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Transcript Exhibit(s)

Docket #(s): L-21284A-23-0335-00229

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ARIZONA CORPORATION COMMISSION  
MARKET CONTROL

Arizona Corporation Commission

DOCKETED

FEB 09 2024

DOCKETED BY  
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Exhibit #: CHMN 1 , CHMN 2 , SD-1 , SD-2 ,  
SD-3 , SD-4 , SD-5 , SD-6 , SD-7 , SD-8 ,  
SD-9 , SD-10 , SD-11 , SD-12 , SD-13 , SD-14 ,  
SD-15 , SD-16 , SD-17 , SD-18 , SD-19 , SD-20 , SD-21

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

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IN THE MATTER OF THE APPLICATION  
OF SUNDOG ENERGY CENTER LLC, IN  
CONFORMANCE WITH THE  
REQUIREMENTS OF ARIZONA REVISED  
STATUTES, SECTIONS 40-360, ET. SEQ.,  
FOR CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY  
AUTHORIZING THE SUNDOG SOLAR  
230KV GENERATION TIE LINE PROJECT  
LOCATED IN PINAL COUNTY,  
ARIZONA.

DOCKET NO.: L-21284A-23-0335-00229

Case No. 229

**CERTIFICATE OF  
ENVIRONMENTAL  
COMPATIBILITY**

Arizona Corporation Commission

**A. INTRODUCTION**

Pursuant to notice given as provided by law, the Arizona Power Plant and Transmission Line Siting Committee ("Committee") held public hearings on February 5-7~~6~~, 2024, in Pinal County, in conformance with the requirements of the Arizona Revised Statutes ("A.R.S.") § 40-360 et seq. for the purpose of receiving evidence and deliberating on the December 20, 2023 Application of SunDog Energy Center LLC ("Applicant") for a Certificate of Environmental Compatibility ("Certificate" ~~or "CEC"~~) in the above-captioned case.

The following members and designees of members of the Committee were present at one or more of the hearing days for the evidentiary presentations, public comment, and/or for the deliberations:

Adam Stafford	Chairman, Designee for Arizona Attorney General
	Kris Mayes
Gabby Mercer	Designee of the Chairman, Arizona Corporation Commission ("Commission")
Leonard Drago	Designee for Director, Arizona Department of Environmental Quality
David French	Designee for Director, Arizona Department of Water Resources



1	Nicole Hill	Designee for Director of the Energy Office of the
2		Department of Commerce
3	Scott Somers	Appointed Member, representing cities and towns
4	<del>Roman Fontes</del>	<del>Appointed Member, representing counties</del>
5	David Kryder	Appointed Member, representing agricultural interests
6	Margaret "Toby" Little	Appointed Member, representing the general public
7	Jon Gold	Appointed Member, representing the general public
8	David Richins	Appointed Member, representing the general public

9 The Applicant was represented by Bert Acken of Acken Law and Sarah A. Noe of  
10 Ballard Spahr LLP. No parties requested intervention pursuant to A.R.S. § 40-360.05.

11 At the conclusion of the hearing, the Committee, after considering the (i)  
12 Application, (ii) evidence, testimony, and exhibits presented by the Applicant, and (iii)  
13 comments of the public, and being advised of the legal requirements of A.R.S. §§ 40-360  
14 through 40-360.13, upon motion duly made and seconded, voted ~~7~~ to ~~0~~, to grant  
15 Applicant, its successors and assigns, this Certificate for construction of the SunDog Solar  
16 230kV Generation Tie Line Project ("Project") as described below.

17 **B. PROJECT DESCRIPTION**

18 The Project consists of an approximately 1.7-mile 230 kV transmission line and  
19 associated interconnection facilities to interconnect the Applicant's planned energy  
20 facilities (the non-jurisdictional "Solar Energy Station") to the regional electrical  
21 transmission grid at the Pinal Central Substation in the City of Coolidge, Pinal County.

22 All Project facilities will be located in a variable-width corridor as shown in  
23 **Exhibit A** (the "Project Corridor"). The Project will originate at the non-jurisdictional  
24 Project Substation proposed to be located in the northeast quarter of Section 26, Township  
25 6 South, Range 7 East. From the Project Substation, the Project will be routed east for  
26 approximately 0.6 miles, then turn south for approximately 0.4 miles, paralleling Alexis  
27 Lane. From there, the Project is routed east for approximately 0.5 miles, continuing to  
28

1 parallel Alexis Lane. From there, the Project would be routed 0.05 miles south, then 0.15  
2 miles east, and then 0.07 miles southeast until it reaches the Point of Interconnection, the  
3 Pinal Central Substation.

4 The final right-of-way width for the Project within the Project Corridor will be up  
5 to 100 feet.

#### 6 CONDITIONS

7 This Certificate is granted upon the following conditions:

8 1. This authorization to construct the Project shall expire ten (10) years from  
9 the date this Certificate is approved by the Arizona Corporation Commission, with or  
10 without modification. Construction of the Project shall be complete, such that the Project  
11 is in service within this ten-year timeframe. However, prior to the expiration of the time  
12 period, the Applicant may request that the Commission extend the time limitation. [Case  
13 224]

14 2. In the event the Project requires an extension of the term(s) of this Certificate  
15 prior to completion of construction, the Applicant shall file such time extension request at  
16 least one hundred and eighty (180) days prior to the expiration of the Certificate. The  
17 Applicant shall use reasonable means to promptly notify the City of Coolidge, the Board  
18 of Supervisors of ~~Coeonino~~Pinal County, all landowners and residents within a five (5)  
19 mile radius of the centerline of the Project, all persons who made public comment at this  
20 proceeding who provided a mailing or email address, and all parties to this proceeding.  
21 The notification provided will include the request and the date, time, and place of the  
22 hearing or open meetings during which the Commission will consider the request for  
23 extension. Notification shall be no more than three (3) business days after the Applicant is  
24 made aware of the hearing date or the open meeting date. [Case 224]

25 3. During the development, construction, operation, maintenance and  
26 reclamation of the Project, the Applicant shall comply with all existing applicable air and  
27 water pollution control standards and regulations, and with all existing applicable statutes,  
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1 ordinances, master plans and regulations of any governmental entity having jurisdiction,  
2 including, but not limited to, the United States of America, the State of Arizona,  
3 ~~Coeconino~~Pinal County, the City of Coolidge, and their agencies and subdivisions,  
4 including but not limited to the following:

- 5 a. All applicable land use regulations;
- 6 b. All applicable zoning stipulations and conditions, including but not  
7 limited to landscaping and dust control requirements;
- 8 c. All applicable water use, discharge and/or disposal requirements of  
9 the Arizona Department of Water Resources and the Arizona  
10 Department of Environmental Quality;
- 11 d. All applicable noise control standards; and
- 12 e. All applicable regulations governing storage and handling of  
13 hazardous chemicals and petroleum products.

14 4. The Applicant shall obtain all approvals and permits necessary to construct,  
15 operate and maintain the Project required by any governmental entity having jurisdiction  
16 including, but not limited to, the United States of America, the State of Arizona,  
17 ~~Coeconino~~Pinal County, the City of Coolidge, and their agencies and subdivisions. ~~[Case~~  
18 224]

19 5. The Applicant shall comply with the Arizona Game and Fish Department  
20 (“AGFD”) guidelines for handling protected animal species, should any be encountered  
21 during construction and operation of the Project, and shall consult with AGFD or U.S.  
22 Fish and Wildlife Service, as appropriate, on other issues concerning wildlife. ~~[Case-224]~~

23 6. The Applicant shall design the Project's interconnection facilities to  
24 incorporate reasonable measures to minimize electrocution of and impacts to avian  
25 species in accordance with the Applicant's avian protection program. Such measures will  
26 be accomplished through incorporation of Avian Power Line Interaction Committee  
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1 guidelines set forth in the current versions of *Suggested Practices for Avian Protection on*  
2 *Power Lines and Reducing Avian Collisions with Power Lines* manuals. [\[Case 224\]](#)

3 7. The Applicant shall consult the State Historic Preservation Office (“SHPO”)  
4 with respect to cultural resources. The Applicant will complete a Class III cultural  
5 inventory of the portions of the final right-of-way that have not been previously  
6 adequately surveyed to identify and evaluate the cultural resources that may be present. If  
7 any archaeological, paleontological, or historical sites or a significant cultural object is  
8 discovered on state, county or municipal land during the construction or operation of the  
9 Project, the Applicant or its representative in charge shall promptly report the discovery to  
10 the Director of the Arizona State Museum (“ASM”), and in consultation with the Director,  
11 shall immediately take all reasonable steps to secure and maintain the preservation of the  
12 discovery as required by A.R.S. § 41-844. [\[Case 224\]](#)

13 8. The Applicant shall comply with the notice and salvage requirements of the  
14 Arizona Native Plant Law (A.R.S. §§ 3-901 *et seq.*) and shall, to the extent feasible,  
15 minimize the destruction of native plants during the construction and operation of the  
16 Project. [\[Case 224\]](#)

17 9. The Applicant shall make every reasonable effort to promptly investigate,  
18 identify and correct, on a case-specific basis, all complaints of interference with radio or  
19 television signals from operation of the Project addressed in this Certificate and where  
20 such interference is caused by the Project take reasonable measures to mitigate such  
21 interference. The Applicant shall maintain written records for a period of five (5) years of  
22 all complaints of radio or television interference attributable to operations, together with  
23 the corrective action taken in response to each complaint. All complaints shall be recorded  
24 to include notation on the corrective action taken. Complaints not leading to a specific  
25 action or for which there was no resolution shall be noted and explained. Upon request,  
26 the written records shall be provided to the Staff of the Commission. The Applicant shall  
27 respond to complaints and implement appropriate mitigation measures. In addition, the  
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1 Project shall be evaluated on a regular basis so that damaged insulators or other line  
2 materials that could cause interference are repaired or replaced in a timely manner. ~~[Case~~  
3 ~~224]~~

4 10. If human remains and/or funerary objects are encountered during the course  
5 of any ground-disturbing activities related to the construction or maintenance of the  
6 Project, the Applicant shall cease work on the affected area of the Project and notify the  
7 Director of the ASM as required by A.R.S. § 41-865 for private land, or as required by  
8 A.R.S. § 41-844 for state, county, or municipal lands. ~~[Case-224]~~

9 11. Within one hundred twenty (120) days of the Commission's decision  
10 approving this Certificate, the Applicant shall post signs in or near public rights-of-way,  
11 to the extent authorized by law, reasonably adjacent to the Project giving notice of the  
12 Project. Such signage shall be no smaller than a roadway sign. The signs shall advise:

- 13 a. Future site of the Project;
- 14 b. A phone number and website for public information regarding the  
15 Project; and
- 16 c. Refer the Public to the Docket.

17 Such signs shall be inspected at least once annually and, if necessary, be repaired  
18 or replaced, and removed at the completion of construction.

19 The Applicant shall make every reasonable effort to communicate the decision  
20 either approving or disapproving the Certificate in digital media. ~~[Case-224]~~

21 12. At least ninety (90) days before construction commences on the Project, the  
22 Applicant shall provide the Board of Supervisors for ~~Coeconino~~Pinal County, the City of  
23 Coolidge, and known builders and developers who are building upon or developing land  
24 within one (1) mile of the of the centerline of the Project with a written description,  
25 including the approximate height and width measurements of all structure types, of the  
26 Project. The written description shall identify the location of the Project and contain a  
27 pictorial depiction of the facilities being constructed. The Applicant shall also encourage  
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1 the developers and builders to include this information in their disclosure statements.  
2 Upon approval of this Certificate by the Commission, the Applicant may commence  
3 construction of the Project. [Case 224]

4 13. The Applicant shall use non-specular conductor and non-reflective surfaces  
5 for the transmission line structures on the Project. [Case 224]

6 14. The Applicant shall be responsible for arranging that all field personnel  
7 involved in the Project receive training as to proper ingress, egress, and on-site working  
8 protocol for environmentally sensitive areas and activities. Contractors employing such  
9 field personnel shall maintain records documenting that the personnel have received such  
10 training. [Case 224]

11 15. The Applicant shall follow the most current Western Electricity  
12 Coordinating Council (“WECC”) and North American Electric Reliability Corporation  
13 (“NERC”) planning standards, as approved by the Federal Energy Regulatory  
14 Commission (“FERC”), National Electrical Safety Code (“NESC”) standards, and Federal  
15 Aviation Administration (“FAA”) regulations. [Case 224]

16 16. The Applicant shall participate in good faith in state and regional  
17 transmission study forums to coordinate transmission expansion plans related to the  
18 Project and to resolve transmission constraints in a timely manner. [Case 224]

19 17. When Project facilities are located parallel to and within one hundred (100)  
20 feet of any existing natural gas or hazardous pipeline, the Applicant shall:

- 21 a. Ensure grounding and cathodic protection studies are performed to  
22 show that the Project's location parallel to and within one hundred  
23 (100) feet of such pipeline results in no material adverse impacts to  
24 the pipeline or to public safety when both the pipeline and the Project  
25 are in operation. The Applicant shall take appropriate steps to ensure  
26 that any material adverse impacts are mitigated. The Applicant shall  
27 provide to Staff of the Commission, and file with Docket Control, a  
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copy of the studies performed and additional mitigation, if any, that was implemented as part of its annual compliance-certification letter; and

- b. Ensure that studies are performed simulating an outage of the Project that may be caused by the collocation of the Project parallel to and within one hundred (100) feet of the existing natural gas or hazardous liquid pipeline. The studies should either: (a) show that such simulated outage does not result in customer outages; or (b) include operating plans to minimize any resulting customer outages. The Applicant shall provide a copy of the study results to Staff of the Commission and file them with Docket Control as part of the Applicant's annual compliance certification letter. [Case 224]

18. The designation of the corridor in this Certificate, as shown in Exhibit A, does not authorize a right-of-way greater than 100250 feet wide for the transmission line nor does it grant the applicant exclusive rights within the corridor outside of the final designated transmission right-of-way. [Case 224]

19. The Applicant shall submit a compliance certification letter annually, identifying progress made with respect to each condition contained in this Certificate, including which conditions have been met. The letter shall be submitted to Commission's Docket Control commencing on ~~December~~August 1, 2024. Attached to each certification letter shall be documentation explaining how compliance with each condition was achieved. Copies of each letter, along with the corresponding documentation, shall be submitted to the Arizona Attorney General's Office. With respect to the Project, the requirement for the compliance letter shall expire on the date the Project is placed into operation. Notification of such filing with Docket Control shall be made to the Board of Supervisors for ~~Coeconino~~Pinal County, the City of Coolidge, all parties to this Docket, and all parties who made a limited appearance in this Docket. [Case 224]

1           20. The Applicant shall provide a copy of this Certificate to the Board of  
2 Supervisors for ~~Coeconino~~Pinal County and the City of Coolidge. ~~{Case 224}~~

3           21. Any transfer or assignment of this Certificate shall require the assignee or  
4 successor to assume, in writing, all responsibilities of the Applicant listed in this  
5 Certificate and its conditions as required by A.R.S. § 40-360.08(A) and R14-3-213(F) of  
6 the Arizona Administrative Code. ~~{Case 224}~~

7           22. In the event the Applicant, its assignee, or successor, seeks to modify the  
8 Certificate's terms at the Commission, it shall provide copies of such request to the Board  
9 of Supervisors for ~~Coeconino~~Pinal County, the City of Coolidge, all parties to this Docket,  
10 and all parties who made a limited appearance in this Docket. ~~{Case 224}~~

11           23. The Certificate Conditions shall be binding on the Applicant, its successors,  
12 assignee(s) and transferees and any affiliates, agents, or lessees of the Applicant who have  
13 a contractual relationship with the Applicant concerning the construction, operation,  
14 maintenance or reclamation of the Project. The Applicant shall provide in any  
15 agreement(s) or lease(s) pertaining to the Project that the contracting parties and/or  
16 lessee(s) shall be responsible for compliance with the Conditions set forth herein, and the  
17 Applicant's responsibilities with respect to compliance with such Conditions shall not  
18 cease or be abated by reason of the fact that the Applicant is not in control of or  
19 responsible for operation and maintenance of the Project facilities. ~~{Case 224}~~

20                           **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

21           This Certificate incorporates the following Findings of Fact and Conclusions of  
22 Law:

23           1. The Project aids the state and the southwest region of the United States in  
24 meeting the need for an adequate, economical, and reliable supply of renewable electric  
25 power.

