MS. GRABEL: Did we miss any questions?

23 CHMN STAFFORD: The other one was how much
24 milkweed is there along the wash at the west end of the
25 gen-tie?

1 BY MS. GRABEL:

2 Q. Mr. Powers, were you able to find that?

3 A. (MR. POWERS) Yes, Mr. Chairman -- Mr. Chairman,
4 I have references in our biological assessment that is
5 being prepared by the Fish and Wildlife Service -- or,
6 I'm sorry, BLM and the Fish and Wildlife Service. I
7 don't have in the specific wash west of our project, I
8 could say that there are no documented occurrences of
9 Monarch butterfly within our action area for the
10 biological assessment. There were larval caterpillars
11 documented in October of 2013 within the action area
12 nearly 20 miles south of the project area.

13 Hold on one second. I lost my place again. My
14 apologies.

15 The Western Monarch Milkweed Mapper shows no
16 occurrence records of Monarch butterfly individuals or
17 milkweed species in the project area. The nearest
18 observations of Monarch butterfly adults consist of a
19 cluster of occurrences between 2008 to 2011,
20 approximately 55 miles southeast of the project area, and
21 it's outside of our action area near Buckeye, Arizona.

22 We did conduct project field surveys in 2021,
23 '22, and '23, and those did include surveys for Monarch
24 butterflies as a target species. No known -- although no
25 individual Monarch butterflies were observed, Hartweg's

1 twinevine, a milkweed species was observed within the
2 solar site, and in the western edge of that gen-tie
3 corridor, which I believe you were referencing with
4 regard to the milkweed species.

5 This was an indication that there was a
6 potential that the species could occur within the project
7 area, and thus, it was included in the BA, which is the
8 mechanism for consultation between the biolog- -- Bureau
9 of Land Management and U.S. Fish and Wildlife Service.

10 And then during the field surveys in 2021 a
11 Queen butterfly, which is a close relative of the
12 Monarch, but it's a nonmigratory resident of Arizona and
13 the Sonoran Desert, which also feeds on milkweed, but
14 it's widespread throughout the state, was identified in a
15 stock tank with surface water outside of the solar
16 facility.

17 It was concluded during our field surveys,
18 though, that based on the lack of milkweed populations
19 observed within our project area, including our gen-tie
20 during the field surveys, it's unlikely that there will
21 be any potential habitat.

22 CHMN STAFFORD: Right. Still, how plants were
23 there, because you said there's a single plant in the
24 project area for the gen- -- for the solar field, so
25 that -- in the generation site --

1 MR. POWERS: Yes, that was the Hartweg's
2 twinevine, which is a milkweed species, observed within
3 the solar facility.

4 CHMN STAFFORD: Right. And then also
5 noticed more along the wash of the western gen-tie, just
6 trying to find out how many, is it a single plant or is
7 it multiple plants?

8 MR. POWERS: No, I don't think we
9 quantified it, because it was out of -- outside of the
10 action area.

11 CHMN STAFFORD: Okay. So, like, where --
12 is it outside the requested corridor, I guess?

13 MR. POWERS: Yes.

14 CHMN STAFFORD: Okay. All right.

15 Is there anything further from members, or
16 are we ready for Mr. Knox?

17 (No response.)

18 BY MS. GRABEL:

19 Q. Okay. Mr. Knox, before you begin, you're about
20 to walk through some of the visual simulations and
21 photographs of this project; is that correct?

22 A. (MR. KNOX) That is correct.

23 Q. And if a committee member wanted to look at all
24 of the visual simulations for the Ranegras Plains project
25 that was prepared, where would those be found?

1 A. (MR. KNOX) Those are included in -- well, it was
2 Exhibit E of the CEC application. They're also included
3 on the placemat.

4 CHMN STAFFORD: Placemat.

5 MR. KNOX: Thank you.

6 BY MS. GRABEL:

7 Q. All right. Go ahead and walk us through the
8 visual simulations, please.

9 A. (MR. KNOX) Okay. So today I will be providing a
10 brief overview of the visual resources analysis conducted
11 for the Ranegras Plains Energy Center. We began the
12 analysis by defining the study area. For this project,
13 the study area under the direction of the Bureau of Land
14 Management was identified five miles out from the
15 requested corridor. Then we identified key observation
16 points, or KOPs, within the study area. We identified a
17 total of 34 key observation points. We'll only be going
18 over a handful of key observation points that are closest
19 to -- to the gen-tie and showing representative photos of
20 those key observation points.

21 CHMN STAFFORD: And we're looking at slide 36 of
22 the presentation and that's also what's on the back of
23 the placemat as well, isn't it?

24 MR. KNOX: That's correct.

25 CHMN STAFFORD: Okay.

1 MR. KNOX: And so the image that you're
2 referencing on the placemat has a number of colors on it,
3 and the Bureau of Land Management classifies four
4 different -- there's four different levels of
5 classification, it's VRM Class 1 through VRM Class 4.
6 VRM Class 1 on your placement is shown as red, and it's
7 in the New Waters Mountain Wilderness Area, and VRM
8 Class 4 is the dark green surrounding Brenda. The two
9 zones in between are VRM Class 2, which is shown in the
10 orange, and then VRM Class 3, which is shown in yellow.

11 MEMBER KRYDER: Mr. Chairman?

12 CHMN STAFFORD: Yes, Member Kryder.

13 MEMBER KRYDER: Maybe it's obvious, but not
14 to me, what determines a class?

15 MR. KNOX: Uh-huh. That's a good question.

16 MEMBER KRYDER: Can you build that for me a
17 little bit?

18 MR. KNOX: Sure. Absolutely.

19 So the way the BLM manages visual resources
20 is under the Visual Resource Management System of 1984.
21 And they classify -- they look at three different
22 criteria as it relates to landscape -- they look at
23 scenic quality. Scenic quality is divided into Class A,
24 Class B, and Class C landscapes. So Class A landscapes
25 are the most distinctive.

1 So on this map in the red is VRM Class 1,
2 and that's the New Waters Mountain Wilderness. It's a
3 diverse landscape in the mountains. There's lots of
4 colors, lots of different textures, and there's likely
5 water present in, you know, springs. So they break it up
6 into scenic quality, A, B, and C, C being the least
7 distinctive, like creosote, flat bursage that we see
8 driving out to Los Angeles. And then A is the most
9 distinctive, like New Waters Mountains Wilderness, and
10 then B is in between, so it's a mix, right?

11 The second criteria they use is viewer
12 sensitivity. And they rate viewer sensitivity as low,
13 moderate, and high. So, again, we have a range. And low
14 is, for example, along Interstate 10 driving at 75 miles
15 an hour, it's a destination route, whereas a high
16 sensitivity would be, like, on a BLM backcountry byway,
17 where you're going there specifically to view the
18 landscape. So that's a high level of sensitivity. A low
19 level of sensitivity is Interstate 10. And then you have
20 a moderate level of sensitivity, which is in the middle,
21 right?

22 And then the third criteria that they use
23 is distance zones. So distance zones are broken up for
24 the BLM in different ranges. And for the VRM system,
25 they break it up into zero to three miles, three miles to

1 five miles, and then five miles to 15 miles. That
2 doesn't really work well for project-specific analysis,
3 right? And so what we did, and under the direction of
4 the BLM, is we broke the distance level -- distance zones
5 into zero to one mile --

6 MEMBER KRYDER: Okay.

7 MR. KNOX: -- one to three miles, and then
8 three to five miles, right? And once they -- once then
9 they have the -- once they conduct baseline analysis of
10 the -- of a specific landscape, what's the scenic
11 quality, what's the sensitivity of the viewer to change
12 on that landscape, and what's the distance that that
13 viewer is from a specific landscape. Then they assign
14 VRM classes, VRM-1, 2, 3, and 4.

15 MEMBER KRYDER: With -- with 1 being lowest
16 or highest?

17 MR. KNOX: One being the highest. So -- so
18 you can't, for example, in any VRM 1 or 2, in -- in the
19 Resource Management Plan -- the BLM uses Resource
20 Management Plan to manage the lands in which they're in
21 charge of. So the Yuma -- the 2010 Yuma Resource
22 Management Plan specifically says that in VRM Class 1 and
23 VRM Class 2, solar facilities, transmission lines, these
24 types of things -- this is one of the reasons why Ten
25 West Link was routed around the Kofa and other sensitive

1 areas, right, it was views. When Devers-Palo Verde was
2 first put in it was a very long time ago, and things were
3 different, and so we're at a different place.

4 So you have that criteria, then they assign
5 VRM 1, 2, 3, or 4. And 3 -- so 3 -- we're in VRM 3, on
6 the map is yellow. And so the project occurs in VRM 3.
7 VRM 3 means that the change in the landscape -- or change
8 in the landscape can occur, but it can't be a dominant
9 feature in the landscape. VRM 4 says that it can be a
10 dominant feature in the landscape. And that's -- and
11 there are other -- there's other nuances to that.

12 So, for example, Ten West Link is currently
13 constructed in a VRM 3, right? Our project is sited
14 parallel and south of Interstate 10, right? And so you
15 have a reduction in impact. And the Chairman stated it
16 earlier when we were talking about a cluster of residents
17 around the Pilot truck stop, that they have to look
18 through Ten West Link to see the Ranegras Plains, so the
19 setting has already been affected, right?