26           2. When constructed in compliance with the conditions imposed in this  
27 Certificate, the Project aids the state, preserving a safe and reliable electric transmission  
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1 system.

2 3. During the course of the hearing, the Committee considered evidence on the  
3 environmental compatibility of the Project as required by A.R.S. § 40-360 *et seq.*

4 4. The Project and the conditions placed on the Project in this Certificate  
5 effectively minimize the impact of the Project on the environment and ecology of the  
6 state.

7 5. The conditions placed on the Project in this Certificate resolve matters  
8 concerning balancing the need for the Project with its impact on the environment and  
9 ecology of the state arising during the course of the proceedings, and, as such, serve as  
10 findings and conclusions on such matters.

11 6. The Project is in the public interest because the Project's contribution to  
12 meeting the need for an adequate, economical, and reliable supply of electric power  
13 outweighs the minimized impact of the Project on the environment and ecology of the  
14 state.

15 7. The Project substation is not jurisdictional because the definition of a  
16 "transmission line" under A.R.S. § 40-360(10) only includes "new switchyards to be used  
17 therewith", not substations.

18 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2023.

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THE ARIZONA POWER PLANT AND  
TRANSMISSION LINE SITING COMMITTEE

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By: \_\_\_\_\_  
Adam Stafford, Chairman

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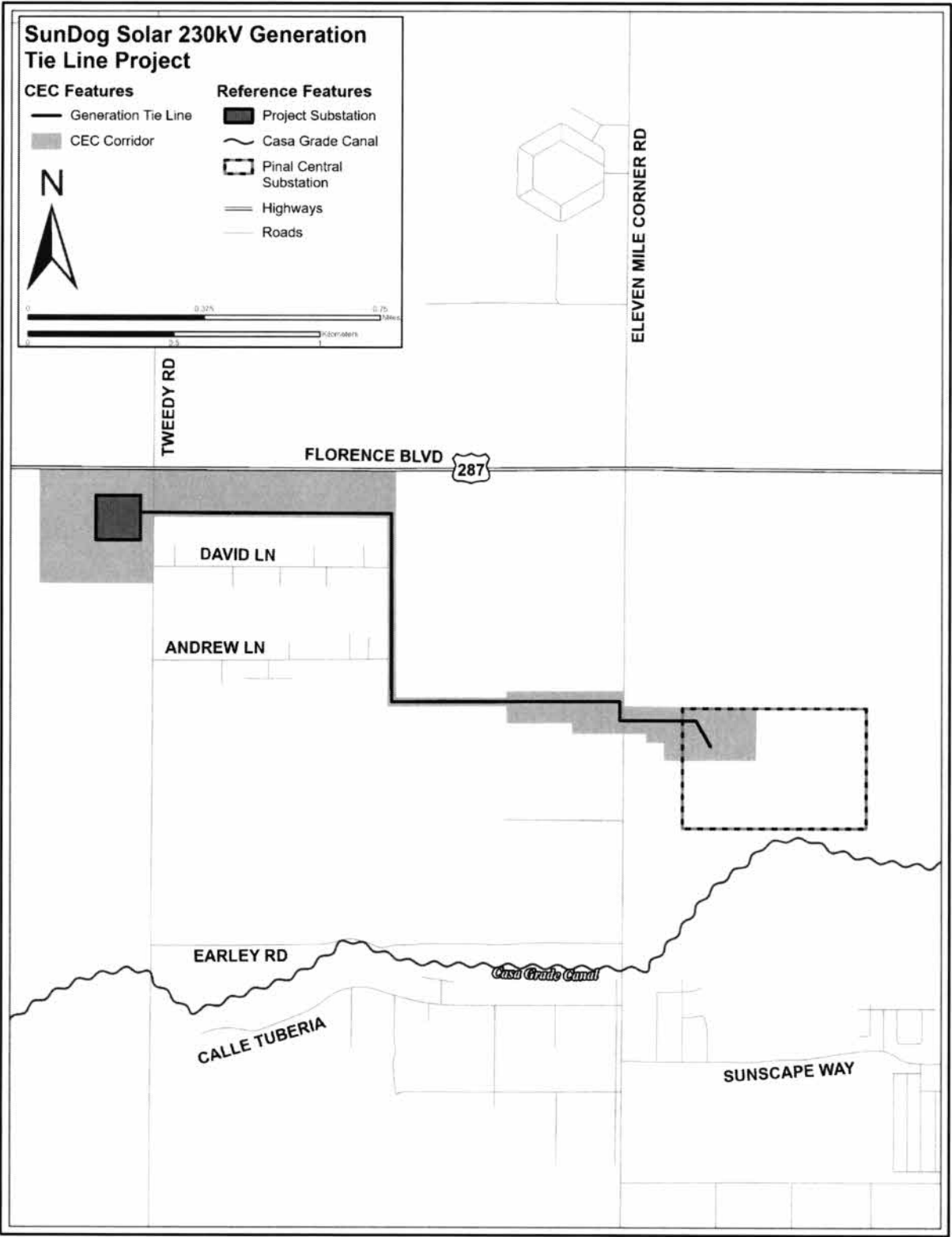
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**EXHIBIT A**



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**BEFORE THE ARIZONA POWER PLANT  
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DOCKET NO.: L-21284A-23-0335-00229

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**CERTIFICATE OF  
ENVIRONMENTAL  
COMPATIBILITY**

**A. INTRODUCTION**

Pursuant to notice given as provided by law, the Arizona Power Plant and Transmission Line Siting Committee ("Committee") held public hearings on February 5-6, 2024, in Pinal County, in conformance with the requirements of the Arizona Revised Statutes ("A.R.S.") § 40-360 et seq. for the purpose of receiving evidence and deliberating on the December 20, 2023 Application of SunDog Energy Center LLC ("Applicant") for a Certificate of Environmental Compatibility ("Certificate") in the above-captioned case.

The following members and designees of members of the Committee were present at one or more of the hearing days for the evidentiary presentations, public comment, and/or for the deliberations:

Adam Stafford	Chairman, Designee for Arizona Attorney General
	Kris Mayes
Gabby Mercer	Designee of the Chairman, Arizona Corporation Commission ("Commission")
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Department of Commerce

Scott Somers Appointed Member, representing cities and towns

David Kryder Appointed Member, representing agricultural interests

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The Applicant was represented by Bert Acken of Acken Law and Sarah A. Noe of Ballard Spahr LLP. No parties requested intervention pursuant to A.R.S. § 40-360.05.

At the conclusion of the hearing, the Committee, after considering the (i) Application, (ii) evidence, testimony, and exhibits presented by the Applicant, and (iii) comments of the public, and being advised of the legal requirements of A.R.S. §§ 40-360 through 40-360.13, upon motion duly made and seconded, voted to , to grant Applicant, its successors and assigns, this Certificate for construction of the SunDog Solar 230kV Generation Tie Line Project ("Project") as described below.

**B. PROJECT DESCRIPTION**

The Project consists of an approximately 1.7-mile 230 kV transmission line and associated interconnection facilities to interconnect the Applicant's planned energy facilities (the non-jurisdictional "Solar Energy Station") to the regional electrical transmission grid at the Pinal Central Substation in the City of Coolidge, Pinal County.

All Project facilities will be located in a variable-width corridor as shown in **Exhibit A** (the "Project Corridor"). The Project will originate at the non-jurisdictional Project Substation proposed to be located in the northeast quarter of Section 26, Township 6 South, Range 7 East. From the Project Substation, the Project will be routed east for approximately 0.6 miles, then turn south for approximately 0.5 miles, paralleling Alexis Lane. From there, the Project is routed east for approximately 0.5 miles, continuing to parallel Alexis Lane. From there, the Project would be routed 0.05 miles south, then 0.15

1 miles east, and then 0.07 miles southeast until it reaches the Point of Interconnection, the  
2 Pinal Central Substation.

3 The final right-of-way width for the Project within the Project Corridor will be up  
4 to 100 feet.

5 **CONDITIONS**

6 This Certificate is granted upon the following conditions:

7 1. This authorization to construct the Project shall expire ten (10) years from  
8 the date this Certificate is approved by the Arizona Corporation Commission, with or  
9 without modification. Construction of the Project shall be complete, such that the Project  
10 is in service within this ten-year timeframe. However, prior to the expiration of the time  
11 period, the Applicant may request that the Commission extend the time limitation.

12 2. In the event the Project requires an extension of the term(s) of this  
13 Certificate prior to completion of construction, the Applicant shall file such time  
14 extension request at least one hundred and eighty (180) days prior to the expiration of the  
15 Certificate. The Applicant shall use reasonable means to promptly notify the City of  
16 Coolidge, the Board of Supervisors of Pinal County, all landowners and residents within a  
17 five (5) mile radius of the centerline of the Project, all persons who made public comment  
18 at this proceeding who provided a mailing or email address, and all parties to this  
19 proceeding. The notification provided will include the request and the date, time, and  
20 place of the hearing or open meetings during which the Commission will consider the  
21 request for extension. Notification shall be no more than three (3) business days after the  
22 Applicant is made aware of the hearing date or the open meeting date.

23 3. During the development, construction, operation, maintenance and  
24 reclamation of the Project, the Applicant shall comply with all existing applicable air and  
25 water pollution control standards and regulations, and with all existing applicable statutes,  
26 ordinances, master plans and regulations of any governmental entity having jurisdiction,  
27 including, but not limited to, the United States of America, the State of Arizona, Pinal  
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1 County, the City of Coolidge, and their agencies and subdivisions, including but not  
2 limited to the following:

- 3 a. All applicable land use regulations;
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5 limited to landscaping and dust control requirements;
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7 the Arizona Department of Water Resources and the Arizona  
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11 hazardous chemicals and petroleum products.

12 4. The Applicant shall obtain all approvals and permits necessary to construct,  
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24 guidelines set forth in the current versions of *Suggested Practices for Avian Protection on*  
25 *Power Lines* and *Reducing Avian Collisions with Power Lines* manuals.

26 7. The Applicant shall consult the State Historic Preservation Office (“SHPO”)  
27 with respect to cultural resources. If any archaeological, paleontological, or historical sites  
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1 or any significant cultural objects are discovered during the construction or operation of  
2 the Project, the Applicant or its representative in charge shall promptly report the  
3 discovery to the Director of the Arizona State Museum (“ASM”), and in consultation with  
4 the Director, shall immediately take all reasonable steps to secure and maintain the  
5 preservation of the discovery as required by A.R.S. § 41-844. Additionally, the Applicant  
6 shall complete a Class III cultural resources inventory of the portions of the Project right-  
7 of-way that have not been previously surveyed to modern standards. If any  
8 archaeological, paleontological, or historical properties are encountered, the inventory  
9 shall provide recommendations on how to mitigate any adverse effects on those historic  
10 properties. Finally, to mitigate potential effects on site AZ AA:2:284(ASM), any ground  
11 disturbance within 50 feet of the site boundary shall be monitored by a qualified  
12 archaeologist. If ground disturbance within the site is necessary, additional data recovery  
13 shall occur within the Project footprint prior to construction, excluding any areas that have  
14 been previously investigated.

15 8. The Applicant shall comply with the notice and salvage requirements of the  
16 Arizona Native Plant Law (A.R.S. §§ 3-901 *et seq.*) and shall, to the extent feasible,  
17 minimize the destruction of native plants during the construction and operation of the  
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4 materials that could cause interference are repaired or replaced in a timely manner.

5 10. If human remains and/or funerary objects are encountered during the course  
6 of any ground-disturbing activities related to the construction or maintenance of the  
7 Project, the Applicant shall cease work on the affected area of the Project and notify the  
8 Director of the ASM as required by A.R.S. § 41-865 for private land, or as required by  
9 A.R.S. § 41-844 for state, county, or municipal lands.

10 11. Within one hundred twenty (120) days of the Commission's decision  
11 approving this Certificate, the Applicant shall post signs in or near public rights-of-way,  
12 to the extent authorized by law, reasonably adjacent to the Project giving notice of the  
13 Project. Such signage shall be no smaller than a roadway sign. The signs shall advise:

- 14 a. Future site of the Project;
- 15 b. A phone number and website for public information regarding the  
16 Project; and
- 17 c. Refer the Public to the Docket.

18 Such signs shall be inspected at least once annually and, if necessary, be repaired  
19 or replaced, and removed at the completion of construction.

20 The Applicant shall make every reasonable effort to communicate the decision  
21 either approving or disapproving the Certificate in digital media.

22 12. At least ninety (90) days before construction commences on the Project, the  
23 Applicant shall provide the Board of Supervisors for Pinal County, the City of Coolidge,  
24 and known builders and developers who are building upon or developing land within one  
25 (1) mile of the of the centerline of the Project with a written description, including the  
26 approximate height and width measurements of all structure types, of the Project. The  
27 written description shall identify the location of the Project and contain a pictorial  
28

1 depiction of the facilities being constructed. The Applicant shall also encourage the  
2 developers and builders to include this information in their disclosure statements. Upon  
3 approval of this Certificate by the Commission, the Applicant may commence  
4 construction of the Project.

5 13. The Applicant shall use non-specular conductor and non-reflective surfaces  
6 for the transmission line structures on the Project.

7 14. The Applicant shall be responsible for arranging that all field personnel  
8 involved in the Project receive training as to proper ingress, egress, and on-site working  
9 protocol for environmentally sensitive areas and activities. Contractors employing such  
10 field personnel shall maintain records documenting that the personnel have received such  
11 training.

12 15. The Applicant shall follow the most current Western Electricity  
13 Coordinating Council ("WECC") and North American Electric Reliability Corporation  
14 ("NERC") planning standards, as approved by the Federal Energy Regulatory  
15 Commission ("FERC"), National Electrical Safety Code ("NESC") standards, and Federal  
16 Aviation Administration ("FAA") regulations.

17 16. The Applicant shall participate in good faith in state and regional  
18 transmission study forums to coordinate transmission expansion plans related to the  
19 Project and to resolve transmission constraints in a timely manner.

20 17. When Project facilities are located parallel to and within one hundred (100)  
21 feet of any existing natural gas or hazardous pipeline, the Applicant shall:

- 22 a. Ensure grounding and cathodic protection studies are performed to  
23 show that the Project's location parallel to and within one hundred  
24 (100) feet of such pipeline results in no material adverse impacts to  
25 the pipeline or to public safety when both the pipeline and the Project  
26 are in operation. The Applicant shall take appropriate steps to ensure  
27 that any material adverse impacts are mitigated. The Applicant shall  
28

1 provide to Staff of the Commission, and file with Docket Control, a  
2 copy of the studies performed and additional mitigation, if any, that  
3 was implemented as part of its annual compliance-certification letter;  
4 and

- 5 b. Ensure that studies are performed simulating an outage of the Project  
6 that may be caused by the collocation of the Project parallel to and  
7 within one hundred (100) feet of the existing natural gas or hazardous  
8 liquid pipeline. The studies should either: (a) show that such  
9 simulated outage does not result in customer outages; or (b) include  
10 operating plans to minimize any resulting customer outages. The  
11 Applicant shall provide a copy of the study results to Staff of the  
12 Commission and file them with Docket Control as part of the  
13 Applicant's annual compliance certification letter.

14 18. The designation of the corridor in this Certificate, as shown in Exhibit A,  
15 does not authorize a right-of-way greater than 100 feet wide for the transmission line nor  
16 does it grant the applicant exclusive rights within the corridor outside of the final  
17 designated transmission right-of-way.

18 19. The Applicant shall submit a compliance certification letter annually,  
19 identifying progress made with respect to each condition contained in this Certificate,  
20 including which conditions have been met. The letter shall be submitted to Commission's  
21 Docket Control commencing on August 1, 2025. Attached to each certification letter shall  
22 be documentation explaining how compliance with each condition was achieved. Copies  
23 of each letter, along with the corresponding documentation, shall be submitted to the  
24 Arizona Attorney General's Office. With respect to the Project, the requirement for the  
25 compliance letter shall expire on the date the Project is placed into operation. Notification  
26 of such filing with Docket Control shall be made to the Board of Supervisors for Pinal  
27  
28

1 County, the City of Coolidge, all parties to this Docket, and all parties who made a limited  
2 appearance in this Docket.

3 20. The Applicant shall provide a copy of this Certificate to the Board of  
4 Supervisors for Pinal County and the City of Coolidge.

5 21. Any transfer or assignment of this Certificate shall require the assignee or  
6 successor to assume, in writing, all responsibilities of the Applicant listed in this  
7 Certificate and its conditions as required by A.R.S. § 40-360.08(A) and R14-3-213(F) of  
8 the Arizona Administrative Code.