20 And so if you had -- I would expect in Ten
21 West Link's EIS to have a higher level of impact in the
22 same area that we're at, but Ranegras Plains is a lower
23 level of impact, only because the setting has been
24 visually affected by Ten West Link.

25 MEMBER KRYDER: That's very helpful. Thank

1 you.

2 MR. KNOX: Uh-huh.

3 CHMN STAFFORD: And the marginal impact of
4 that second line is much lower, because I guess at some
5 point the marginal effect would get greater if you had,
6 like, if it's the 15th line, or something, but if there's
7 one existing 500-kV, you add another one further away,
8 and it seems intuitively to have a lesser impact, a
9 marginal impact would be almost negligible compared to --
10 than the impact of the first line.

11 MR. KNOX: That's exactly right. And,
12 again, going back to the guiding document, which is BLM's
13 Yuma Resource Management Plan, they specifically state a
14 number of areas that the consolidation of these types of
15 facilities is preferred, because then you're not
16 bisecting habitat in other areas, you're using existing
17 construction access roads, you're mirroring modeling, you
18 know, your gen-tie with another gen-tie, matching spans,
19 you know, as you go down Interstate 10 towards PVNGS,
20 even with the Ten West Link, the Ten West Link mirrored
21 and modeled the Devers line crossing Interstate 10,
22 structure for structure.

23 And in that sense, this consolidation and
24 then mimicking other structures reduces visual impact,
25 but then you have to -- again, you have to ask the

1 question about how sensitive is the driver along
2 Interstate 10 doing 80 miles an hour? Do they really
3 care, as opposed to being on a backcountry byway.

4 MEMBER KRYDER: And that's the segue for my
5 next question. This sounds highly subjective that, in
6 other words, if I had a bad burrito last night I might
7 answer some of these questions differently than if I had
8 a dish of ice cream, okay? How in the world is this all
9 compiled, going back to BLM? I mean, I understand
10 they're the big dog in the argument, and they tell you
11 what you have to follow, but somewhere buried behind all
12 of that is someone, I assume, someones, or is it a
13 committee? How does that all happen? I know this -- I
14 don't mean to go down a rabbit hole, Mr. Chairman, but it
15 seems to me that you are put in a reasonably difficult
16 spot where you have to live with the rule that's given to
17 you, but you have no input on how that rule is
18 ascertained. Speak to me a little bit, if you know, and
19 I'll try to keep short and I'll zip my lip myself.
20 Who de- -- who develops this dog?

21 MR. KNOX: And so it's a collaborative
22 effort.

23 MEMBER KRYDER: Blame it on the committee,
24 okay.

25 MR. KNOX: So you're exactly right, visual

1 resources is a subjective topic that not only the Bureau
2 of Land Management has codified in their Visual Resource
3 Management System of 1984, but in 1996, the Forest
4 Service implemented the scenery management system. And
5 the difference between the two is the Forest Service
6 looks at absorption capability in the landscape, so the
7 ability of the project to be absorbed within the existing
8 landscape, where the BLM looks at the contrast of the
9 project against the existing landscape. It's the same
10 idea, it's just looked at in a different lens.

11 And to make -- to make it more -- to make
12 it more objective, it's actually pretty straightforward,
13 I've been doing this for 30 years, I moved into project
14 management role, but when I started working at the
15 Coronado National Forest as a landscape architect, I
16 learned what other people were doing to make it more
17 objective. And so -- so you inventory your sensitive
18 viewers, you inventory your scenic quality or the Forest
19 Service calls it scenic integrity, right? And then you
20 inventory the distance that the viewer is from specific
21 landscapes, and you can make a matrix of that. And if
22 you have X and you have Y and you have Z, it comes up to
23 whether you're in or out of compliance with VRM Classes 1
24 through 4.

25 MEMBER KRYDER: Very helpful. I can

1 envisage somebody having a whole lifetime of that. Thank
2 you.

3 MR. KNOX: You're welcome.

4 MEMBER GOLD: Mr. Chairman?

5 CHMN STAFFORD: Yes, Member Gold.

6 MEMBER GOLD: This again is for Mr. Knox.
7 I see there's a lot of thought, you have a lot of
8 knowledge on this, and it was something that I was not
9 aware of before. I see the color scheme is based on the
10 rainbow, red, orange, yellow, green, in your diagram, but
11 I'm noticing some areas that have no color.

12 MR. KNOX: Uh-huh.

13 MEMBER GOLD: What is that?

14 MR. KNOX: That's private land. And so the
15 Bureau of Land Management is not in a position to -- you
16 know, beauty is in the eye of the beholder, right, so
17 you're not going to tell someone in Hope that they have a
18 C landscape when they consider it an A landscape.

19 MEMBER GOLD: Gotcha.

20 MR. KNOX: They don't have jurisdiction.

21 MEMBER GOLD: So that means that the red --
22 the dark red color in the 1 -- the Class 1 area, the one
23 that surrounds where I guess mines are --

24 MR. KNOX: Uh-huh.

25 MEMBER GOLD: -- so mines would be in a

1 mountainous area. I'm guessing area one is a mountainous
2 area?

3 MR. KNOX: Yeah, that's the New Water
4 Mountains Wilderness Area.

5 MEMBER GOLD: That would make perfect
6 sense.

7 MR. KNOX: Uh-huh.

8 MEMBER GOLD: All right. Never knew any of
9 that stuff before.

10 MR. KNOX: Uh-huh.

11 MEMBER GOLD: Okay. Thank you.

12 MR. KNOX: There's a system to it.

13 MEMBER GOLD: There is. Thought went into
14 it.

15 MR. KNOX: Okay. So -- so I think we've
16 covered what the map is showing. And -- and on the map
17 we selected key observation points in which to simulate
18 the proposed project, so then those are the labels. We
19 have three simulations that we'll present. Simulation 1,
20 2, and 3. And then their associated key observation
21 points, which we'll go through in the -- in the next
22 photos.

23 So I'm on slide 37. So key observation
24 point 3 was taken along Interstate 10 looking in a
25 south/southeast direction near the Series Compensation

1 Station Switchyard. The foreground can be characterized
2 as lowland Sonoran Desert scrub and relatively flat
3 rolling terrain. The hills in the middle ground and New
4 Water Mountains in the distant background provide
5 additional contrast reduction through what's called
6 topographic backdropping.

7 And so backdropping is when topography is
8 placed behind, in this case, the transmission line. And
9 what topographic backdropping tends to do is absorb the
10 project. It reduces project contrast. It makes it more
11 difficult for the feature to be seen. Further along
12 Interstate 10 intermittent pockets of dense vegetation,
13 mesquite, creosote reduce project visibility.

14 So the New Water Mountains watershed runs
15 down towards Interstate 10, and ultimately it drains into
16 Bouse Wash. And what happens along the southern edge of
17 Interstate 10 is you have more dense vegetation growth,
18 you have larger creosote bushes, and you have larger
19 mesquites. And those -- and those provide intermittent
20 screening along Interstate 10.

21 Finally, the project would be sited
22 approximately one-half mile, so this is from this key
23 observation point 3, approximately one-half mile from
24 Interstate 10. So the combination of distance,
25 vegetation screening, and topographic backdropping all

1 aid in the reduction of project contrast and project
2 visibility.

3 Okay. Now we're at key observation point
4 4. So key observation point 4 -- and we should be on
5 slide 38.

6 So there you go. Thanks, Eli.

7 So key observation point 4 was taken along
8 Interstate 10 facing in a south/southeast direction.
9 Here the distance from the project has increased, and
10 topographic backdropping is available through the
11 Eagletail Mountains in the far distant background and the
12 New Water Mountains. The vegetation is mostly
13 indistinctive, being homogeneous creosote, bursage plain
14 on a very flat terrain. This landscape type is
15 predominant in southern Arizona, and one of the reasons
16 that BLM manages these types of lands in VRM Class 3 and
17 VRM Class 4.

18 CHMN STAFFORD: How come the KOP on the
19 screen looks different than the KOP on the placemat?

20 MEMBER KRYDER: KOPs.

21 MS. GRABEL: Mr. Chairman, the placemats
22 have the simulations on them, as opposed to just the
23 photograph of the key observation point. We will be
24 going through the visual simulations later in the
25 presentation.

1 CHMN STAFFORD: Isn't the existing one
2 going to be the same as the same as what the key
3 observation -- key observation point shows?

4 MR. KNOX: Well, you're speaking, Chairman,
5 of key observation point 4?

6 CHMN STAFFORD: Correct.

7 MR. KNOX: So key observation point 4 is
8 along Interstate 10. On my maps, on both on slide 36 and
9 on the placemat, key observation point 4 is at the
10 correct location.

11 CHMN STAFFORD: Right. But in the existing
12 conditions I'm seeing a fence I'm not seeing on the
13 screen here. It's at a different angle almost, it looks
14 like.

15 MEMBER GOLD: It's at a different angle.
16 Yeah, fence is in the background.

17 CHMN STAFFORD: Right. The fence is in a
18 different position. It says key observation point 4,
19 simulation 1.

20 MR. KNOX: Simulation -- it says -- it says
21 simulation 1, it says figure 4. On the placemat?

22 CHMN STAFFORD: Here it says KOP-4,
23 simulation 1; figure 4, simulation 1. It's different
24 than what I'm seeing on the screen, because here's the
25 existing, and I'm looking along the fence and then here,

1 it looks like I'm looking more perpendicular instead of
2 parallel to the fence.

3 MS. SKULSTAD: Yeah, it's a different
4 picture from the same spot.

5 MR. KNOX: Yeah, that's correct.

6 So when we photographed KOPs, we took
7 180-degree views, so we have four different pictures that
8 support KOP-4. The ones that are in the presentation and
9 the ones that -- the two that were in the simulation were
10 taken from the same location, but at a different -- at a
11 different vantage -- it's at the same vantage point, but
12 it was taken at a different location.

13 CHMN STAFFORD: Facing a different
14 direction?

15 MR. KNOX: Thank you. Facing a different
16 direction. Thank you.

17 MEMBER GOLD: A different orientation. One
18 looks like you're looking south, the other looks like
19 you're looking a little more southeast.

20 CHMN STAFFORD: Right. So you can see --

21 MR. KNOX: That's correct.

22 CHMN STAFFORD: If you look at the figure
23 4, simulation 1 on the placemat it shows, like, the cone
24 showing the view of this shot. Do you have the similar
25 reflection, so we can see which --

1 MEMBER MERCER: Mr. Chairman?

2 CHMN STAFFORD: -- angle -- just a
3 second -- what angle you're looking at from the one
4 that's on the screen.

5 Yes, Member Mercer.

6 MEMBER MERCER: If we go and look at slide
7 43, it has the same pictures as we're seeing in the
8 placemat.

9 CHMN STAFFORD: That's just what it is?

10 MEMBER MERCER: Yeah, but that one is
11 definitely not the same.

12 CHMN STAFFORD: Right. So do you have, for
13 example, like, in the placemat one, like I said, the cone
14 showing which direction it is -- can you provide that for
15 this KOP-4 which angle it's looking?

16 MR. KNOX: Yes, we can.

17 CHMN STAFFORD: Okay. Can you throw that
18 up on the screen real quick, so I can get my bearings?

19 MEMBER MERCER: That would be slide 43.

20 MR. KNOX: That's -- that's correct.

21 So -- so the KOP-4, these -- these slides
22 right here, are intended to describe the landscaping,
23 which the project crosses. The simulation photos taken
24 from the same location at a different orientation are --
25 were presented to show what the project looks like.

1 These are -- this is a -- these are baseline pictures,
2 there's no simulation in -- in the slide presentation.

3 CHMN STAFFORD: So yes, the one I'm looking
4 at here is KOP-4A and B.

5 MR. KNOX: Uh-huh.

6 CHMN STAFFORD: There's no -- this is the
7 actual photographs, no simulation, correct?

8 MR. KNOX: That's correct. They're
9 characterization photos of the landscape that the project
10 is crossing. And you can see in the text in the -- in
11 the binder, for example, the top photo was taken at
12 106 degrees east/southeast, where KOP-4B was taken at
13 180 -- so more south, 180 degrees.

14 CHMN STAFFORD: Okay. Let me pull it up in
15 here, then, because I -- what I'm looking for is the cone
16 which shows which way I'm looking for the picture.

17 MR. KNOX: Right.

18 MR. POWERS: That's not included in the
19 exhibit.

20 MR. KNOX: Right. There's not a one --
21 there's not a one-to-one match between simulation 1 and
22 KOP-4, although they're taken at the same location, it's
23 a different -- it's a different orientation of the photo.

24 CHMN STAFFORD: Okay. So I'm looking at
25 slide 38 of the presentation, the top photograph is taken

1 looking which direction?

2 MR. KNOX: East/southeast about
3 106 degrees.

4 CHMN STAFFORD: And then the bottom one?

5 MR. KNOX: Is south, so you're looking
6 pretty much at 180 degrees south. So you're looking at
7 the New Water Mountains Wilderness on the eastern flank,
8 and then the Eagletails on the far left.

9 CHMN STAFFORD: Okay.

10 MS. GRABEL: Mr. Chairman, would it be
11 helpful if Mr. Ancharski highlighted them on the map
12 that's displayed on the screen?

13 MR. ANCHARSKI: So the first one -- oh,
14 sorry, the first one would be looking east -- say
15 east/southeast in this -- this direction towards the
16 solar array. And then the second, 4B, is looking -- is
17 looking south.

18 CHMN STAFFORD: Are you highlighting
19 something, because I'm not seeing anything on the screen.

20 MR. ANCHARSKI: Oh, it's not showing up,
21 I'm sorry. Where --

22 MR. KNOX: So as a point of reference,
23 Mr. Chairman, if you're looking at simulation 1, and you
24 see the cone shape off to the -- see I'm on the right
25 side of the photograph, and there's a little cone shape,

1 and if you look at KOP-4B, which is -- should be
2 the -- well, the photographs that were shown, you'll see
3 that cone, but the orientation of the view is more to the
4 southeast.

5 CHMN STAFFORD: Right. And where does that
6 show on the cone? Is it on -- let's see -- right, I see
7 it here.

8 MR. KNOX: Uh-huh.

9 CHMN STAFFORD: But 4B was one of the two
10 images we saw previously on the screen.

11 Okay. That's 5.

12 MEMBER GOLD: This is 4A and B.

13 CHMN STAFFORD: Right. So I see from this
14 shot, I have the cone, and these ones I don't. So I was
15 trying to see if they could show that.

16 MR. KNOX: That cone there --

17 THE REPORTER: I have to be able to hear
18 you.

19 MR. ANCHARSKI: Richard, can you come here
20 and do it? Can you do it on the screen?

21 MR. KNOX: So go to the next -- so that's
22 the correct -- that's the correct lo- --

23 CHMN STAFFORD: Can you get a microphone in
24 front of him, so she can hear him. There you go.

25 MR. KNOX: So that's the correct location

1 of KOP-4.

2 CHMN STAFFORD: Right.

3 MR. KNOX: Now go to the -- and so this
4 cone here -- you see this cone right here? It's a good
5 point of reference -- oh, well, it went away. What's
6 happening?

7 CHMN STAFFORD: Okay.

8 MR. KNOX: So this cone right here.

9 CHMN STAFFORD: This mountain -- you're
10 talking about the mountain formation there?

11 MR. KNOX: That one right there.

12 CHMN STAFFORD: Right, okay.

13 MR. KNOX: Now, if you looked at the
14 placemat --

15 CHMN STAFFORD: Uh-huh.

16 MR. KNOX: -- that cone -- that cone is off
17 to the right more. That cone is -- that cone is right
18 here.

19 CHMN STAFFORD: Okay. So it's just
20 a --

21 MR. KNOX: It's a different -- we took a
22 number -- we took a number of different photos from the
23 same location at different orientations.

24 CHMN STAFFORD: Okay. And then the one on
25 top, that mountain is not even in the shot.

1 MR. KNOX: Right. Because we moved the
2 camera further to the north, so this is -- this is
3 looking more east and this is looking more southeast.
4 And this one is looking more south.

5 MEMBER LITTLE: Mr. Chairman?

6 CHMN STAFFORD: Yes, Member Little.

7 MEMBER LITTLE: Maybe it would be --
8 clarify if I mentioned that the way I understand it, the
9 two pictures that are up on the screen are simply to show
10 us what the vegetation around that particular point
11 looked like. And the simulation is shown by the cone.
12 So there is no cone that shows anything about what those
13 two pictures are up there, other than just the location
14 itself.

15 CHMN STAFFORD: Right. Right. That was my
16 confusion, because typically when we get a KOP, it's from
17 one location in one direction and they show it with and
18 without. They don't pan it different ways, so --

19 MEMBER LITTLE: The simulation does that,
20 but --

21 CHMN STAFFORD: Right. Right. So this one
22 they have additional things from the same KOP at a
23 different angle, so I was trying to get a perspective of
24 which way I was looking based on that. But you explained
25 it. I got it. Thank you.

1 MS. GRABEL: And, Mr. Chairman, to Member
2 Little's point, the KOPs that Mr. Knox is walking through
3 is found is Exhibit B-9 to the CEC application, whereas
4 the visual simulations are found in Exhibit E. They're
5 meant to demonstrate two different things.

6 MEMBER GOLD: Mr. Chairman?

7 CHMN STAFFORD: Yes, Member Gold.

8 MEMBER GOLD: Okay. So if I understand
9 this correctly, we have different orientations from each
10 of the KOPs in the images. The images on slide 38 are a
11 different orientation than the placemat, but part of the
12 CEC is the slides, not the placemat or is the placemat
13 part of the CEC too?

14 MS. GRABEL: The placemat is not in
15 evidence. It's just an illustrative --

16 MEMBER GOLD: That's what I wanted to
17 say --

18 MS. GRABEL: Correct.

19 MEMBER GOLD: -- clarify. So the thing
20 that we're really looking at is the vegetation in slide
21 38 and slide 39, to prove your point. Suggestion for the
22 future, keep the same pictures.

23 MR. KNOX: Understood.

24 MEMBER GOLD: Just a suggestion. It
25 doesn't affect -- it doesn't affect what we're -- what

1 we're doing, but it just confuses us a little.