9 22. In the event the Applicant, its assignee, or successor, seeks to modify the  
10 Certificate's terms at the Commission, it shall provide copies of such request to the Board  
11 of Supervisors for Pinal County, the City of Coolidge, all parties to this Docket, and all  
12 parties who made a limited appearance in this Docket.

13 23. The Certificate Conditions shall be binding on the Applicant, its successors,  
14 assignee(s) and transferees and any affiliates, agents, or lessees of the Applicant who have  
15 a contractual relationship with the Applicant concerning the construction, operation,  
16 maintenance or reclamation of the Project. The Applicant shall provide in any  
17 agreement(s) or lease(s) pertaining to the Project that the contracting parties and/or  
18 lessee(s) shall be responsible for compliance with the Conditions set forth herein, and the  
19 Applicant's responsibilities with respect to compliance with such Conditions shall not  
20 cease or be abated by reason of the fact that the Applicant is not in control of or  
21 responsible for operation and maintenance of the Project facilities.

22 **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

23 This Certificate incorporates the following Findings of Fact and Conclusions of  
24 Law:

25 1. The Project aids the state and the southwest region of the United States in  
26 meeting the need for an adequate, economical, and reliable supply of renewable electric  
27 power.  
28

1           2.     When constructed in compliance with the conditions imposed in this  
2 Certificate, the Project aids the state, preserving a safe and reliable electric transmission  
3 system.

4           3.     During the course of the hearing, the Committee considered evidence on the  
5 environmental compatibility of the Project as required by A.R.S. § 40-360 *et seq.*

6           4.     The Project and the conditions placed on the Project in this Certificate  
7 effectively minimize the impact of the Project on the environment and ecology of the  
8 state.

9           5.     The conditions placed on the Project in this Certificate resolve matters  
10 concerning balancing the need for the Project with its impact on the environment and  
11 ecology of the state arising during the course of the proceedings, and, as such, serve as  
12 findings and conclusions on such matters.

13          6.     The Project is in the public interest because the Project’s contribution to  
14 meeting the need for an adequate, economical, and reliable supply of electric power  
15 outweighs the minimized impact of the Project on the environment and ecology of the  
16 state.

17          7.     The Project substation is not jurisdictional because the definition of a  
18 “transmission line” under A.R.S. § 40-360(10) only includes “new switchyards to be used  
19 therewith”, not substations.

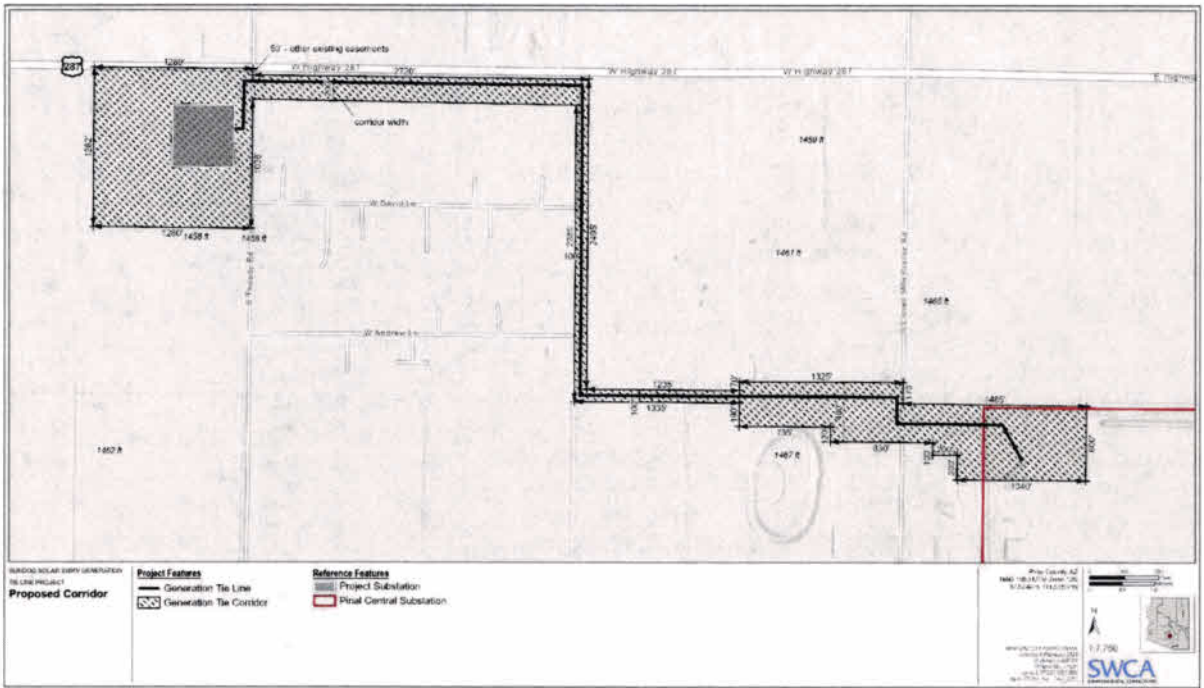
20                 DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2024.

22                                     THE ARIZONA POWER PLANT AND  
23                                     TRANSMISSION LINE SITING COMMITTEE

24                                     By: \_\_\_\_\_  
25   Adam Stafford, Chairman

# **EXHIBIT A**





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3 Katie DeSpain, Devin Petry, and Colin Agner - for

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SD-1



**Application  
for a**

**Certificate of Environmental Compatibility**

**SunDog Solar 230kV  
Generation Tie Line Project**



Prepared for:

**State of Arizona  
Power Plant and Transmission Line Siting Committee**

Submitted by:

**SunDog Energy Center LLC**

**December 2023**

**Case No. TBD**

**SunDog Solar 230kV Generation Tie Line Project****Docket No. L-21284A-23-0335-00229****WITNESS SUMMARY**

of

**KATIE DESPAIN**

January 22, 2024

Ms. DeSpain is an Associate, Renewable Development at Invenergy LLC, the parent company of SunDog Energy Center LLC (SunDog) and the Applicant for the SunDog Solar 230kV Generation Tie Line Project (Project). She served as the project manager for this Project for SunDog as it relates to the Project Certificate of Environmental Compatibility (CEC). Her testimony will include a discussion of the Applicant and a Project overview, the Project proposed route, corridor, and right-of-way, and the public and stakeholder involvement conducted as part of the Project.



**SunDog Solar 230kV Generation Tie Line Project****Docket No. L-21284A-23-0335-00229****WITNESS SUMMARY**

of

**DEVIN PETRY**

January 22, 2024

Mr. Petry is a Strategic Growth Director at SWCA Environmental Consultants (SWCA), the environmental consultant retained by SunDog Energy Center LLC for the SunDog Solar 230kV Generation Tie Line Project (Project). He served as the project manager for this Project for SWCA as it relates to the Project Certificate of Environmental Compatibility (CEC). His testimony will include a discussion of the environmental studies conducted by SWCA and the results of those analyses as part of the Project CEC.

Mr. Petry will present his findings and conclusions with respect to applicant and notice requirements for the Project and an overview of the visual resources, cultural resources, and noise and interference environmental resources conducted for the Project. His testimony will include the presentation of photographic simulations and a virtual tour of the Project. Mr. Petry concludes that the Project as proposed conforms to all applicable jurisdictional management plans and is environmentally compatible.



**SunDog Solar 230kV Generation Tie Line Project****Docket No. L-21284A-23-0335-00229****WITNESS SUMMARY**

of

**COLIN AGNER**

January 22, 2024

Mr. Agner is an Environmental Planner and Project Manager at SWCA Environmental Consultants (SWCA), the environmental consultant retained by SunDog Energy Center LLC for the SunDog Solar 230kV Generation Tie Line Project (Project). He served as the assistant project manager for this Project for SWCA as it relates to the Project Certificate of Environmental Compatibility (CEC). His testimony will include a discussion of the environmental studies conducted by SWCA and the results of those analyses as part of the Project CEC.

Mr. Agner will present his findings and conclusions with respect to land uses and existing plans, biological resources, and recreation. Mr. Agner concludes that the Project as proposed conforms to all applicable jurisdictional management plans and is environmentally compatible.





SD-5

Eleven Mile  
Corner Rd

287

Laughlin Rd

Tweedy Rd

**Project Features**

- Generation Tie Line
- Generation Tie Corridor

**Reference Features**

- Roads
- Project Substation
- SunDog Energy Center
- Solar Facility
- Pinal Central Substation

Pinal County, AZ  
NAD 1983 UTM Zone 12N  
32.8748°N 111.5753°W



17,750

**SWCA**  
ENVIRONMENTAL CONSULTANTS

Base File: E:\Acad\GIS\Projects\...  
Drawing: 11142023...  
Layer: 7725012\_Corridor  
App: 7725012\_Sun\_Dog\_CEC





POLITICAL RALLY IN ARIZONA

Kennedy Jr. draws Biden, Trump voters united by distrust

By JON J. COOPER Associated Press

PHOENIX — Some voted for Donald Trump, others for Joe Biden. A few had never wanted anything to do with politics before they heard Robert F. Kennedy Jr. on a podcast or YouTube video.

Lined up outside a Phoenix wedding hall tucked between a freeway, a railroad track and a U-Haul rental center, the hundreds of people who turned out Wednesday to hear Kennedy speak shared little in common ideologically. What united them was a deep-seated distrust — of the media, of corporations and especially of the government — and a belief that Kennedy is the only person in politics willing to tell them the truth.

"I like that he talks to us like adults," said Gilbert Limon, a 48-year-old pharmacist from Phoenix. "He tells you the majority of what you need to know. When I feel like other politicians just give you bits and pieces to try to fit their agenda. I've had enough of that."

Voters are not enthusiastic about a Biden-Trump rematch, and alternatives like Kennedy or the No Labels third-party movement, which would typically be longshots, see an opening. Kennedy's appearance in a 2024 battleground state highlights how he could influence the election in ways that are tough to predict. Allies of both Trump and Biden have expressed concerns that Kennedy's independent bid could pull votes from their candidate in next year's expected general election rematch.

Candidates from outside the Republican and Democratic parties rarely make a splash, if they can make the ballot to begin with. But third-party candidates don't usually carry a famous last name like Kennedy's, or his existing network of supporters.

Kennedy made the stop in Phoenix as part of his laborious push to get access to the 2024 presidential ballot as an independent candidate. Each he figures will require him to collect at least a million signatures across the country. Aides mingled in the crowd, filling up his petitions to qualify in Arizona.

Ballot access for independent and minor-party candidates is an expensive and complicated process, with each state setting its own rules. Campaigns usually hire people to collect signatures and often need a small army of lawyers to challenge access rules and fight against others trying to keep the candidates off the ballot.

American Values 2024, a super PAC supporting Kennedy, has pledged to spend \$15 million to help him get on the ballot in 10 states. Kennedy secured a victory in Utah, where the lieutenant governor pushed back the deadline to qualify from January to March after Kennedy filed suit.

Kennedy is a member of one of the Democratic Party's most famous families — his father was the attorney general for his uncle, President John F. Kennedy. But he's more recently built closer ties to the far right, where his conspiratorial and isolationist views are at home.

Enriquez Porras, a 52-year-old physician from Phoenix, voted for Hillary Clinton in 2016 and Trump in 2020. She said she's torn about the third-party campaign. She'd like to vote for someone she believes in, like Kennedy, but also wants to make sure Biden loses and may vote strategically. "I don't want to be that person," Porras said, "but I feel like there's a lot at stake and that may just have to happen."



Independent presidential candidate Robert F. Kennedy Jr. speaks at a voter rally Wednesday in Phoenix.

taking action to identify misinformation, including about COVID-19 and COVID-19 vaccines.

Rigorous study and real-world evidence from hundreds of millions of administered shots prove that COVID-19 vaccines are safe and effective. Deaths caused by vaccination are extremely rare and the risks associated with not getting vaccinated

are far higher than the risks of vaccination.

Among the dozen Kennedy supporters who spoke to the AP in Phoenix, many share his view that corporations, especially drug companies, wield too much power.

Debra Sheetz first started paying attention to Kennedy when she was doing her own research on COVID-19 vac-

inations.

"I've been listening to him for the last several years," she said. "I was so interested when he decided to make this big leap into politics because he has a lot of good ideas. He can really speak to what people really care about."

Sheetz, 71, voted for Biden in 2020, she said sheepishly, because she found him to have "more balance, a little

more sanity" compared with Trump. But she was disillusioned by Biden's support for pandemic-era restrictions and what she sees as a loss of freedom to speak freely.

"We lost our First Amendment," said Sheetz, who lives in Ashland, Oregon, but has spent the past few years traveling the country in her RV. "The most important thing is the ability for free speech and free ideas to share. Other ways to look at things. If you lose that, authoritarianism is there."

Curt Eastin, a 65-year-old professional coach from Chandler, a Phoenix suburb, voted for Biden in 2020 but won't again. If Kennedy weren't running, he'd vote for Trump next year, he said. "I like that I can trust him. I think he's honest," he said. "And even if I don't agree with him, I know that he came to his conclusions honestly. I can't trust any of the other people."

Kennedy is keenly aware that his fans avoid the mainstream media, where journalists often flag the falsity of his vaccine claims, in favor of free-wheeling alternative sources online. He said he's drawing support especially from young people but struggling with people in his

own generation.

"The problem with the baby boomers, I think, is they get their news from MSNBC, Fox and CNN," he told the crowd in Phoenix, which responded with boos. "Whereas young people are getting their news from podcasts and other alternative sources."

Third-party or independent candidates rarely do well in presidential contests. Even the most successful recent example, Ross Perot in 1992, didn't win a single electoral vote despite winning 19% of the popular vote.

Sometimes, minor-party candidates will get enough votes that partisans will blame them for tipping the scales to elect the popular vote loser, like Ralph Nader in 2000 or Jill Stein in 2016, both Green Party candidates. "One of the biggest reasons I like him is because of his stance on partisanship in our House and our Senate, and I like how he wants to try and reunite both of them," said Michael Chacon, a 23-year-old student in Tempe who has never voted and still wasn't sure whether he will in 2024. "I think that's a really good idea. I think cooperation would go along way."

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF SUNDOG ENERGY CENTER LLC, IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES, SECTIONS 40-360, ET. SEQ., FOR CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE SUNDOG SOLAR 230KV GENERATION TIE LINE PROJECT LOCATED IN PINAL COUNTY, ARIZONA.

Docket No. : L-21284A-23-0335-00229 Case No. 229 NOTICE OF HEARING

A PUBLIC HEARING WILL BE HELD before the Arizona Power Plant and Transmission Line Siting Committee (Committee) regarding the Application of SunDog Energy Center LLC (Applicant) for a Certificate of Environmental Compatibility to authorize the SunDog Solar 230kV Generation Tie Line Project (Project). The Project includes an approximately 1.7-mile transmission line and associated interconnection facilities from the SunDog Solar Energy Center substation to the Pinal Central Substation. All Project components are located in Pinal County, Arizona. A general location map of the Project is attached as Exhibit A.

The hearing will be held at the Radisson Hotel Casa Grande, 777 N Pinal Avenue, Casa Grande, AZ, 85122. The hearing will be held on Monday, February 5, 2024, at 1:00 p.m. and will continue on Tuesday, February 6, 2024, and Wednesday, February 7, 2024, as necessary, beginning at 9:00 a.m. If any revisions to the hearing schedule are required, they will be noticed on the Project website at www.SunDogSolarEnergyCenter.com and on the Arizona Corporation Commission (ACC) website at https://www.azcc.gov/arizona-power-plant/meeting-schedule.

PUBLIC COMMENT WILL BE TAKEN IN A SPECIAL SESSION ON MONDAY, FEBRUARY 5, 2024, BEGINNING AT 5:30 PM, VIA TELEPHONE, ZOOM OR IN PERSON at the RADISSON HOTEL CASA GRANDE, 777 N PINAL AVENUE, CASA GRANDE, AZ 85122. PUBLIC COMMENT MAY BE TAKEN AT THE BEGINNING OF EACH HEARING DAY, OR AT OTHER TIMES DURING THE HEARING, AT THE DISCRETION OF THE CHAIRMAN OF THE COMMITTEE.