2 MR. KNOX: Okay.

3 CHMN STAFFORD: Well, I think later on with
4 the pictures that are here, the existing simulations,
5 they're in the record, they're not -- it's not, like, a
6 new thing, it's in here, it's just in a different
7 context, you said one was in Exhibit --

8 MS. GRABEL: B-9 is the KOPs. And then the
9 visual simulations are in Exhibit E.

10 CHMN STAFFORD: E, right.

11 MS. GRABEL: And we will be walking through
12 the visual simulations. I think Mr. Knox just wants to
13 orient us as to the KOPs. And then we'll walk through
14 the visual sims that --

15 CHMN STAFFORD: Right.

16 MS. GRABEL: -- we're used to seeing.

17 CHMN STAFFORD: Right. It's just helpful
18 if we don't get different views from the same KOP, so I
19 was just -- you know, because I'm looking at the screen
20 and I'm looking at the KOP with the cone, and it's
21 totally different. And I'm trying to orient myself to
22 what we're looking at. You've gotten that covered, so
23 now I won't need to ask that question for everyone that
24 you're doing just to show what the environment looks
25 like. It's just -- typically, we don't -- we don't get

1 more than one point of view from each KOP. So it kind of
2 threw me off a little bit. But I've got it, and please
3 proceed.

4 MR. KNOX: Okay. I am on slide 39 and this
5 is at KOP-5. KOP-5 was taken along the El Paso Natural
6 Gas Pipeline, which also doubles as a connector route for
7 the Arizona Peace Trail. And so it's important to
8 understand that the Arizona Peace Trail proper in our
9 study area occurs east and off-site along Hovatter Road,
10 east of the solar array. The BLM has designated the
11 El Paso Natural Gas Pipeline as a connector route to get
12 to the Arizona Peace Trail, so that's important to
13 understand.

14 So KOP-5 was taken at this -- this junction
15 of the project and the pipeline. Again, we see a fairly
16 homogeneous landscape type, a Class C type landscape,
17 with creosote, bursage, and it's very flat and very
18 sparse. And you can see -- in the upper left picture,
19 you can see the pipeline right-of-way towards the right
20 side of that picture.

21 CHMN STAFFORD: Can you zoom in on that?

22 MR. KNOX: Uh-huh. That's correct.

23 So El Paso Natural Gas has a 50-foot wide
24 right-of-way. This pipeline continues into the Phoenix
25 area, and then heads south down to Tucson. It also forms

1 the southern edge. We're offset by 100 feet, but it
2 forms the southern edge of the solar array. So if you
3 look at your placemat again and you look at the solar
4 array, there's a straight line that goes from KOP-5 to
5 the west and you follow the dotted line and you see that
6 it forms the southern boundary of the solar array.

7 I've just got to log back in.

8 Okay. KOP-16 on your placemat is north of
9 Interstate 10 in the lime green area, and it's taken east
10 or along Vicksburg Road looking east at predominantly
11 agricultural fields. And from this distance of
12 approximately two to three miles, the project would be
13 nearly impossible to see. At about two miles if you held
14 a toothpick of up to a 500-kV structure, the toothpick
15 would block that structure.

16 MEMBER KRYDER: Mr. Chairman?

17 CHMN STAFFORD: Yes, Member Kryder.

18 MEMBER KRYDER: Quick question, Mr. Knox.

19 What kind of crops?

20 MR. KNOX: You know, I think these are
21 alfalfa, Timothy crops.

22 MEMBER KRYDER: But you don't know the
23 difference?

24 MR. KNOX: Well, I used to have horses.
25 Timothy is more hot for horses, I don't know. But I

1 think it's -- I think it's a grass species.

2 MEMBER KRYDER: Okay.

3 MR. KNOX: Okay. I'm on slide 41 at
4 KOP-23. KOP-23 was taken from Interstate 10 looking
5 south. From here the project would be approximately one
6 mile to the south and the gen-tie would come in towards
7 the right side of this image and we do have a simulation
8 of this KOP. And the New Water Mountains provides
9 additional topographic backdropping that reduces project
10 contrast. And along this area, too, there is vegetative
11 screening -- intermittent vegetative screening that
12 assists in reducing project contrast and project
13 visibility.

14 KOP-33, I'm on slide 42, was taken from
15 Vicksburg Road, looking southeast, and you can see the
16 Ten West Link 500-kV transmission line in the foreground.
17 Here the project would parallel this transmission line
18 into the project substation to the east and on the south.
19 Again, we see a fairly common and indistinctive landscape
20 of sparse creosote, bursage. So now I'll walk you
21 through the simulations developed for the project.

22 MEMBER LITTLE: Mr. Chairman?

23 CHMN STAFFORD: Yes, Member Little.

24 MEMBER LITTLE: I'm looking at the map in
25 B-9 that shows all of the KOPs. I'm not sure that we

1 have anything up on the screen that you can point it out
2 to me, but where is the La Posa SRMA?

3 MR. KNOX: That's a very good question,
4 Committee Member -- it's Little?

5 MEMBER LITTLE: Uh-huh.

6 MR. KNOX: So the SMRA [sic] is a special
7 management recreation area, and La Posa begins just west
8 of the solar array fence line. So the solar array fence
9 line is where it's at, because that's the end
10 of -- that's the far eastern end of the La Posa SMRA.

11 MEMBER LITTLE: Okay. And how far, then,
12 west does it go?

13 MR. KNOX: It extends all the way to
14 Quartzsite. And then it heads south towards
15 Interstate 8. It's very -- the La Posa SMRA is very
16 large.

17 MEMBER LITTLE: And where -- where is it
18 relative north and south to the project? Is it
19 continue -- I mean, does the project go right through it?

20 MR. KNOX: It does go right through it.
21 And there's no prohibition in the Yuma RMP for these
22 types of facilities, for transmission lines, for access
23 roads. There is a prohibition for the solar array. You
24 can't put the solar array in the La Posa SMRA,
25 but -- uh-huh.

1 MEMBER LITTLE: Okay. And I sort of
2 gathered from what I read in the application that that is
3 used a lot by offroad vehicles and --

4 MR. KNOX: That's correct.

5 MEMBER LITTLE: So there's a lot of people
6 out there tearing it up probably, right?

7 MR. KNOX: They are tearing it up. And I'd
8 like to bring Patty Varra back into the discussion here.
9 As part of our outreach, she reached out to the OHV
10 community.

11 MEMBER LITTLE: Thank you. That answers my
12 question.

13 MS. VARRA: Apologies, I have to bring my
14 notes up.

15 MS. GRABEL: Do you have a question for Ms.
16 Varra, Member Little?

17 MEMBER LITTLE: No, I didn't. I think you
18 answered my question, thank you.

19 MS. VARRA: Okay. Thank you.

20 MEMBER LITTLE: Well, I guess I could ask,
21 what was their response? I mean, what was their --

22 MS. VARRA: They had no objection. They
23 were fine with our plans. There is a very slight
24 alignment of the connector route, so currently it jogs
25 left north a little bit. The connector route within the

1 project site area. What we proposed is getting rid of
2 that jog north and straightening out the connector route
3 to follow along the existing gas line that most of them
4 are using anyway. And so both of the recreational
5 vehicle associations that we reached out to had no
6 objection to the proposed realignment of that connector
7 route.

8 MEMBER LITTLE: Who else has jurisdiction
9 over the connector route or is it just a --

10 MS. VARRA: We did reach out to the Arizona
11 Trail, Incorporated -- Arizona Peace Trail, Incorporated,
12 who does -- they're a volunteer group who does the
13 maintenance and things. And so -- and they did support
14 the realignment.

15 MEMBER LITTLE: Okay. Thank you.

16 MR. KNOX: Okay. So simulation 1, I think
17 it might be important to just orient the committee to how
18 the simulations are laid out. So on the right margin is
19 where the simulation photo was taken from. And then the
20 second -- the photo in the center is more detail-specific
21 to its regional location. The top picture is the
22 existing and then the bottom picture is the simulated
23 view.

24 So simulation 1 was developed from KOP
25 number 4 along Interstate 10, approximately a half mile

1 from the project looking south/southeast. The Ten West
2 Link can be seen in the simulation. Also, if you look in
3 the center of that simulation, you'll see two of the
4 three-pole structures. These are structures 43 and 44.
5 They're left of center in the simulation. For travelers
6 along Interstate 10 driving at 70 to 80 miles an hour,
7 the project would be visible, but would not dominate the
8 viewshed. Again, that's an important criteria for the
9 Bureau of Land Management when it comes to them making
10 the decision of the project being in compliance with
11 their VRM system.

12 Travel along I-10 were assigned a moderate
13 level of sensitivity during the visual analysis, given
14 the distance, nondistinctive landscape type, again, Class
15 C, and moderate sensitivity level of the viewer. The
16 project would conform with the BLM VRM Class 3. And in
17 the current DEIS, Draft Environmental Impact Statement,
18 that -- that is the decision that the BLM has made, that
19 the project does conform with VRM Class 3.

20 MEMBER LITTLE: Mr. Chairman?

21 CHMN STAFFORD: Yes, Member Little.

22 MEMBER LITTLE: I'm a little confused by
23 this one, in that the existing picture doesn't show the
24 Ten West Link. Is it not constructed there yet?

25 MR. KNOX: That's correct. At the time

1 that these photos were taken, it wasn't constructed.

2 MEMBER LITTLE: Okay. So the simulation
3 shows both, then, or --

4 MR. KNOX: The simulation shows the
5 Ranegras Plains Energy Center project.

6 MEMBER LITTLE: But the Ten West Link will
7 also be in -- in that viewshed?

8 MR. KNOX: That's correct.

9 MEMBER LITTLE: Okay.

10 MR. KNOX: At this portion. So Ten West
11 Link, I believe it was two years ago, went to
12 construction, and they constructed it and they put in
13 certain structures. They used two different structures.
14 They used a Delta-v that's guide, and then they used the
15 four-footed lattice structure. And they put in the Vs
16 and they only put in a handful of the lattice structure,
17 and then they came back and they had them all in and then
18 ran the conductors.

19 You'll see in, for example, simulation
20 number 3, you'll see that the conductors haven't been
21 strung yet on Ten West Link.

22 MEMBER LITTLE: Ah, okay.

23 MR. KNOX: So at the time that the photos
24 were taken, they had begun construction, but they didn't
25 have all the towers constructed yet.

1 MEMBER LITTLE: Okay. Thank you.

2 MR. KNOX: Uh-huh.

3 Okay. Okay. So KOP-23, simulation number
4 2, was developed along Interstate 10 approximately
5 three-quarters of a mile away from where the picture was
6 taken. The New Water Mountains Wilderness can be seen in
7 the distant background. The project is slightly visible
8 to the right, center right of the picture. And you'll
9 see the -- it's structure 72, which is a three-pole
10 structure towards the center of the simulation, and it's
11 at that location that then the project connects with the
12 substation.

13 And then simulation number 3 was developed
14 along Vicksburg Road at a distance of a quarter mile from
15 the Ten West Link corridor. The project can be seen
16 simulated to the right or south of the existing Ten West
17 Link transmission line. Here the project would be highly
18 visible, however, given the common landscape type that it
19 occurs in, the level of sensitivity of the view -- of the
20 viewer, and the existing Ten West Link transmission line,
21 the project remains in conformance with VRM Class 3.

22 Okay. The next -- and the next portion
23 includes the video simulation.

24 MS. GRABEL: Before we actually -- before
25 we do the virtual tour, Mr. Knox, will you please turn to

1 Exhibit RP-12. And, actually, Mr. Chairman, I should
2 ask, do you want to do the virtual tour now or do you
3 want to wait until after the lunch break?

4 CHMN STAFFORD: What do the members think,
5 are you ready to do the virtual tour or do you want to
6 take a lunch?

7 MEMBER KRYDER: Let's do lunch.

8 CHMN STAFFORD: I think it's a good time to
9 take a lunch break and we'll come back and do the visual
10 tour when we get back. So let's go ahead and recess
11 until 1:30.

12 MEMBER KRYDER: 2:00.

13 CHMN STAFFORD: 2:00?

14 MEMBER KRYDER: There's no places to eat
15 around here.

16 CHMN STAFFORD: Okay. All right. Let's
17 take a recess for lunch and come back at 2:00, at which
18 time we'll do the virtual tour.

19 All right. We stand in recess.

20 (Recessed from 12:44 p.m. until 2:14 p.m.)

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

23 Ms. Grabel, I believe you were about to do
24 the virtual tour?

25 MS. GRABEL: That's exactly right.

1 Q. So, Mr. Knox, if you could please turn to
2 Exhibit RP-12. Exhibit RP-12 is a copy of the virtual
3 tour that was developed for this matter. And a link to
4 the virtual tour was provided to the committee on Exhibit
5 RP-12; is that correct?

6 A. (MR. KNOX) That's correct.

7 Q. Was the virtual tour prepared by you or under
8 your direction and control?

9 A. (MR. KNOX) It was.

10 Q. How was the tour prepared?

11 A. (MR. KNOX) So we used Google Earth as a base for
12 topography and vegetation, as well as roads and other
13 existing infrastructure. And we overlaid a PLS CAD,
14 which is Power Line Siting CAD onto the top of the Google
15 Earth imagery that depicts the 500-kV gen-tie. We also
16 modeled what Google Earth didn't have was the Ten West
17 Link structures, and so we built CAD wire frame
18 structures and interpreted recent aerial imagery as it
19 related to the Ten West Link structure locations and
20 their structure pads.

21 So the Ten West Link line that's represented in
22 the video tour is as it's constructed on the ground. And
23 the Ranegras 500-kV line is constructed as it was in our
24 PLS CAD model.

25 Q. Does the virtual tour represent a realistic view

1 of the landscape surrounding the proposed project
2 location?

3 A. (MR. KNOX) It does.

4 Q. Thank you.

5 Please go ahead and begin.

6 A. (MR. KNOX) Okay. So what you're going to want
7 to do, Eli, is keep going and then pause it right there.

8 We'll just get our bearings here, Committee
9 Members. So we're starting on the far eastern end of the
10 gen-tie, and what you'll see is the -- is pole 72, which
11 is a three-pole structure. And then you have the
12 A-frame, so you have the slack span and then the A-frame
13 and that's the location of the project substation. And
14 we're looking west and to the left side or to the south
15 is the battery energy storage system. Those are the
16 white boxes. And then what you see is only a portion of
17 the solar array.

18 Also in this view you'll see the Ten West Link
19 line to the north or to the right of the proposed
20 Ranegras Plains gen-tie, and right along to the left side
21 between both corridors you'll see the existing
22 construction access road. And we're going to utilize
23 that access road to access all of the structures along
24 the gen-tie. The video moves at a pretty good clip, and
25 we can pause it, we can replay it, but we do slow down

1 towards the center at 43 and 44, to show you the two
2 other three-pole structures that span a sensitive
3 resource, and then we continue west to the end at the
4 Series Compensation Station Switchyard.

5 MEMBER LITTLE: Mr. Chairman?

6 CHMN STAFFORD: Yes, Member Little.

7 MEMBER LITTLE: Are those the solar -- is
8 there another solar project on the north side of Ten
9 West? Is that what is indicated there?

10 MR. KNOX: So that is a part of the
11 Ranegras Plains Energy Center.

12 MEMBER LITTLE: Oh, okay. I didn't realize
13 that. Okay. Thank you.

14 MEMBER KRYDER: Mr. Knox?

15 CHMN STAFFORD: Member Kryder.

16 MEMBER KRYDER: Right there, I'm sorry, I
17 didn't mean to hit you. This is the -- I'm trying to get
18 a fix on the access road, and do you have a pointer?

19 MR. KNOX: I do happen to have one.

20 MEMBER KRYDER: Is it that gizmo? Okay,
21 fine. That's the access road for the existing line,
22 correct?

23 MR. KNOX: Right. So right --

24 MEMBER KRYDER: So --

25 CHMN STAFFORD: One at a time, please. One

1 at a time.

2 MEMBER KRYDER: Okay. I'll shut up, then.
3 What's going on?

4 CHMN STAFFORD: Do you have a question? Go
5 ahead and ask it.

6 MEMBER KRYDER: My question -- my question
7 is if that's the access road, I can see that it's up real
8 close to the V construction of the existing line,
9 correct?

10 MR. KNOX: That's correct.

11 MEMBER KRYDER: And so from that road
12 you'll have to cut a little 90 degrees to the left road
13 through.

14 MR. KNOX: That's correct. That's correct.

15 MEMBER KRYDER: How far -- what's the
16 distance from the road to that A-frame that I see there?

17 MR. KNOX: So this --

18 MEMBER KRYDER: Back of the envelope.

19 MR. KNOX: So I understand your question.
20 This portion of the line of Ten West Link crosses the
21 northwest corner of the solar array.

22 MEMBER KRYDER: Right.

23 MR. KNOX: So that A-frame and the
24 substation and that three-pole structure, which is
25 structure 72 --

1 MEMBER KRYDER: Right.

2 MR. KNOX: -- and then there's one more
3 structure, which is structure 71 --

4 MEMBER KRYDER: Right.

5 MR. KNOX: -- those occur within the fence
6 line of the solar array. But I do understand your
7 question, it's 200 feet. So from -- from the western
8 fence line of the solar array to the Series Compensation
9 Station Switchyard there will be spur roads at each
10 structure location. Each spur road is approximately
11 200 feet long and 24 feet wide, and it leads -- and that
12 spur road ends at the Ranegras Plains requested CEC
13 corridor. And then what happens is we have a
14 200-by-200-foot structure assembly area.

15 MEMBER KRYDER: Right.

16 MR. KNOX: And so it's 200 feet from the
17 structure assembly area to that construction road.

18 MEMBER KRYDER: Okay. So you might be
19 400 feet, then, from the existing road to the far side of
20 your corridor?

21 MR. KNOX: That's correct.

22 MEMBER KRYDER: Okay. And that would be
23 true the full 11 miles, thereabouts?

24 MR. KNOX: That's correct. The spur roads
25 it would stop at the northern edge of the -- of our

1 requested corridor, because what happens at that location
2 is the structure assembly area then picks up, the 200 by
3 200.

4 MEMBER KRYDER: Oh, okay.

5 MR. KNOX: So there's no need to create the
6 road to the south side of the right-of-way.

7 MEMBER KRYDER: And do you pretty well
8 clear under -- in that 200-foot corridor, will you
9 clear-cut it? I mean, are you going to doze it level?
10 Are you -- how much destruction do you do to the
11 environment when you lay the poles out and you drag the
12 lines and all of that?

13 MR. KNOX: Right. So we've proposed to do
14 a mow and grow.

15 MEMBER KRYDER: I don't know what that
16 means.

17 MR. KNOX: So mow -- so site preparation
18 methods for this project, and I'm talking about the total
19 complete project, there are four different types of site
20 preparation. One is grading and leveling, things like,
21 and it's not applicable here, but things like inverter
22 pad location, substation foundation, O&M building, and
23 that's grading level.