PLEASE BE ADVISED THAT ALL LOCAL AND STATE PUBLIC HEALTH AND SAFETY GUIDELINES WILL BE FOLLOWED DURING THE HEARING AND PUBLIC COMMENT SESSION. RESTRICTIONS ON PUBLIC ACCESS, SAFETY PROTOCOLS, AND REVISIONS TO THE HEARING SCHEDULE MAY OCCUR DUE TO PUBLIC HEALTH CONSIDERATIONS.

THE PUBLIC HAS THE OPTION TO WATCH THE HEARING ONLINE OR LISTEN TO THE HEARING VIA TELEPHONE. At least 24 hours in advance of the hearing, information regarding online and telephone hearing access, as well as any additional details regarding safety protocols or other revisions to the hearing schedule will be noticed on the Project website at www.SunDogSolarEnergyCenter.com. The Chairman may, at his discretion, recess the hearing to a time and place to be announced during the hearing, or to be determined after recess. The date, time, and place at which the hearing will be resumed will be posted on the above-noted Project and ACC websites. NOTE: NOTICE OF ANY SUCH RESUMED HEARING WILL BE GIVEN; HOWEVER, PUBLISHED NOTICE OF SUCH A RESUMED HEARING IS NOT REQUIRED.

If the Committee decides to conduct a tour, notice that includes a map and itinerary of such tour will be available at the hearing and posted on the Project and ACC websites. Members of the public may follow the Committee on the tour. During the tour, the Committee may hear testimony at stops on the tour concerning what is visible at stops and the relevance of the location and view to the Project. No other discussion or deliberation concerning the Application will occur during the tour. A court reporter or recording device will record any testimony taken on the tour for transcription. Public health and safety protocols specific for the tour will be included on the itinerary. If the Committee decides not to conduct a tour, the hearing will continue as scheduled.

A map of the Project site and detailed information about project facilities and technology are contained in the Application, which is available for inspection at the following locations:

- ACC Docket Control Center, Phoenix Office, located at 1200 West Washington Street, Suite 108, Phoenix, AZ 85007
The Project website: www.SunDogSolarEnergyCenter.com
Eloy Public Library, 1000 North Main Street, Eloy, AZ 85131
Coolidge Public Library, 160 West Central Avenue, Coolidge, AZ 85128

The Applicant will make available final copies of the pre-filing conference, pre-hearing conference and hearing transcripts at each of the above locations and website.

Each county, municipal government, and state agency interested in the Project that desires to be a party to the proceedings shall, not less than ten (10) days before the date set for the hearing, file a Notice of Intent to Become a Party with the Director of Utilities, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, AZ 85007.

Any domestic non-profit corporation or association formed in whole or in part to promote conservation or natural beauty, to protect the environment, personal health, or other biological values to preserve

historical sites, to promote consumer interests, to represent commercial and industrial groups, or to promote the orderly development of the area in which the Project is located desiring to become a party to the proceedings shall, not less than ten (10) days before the date set for the hearing, file Notice of Intent to Become a Party with the Director of Utilities, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, AZ 85007.

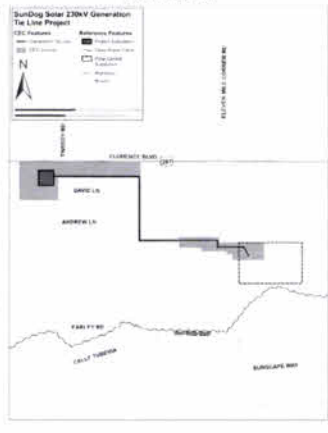
The Committee or the Chairman, at any time deemed appropriate, may make other persons parties to the proceedings. Any person may make a limited appearance at the hearing by filing a statement in writing with the Director of Utilities, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, AZ 85007, and the Chairman of the Committee at 2005 North Central Avenue, Phoenix, AZ 85007, not less than five (5) days before the date set for the hearing. A person making a limited appearance will not be a party or have the right to present testimony or cross-examine witnesses.

This proceeding governed by Arizona Revised Statutes (A.R.S.) §§ 40-360 to 40-360.13 and Arizona Administrative Code (AAC) R14-3-201 to R14-3-220. No substantive communication, not in the public record, may be made to any member of the Committee. The written decision of the Committee will be submitted to the ACC pursuant to A.R.S. § 40-360.07. Any person intending to be a party to the proceedings on the matter before the ACC must be a party to the proceedings before the Committee.

ORDERED This 21st day of December, 2023.

/s/Adam Stafford
Adam Stafford, Chairman
Arizona Power Plant and
Transmission Line Siting Committee
Assistant Attorney General

EXHIBIT A



## Best stories

From Page TVD1

that people can use it to put one step forward to leaving the past behind. It's humbling," Scott said.

Although his song "The Bottle" won the I Heart Radio Jack Daniel's Battle of the Bar Bands in 2021, "This Time" is perhaps his most popular, having garnered more than 5 million streams on various music platforms.

Written when Scott was incarcerated, "This Time" is about hope, not giving up and recovering from setbacks.

Singing the song can sometimes make him emotional, he said.

At a recent concert, performing prior to Parmelee at the Shindig at State Farm Stadium in Glendale in March, he said he could hardly get through the song without crying.

"I was looking at my daughter when singing it," Scott said. "I had to try not to break down. I think singing that song reminds me that there was a time only a few years ago, that something like this, having a singing career and having my family with me, didn't seem possible."

Scott was in prison in solitary confinement, alone with his thoughts, when he wrote the song.

"Everybody in prison has a 'this time' that they talk about. This time, they are going to figure it out. ... This time it's going to be different," he said. "The song is all about hoping for another chance, and of course giving thanks to God."

Scott grew up in Eloy, Casa Grande and Arizona City.

"I'd made my mistakes in the past. I battled with a drug problem and had some trouble with the law," Scott said. "I went to jail and paid my debt to society. When

## Shelters

From Page TVD3

to euthanize animals recently rely again on the practice to help control overpopulation. Some cities have required owners to spay or neuter their pets, but often such policies aren't enforced.

Around the country, shelters and advocates are working to reduce intakes and encourage more adoptions.

That includes expanding foster programs that send animals to temporary homes instead of shelters. Other programs ease the financial burden of owning a dog or a cat through pet food pantries and veterinary services like spay and neuter clinics.

Animal Care Centers of NYC, which runs New York City's public shelters, limited cat intakes to only the most urgent cases for several weeks this summer and similarly limited dog intakes for six weeks beginning Oct. 7. Many New York City shelters also were keeping dogs in offices, as well as hallways, to avoid having to euthanize them.

Last year Mohawk Hudson reduced the number of its contracts with municipalities to take in strays and has decided not to keep taking in pets surrendered from owners.

Increasing adoptions is especially crucial, argued Best Friends Animal Society CEO Julie Castle, saying that millions of people buy new pets each year even as hundreds of thousands of animals die in shelters.

"We know people are going to get pets, so let's go back to the basics of really marketing adoptions, because at the end of the day, we are in a competitive space with breeders and pet stores," Castle said.

The national animal welfare organization, which runs a sanctuary in Utah, partners with businesses and shelters and rescue groups to run adoption events around the country, where adoption fees are waived or reduced.

While some shelters have responded to the crush by adding more capacity, advocates believe a long-term solution has to confront the reasons why shelters are resorting to housing animals in their offices.

"People will say, 'Oh, can't you just build more kennels?'" Bouck said. "And we could fill those up in two seconds."



Rolida Khairalla/PinalCentral  
Linda Déman, left, helps a customer with a purchase at the Arizona Renaissance Festival near Gold Canyon.

I was out of jail. I was just grateful for the second chance to be a husband and a father."

## Renaissance Festival offers abundance of unusual shopping experiences

There are a host of unexpected sights and endless things to do on every street corner at the Arizona Renaissance Festival.

And in Fairhaven, the site in Gold Canyon where the festival is held every year, there are a lot of street corners.

From rows and rows of pubs, cafes, inns and other eateries serving up a range of good eats to the lines of entertainment booths, stages, stalls and shops that line the streets, there's no limit on what there is to do, see and eat at the festival.

The festival is well known for the abundance of entertainment it offers, from kooky characters that walk the streets to crowd at the tournament arena.

But the festival is also a buzzing hive for those who love unusual shopping

finds. It's home to a wealth of vendors who sell artisan and handcrafted goods that you just can't find in very many other places.

Take for example Pillows and Tapestry Hangings. This quaint little booth that's located not far from the King's Arena, where jousting tournaments are held, is run by Linda Déman, who's been handcrafting her own pillows and tapestries for decades.

Déman refers to herself as a "dreamstress" on her business card and has been selling her unique hand-

crafted goods at the Renaissance Festival in Arizona for 34 years.

## De Anza's famous route took him through Pinal County

The new Anza Trail Historic Park officially opened in Tucson in January, reigniting interest in the epic, 1,200-mile expedition led by Lt. Col. Juan Bautista de Anza in 1775.

Through the historic two-year journey, Anza led a group of hundreds of Spanish men, women and children from Sonora, Mexico, to the San Francisco Bay.

The route the travelers took passed through present-day Arizona and Pinal County and is part of the Juan Bautista de Anza National Historic Trail, which allows modern explorers to retrace the steps of the historic journey to imagine what Anza and the travelers may have seen along the way.

Much of the route can be traveled by car, as the route is paralleled to a highway. Other sections are best seen on horseback, bicycle or by foot.

Traveling through the Santa Cruz River Valley in Arizona, Anza and the group turned north near Pinal Peak in search of water.

With Pinal Peak as a backdrop, they camped west of what is now Pinal Peak State Park. The stop

was recorded in a diary kept by the priest traveling with the group.

The next day, the group continued on their journey, making a detour to survey the Casa Grande Ruins. They camped among the local Pima people.

"These Pima Indians of the Gila are gentle and of good heart," an Oct. 31, 1775, diary entry reads.

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Casa Grande, AZ 85122  
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## BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF SUNDOG ENERGY CENTER LLC, IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES, SECTIONS 40-360, ET SEQ., FOR CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE SUNDOG SOLAR 230KV GENERATION TIE LINE PROJECT LOCATED IN PINAL COUNTY, ARIZONA

Docket No. : L-21284A-23-0335-00229 Case No. 229 NOTICE OF HEARING

A PUBLIC HEARING WILL BE HELD before the Arizona Power Plant and Transmission Line Siting Committee (Committee) regarding the Application of SunDog Energy Center LLC (Applicant) for a Certificate of Environmental Compatibility to authorize the SunDog Solar 230kV Generation Tie Line Project (Project). The Project includes an approximately 1.7-mile transmission line and associated interconnection facilities from the SunDog Solar Energy Center substation to the Pinal Central Substation. All Project components are located in Pinal County, Arizona. A general location map of the Project is attached as Exhibit A.

The hearing will be held at the Radisson Hotel Casa Grande, 777 N Pinal Avenue, Casa Grande, AZ, 85122. The hearing will be held on Monday, February 5, 2024, at 1:00 p.m. and will continue on Tuesday, February 6, 2024, and Wednesday, February 7, 2024, as necessary, beginning at 9:00 a.m. If any revisions to the hearing schedule are required, they will be noticed on the Project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com) and on the Arizona Corporation Commission (ACC) website at <https://www.azcc.gov/arizona-power-plant/meeting-schedule>.

PUBLIC COMMENT WILL BE TAKEN IN A SPECIAL SESSION ON MONDAY, FEBRUARY 5, 2024, BEGINNING AT 5:30 PM, VIA TELEPHONE, ZOOM OR IN PERSON at the RADISSON HOTEL, CASA GRANDE, 777 N PINAL AVENUE, CASA GRANDE, AZ 85122. PUBLIC COMMENT MAY BE TAKEN AT THE BEGINNING OF EACH HEARING DAY, OR AT OTHER TIMES DURING THE HEARING, AT THE DISCRETION OF THE CHAIRMAN OF THE COMMITTEE.

PLEASE BE ADVISED THAT ALL LOCAL AND STATE PUBLIC HEALTH AND SAFETY GUIDELINES WILL BE FOLLOWED DURING THE HEARING AND PUBLIC COMMENT SESSION. RESTRICTIONS ON PUBLIC ACCESS, SAFETY PROTOCOLS, AND REVISIONS TO THE HEARING SCHEDULE MAY OCCUR DUE TO PUBLIC HEALTH CONSIDERATIONS.

THE PUBLIC HAS THE OPTION TO WATCH THE HEARING ONLINE OR LISTEN TO THE HEARING VIA TELEPHONE. At least 24 hours in advance of the hearing, information regarding online and telephone hearing access, as well as any additional details regarding safety protocols or other revisions to the hearing schedule will be noticed on the Project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com). The Chairman may, at his discretion, recess the hearing to a time and place to be announced during the hearing, or to be determined after recess. The date, time, and place at which the hearing will be resumed will be posted on the above-noted Project and ACC websites. NOTE: NOTICE OF ANY SUCH RESUMED HEARING WILL BE GIVEN; HOWEVER, PUBLISHED NOTICE OF SUCH A RESUMED HEARING IS NOT REQUIRED.

If the Committee decides to conduct a tour, notice that includes a map and itinerary of such tour will be available at the hearing and posted on the Project and ACC websites. Members of the public may follow the Committee on the tour. During the tour, the Committee may hear testimony at stops on the tour concerning what is visible at stops and the relevance of the location and views to the Project. No other discussion or deliberation concerning the Application will occur during the tour. A court reporter or recording device will record any testimony taken on the tour for transcription. Public health and safety protocols specific for the tour will be included on the itinerary. If the Committee decides not to conduct a tour, the hearing will continue as scheduled.

A map of the Project site and detailed information about project facilities and technology are contained in the Application, which is available for inspection at the following locations:

- ACC Docket Control Center, Phoenix Office, located at 1200 West Washington Street, Suite 108, Phoenix, AZ: 85007
- The Project website: [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com)
- Eloy Public Library, 1000 North Main Street, Eloy, AZ 85131
- Coolidge Public Library, 160 West Central Avenue, Coolidge, AZ 85128

The Applicant will make available final copies of the pre-filing conference, pre-hearing conference and hearing transcripts at each of the above locations and website.

Each county, municipal government, and state agency interested in the Project that desires to be a party to the proceedings shall, not less than ten (10) days before the date set for the hearing, file a Notice of Intent to Become a Party with the Director of Utilities, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, AZ 85007.

Any domestic non-profit corporation or association formed in whole or in part to promote conservation or natural beauty, to protect the environment, personal health, or other biological values to preserve

historical sites, to promote consumer interests, to represent commercial and industrial groups, or to promote the orderly development of the area in which the Project is located desiring to become a party to the proceedings shall, not less than ten (10) days before the date set for the hearing, file Notice of Intent to Become a Party with the Director of Utilities, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, AZ 85007.

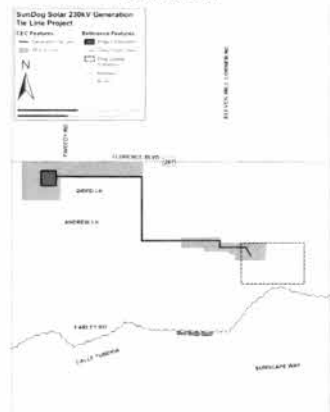
The Committee or the Chairman, at any time deemed appropriate, may make other persons parties to the proceedings. Any person may make a limited appearance at the hearing by filing a statement in writing with the Director of Utilities, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, AZ 85007, and the Chairman of the Committee at 2005 North Central Avenue, Phoenix, AZ 85007, not less than five (5) days before the date set for the hearing. A person making a limited appearance will not be a party or have the right to present testimony or cross-examine witnesses.

This proceeding governed by Arizona Revised Statutes (A.R.S.) §§ 40-360 to 40-360.13 and Arizona Administrative Code (A.A.C.) R14-3-201 to R14-3-220. No substantive communication, not in the public record, may be made to any member of the Committee. The written decision of the Committee will be submitted to the ACC pursuant to A.R.S. § 40-360.07. Any person intending to be a party to the proceedings on the matter before the ACC must be a party to the proceedings before the Committee.

ORDERED This 21st day of December, 2023.

/s/Adam Stafford  
Adam Stafford, Chairman  
Arizona Power Plant and  
Transmission Line Siting Committee  
Assistant Attorney General

## EXHIBIT A



STATE OF ARIZONA

SD-6

COUNTY OF PINAL

} ss.