24 And then the next three site preparation
25 methods are mow and grow, which is we mow down the

1 vegetation three to five inches from the ground. We go
2 in and construct, and then we allow the vegetation to
3 grow back.

4 MEMBER KRYDER: Okay.

5 MR. KNOX: And then there's mow and prune
6 and then there's mow and till. And all of them, with the
7 exception of mow and prune, again, we cut it to three to
8 five inches to the ground, we allow the vegetation to
9 grow back, but because it grows up underneath the panels
10 that we need to prune it, so it doesn't interfere with
11 the racking system. And then mow and till is reserved
12 for specific areas within the solar array.

13 MEMBER KRYDER: And in this case under the
14 gen-tie line, it will be which one?

15 MR. KNOX: This one is a mow and grow.

16 MEMBER KRYDER: Mow and grow. Okay. I've
17 hunted around them and I see them happen, so okay, I
18 didn't know that that was what they were called. Thank
19 you very much.

20 MR. KNOX: Yes, sir.

21 Okay. So we begin to head west and we're
22 crossing Vicksburg Road here and you see a label for
23 Vicksburg Road. And you see the two different types of
24 structures that are used for Ten West Link, its the V and
25 it's also the four-legged lattice structure. The

1 corridor from structure to structure is 350 feet.
2 There's 150-foot separation between the Ten West Link's
3 200-foot corridor and Ranegras Plains 200-foot corridor.
4 We span all --

5 CHMN STAFFORD: You mean right-of-way?

6 MR. KNOX: -- drainage -- excuse me?

7 CHMN STAFFORD: You mean right-of-way, not
8 corridor?

9 MR. KNOX: Right-of-way, yes, sir.

10 And this is where -- this is pole 43 and
11 then pole 44, and we can just pause it right there. So
12 this is a 1600-foot span and we span a sensitive resource
13 here. What's important to note is that the PLS CAD model
14 at this -- between these two structures, because of
15 blowout, requires an additional 50-foot -- it's an aerial
16 right-of-way. There is no additional ground disturbance,
17 it just is for conductor blowout in 90-mile-an-hour winds
18 because it's such a long span, and so you need to keep
19 that separation from Ten West Link.

20 Okay. Eli.

21 And we see off to the right, the topography
22 on the right is Bear Hills, and just beyond Bear Hills is
23 U.S. 60 that leads up to Brenda and on the left that
24 topography is the very tail end of the New Water
25 Mountains, at this point it's not the wilderness, it's

1 the New Water Mountains.

2 The elevation rises from the solar site,
3 which is around 1200 feet above mean sea level to
4 approximately 1500 feet above mean sea level, as we
5 approach the Series Compensation Station. And just in
6 that little bit of elevational change you start seeing
7 more upland, Sonoran palo verde, and ocotillo, cholla,
8 that kind of thing.

9 MEMBER GOLD: Mr. Chairman?

10 CHMN STAFFORD: Yes, Member Gold.

11 MEMBER GOLD: Could you pause it for a
12 second? I have a question. I'm counting the poles and
13 you have two poles to every one of the lines to the right
14 of you. Why do you have twice as many poles?

15 MR. KNOX: That's a very good question. So
16 this is a single-circuit -- single pole, single-circuit
17 500-kV line. And with a pole structure, we cannot
18 achieve the spans that Ten West Link can. So Ten West
19 Link spans are likely in the 1200- to 1500-foot, and so
20 our spans are between 800 and a 1,000 feet. Most all of
21 these spans are between, you know, call it 750 and 900.

22 MEMBER GOLD: So what is the voltage of the
23 spans adjacent to yours?

24 MR. KNOX: So Ten West Link is a 500-kV
25 line as well.

1 MEMBER GOLD: So it's the same line as
2 yours?

3 MR. KNOX: Uh-huh.

4 MEMBER GOLD: But since you only have a
5 single span, you can use small poles?

6 MR. KNOX: So in -- it's -- it's more cost
7 economical for short gen-ties to use single-pole
8 structures than it is to use more expensive lattice
9 towers. And so the Ten West Link project, I believe, is
10 over 100 miles, I think it's maybe 110 miles. And so
11 they had a lot of ground to cover, and so they chose to
12 use the lattice structure, and they used two different
13 types of lattice structures, the V-guide and then also
14 the four-legged lattice.

15 MEMBER LITTLE: Mr. Chairman?

16 MEMBER GOLD: They have three lines down --

17 CHMN STAFFORD: Wait, one at a time.

18 Member Gold, finish your question, and then you'll be
19 next, Member Little.

20 MEMBER GOLD: So they have three lines on
21 their lattice poles. And how many lines do you have in
22 your pole?

23 MR. KNOX: Three.

24 MEMBER GOLD: You have three also?

25 MR. KNOX: Uh-huh.

1 MEMBER GOLD: And you use the same gauge
2 wire?

3 MR. KNOX: I don't know what --

4 MEMBER GOLD: For the 500 -- for the same
5 voltage, you'll use the same gauge wire, I'm guessing.
6 But it's less expensive -- okay. I get it. You're the
7 experts economically, is this the less expensive way to
8 go?

9 MR. KNOX: To use single poles for a short
10 span. The wires for whether it's a 69-kV or 230, 500-kV,
11 you'll have three wires.

12 MEMBER GOLD: Yeah. Okay. I was just
13 curious, so this is less expensive and you figured it
14 out.

15 MR. KNOX: It's more economical to go with
16 a single-pole structure for a short span, that's correct,
17 sir.

18 MEMBER GOLD: Gotcha.

19 CHMN STAFFORD: And they're both
20 single-circuit, though, correct?

21 MR. KNOX: I believe Ten West Link is a
22 single-circuit line, uh-huh.

23 CHMN STAFFORD: Member Little?

24 MEMBER LITTLE: Mr. Chairman, I just would
25 also like to add to that, the Ten West is designed to

1 carry a great deal more power than is the -- this
2 gen-tie. And I would guess that the conductors are
3 different and/or that you have more conductors per phase.
4 It's a three-phase circuit, but you can have more than
5 one conductor per phase.

6 And I don't remember, I testified on that
7 project, but I don't remember whether -- how many
8 conductors they have. But it is designed to carry a
9 great deal more power.

10 CHMN STAFFORD: I guess we're ready to
11 resume the virtual tour.

12 MR. KNOX: Well, we're at the -- we're at
13 the very west end, and yes, and the camera is going to
14 pan to the right. You see the Series Compensation
15 Station with the two large A-frames.

16 You can pause it right there, Eli. This is
17 a pretty good vantage point.

18 So we just traveled 11 miles west, and now
19 we're looking due east, and you can see Interstate 10,
20 both the north and southbound lanes. And then you see a
21 diagonal that comes in just south of Interstate 10,
22 that's the Arizona Peace Trail connector route. And
23 right where the Arizona Peace Trail connector route
24 intersects our project's corridor is where KOP-5 was
25 taken from, so -- and OHV users use this, and if you

1 follow that, that's the pipeline corridor -- the El Paso
2 Natural Gas Pipeline corridor. And then again you can
3 see the separation between Ten West Link on the north and
4 the Ranegras Plains on the south.

5 BY MS. GRABEL:

6 Q. Mr. Knox, does that conclude your testimony?

7 A. (MR. KNOX) That concludes my testimony.

8 MS. GRABEL: Mr. Chairman, Committee
9 Members, any further questions?

10 CHMN STAFFORD: Questions from members?

11 (No response.)

12 CHMN STAFFORD: I had a quick question.

13 The custom gen-tie structures 43 and 44, are they located
14 on State Trust Land or BLM land?

15 MR. KNOX: They're on State Trust Land.

16 CHMN STAFFORD: All right. And then those
17 three-pole structures, are they not in Exhibit G to the
18 application, I don't recall -- I only recall seeing the
19 monopole structures.

20 MR. KNOX: They are included in the family
21 of structures in Exhibit G.

22 CHMN STAFFORD: Okay. All right. I guess
23 go onto the next part of your testimony.

24 MS. GRABEL: I believe that concludes our
25 testimony, Mr. Chairman.

1 CHMN STAFFORD: Okay. You might want to
2 talk about the letter from Staff that was docketed after
3 you filed your exhibits on February 4th.

4 MS. GRABEL: Would you like us to make it
5 an exhibit?

6 CHMN STAFFORD: Yes, please.

7 MS. GRABEL: Okay. We'll go ahead and make
8 that Exhibit RP-14. And while we're on exhibits, I
9 suppose we should move the applicant's Exhibits 1
10 through 12 and 14. We haven't yet talked about the CEC,
11 which is RP-13.

12 CHMN STAFFORD: Okay. All right. Well,
13 I'll admit them after we get done talking about
14 everything. So who is going to cover the letter from
15 Staff?

16 MS. GRABEL: I suppose we could have
17 Mr. Knox talk about the letter from Staff.

18 CHMN STAFFORD: There we go.

19 BY MS. GRABEL:

20 Q. Do we need to pull it up, Mr. Knox? It was
21 docketed just a couple of days ago.

22 CHMN STAFFORD: February 4th.

23 Have you seen it, Member Little?

24 MEMBER LITTLE: Yes, I have. And I have a
25 question about it.

1 CHMN STAFFORD: Well, let's let them
2 introduce it and then we'll lay into the questions.

3 MEMBER LITTLE: Okay. Thank you.

4 MS. GRABEL: Mr. Chairman, can you give us
5 five minutes of a recess just so I can show Mr. Knox. I
6 don't believe he's read it yet.