**Affidavit of Publication**

**Kara K. Cooper**, first being duly sworn deposes and says: That he/she is a native born citizen of the United States of America, over 21 years of age, that I am an agent and/or publisher of the Casa Grande Dispatch, a newspaper published at Casa Grande, Pinal County, Arizona, Tuesday, Thursday, and Saturday of each week; that a notice, a full, true and complete printed copy of which is hereunto attached, was printed in the regular edition of said newspaper, and not in a supplement thereto, for ONE issue. The publications thereof having been on the following date:

**12/26/2023**

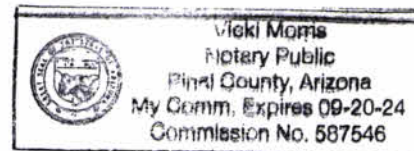
**CASA GRANDE DISPATCH**

By *Kara K. Cooper*  
agent and/or publisher of the Casa Grande Dispatch

Sworn to before me this *29th*  
day of *Dec.* A.D., *2023*

*Vicki Morris*

Notary Public in and for the County  
Of Pinal, State of Arizona



STATE OF ARIZONA

COUNTY OF PINAL

} ss.

**Affidavit of Publication**

**Kara K. Cooper**, first being duly sworn deposes and says: That he/she is a native born citizen of the United States of America, over 21 years of age, that I am an agent and/or publisher of the Tri-Valley Dispatch, a newspaper published at Casa Grande, Pinal County, Arizona, Thursday of each week; that a notice, a full, true and complete printed copy of which is hereunto attached, was printed in the regular edition of said newspaper, and not in a supplement thereto, for ONE issue. The publications thereof having been on the following date:

**12/28/2023**

**TRI-VALLEY DISPATCH**

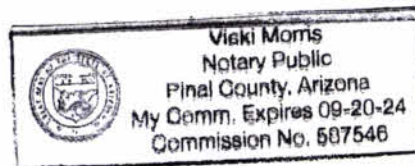
By *Kara K. Cooper*  
agent and/or publisher of the Tri-Valley Dispatch

Sworn to before me this *28th*

day of *Dec* A.D., *2023*

*Utchi Morris*

Notary Public in and for the County  
Of Pinal, State of Arizona



**Colin Agner**

---

**From:** Chad Price <cprice@EloyAZ.gov>  
**Sent:** Wednesday, January 3, 2024 9:16 AM  
**To:** Colin Agner; Paul Anchondo  
**Cc:** Devin Petry  
**Subject:** RE: Eloy Library Document Hosting Request - State Permit

Colin,

We did receive the CEC document and it is on display at our library. Let me know if you need anything else.

Thanks,

**Chad Price**

City of Eloy  
Community Services Manager  
100 E. 7<sup>th</sup> St.  
Eloy, AZ 85131  
(Main) 520 466-7351  
(Direct) 520 464-3431  
(Email) [cprice@eloyaz.gov](mailto:cprice@eloyaz.gov)  
(Website) [www.eloyaz.gov](http://www.eloyaz.gov)

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**From:** Colin Agner <cagner@swca.com>  
**Sent:** Tuesday, January 2, 2024 2:18 PM  
**To:** Paul Anchondo <panchondo@EloyAZ.gov>  
**Cc:** Chad Price <cprice@EloyAZ.gov>; Devin Petry <devin.petry@swca.com>  
**Subject:** RE: Eloy Library Document Hosting Request - State Permit

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Hi Paul-



I am just following up with you to see if Eloy received the CEC document okay and if it is on display at the library?

Thanks!!

-Colin

**Colin Agner, M.S.**  
Project Manager

**SWCA Environmental Consultants**  
343 West Franklin Street  
Tucson, Arizona 85701  
[cagner@swca.com](mailto:cagner@swca.com)  
P. 520-563-4424

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**From:** Paul Anchondo <[panchondo@EloyAZ.gov](mailto:panchondo@EloyAZ.gov)>  
**Sent:** Wednesday, December 20, 2023 2:23 PM  
**To:** Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>  
**Cc:** Chad Price <[cprice@EloyAZ.gov](mailto:cprice@EloyAZ.gov)>  
**Subject:** RE: Eloy Library Document Hosting Request - State Permit

Thanks for letting me know. We'll let you know when we have the doc on display.  
thx!

***Paul Anchondo***  
Community Services Director  
City of Eloy  
100 E 7<sup>th</sup> St  
Eloy, AZ 85131  
(520) 466-7351  
[panchondo@eloyaz.gov](mailto:panchondo@eloyaz.gov)  
web: [www.eloyaz.gov](http://www.eloyaz.gov)

**From:** Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>  
**Sent:** Wednesday, December 20, 2023 1:55 PM  
**To:** Paul Anchondo <[panchondo@EloyAZ.gov](mailto:panchondo@EloyAZ.gov)>  
**Subject:** RE: Eloy Library Document Hosting Request - State Permit

---

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---

Hi Paul-

The document has been shipped to the Eloy Public Library address. It showing an anticipated delivery date of 12/26/2023. If you could let me know when you've received it and it's on display, I would appreciate it!

Thank you!

-Colin Agner

**Colin Agner, M.S.**  
Project Manager

**SWCA Environmental Consultants**  
343 West Franklin Street  
Tucson, Arizona 85701  
[cagner@swca.com](mailto:cagner@swca.com)  
P. 520-563-4424

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**From:** Paul Anchondo <[panchondo@EloyAZ.gov](mailto:panchondo@EloyAZ.gov)>  
**Sent:** Monday, December 11, 2023 1:53 PM  
**To:** Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>  
**Subject:** RE: Eloy Library Document Hosting Request - State Permit

Sounds good Colin.  
Thx for the reminder!

***Paul Anchondo***  
Community Services Director  
City of Eloy  
100 E 7<sup>th</sup> St  
Eloy, AZ 85131  
(520) 466-7351  
[panchondo@eloyaz.gov](mailto:panchondo@eloyaz.gov)  
web: [www.eloyaz.gov](http://www.eloyaz.gov)

**From:** Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>  
**Sent:** Friday, December 1, 2023 1:00 PM  
**To:** Paul Anchondo <[panchondo@EloyAZ.gov](mailto:panchondo@EloyAZ.gov)>  
**Cc:** Devin Petry <[devin.petry@swca.com](mailto:devin.petry@swca.com)>  
**Subject:** RE: Eloy Library Document Hosting Request - State Permit

---

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---

Hi Paul-

I just wanted to send you a quick update because it has been some time since we last emailed. We are anticipating sending you the document on December 21<sup>st</sup>, 2023. I will send you a follow up once it is shipped, but I figured I would let you know.

Thanks!!

-Colin Agner

**Colin Agner, M.S.**  
Project Manager

**SWCA Environmental Consultants**

343 West Franklin Street  
Tucson, Arizona 85701  
[cagner@swca.com](mailto:cagner@swca.com)  
P. 520-563-4424

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**From:** Paul Anchondo <[panchondo@EloyAZ.gov](mailto:panchondo@EloyAZ.gov)>  
**Sent:** Thursday, October 12, 2023 1:00 PM  
**To:** Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>  
**Subject:** RE: Eloy Library Document Hosting Request - State Permit

Good afternoon Colin,  
We'd be happy to assist. I'll forward your email to our library staff so they are aware.  
Thx,

***Paul Anchondo***

Community Services Director  
City of Eloy  
100 E 7<sup>th</sup> St  
Eloy, AZ 85131  
(520) 466-7351  
[panchondo@eloyaz.gov](mailto:panchondo@eloyaz.gov)  
web: [www.eloyaz.gov](http://www.eloyaz.gov)

**From:** Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>  
**Sent:** Thursday, October 12, 2023 12:29 PM  
**To:** Paul Anchondo <[panchondo@EloyAZ.gov](mailto:panchondo@EloyAZ.gov)>  
**Subject:** Eloy Library Document Hosting Request - State Permit

---

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---

Hello Paul-

I am an environmental planner and project manager at SWCA Environmental Consultants. SWCA has prepared an environmental / state permitting document called a Certificate of Environmental Compatibility (CEC) for a transmission project in unincorporated Pinal County that isn't too far from Eloy, Arizona. This document is a part of an application required by the Arizona Corporation Commission (ACC) for certain high-voltage transmission lines. Public outreach is a huge part of the CEC process, and the ACC requires that the CEC be put on display for public review. I am emailing you to see if a single hard copy of the CEC document could be displayed at the Eloy Library? The project document is still being drafted, but we are anticipating that the hard copy would be in a single 1-inch binder.

If the library agrees to host this document, SWCA would mail the CEC hard copy to the library location via certified mail in late December and would alert you when the permitting process is completed. I would send you a follow up email



when the CEC document is sent if the library is willing to host this document, and if you are able to reply when you receive it and that is available and displayed that would be great! If you have any questions please feel free to contact me at the number or email address below.

Thank you for the consideration Paul!

-Colin Agner

**Colin Agner, M.S.**  
Project Manager

**SWCA Environmental Consultants**

343 West Franklin Street

Tucson, Arizona 85701

[cagner@swca.com](mailto:cagner@swca.com)

P. 520-563-4424



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**Colin Agner**

---

**From:** Joyce Baker <joyce.baker@pinal.gov>  
**Sent:** Tuesday, January 2, 2024 2:32 PM  
**To:** Colin Agner  
**Subject:** Re: Coolidge Library Document Hosting Request - State Permit

Colin,

I went to check on it last week and got interrupted. We received the binder and it is on display. However the rings of the binder are damaged so you can't easily turn the pages to read them. I don't have any spare binders but I'll order some so I can transfer it to a working binder. Did you want me to send you a picture to prove it is on display?

Thanks,  
**Joyce Baker, MLIS**  
Library Manager  
Coolidge Public Library  
160 W Central Ave  
Coolidge, AZ 85128  
520-723-6030 FAX: 520-723-7026

On Tue, Jan 2, 2024 at 2:19 PM Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)> wrote:

Hi Joyce-

I am just following up to see if the Coolidge library received the CEC document okay and if it is on display at the Coolidge library?

Thanks!!

-Colin

**Colin Agner, M.S.**

Project Manager

**SWCA Environmental Consultants**  
343 West Franklin Street

Tucson, Arizona 85701

[cagner@swca.com](mailto:cagner@swca.com)

P. 520-563-4424

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**From:** Joyce Baker <[joyce.baker@pinal.gov](mailto:joyce.baker@pinal.gov)>  
**Sent:** Friday, December 1, 2023 1:04 PM  
**To:** Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>  
**Cc:** [library@coolidgeaz.com](mailto:library@coolidgeaz.com); Devin Petry <[devin.petry@swca.com](mailto:devin.petry@swca.com)>  
**Subject:** Re: Coolidge Library Document Hosting Request - State Permit

Thank you for the update. We can still host the document here.

## Joyce Baker, MLIS

Library Manager

Coolidge Public Library

160 W Central Ave

Coolidge, AZ 85128

520-723-6030 FAX: 520-723-7026

On Fri, Dec 1, 2023 at 12:58 PM Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)> wrote:

Hi Joyce-

I just wanted to send you a quick update because it has been some time since we last emailed. We are anticipating sending you the document on December 21<sup>st</sup>, 2023. I will send you a follow up once it is shipped, but I figured I would let you know.

Thanks!!

-Colin Agner

**Colin Agner, M.S.**

Project Manager

**SWCA Environmental Consultants**

343 West Franklin Street

Tucson, Arizona 85701

[cagner@swca.com](mailto:cagner@swca.com)

P. 520-563-4424

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**From:** Joyce Baker <[joyce.baker@pinal.gov](mailto:joyce.baker@pinal.gov)>  
**Sent:** Friday, October 13, 2023 11:30 AM  
**To:** Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>  
**Cc:** [library@coolidgeaz.com](mailto:library@coolidgeaz.com)  
**Subject:** Re: Coolidge Library Document Hosting Request - State Permit

Yes, we can do that for you. Do you have an estimate about how large the document is? I just want to know how much space we should reserve for it.

**Joyce Baker, MLIS**

Library Manager

Coolidge Public Library

160 W Central Ave

Coolidge, AZ 85128

520-723-6030 FAX: 520-723-7026

On Thu, Oct 12, 2023 at 12:37 PM Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)> wrote:

Hello-

I am an environmental planner and project manager at SWCA Environmental Consultants. SWCA has prepared an environmental / state permitting document called a Certificate of Environmental Compatibility (CEC) for a transmission project in unincorporated Pinal County that isn't too far from Coolidge, Arizona. This document is a part of an application required by the Arizona Corporation Commission (ACC) for certain high-voltage transmission lines. Public outreach is a huge part of the CEC process, and the ACC requires that the CEC be put on display for public review. I am emailing you to see if a single hard copy of the CEC document could be displayed at the Coolidge Library? The project document is still being drafted, but we are anticipating that the hard copy would be in a single 1-inch binder.

If the library agrees to host this document, SWCA would mail the CEC hard copy to the library location via certified mail in late December and would alert you when the permitting process is completed. I would send you a follow up email when the CEC document is sent if the library is willing to host this document, and if you are able to reply when you receive it and that is available and displayed that would be great! If you have any questions please feel free to contact me at the number or email address below.

Thank you for the consideration!

-Colin Agner

**Colin Agner, M.S.**

Project Manager

**SWCA Environmental Consultants**  
343 West Franklin Street

Tucson, Arizona 85701

[cagner@swca.com](mailto:cagner@swca.com)

P. 520-563-4424



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**ORIGINAL**

1555 East Orangetwood Ave.  
Phoenix, Arizona 85020-5130



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602.266.9661 Fax  
877.266.6535 Toll Free  
www.glennic-reporting.com

SD-7 E000033083

**January 9, 2024**

TO: Docket Control  
Arizona Corporation Commission

**AFFIDAVIT OF SERVICE TO:**

Eloy Public Library  
1000 North Main Street  
Eloy, AZ 85131

Re: Hearing held before the Power Plant and Transmission Line Sitting Committee  
**Applicant/Project:** SunDog Energy Center LLC / 230kV Gen-Tie Project LSC 229  
**Docket No:** DOCKET NO. L-21284A-23-0335-00229

Transcript of **Prefiling Conference, held on 12/12/2023 via videoconference**

The above-referenced location is now in receipt of the reporter's transcript of proceedings. Please see attached transmittal letter and FedEx proof of delivery.

Thank you.

<b>TRACKING NUMBER</b>	<a href="#">774637674091</a>
<b>FROM</b>	GLENNIE REPORTING SERVICES 1555 East Orangewood Avenue PHOENIX, AZ, US, 85020
<b>TO</b>	Eloy Public Library Administrator 1000 N. Main Street Eloy, AZ, US, 85131
<b>REFERENCE</b>	SunDog 12-12
<b>SHIPPER REFERENCE</b>	SunDog 12-12
<b>SHIP DATE</b>	Wed 1/03/2024 03:51 PM
<b>DELIVERED TO</b>	Receptionist/Front Desk
<b>PACKAGING TYPE</b>	FedEx Envelope
<b>ORIGIN</b>	PHOENIX, AZ, US, 85020
<b>DESTINATION</b>	Eloy, AZ, US, 85131
<b>SPECIAL HANDLING</b>	Direct Signature Required
<b>NUMBER OF PIECES</b>	1
<b>TOTAL SHIPMENT WEIGHT</b>	0.50 LB
<b>SERVICE TYPE</b>	FedEx Priority Overnight



December 29, 2023

**COPY**

FedEx 2day

Attention: Administrator  
Eloy Public Library  
1000 North Main Street  
Eloy, AZ 85131

Re: Hearing held before the Power Plant and Transmission Line Sitting Committee

**Applicant/Project:** SunDog Energy Center LLC / 230kV Gen-Tie Project LSC 229  
**Docket No:** DOCKET NO. L-21284A-23-0335-00229

Transcript of **Prefiling Conference, held on 12/12/2023 via videoconference**

Dear Sir or Madam:

We are enclosing a certified copy of the reporter's transcripts of proceedings from the above-referenced matter for you to make available for public viewing to the citizens of your community. **Please place the transcript together with the Certificate of Environmental Compatibility (CEC) Application.**

This transcript is being provided to your location courtesy of SunDog Energy Center LLC / 230kV Gen-Tie Project LSC 229, the applicant in this matter.

Please let us know if you have any questions or comments.

Very truly yours,

GLENNIE REPORTING SERVICES, L.L.C.