7 CHMN STAFFORD: Okay. Yes. We'll take a
8 five-minute recess. Thanks.

9 (Recessed from 2:33 p.m. until 2:36 p.m.)

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

12 We were about to discuss this response
13 letter from the Commission Staff.

14 MS. GRABEL: Thank you, Mr. Chairman.

15 So the Staff submitted data requests to the
16 company. We've replied giving them -- they asked for a
17 System Impact Study. At that time the System Impact
18 Study had not been completed, so we provided them with
19 two interconnection studies CAISO had conducted. Upon
20 the Staff's review of those interconnection studies, they
21 issued a recommendation saying that they believe the
22 proposed project could improve the reliability and safety
23 of the grid and the delivery of power in Arizona, as long
24 as the possible issues identified in the interconnection
25 studies are properly mitigated.

1 CHMN STAFFORD: Okay. And Member Little?

2 MEMBER LITTLE: And it is that last part
3 that I would like to address, the issues being properly
4 mitigated. I would like the applicant to go on the
5 record as saying that they are aware of what they are,
6 and they will do whatever is necessary or recommended by
7 Cal ISO to mitigate the issues.

8 MS. VARRA: Thank you. This is Patty Varra
9 speaking again. Yes, we are aware of the constraints and
10 we are prepared to work with CAISO on working through
11 that.

12 MEMBER LITTLE: Okay. I have a further
13 question that I'm not sure if anybody here can answer,
14 but what is the -- there's a sentence in the Staff letter
15 that says, "The applicant stated in a response to a data
16 request that the observed thermal overloads will be
17 resolved using Cal ISO's Congestion Management System and
18 that there will not be any transmission upgrades
19 required."

20 What does -- is there anyone on either of
21 the two panels that can address what Cal ISO's Congestion
22 Management System is?

23 MS. VARRA: I cannot speak to California
24 ISO's management restrictions.

25 MR. POWERS: I cannot either.

1 MS. GRABEL: I think the answer,
2 unfortunately, is no, Member Little.

3 MEMBER LITTLE: Okay. Thank you.

4 CHMN STAFFORD: Is that RP-14?

5 MR. ANCHARSKI: Yes.

6 MEMBER LITTLE: Mr. Chairman, I do have
7 some further questions. They're not on that -- on the
8 Staff letter.

9 CHMN STAFFORD: By all means, please.

10 MEMBER LITTLE: Okay. I would just like to
11 address a little bit the public concern statements. We
12 didn't talk very much about that. As was mentioned
13 already, there -- you guys -- you've got a lot of
14 participation from the public, particularly for a project
15 that's out in the middle of nowhere. And I understand
16 that from what you said that part of that participation
17 was because this project was erroneously associated with
18 another project that was considered contentious.

19 However, there were a lot of different
20 kinds of comments, themes that were identified in the
21 scoping summary. And my first question is, were the
22 comments taken into account and -- by the applicant, and
23 at what point in the development of the federal -- or the
24 studies that were done in support of the federal EIS --
25 draft EIS.

1 MS. VARRA: So I'll let you speak to the
2 agencies.

3 MR. POWERS: You're speaking about like the
4 scoping -- the scoping as part of the draft EIS?

5 MEMBER LITTLE: Yes.

6 MR. POWERS: Yeah. Boy, that's -- comments
7 from the public and the agencies that are brought up
8 during scoping of the draft EIS that are brought into the
9 proposed POD at various stages throughout the process,
10 and have all been incorporated, if feasible, into the
11 draft EIS.

12 MEMBER LITTLE: Okay. That answers that
13 question. I'm just wondering about some of the
14 categories that were listed in the scoping summary. Fire
15 and fuels management, was that mostly with respect to the
16 batteries?

17 MR. POWERS: Yes.

18 MEMBER LITTLE: And what would have been
19 your response to that? I mean, there's not a fire
20 department that's real close.

21 MR. POWERS: Yeah, we develop a fire
22 management plan for our projects, and I believe you have
23 been coordinating with the local fire districts.

24 MS. VARRA: Right. To get -- we have been
25 working with the local fire. We are outside of a zone --

1 a fire response zone, so we're trying to get into place
2 now with McMullen Valley Fire and they're coordinating
3 with Quartzsite Fire. We're trying to get a will serve
4 letter from them to agree to service our project area.

5 MEMBER LITTLE: Good. Thank you.

6 And then I -- I'm curious what kind of a
7 question deals with soils?

8 MR. POWERS: I can take a stab at that.
9 What I think that comes from, I believe that
10 question -- or that comment came from some of the
11 neighboring facilities that are currently under
12 construction. Those projects are on private land and
13 sometimes public -- the BLM has to, I guess, entertain
14 questions from projects that normally wouldn't be under
15 their jurisdiction, it's not on federal land. And so
16 those private projects, they are employing a different
17 type of development for the construction of those
18 projects. Essentially what they're doing is grading out
19 the land as flat as they can to maximize their -- the
20 concentration of solar panels.

21 And I think where that, those comments are
22 coming from, soil stability, issues with soils, dust
23 abatements, that sort of thing, is because they're
24 observing those projects along I-10. Our project is not
25 like that. In our proposed POD, in the plan -- or, I'm

1 sorry, the proposed action in the draft EIS, way back
2 going, I believe, when we first submitted this in 2021
3 going through the variance process, it's always been a
4 low-development-type model rather than blading out the
5 desert landscape to maximize land for solar panels, we're
6 going to be using terrain following trackers. And, as
7 Mr. Knox pointed out, employing, for the most part over
8 the land for the solar facility, it's going to be a mow
9 and grow, essentially a brush hog that's going to cut
10 down the vegetation to five or six inches above the
11 ground, but leaving all of the -- all of the roots and
12 the seed banks and everything in place, and simply
13 driving our pile drivers over that material and the
14 terrain to install the solar array.

15 Quite frankly, it makes things on the back
16 side of construction a lot easier, because all of that
17 plant material is still within the soil structure, and it
18 helps us close out our storm water a lot sooner, because
19 we could show that we have coverage and soil
20 stabilization prior to, you know, closing out our SWIP
21 and moving off the site and moving on to operations.

22 It also helps with the wildlife agencies,
23 that we can retain some of that soil biodiversity and the
24 plant material that will grow up underneath the panels.
25 And I guess the third part of that would likely go into

1 those comments about soil and the spoil issues is that
2 employing those types of construction methods also keeps
3 dust down. And so we don't have to use as much water, we
4 don't have to be concerned as much with dust throughout
5 the area, because we're keeping that soil kind of intact
6 with the -- with the root structure.

7 MEMBER LITTLE: Thank you. That sounds
8 great. I noticed that the most comments, by far, had to
9 do with wildlife and special status species. I'm
10 assuming that most of those questions were things having
11 to do with the wildlife and special status species that
12 we've already discussed; is that correct?

13 MR. POWERS: That's correct.

14 MEMBER LITTLE: Okay. Thank you very much.

15 CHMN STAFFORD: All right. The maximum
16 height of the towers is planned to be 180 feet?

17 MS. VARRA: Yes, that's correct.

18 CHMN STAFFORD: Okay.

19 MEMBER LITTLE: Mr. Chairman, I did have
20 one more question.

21 CHMN STAFFORD: Oh, please, Member Little.

22 MEMBER LITTLE: You mentioned that there
23 will be some aircraft avoidance lighting. Is there an
24 airport around there or just a strip or -- I'm just
25 curious?

1 CHMN STAFFORD: I think Luke Air Force Base
2 is somewhere in the general vicinity.

3 MR. KNOX: That's correct, we --

4 MEMBER KRYDER: No, there's the Yuma
5 training ground or bombing ground out there.

6 MR. KNOX: That's correct. So it's -- it's
7 the Marine Corps Air Station at Yuma we entered into
8 consultation with, and they had indicated upon that
9 consultation that structures 58 to 72 would require these
10 FAA lights. And then we entered into consultation with
11 the Department of Defense, and the Department of Defense
12 directed us to install lights on structures 1 through 45.

13 So there is a little gap in the middle.
14 Why there's a little gap in the middle, I don't know, but
15 it's for low-flying aircraft training missions.

16 MEMBER LITTLE: Okay. Thank you.

17 One further question and that is that, just
18 for the record, are you aware of any of the people that
19 live close by or work close by in that little area where
20 the two truck stops are, are you aware if any of them
21 attended any of the meetings, and specifically made
22 comments about this project?

23 MS. VARRA: I am not aware of their
24 attendance or their not attending. Addresses weren't a
25 piece of the sign-in sheets, so we didn't hear from

1 anyone who specifically identified their location as
2 being those near the -- near the truck stops.

3 MEMBER LITTLE: Thank you. I think I'm
4 done, Mr. Chairman.

5 CHMN STAFFORD: All right. I guess my
6 confusion here is it said in the draft construction
7 operation and maintenance plan, I think it's around 1240
8 of the PDF in the docket, it looks like the structure
9 states it would be per Luke Air Force Base, I guess
10 they're the ones that are talking to you about it, even
11 though it's going to be Yuma Air Field that's going to be
12 impacted by the line.