*Arielle Vila*

admin@glennie-reporting.com

**ORIGINAL**

1555 East Orangetwood Ave.  
Phoenix, Arizona 85020-5130



602.266.6535 Phone  
602.266.9661 Fax  
877.266.6535 Toll Free  
www.glennie-reporting.com

SD-7 E000033084

**January 9, 2024**

TO: Docket Control  
Arizona Corporation Commission

**AFFIDAVIT OF SERVICE TO:**

Coolidge Public Library  
160 West Central Avenue  
Coolidge, AZ 85128

Re: Hearing held before the Power Plant and Transmission Line Sitting Committee  
**Applicant/Project:** SunDog Energy Center LLC / 230kV Gen-Tie Project LSC 229  
**Docket No:** DOCKET NO. L-21284A-23-0335-00229

Transcript of **Prefiling Conference, held on 12/12/2023 via videoconference**

The above-referenced location is now in receipt of the reporter's transcript of proceedings. Please see attached transmittal letter and FedEx proof of delivery.

Thank you.

<b>TRACKING NUMBER</b>	<a href="#">774637686555</a>
<b>FROM</b>	GLENNIE REPORTING SERVICES 1555 East Oranewood Avenue PHOENIX, AZ, US, 85020
<b>TO</b>	Coolidge Public Library Administrator 160 W. Central COOLIDGE, AZ, US, 85128
<b>REFERENCE</b>	SunDog 12-12
<b>SHIPPER REFERENCE</b>	SunDog 12-12
<b>SHIP DATE</b>	Wed 1/03/2024 03:51 PM
<b>DELIVERED TO</b>	Receptionist/Front Desk
<b>PACKAGING TYPE</b>	FedEx Envelope
<b>ORIGIN</b>	PHOENIX, AZ, US, 85020
<b>DESTINATION</b>	COOLIDGE, AZ, US, 85128
<b>SPECIAL HANDLING</b>	Direct Signature Required
<b>NUMBER OF PIECES</b>	1
<b>TOTAL SHIPMENT WEIGHT</b>	0.50 LB
<b>SERVICE TYPE</b>	FedEx Priority Overnight

December 29, 2023

**COPY**

FedEx 2day

Attention: Administrator  
Coolidge Public Library  
160 West Central Avenue  
Coolidge, AZ 85128

Re: Hearing held before the Power Plant and Transmission Line Sitting Committee

**Applicant/Project:** SunDog Energy Center LLC / 230kV Gen-Tie Project LSC 229  
**Docket No:** DOCKET NO. L-21284A-23-0335-00229

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This transcript is being provided to your location courtesy of SunDog Energy Center LLC / 230kV Gen-Tie Project LSC 229, the applicant in this matter.

Please let us know if you have any questions or comments.

Very truly yours,

GLENNIE REPORTING SERVICES, L.L.C.

*Arielle Vila*

admin@glennie-reporting.com



SD-8 Solar Energy Center

Home

Overview The Project About Solar Energy Documents Contact

## Current Efforts

**The Funding Solar 2030v Generation To Live Project CEC Hearing Information**

A public hearing will be held before the Arizona Power Plant and Transmission Load Binding Committee (Committee) regarding the Application of SunDog Energy Center, LLC (Applicant) for a Certificate of Environmental Compatibility to Authorize the SunDog Solar 2030v Generation To Live Project (Project). The Project includes an approximately 1.7-mile transmission line and associated infrastructure facilities from the SunDog Solar Energy Center Substation to the Gray Centre Substation in Pinal County, Arizona.

The hearing will be held at the Ralston Hotel, Casa Grande, 777 N. Ray Avenue, Casa Grande, AZ, 85122. The hearing will be held on Monday, February 5, 2024, at 1:00 p.m. and will conclude on Tuesday, February 6, 2024, and Wednesday, February 7, 2024, as necessary, beginning at 9:00 a.m. if any revisions to the hearing schedule are required. They will be located on the website and on the Arizona Corporation Commission (ACC) website at <https://www.azcc.gov/record/2023/02/03/202302031231>.

Public comment will be taken in a special session on Monday, February 5, 2024, beginning at 8:30 AM, via telephone. Zoom or in person at the Ralston Hotel, Casa Grande, 777 N. Ray Avenue, Casa Grande, AZ, 85122. Public comment may be taken at the beginning of each hearing day, or at other times during the hearing, at the discretion of the chairman of the committee.

Witnesses are advised that all topics and some public input and safety guidelines will be followed during the hearing and public comment session. Petitions or public access safety protocols, and witnesses to the hearing schedule may occur due to public safety considerations. The public has the option to enter the hearing online or attend in person at the hearing location. The Chairman may, at his discretion, restrict the hearing to a time and date to be indicated during the hearing, or to be designated per request.

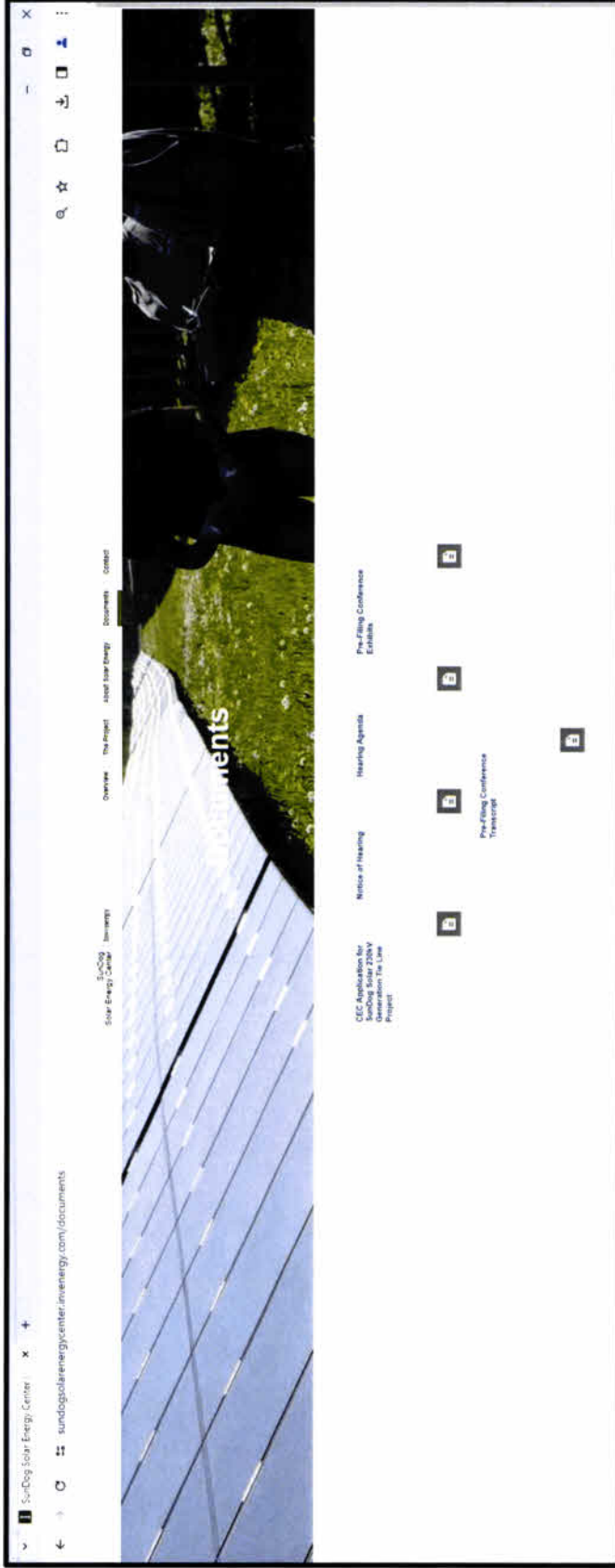
To view the CEC hearing only, please click here: <https://www.azcc.gov/record/2023/02/03/202302031231>.

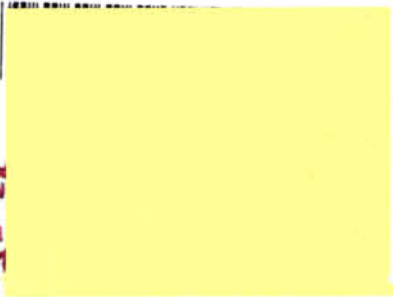
To participate in the public comment session, please click here: <https://www.azcc.gov/record/2023/02/03/202302031231>.

To view the public comment session, please click here: <https://www.azcc.gov/record/2023/02/03/202302031231>.

To view the public comment session, please click here: <https://www.azcc.gov/record/2023/02/03/202302031231>.

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RETURN TO SENDER

Mailer: Arizona Corporation Commission

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Printed Name	Steven Amara

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Delivery Address	CORP COMMISSION
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PINAL COUNTY  
LEO LEW  
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Arizona Corporation Commission

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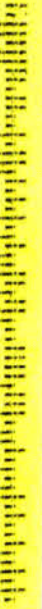
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PINAL COUN  
LEO LEW  
L-21284A-23-  
31 N. PINAL  
FLORENCE,  
AZ 85007

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Mailer: Arizona Corporation Commission

Date Produced: 01/03/2024

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CITY OF COOLIDGE  
RICK MILLER  
L-21284A-23-0335-00229  
130 W. CENTRAL AVENUE  
COOLIDGE, AZ 85128

Arizona Corporation Commission

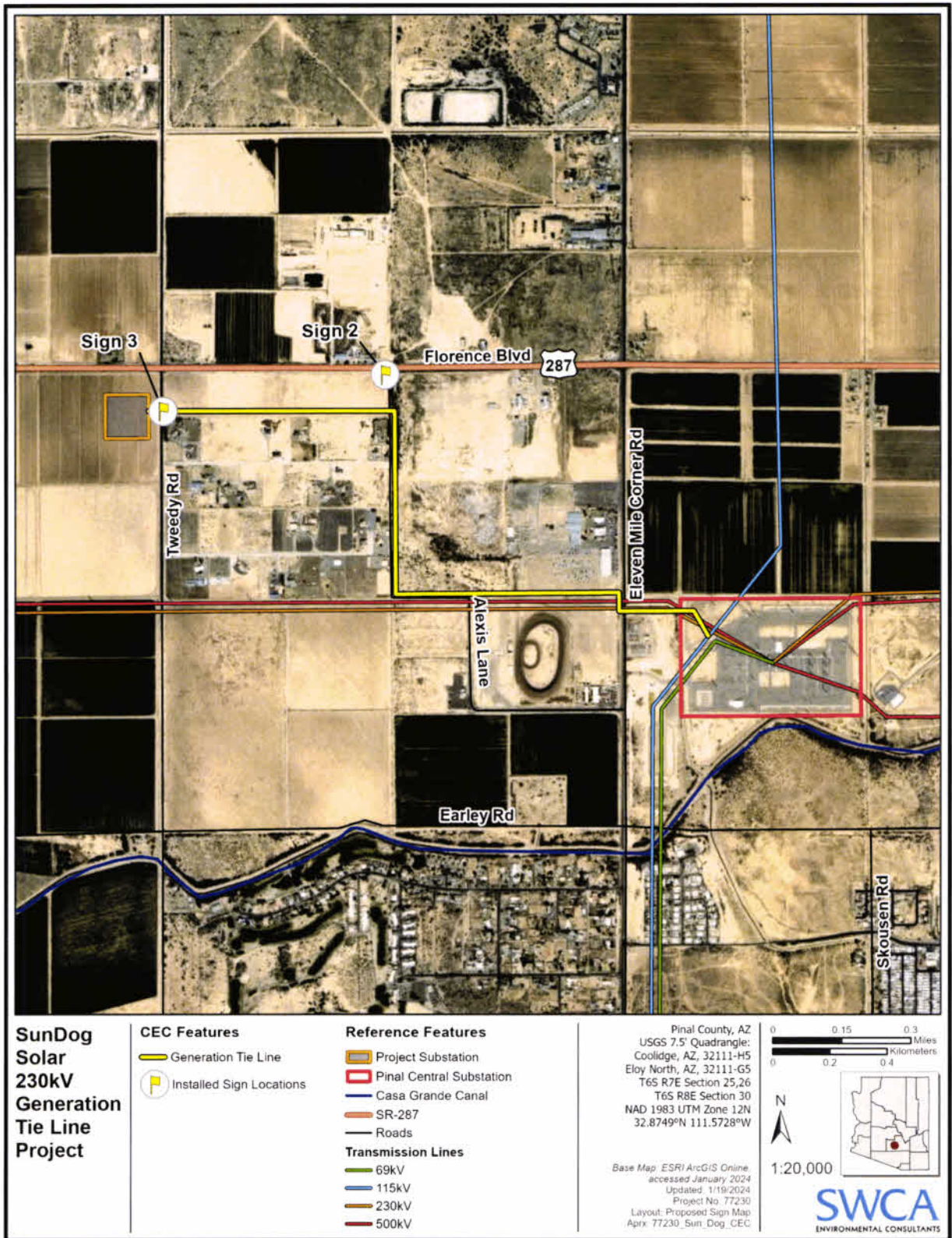
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Customer Reference Number: C4694458.28140977



# NOTICE OF PUBLIC HEARING

## SunDog Energy Center LLC

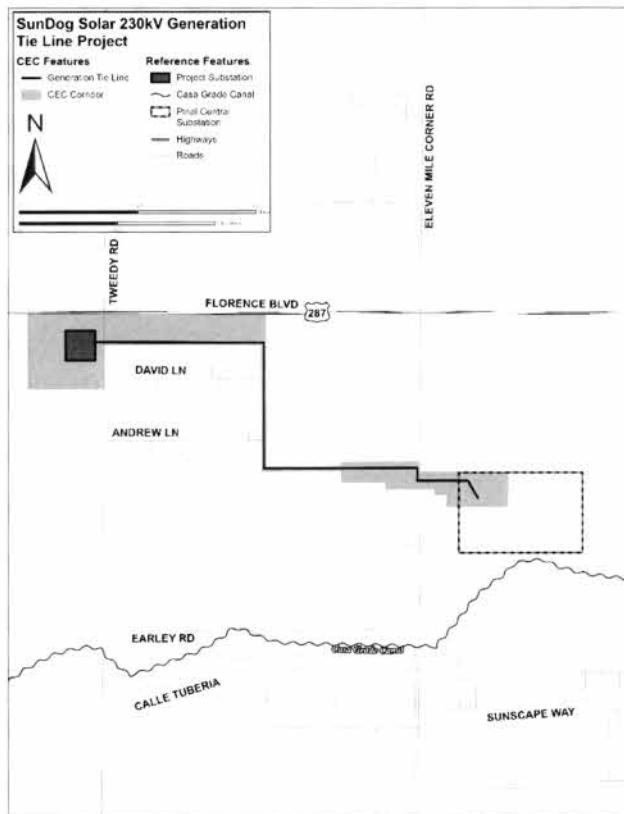
### SunDog Solar 230kV Generation Tie Line Project

SunDog Energy Center LLC invites the public to participate at a public hearing before the Arizona Power Plant and Transmission Line Siting Committee

February 5 <sup>th</sup> , 2024	1:00PM–5:00PM	Radisson Hotel Casa Grande 777 N Pinal Avenue Casa Grande, AZ 85122
February 6 <sup>th</sup> – 7 <sup>th</sup> , 2024, as needed	9:00AM–5:00PM	

If any revisions to the hearing schedule are required, they will be noticed on the Project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com) and on the ACC website at <https://www.azcc.gov/arizona-power-plant/meeting-schedule>

The Transmission Line Siting Committee will hear public comments on February 5<sup>th</sup>, 2023, beginning at 5:30PM. Comments may be presented in-person at the Radisson Hotel Casa Grande or virtually. To present virtually, please visit [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com) and click on the meeting link provided.



For more information, call the project information line at (866) 786-8656, or visit the project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com).

Arizona Corporation Commission Docket Number: L-21284A-23-0335-00229

Case Number: 229





# Invenergy

1401 17th Street | Suite 1100 | Denver, Colorado 80202  
T 303-800-9341

July 17, 2023

## Invitation to learn about the proposed SunDog Solar 230kV Generation Tie Line Project

Dear Interested Party,

Invenergy is seeking your input on the proposed SunDog Solar Generation Tie Line Project in Pinal County and Coolidge, Arizona. Invenergy is proposing to build a 230-kilovolt, alternating current generation intertie transmission line (gen-tie) approximately 1.5 miles long (project). The proposed gen-tie would connect the future SunDog Solar Energy Center, a proposed 200-megawatt (MW) solar and 200 MW battery energy storage facility, to the existing Pinal Central Substation via a step-up substation. More information about the project is available at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com).

Invenergy is hosting an open house on Wednesday, July 26, 2023, from 4:30pm – 6:30pm, for the community to learn about the project, meet the project team, and provide comments. Information will be on display and light snacks will be provided. No formal presentation is planned. The open house will be at Mary C. O'Brien Elementary School, 1400 North Eleven Mile Corner Road, Casa Grande, AZ 85194.

There will also be a virtual open house hosted at [www.SunDogSolarOpenHouse.com](http://www.SunDogSolarOpenHouse.com).

Invenergy will be applying for a Certificate of Environmental Compatibility with the Arizona Power Plant and Transmission Line Siting Committee to allow for the construction and operation of the project. SunDog Energy Center LLC (SunDog) and SWCA Environmental Consultants (SWCA) are in the process of analyzing the project gen-tie (Figure 1).

As part of this analysis, we are soliciting public and stakeholder input. Please submit a comment or question through one of the following methods:

**Mail:** SunDog Solar Energy Center  
c/o SWCA Environmental Consultants  
20 East Thomas Road, Suite 1700  
Phoenix, Arizona 85012  
**Email:** [SunDogSolarHotline@Invenergy.com](mailto:SunDogSolarHotline@Invenergy.com)  
**Voicemail:** (866) 786-8656  
**Project Website:** [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com)

The comment period for the project will extend from July 16, 2023, to August 18, 2023. We look forward to receiving your input.

Sincerely,



Katie DeSpain  
Associate, Renewable Development  
Invenergy



# Invenergy

1401 17th Street | Suite 1100 | Denver, Colorado 80202  
T 303-800-9341

January 5, 2024

## Notice of Hearing for the Proposed SunDog Solar 230kV Generation Tie Line Project (Docket No. L-21284A-23-0335-00229)

Dear Interested Party,

SunDog Energy Center LLC (SunDog), an affiliate of Invenergy LLC, is proposing to build a 230-kilovolt, alternating current generation intertie transmission line (Generation Tie Line) approximately 1.7 miles long (Project) (see Figure 1). The proposed Project is designed to deliver power from the adjacent SunDog Solar Energy Center, a proposed 200-megawatt (MW) solar photovoltaic facility (Solar Facility) with a 200-MW battery storage system, to the existing Pinal Central Substation via a step-up substation. More information about the project is available at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com).

SunDog filed an application for a Certificate of Environmental Compatibility (CEC Application) with the Arizona Corporation Commission to construct and operate the Project; the Project is docketed as L-21284A-23-0335-00229 and the case number is 229. The Arizona Power Plant and Transmission Line Siting Committee (Committee) will initially evaluate the CEC Application and, after holding public hearings, will make a recommendation to the Arizona Corporation Commission. This letter provides notice of the public hearing related to the CEC Application.

A copy of the CEC Application can be found on the Project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com), at the Arizona Corporation Commission Docket Control, Phoenix Office, located at 1200 West Washington Street, Suite 108, Phoenix, AZ 85007, at the Eloy Public Library located at 1000 North Main Street, Eloy, AZ 85131, and at the Coolidge Public Library located at 160 West Central Avenue, Coolidge, AZ 85128.

A public hearing regarding the CEC Application has been scheduled before the Committee from February 5 through February 7, 2024, at the Radisson Hotel Casa Grande located at 777 N Pinal Avenue, Casa Grande, AZ 85122. The hearing will commence at 1:00 p.m. on February 5 and at 9:00 a.m. on subsequent days, as necessary. A public comment session will be held starting at 5:30 p.m. on February 5. Members of the public or other stakeholders are invited to attend the hearing in person or virtually. Information regarding virtual access, as well as any additional hearing information will be posted on the project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com) at least 24 hours prior to the event.

You may reach the project team or the SunDog Project Manager through one of the following methods:

**Mail:** SunDog Solar Energy Center  
c/o SWCA Environmental Consultants  
20 East Thomas Road, Suite 1700  
Phoenix, Arizona 85012

**Email:** [SunDogSolarHotline@Invenergy.com](mailto:SunDogSolarHotline@Invenergy.com)

**Voicemail:** (866) 786-8656

**Project Website:** [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com)

Sincerely,



Katie DeSpain  
Associate, Renewable Development  
Invenergy



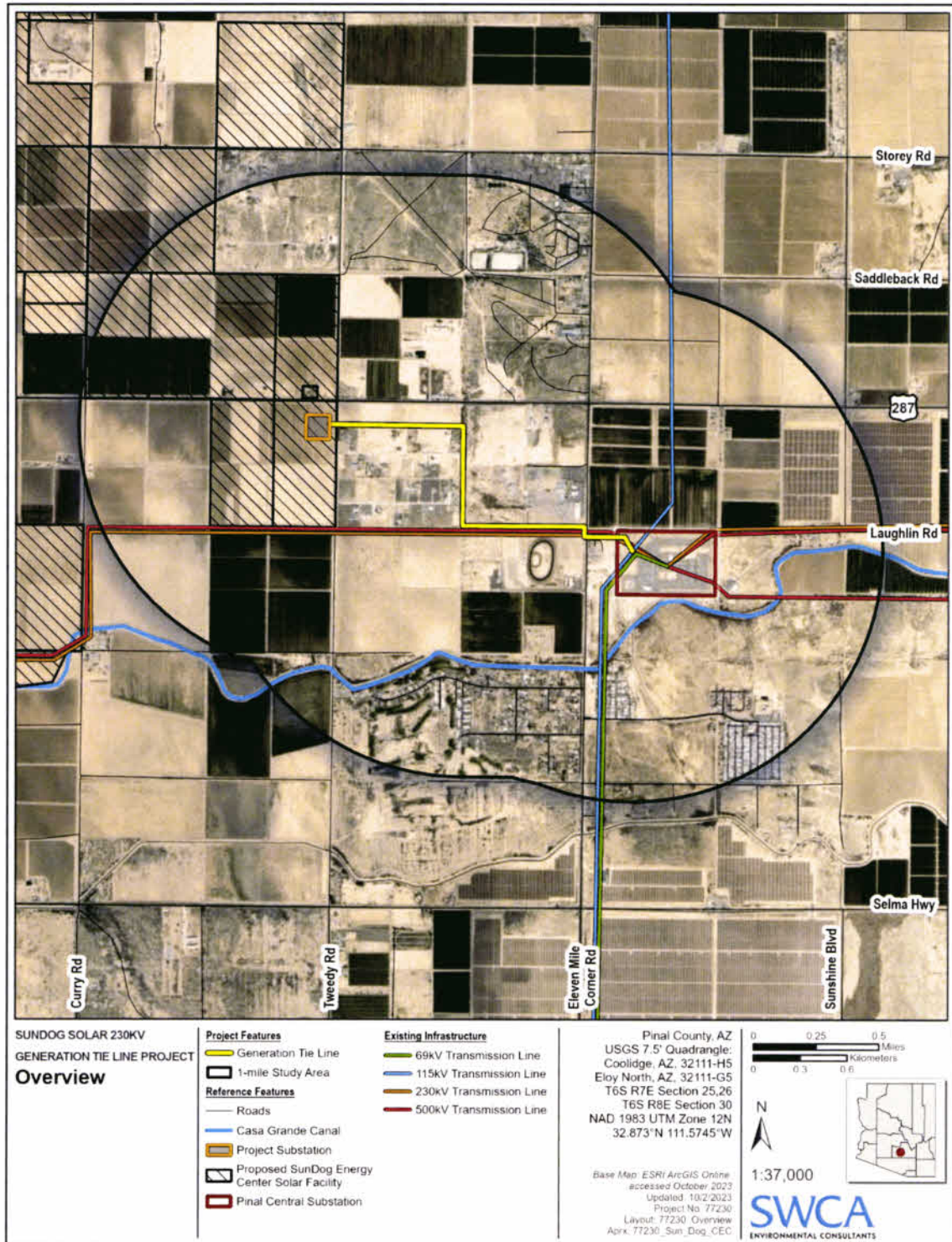


Figure 1. Project overview.

## SUMMARY OF PUBLIC OUTREACH EFFORTS

For the SunDog Solar 230kV Generation Tie Line Project (Generation Tie Line) (herein called the Project), SunDog Energy Center LLC (SunDog or Applicant) and SWCA Environmental Consultants (SWCA) conducted a multi-faceted public and agency involvement program. The purpose of the outreach program was to ensure that local jurisdictions, relevant agencies, community residents, and other stakeholders were informed of the Project and provided with opportunities to relay information or potential concerns about the Project.

The outreach program involved use of the following means of communication:

- Informational Letters
- Website and Social Media
- Virtual Open House
- In-Person Open House Meeting
- Newspaper Advertisements
- Email and Telephone Line
- Broadcast Notification Signs
- Public Viewing Locations for CEC Application
- Distribution of CEC Application to Regulatory Agencies

### Informational Letters

The Applicant sent two informational letters to 435 landowners, residents, and relevant stakeholders within 1 mile of the Project as part of the CEC public involvement process. Both letters provided methods of contact such as a Project website, email address, telephone number, and physical mailing address as well as a brief description of the Project's purpose and need, an overview of the Project, and a map showing a location of the Project. The first notification letter was mailed on July 17, 2023. This letter introduced the Project and announced opportunities for comment, including a virtual open house that was launched June 9, 2023, and an in-person open house at Mary C. O'Brien Elementary School on July 26, 2023. The second notification letter was mailed on January 5<sup>th</sup>, 2024. This letter announced the filing of the CEC application as well as the dates of the Project's Arizona Power Plant and Transmission Line Siting Committee public hearings.

### Website and Social Media

The Applicant hosts a Project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com), that serves as a central location to provide stakeholders and interested parties with Project information and opportunities for public comment. The website includes general information regarding the solar facilities and the Project in its entirety. The website was advertised through informational letters, newspaper advertisements, the telephone information line, the virtual open house, and the public in-person open house. The Project website was updated with CEC hearing details including a dial-in number and virtual participation link on January 5, 2024. Screenshots of the Project website are included in the CEC Application as Exhibits J-2a through J-2d, and in the CEC Hearing Exhibit List.



Social media advertisements were purchased through Facebook to advertise the Project and the in-person open house. The social media advertisements ran from July 18, 2023, to July 25, 2023. A screenshot of the social media advertisement is included in the CEC Application as Exhibit J-3. During this period, there were 38 link clicks, 1,223 accounts reached, 7,940 impressions, 1 like, and zero comments or shares on the social media advertisement.

A social media advertisement will be purchased through Facebook to announce the dates of the Project's Arizona Power Plant and Transmission Line Siting Committee public hearings. This social media advertisement will run from January 22, 2024, to February 2, 2024.

## Virtual Open House

The Applicant hosted an online virtual open house at [www.SunDogSolarOpenHouse.com](http://www.SunDogSolarOpenHouse.com) to provide general information on the Project, including information on the Generation Tie Line and Project Substation. The virtual open house was announced in the informational letter and paid newspaper advertisements, the Project website, and through the telephone information line.

The virtual open-house format included an interactive website with Project information provided in clickable modules, which allowed interested parties to visit and review the materials at their convenience, and to ask questions, request information, or provide comment through embedded comment forms. The clickable modules included large maps and text displays with highlighted details of the Project and associated Generation Tie Line and images simulating the appearance of the facilities after construction. Following the online publishing of the virtual open house, the Applicant initiated a 1-month comment period, requesting that stakeholder comments or questions be provided by August 18, 2023. During this period, 86 viewers attended the virtual open-house meeting. No comments were submitted through the website during the formal comment period, but comments will continue to be accepted throughout the duration of the Project. As of January 10, 2024, no comments have been submitted through the virtual open house website. The virtual open house is still available for the public to view.

## In-Person Open House

The Applicant hosted an in-person public open-house meeting was held for the Project on Wednesday, July 26, 2023, from 4:30 p.m. to 6:30 p.m. at Mary C. O'Brien Elementary School (1400 North Eleven Mile Corner Road, Casa Grande, Arizona, 85194). The format of the meeting was an informal open house, allowing community members to attend at their convenience, review informational displays, and communicate with members of the Project team. Exhibit J-5a of the CEC Application shows the meeting sign-in sheet. At the open house, there were 10 people who signed in, three of whom provided a formal comment (which can be found in CEC Application Exhibits J-5b through J-5d) (see Table 1 below). Information relayed at the meeting can be found in Exhibits J-6a through J-6m of the CEC Application.

## Newspaper Advertisements

The Applicant placed advertisements in the *Casa Grande Valley Newspapers* on July 13 and July 20, 2023. These advertisements provided information regarding the Project and associated solar facilities and announced the virtual open house and additional opportunities for comment through the telephone information line, postal mail, the Project website, and the in-person open house. Copies of the newspaper advertisement can be found in Exhibits J-8a and J-8b of the CEC Application.

## Email and Telephone Line

The Applicant created a telephone information line and email address to provide additional opportunities for members of the public to learn about the Project and express questions or comments.

The telephone number and email address were provided in informational letters, social media advertisements, and newspaper advertisements as well as at the virtual and in-person open house meetings. Initially, the telephone line gave a summary of the Project and announced the Project virtual open house and associated 30-day comment period. Following the completion of the comment period, the telephone line was updated to inform callers to leave a message with their name and number and the Applicant will return their call. The telephone line also invited the caller to visit the Project website for additional information. The telephone line will continue to provide callers with the opportunity to comment or request information throughout the entirety of the CEC permitting process. One comment was provided through the project email (see Table 1 below).

## Notification Signs

The Applicant installed two of the three proposed notification signs in the Project vicinity to announce the dates of the Project's Arizona Power Plant and Transmission Line Siting Committee public hearings. Two of the three signs, located on privately-owned land, were installed on January 10, 2024. A third notification sign was identified in the Project vicinity on Pinal County-administered land and the Applicant is working with Pinal County to have the notification sign installed. A map of notification sign locations and photographs of notification sign installation can be found in the CEC Hearing Exhibit List.

## Public Location to Review the CEC Application

The Applicant placed the CEC application for public view at the Eloy Public Library (1000 North Main Street, Eloy, AZ 85131) and Coolidge Public Library (160 West Central Avenue, Coolidge, AZ 85128). The Eloy Public Library and the Coolidge Public Library received the CEC Applications on December 21, 2023. Representatives from both the Eloy Public Library and Coolidge Public Library confirmed receipt of the CEC Application and that the CEC Application is on display. Confirmations of receipt can be found in the CEC Hearing Exhibit List.

## Distribution of the CEC Application to Regulatory Agencies and Utilities

On July 17, 2023, letters were sent to the agencies and utilities (including San Carlos Irrigation Project, Bureau of Reclamation, Arizona Game and Fish Department [AZGFD], Arizona Public Service, Western Area Power Administration [WAPA], Salt River Project, Tucson Electric Power, Hohokam Irrigation and Drainage District, Arizona Department of Transportation, Electrical District No. 2, Pinal County Fairgrounds, and the Arizona State Land Department) to provide Project information and request new or additional information on planned developments within the Study Area. A copy of the letter can be found in Exhibits H-1a and H1-b of the CEC Application. The Applicant received feedback from the AZGFD and WAPA. The AZGFD and WAPA responses can be found in Exhibits H-2 and H-3, respectively, of the CEC Application. The Applicant also consulted with the Arizona State Historic Preservation Office (SHPO) regarding the Generation Tie Line Project. A copy of the SHPO consultation is included as Exhibit E-1 of the CEC Application.

## Public Comments

The Applicant solicited and considered public comments throughout the process of developing the CEC application and preparing for hearings. Comments received during the public involvement process, including responses when applicable, are included in Table 1 below.

Of the nine comments received about the Project, six comments are from the owners of one neighboring residence. These homeowners submitted their comments through multiple forums (by email, in person, and through the Arizona Corporation Commission). Each comment and response are provided in Table 1. These homeowners have expressed general opposition in each comment but have not provided specific mitigation or design considerations that the Applicant could consider as part of the Project. The Applicant offered to meet them in person to discuss the Project so the Applicant could better understand their specific concerns and consider options for the Project to address their concerns; however, they declined offers to meet with the Applicant. No specific mitigation measures or design considerations have been identified by the Applicant, as no specific concerns have been provided and they have declined offers to meet to discuss their concerns further.