13 MR. KNOX: And that was our first -- right.
14 So it was DOD, which was the Marine Corps Air Station,
15 and then it was Luke Air Force Base that we entered into
16 a consultation with initially, and it was structures 58
17 to 72.

18 CHMN STAFFORD: Okay. All right. I
19 don't -- I don't recall seeing any correspondence from
20 SHPO in this.

21 MR. POWERS: I believe the -- that would
22 probably fall into the consultation -- well, it's -- as
23 part of the cultural resource attachments, which I don't
24 know were provided because of the confidentiality.

25 CHMN STAFFORD: Yeah, I'd like to talk

1 about that some more.

2 All right. So the things you talk -- so
3 you established that those are on State Trust Land, and
4 that one says it doesn't require -- the statute you
5 mentioned, 39-125, doesn't require disclosure of public
6 records that relate to the location of archaeological
7 discoveries. So I would like you to provide us with the
8 confidential B-10 exhibit. We can do this two ways, you
9 can redact all the location information or you could
10 provide it to me for in camera inspection to look at it
11 and then we can decide which -- I can just tell you which
12 ones need to be redacted.

13 I think it's probably location -- I think
14 the federal one is a little broader, but it requires a
15 determination from the head of the agency. And I don't
16 know what's in B-10, if there's a directive from the
17 agency saying, oh, because there's a little more broad
18 than just the location data, potentially.

19 MS. GRABEL: Correct, Mr. Chairman. The
20 report itself has a big heading that says,
21 "Confidential," and cites the three laws that I read off
22 to you on the record. And so I think perhaps initially
23 we can provide it to you for in camera review and take it
24 from there.

25 CHMN STAFFORD: Okay. The other thing was

1 I went to Westlaw and pulled up the 16 USC 478 and it
2 says it's repealed, did they move that section someplace
3 else?

4 MS. GRABEL: I do not know the answer to
5 that.

6 CHMN STAFFORD: Or is it just an old form?

7 MS. GRABEL: It may be an old form.

8 CHMN STAFFORD: Because I -- because they
9 didn't get rid of the whole act, they just must have
10 moved that section someplace else. But I just got
11 flagged -- red flagged on Westlaw saying this is
12 repealed. And a bunch of subsequent ones too. So they
13 have must have -- it's been -- I'm sure it's been
14 numbered elsewhere, though.

15 MS. GRABEL: I can try to find out for you.

16 CHMN STAFFORD: Okay. Thanks. So you will
17 provide that. Would you provide that later today or in
18 the morning, do you think?

19 MR. POWERS: I have it right here.

20 MS. GRABEL: We can provide it to you now.

21 MR. POWERS: I have it on my screen, if you
22 would like to see it.

23 CHMN STAFFORD: How many pages is it?

24 MR. POWERS: Our consultant broke the
25 reports down into -- so this one is just specific to the

1 transmission line, it's 94 pages.

2 CHMN STAFFORD: Trying to think of a better
3 way than me taking your computer with me today.

4 MS. GRABEL: We have a printer here,
5 Mr. Chairman.

6 MR. POWERS: I can provide it to Eli to
7 print it, if you'd like.

8 CHMN STAFFORD: Okay. That way you're not
9 waiting for me to finish reading it on your computer,
10 because, I mean, you guys are pretty much done with
11 your -- you're almost done with your direct, aren't you?

12 MS. GRABEL: Yes, we are.

13 CHMN STAFFORD: Okay. Right. So then yes,
14 print out a copy, let me look at it. And then we can
15 address it in the morning whether we need it as an
16 exhibit or not. I think the last thing we need to cover
17 is the draft certificate, RP-13?

18 MS. GRABEL: Correct. So I mean, I don't
19 have a witness to admit the exhibit, but I wrote it under
20 my own direction and control with Mr. Ancharski.

21 CHMN STAFFORD: It's been filed and we have
22 it, so yes.

23 MS. GRABEL: Yes.

24 CHMN STAFFORD: Okay. With that I'll admit
25 Exhibits RP-1 through 14. We'll see if we're going to do

1 a 15 or -- after I get a chance to look at that.

2 (Exhibits RP-1 through RP-14 were admitted
3 into evidence.)

4 CHMN STAFFORD: We have public comment
5 scheduled for 5:30. I don't think it will probably go
6 past 6:00.

7 Are there any other questions from members?

8 (No response.)

9 CHMN STAFFORD: The ones online have
10 been -- haven't had a lot of questions today. Or Member
11 Richins, usually you're -- got a few more.

12 MEMBER RICHINS: These -- Chairman, these
13 guys are working on the EIS, I know what that takes. And
14 if it were up to me, I would motion them to get a free
15 pass, just because they have an EIS or they're relatively
16 close, instead of having to come to this committee in the
17 future. So -- is that clear enough?

18 CHMN STAFFORD: Thank you.

19 MEMBER RICHINS: This is an exercise in
20 waste.

21 CHMN STAFFORD: All right. Well, do you
22 want to give your closing now or wait until after public
23 comment?

24 MS. GRABEL: I can give a closing now. I
25 don't really have one prepared since it was such a short

1 hearing. But I think that this project, unlike others,
2 is one that's kind of like a relatively easy ask. As
3 Member Richins says, we are going through an EIS, which
4 is a very comprehensive environmental analysis. This is
5 a relatively short generation tie line, 11 miles, that
6 parallels a 120-mile larger transmission line along the
7 I-10. So it's already in a utility corridor. It's in an
8 area that has been designated by the federal government
9 as one that should be -- that's appropriate for the
10 energy resources. And for those reasons, we ask that you
11 afford us the CEC.

12 CHMN STAFFORD: Yes, I seem to indicate the
13 marginal impact of this line is pretty small, given its
14 location. However, the marginal impact of this
15 application is quite significant. I mean, for a line as
16 simple as this, the amount of pages of the application
17 are just staggering. I think part of it had to do with
18 the fact that there was an error with the docketing of it
19 that duplicated at least a thousand pages in there. So
20 I've spoken with docket control, and I'll follow up with
21 them to figure out how to avoid this.

22 Another irregularity was that I didn't
23 receive my copy of it. So I went to the online version
24 in the docket. And that was extremely cumbersome to
25 navigate, especially when I realized, oh, wait, it's not

1 deja vu this is a duplicate here. It's like I'm looking
2 at the same thing again.

3 So hopefully we can avoid that in the
4 future, because I was -- I was pulling my hair out for a
5 while last week looking at the duplications in there,
6 so -- but I'll deal with them. I'm not sure where the
7 disconnect happened, but I did get the hard copy for the
8 Attorney General records from you, so I appreciate that.
9 Thank you.

10 All right. Well, anything further from
11 members?

12 MEMBER RICHINS: Chairman, I just hope
13 future applicants will study Ms. Grabel's close for its
14 brevity and eloquence, just as --

15 MS. GRABEL: Including Ms. Grabel.

16 CHMN STAFFORD: All right. Well, with that
17 I guess we'll recess until 5:30 when we'll come back for
18 public comment. And then we'll -- after that's
19 concluded, we'll reconvene at 9:00 a.m. tomorrow morning
20 back here to discuss and vote on the CEC.

21 With that, we stand in recess until 5:30.

22 (Recessed from 2:55 p.m. until 5:30 p.m.)

23 CHMN STAFFORD: Let's go on the record.
24 Now's the time set for public comment for Line Siting
25 Case 243. At this time there appear to be no members of

1 the public in the room or on the phone or on the WebEx.

2 Ms. Grabel, there's no -- no members of the
3 public have shown up and filled out any of the speaker
4 slips?

5 MS. GRABEL: That's correct, Chairman
6 Stafford. We did not expect much public comment, if any.

7 CHMN STAFFORD: All right. Well, at this
8 point I guess we'll -- we'll stay here until 6:00 to
9 allow the public an opportunity to comment. But at this
10 time we'll go off the record and wait for someone to show
11 up or call in and then at which point we'll go back on
12 the record and take their comments.

13 Let's go off the record.

14 (Recessed from 5:30 p.m. until 6:00 p.m.)

15 CHMN STAFFORD: Let's go back on the
16 record. It is now 6:00 and no members of the public have
17 shown up in person or on the WebEx or called in to make
18 public comment.

19 With that, we will recess until 9:00 a.m.
20 tomorrow morning where we will resume the hearing.

21 With that, we are in recess.

22 (The hearing recessed at 6:00 p.m.)

23

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1 STATE OF ARIZONA)
COUNTY OF MARICOPA)

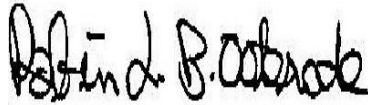
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4 BE IT KNOWN that the foregoing proceedings were
5 taken before me; that the foregoing pages are a full,
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were taken down by me in shorthand and thereafter reduced
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7 I CERTIFY that I am in no way related to any of
8 the parties hereto nor am I in any way interested in the
outcome hereof.

9 I CERTIFY that I have complied with the ethical
10 obligations set forth in ACJA 7-206(F)(3) and ACJA 7-206
11 (J)(1)(g)(1) and (2). Dated at Phoenix, Arizona, this
12 13th day of February, 2025.

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ROBIN L. B. OSTERODE, RPR
CA CSR No. 7750
AZ CR No. 50695

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* * * * *

18 I CERTIFY that Glennie Reporting Services, LLC,
19 has complied with the ethical obligations set forth in
20 ACJA 7-206(J)(1)(g)(1) through (6).

21
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