Table 1. Comments Received

Comment number	Method of Comment	Comment	Response
1	Project Email	The proposed path for lines and towers encircles the only subdivision of homes in this area on all four sides. It would be an environmental danger for the people living there, and a financial disaster for the owners of these \$800-\$1 million homes, some of which are still being built. This is not an appropriate or responsible path proposal as your website advertises. Your representative actually stated that the indirect path of the towers came about because Invenergy was not allowed to place their equipment on other open land or on the pathway of other energy companies! So they chose a path that surrounds homes on all four sides! Your representative also stated that there would be a noticeable humming noise from the transmission lines. Our properties would plummet in value. Our community has joined together to reach out to Arizona lawmakers and committees to make them aware of this plan and the damage it would cause. We object to your stated pathway and ask you to revisit your plan and find a different pathway in an area of open land that would not affect the health and finances of this community in Pinal County. Jerry and Janet Devan	Please see comment 5 for response.
2	In-person public meeting	The proposed Substation off David/Tweedy would negatively impact our residential property valuation. I understand the simplest route would run right through a current agricultural/residential area. We would obviously prefer using current SRP easements that already allow for this.	Team members discussed the concerns with the commenter at the in-person open house meeting. The Applicant considered using the existing SRP easement, however, after discussing with SRP, SRP determined that it would not be possible to accommodate the Generation Tie Line in the existing SRP easement due to safety concerns.
3	In-person public meeting	Very concerned on the impact to the fairgrounds. That area is currently used for carnival rides and the use of parking RV's of people working the events. Please look at the possibility of minimizing the impact on the southern side of the fairgrounds.	Team members discussed the concerns with the commenter at the in-person open house meeting. The Applicant has adjusted the Generation Tie Line route and right-of-way width to minimize impacts to the Pinal County Fairgrounds (see Exhibit F for additional information).
4	In-person public meeting	Our property is at the corner of your proposed project. We oppose this project path. There is open property for miles in all directions of the project and no reason to put these lines next to the only subdivision. It will take down the value of our property by hundreds of thousands. Perhaps Invenergy would like to buy our property at its current value? And have the owners of Invenergy live there and listen to the humming lines and look at the stars through towers on two sides of the house. Please contact us. We will be in touch with Pinal County and our neighbors to try to change or stop the path of this project. Please see where our home is located on your map. We hope to hear from you soon and from someone in authority.	Team members discussed the concerns with the commenter at the in-person open house meeting, and the project developer provided contact information to further discuss concerns with the commenter.

Comment number	Method of Comment	Comment	Response
5	ACC Utilities Complaint Form	<p>URGENT</p> <p>ARE YOU AWARE THAT THERE ARE PLANS TO INSTALL HIGH VOLTAGE POWER LINES AND TOWERS AROUND 3 SIDES OF OUR DAVID LANE/ANDREW LANE COMMUNITY, AN AREA OF LARGE, NEW HOMES BETWEEN CASA GRANDE AND ELOY?</p> <p>The PROPOSED PROJECT is called: SUNDOG SOLAR 230KV GENERATION TIE LINE PROJECT</p> <p>A company called INVENERGY is applying for approval from Arizona Power Plant Site Committee and the Pinal County Board of Supervisors and Zoning Commission. The towers and lines are to be installed the whole length of the road at the east end of ANDREW AND DAVID LANE; and the entire length of the canal running behind LYMAN COURT, BLUE SKY, ALEXIS LANE, BETHANY. A power storage station and equipment and towers are planned for the entire corner of RT.287 (FLORENCE BLVD ) AND TWEEDY ROAD.</p> <p>This plan would wall-in our entire subdivision of new builds and upper -market -value homes WITH HIGH VOLTAGE POWER LINES AND TOWERS ON ALL FOUR SIDES. They would be very close to many of our homes. We have been told by INVENERGY that there would be a CONSTANT BUZZING SOUND. Some people living in close proximity to power lines have complained of headaches, tumors, radiation, etc. All of us in this community, including children and even livestock should not be subjected to this.</p> <p>THE VALUE OF OUR PROPERTIES WOULD PLUMMET. No one wants to buy a home surrounded by high voltage and towers. Can you imagine what it would look like to be boxed in on all four sides by wires and towers? Can you imagine what a realtor's aerial view of our community would look like?</p> <p>On July 26 (just a few days ago) we received a letter in the mail. It looked like junk mail. The envelope said it was regarding our property. The return address said INVENERGY. For some reason, I opened it. It announced a meeting for July 26 (the same day I received it). We attended this meeting, where they showed virtual images of what they planned to do next to our properties on any land that they could get their hands on from Pinal County. They were trying to see how much PUSH-BACK they might get from residents about the plan and the proposed path of the lines and towers.</p> <p>INVENERGY is going to try to railroad their plan through with us and with Pinal County quickly and quietly. We were told that they only alerted Pinal County to their plan on July 26 too.</p> <p>We have made contact with BRANDON GAYLORD, District Administrator, District 3, who was also at that meeting. He did some research about Invenergy and their plan. So far they are just in the early stages, attempting to get property from the county or farmers who will sell to them and then applying for approval from the county. They are trying to save themselves money, of course, by imposing the path of their project onto whatever they can get cheap instead of even taking direct pathways on open property or other energy line property. SunDog Solar representatives actually told us that the reason they have chosen the path surrounding our community is that the other utilities such as SRP will not share pathways with them and they have been unable to purchase property that is a distance away from this residential community!</p> <p>We have been told that that things will really start moving in September-November of this year.</p> <p>PLEASE do not allow ANOTHER international company to destroy more of beautiful Arizona. Please protect our health and our property values by voting NO to any proposals from INVENERGY and SUNDOG SOLAR which surround residential areas.</p> <p>Thank you for reading and considering. Any replies would be appreciated.</p> <p>From concerned citizens, Jerry and Janet DeVan</p>	<p>Mr. and Mrs. Devan,</p> <p>We are writing in regard to the SunDog Solar Energy Center Generation Tie Line (SunDog Gen-Tie) Project, and we would like to coordinate with you further regarding the Project. The SunDog Gen-Tie Project is a proposed approximately 1.7-mile, 230-kilovolt transmission line, intended to connect the planned SunDog Solar Energy Center to the existing Pinal Central Substation.</p> <p>Invenergy appreciates your attendance, and the spoken and written comments you provided during the Project Open House meeting held on July 26, 2023, as well as the emailed comment you provided through the Project email address. Please know that the comments are being considered, and will be included in the permitting application documents for this effort. We understand that you have concerns about the location of the Project in relation to your home. We would like to take the opportunity to speak with you and perhaps meet to review and discuss your concerns. Is there a date/time that may work for you both to discuss further?</p> <p>Thank you for your time and consideration.</p> <p>Best, Katie DeSpain, Associate, Renewable Development, Invenergy</p>

Comment number	Method of Comment	Comment	Response
6	ACC Utilities Compliant Form	<p>Good day,</p> <p>I am writing to ask all committee members to help us. We are the "little guy" trying to prevent the big, international energy companies from ruining our property values and physical and mental health. Invenergy is trying to quickly and quietly change the original proposed pathway of their lines and towers from a pathway where equipment already exists to a pathway that surrounds a subdivision of large new homes at close range. We have been told by Invenergy's representative that there would be a constant buzzing noise. We were also told that, since SRP and other energy companies will not share pathways with them, they are pursuing railroading through this pathway which would put electrical lines and equipment on all four sides of the Alexis Lane, David Lane, Andrew Lane, and Tweedy Road subdivision in Pinal County near the fairgrounds and Eleven Mile Corner. If they can get this pathway pushed through, it will save THEM money. They are unconcerned about the property values of these homes or the health of the residents. Are you?</p> <p>They have reported that the owls will not be negatively impacted! But what about the PEOPLE? The original docket number is on this letter above. But it is not showing the pathway next to our homes that they are trying to get approved. They are calling their project the SUNDOG SOLAR 230kv GENERATION TIE LINE PROJECT. The residents being affected were only told about it the SAME DAY that Invenergy had a public meeting about it. This company is trying to bait and switch their plan with the Arizona Commissions who vote on it.</p> <p>We have contacted our senators and state representative about this and are asking for your protection as you review Invenergy's request. Please protect the PEOPLE of Arizona and don't give our county and state over to the international companies who just want to make money from OUR loss.</p> <p>Thank you for your consideration, Jerry and Janet DeVan</p>	Same response as comment 4.
7	Email	<p>Hello again, Katie DeSpain,</p> <p>Please let us know specifically what you would like to discuss with us. Since the proposed tie line route is unacceptable to us and would have huge financial and environmental impact (physically and mentally) and (financial) damages to our corner property we must object and ask that you and Invenergy come up with some solution. Please let us know if you are considering alternative ideas for us to discuss. Please be specific.</p> <p>Thank you, Jerry and Janet DeVan</p>	<p>Mr. and Mrs. Devan,</p> <p>Thank you very much for your email. We would like to meet to better understand your specific concerns so that we can evaluate potential options to address. In our experience, in person meetings are very helpful in the process to identify solutions.</p> <p>Best, Katie DeSpain, Associate, Renewable Development, Invenergy</p>



Comment number	Method of Comment	Comment	Response
8	Email	<p>Katie DeSpain,</p> <p>We did state our objections at the meeting on July 26, and also invited you to our home to see first hand how the amended tie-line path would affect our property. However, you turned down our offer, and also stated that property values were not a subject that you dealt with. At that time, you also told us that the proposed tie-line route had been changed from the original direct route (from 2020) to a path close to our home and subdivision because other power companies would not share passage where other power lines already exist, and the new indirect pathway in close proximity to our homes was more cost effective for SunDog/Invenergy! You further stated that there would be a NOISE PRODUCED BY THE POWER LINES.</p> <p>Even as of today, we would not be able to sell our home just because the POSSIBILITY of power lines running right next to us on 2 sides would have to be disclosed. So SunDog/ Invenergy has ALREADY had an impact on us, financially and healthwise/ stress. Earlier this year our home and its 2.5 corner acreage were valued at just under \$1 million dollars. We expressed to you , in writing , that Invenergy's planned pathway would affect the inheritance of our children ( but, of course, international companies don't care about that ) and asked if Invenergy would like to purchase our home and let one of its executives live there!</p> <p>Your reply below was not specific enough to give us any hope of any changes in the tie-line pathway, or any interest in benefitting us. Our time is valuable. Is there anything you wish to discuss in person that could change the situation?</p> <p>Jerry and Janet Devan</p>	<p>Thank you for sharing your concerns. Please do not hesitate to contact me should you have any further questions or should you desire to meet in the future.</p> <p>Best, Katie DeSpain, Associate, Renewable Development, Invenergy</p>

9

ACC Utilities  
Compliant  
Form

Dear Mr. and Ms. Hallman,

To whom it may concern,  
  
My family and I are deeply saddened to see the proposed project of a substation in the land directly in front of our home - only separated by a narrow canal. My husband and I are foster parents to many (so far 17 amazing children). Aside from that we also have a small cattle breeding operation that brings so much to not only our lives but the lives of every child we welcome in. This proposed plan brings a variety of problems that would hinder our day to day life.

There is not enough evidence or research done about what living so close to one can do not only to humans but to the livestock we raise and eventually consume. We bring in already compromised children and we are going to ask to put them at risk even more?

I sincerely hope the county will consider moving the substation to a land not already inundated with homes and livestock.

Thank you for your time

The Hallmans

We wanted to inform you about the docket information for this case and direct you toward resources you can use to learn more about The Project. The assigned Case No. for The Project is 229, and Docket No. is L-21284A-23-0335-00229. The Project website is SunDogSolarEnergyCenter.com, where you can find the full CEC permit application as well as other CEC-related documents. Information regarding the upcoming public hearing can also be found on this website. Since your property is in proximity to the project location, we have also sent mailers to your address containing the public hearing information as well. Please let us know if you did not receive these mailers.

Additionally, we would like to speak with you about any specific concerns you have related to The Project. You can reach us by using The Project's email address, SunDogSolarHotline@invenergy.com, or by calling The Project's phone number, (866) 786-8656.

Finally, please see attached for the Notice of Hearing for convenience. Please let us know if you would like to speak further or if we can answer any questions.

Sincerely,  
Katie DeSpain | Associate – Renewable Development

**COMMISSIONERS**  
 Jim O'Connor – Chairman  
 Lea Márquez Peterson  
 Anna Tovar  
 Kevin Thompson  
 Nick Myers



**ARIZONA CORPORATION COMMISSION**

Douglas R. Clark  
 Executive Director

Robin Mitchell  
 Legal Division Director

December 29, 2023

Albert H. Acken  
 111 E. Dunlap Avenue, Suite 1-172  
 Phoenix, Arizona 85020

Lea A. Phillips  
 Sarah A. Noe  
 1 E. Washington Street, Suite 2300  
 Phoenix, Arizona 85004

**Via Email Only to:**  
[bert@ackenlaw.com](mailto:bert@ackenlaw.com)  
[phillipsla@ballardspahr.com](mailto:phillipsla@ballardspahr.com)  
[noes@ballardspahr.com](mailto:noes@ballardspahr.com)

Re: Staff's First Set of Data Requests to SunDog Energy Center, LLC  
 Docket No. L-21284A-23-0335-00229

Dear Mr. Acken, Ms. Phillips, and Ms. Noe:

Please treat this as Staff's First Set of Data Requests to SunDog Energy Center, LLC in the above-referenced matters.

For purposes of this data request set, the words "SunDog," "Company," "you," and "your," refer to SunDog Energy Center, LLC and any representative, including every person and/or entity acting with, under the control of, or on behalf of SunDog Energy Center, LLC. For each answer, please identify by name, title, and address each person providing information that forms the basis for the response provided.

These data requests are continuing, and your answers or any documents supplied in response to these data requests should be supplemented with any additional information or documents that come to your attention after you have provided your initial responses. Please respond within ten (10) calendar days of your receipt of the copy of this letter. However, if you require additional time, please let us know.

***Please provide one searchable PDF, DOC or EXCEL file (via email or electronic media) of the requested data directly to each of the following addresses:***

- (1) Samantha A. Egan, Staff Attorney, Legal Division, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, Arizona 85007.
- (2) Chaunce De Roos, Utilities Division, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, Arizona 85007. [ederoos@azcc.gov](mailto:ederoos@azcc.gov)

Robin R. Mitchell, Chief Counsel & Legal Division Director  
 1200 W. Washington Street, Phoenix, AZ 85007 | 602-542-3402 | [azcc.gov](http://azcc.gov)



Page 2

December 29, 2023

- (3) Legal Division, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, Arizona 85007. [legaldiv@azcc.gov](mailto:legaldiv@azcc.gov)

Sincerely,

/s/ Samantha A. Egan  
Samantha A. Egan, Staff Attorney  
Legal Division  
(602) 542-3402

SAE:cls  
Attachment

**ARIZONA CORPORATION COMMISSION  
STAFF'S FIRST SET OF DATA REQUESTS TO  
SUNDOG ENERGY CENTER, LLC  
DOCKET NO. L-21284A-23-0335-00229  
DECEMBER 27, 2023**

**Subject: All information responses should ONLY be provided in searchable PDF, DOC or EXCEL files via email or electronic media.**

\*\*\*For all data requests for which you do not have the information requested, please state such and skip to the next data request. Also, for responses to data requests that may be voluminous or overly burdensome, please contact the assigned engineer, Chaunce De Roos (602) 542-0941.

- STF 1.1.** Were transmission system impacts for the proposed project evaluated? If so, please describe, in general terms, the results of the evaluation and provide a copy of the system impact studies.
- STF 1.2.** Please provide a general description of the impact the proposed project will have on the available transmission capacity currently in the area of the proposed project.
- STF 1.3.** Please explain whether the proposed project will improve system reliability. Provide any studies that have been done that indicate the proposed project would improve system reliability.
- STF 1.4.** Is the applicant aware of any mandate or requirement regarding transmission pole height? If yes, has the applicant obtained a variance?
- STF 1.5.** Will this project eliminate the need to construct any transmission line(s) in the future?
- STF 1.6.** Has the Applicant entered into a power purchase agreement with any entity? If yes, please provide the entity.

**ARIZONA CORPORATION COMMISSION  
STAFF'S FIRST SET OF DATA REQUESTS TO  
SUNDOG ENERGY CENTER LLC  
DOCKET NO. L-21284A-23-0335-00229  
DECEMBER 27, 2023**

**Subject:** All information responses should ONLY be provided in searchable PDF, DOC or EXCEL files via email or electronic media.

\*\*\*For all data requests for which you do not have the information requested, please state such and skip to the next data request. Also, for responses to data requests that may be voluminous or overly burdensome, please contact the assigned analyst, Luke Hutchison at (602) 542-4382 to discuss.

**SUNDOG ENERGY CENTER LLC'S RESPONSE  
TO STAFF'S FIRST SET OF DATA REQUESTS  
DOCKET NO. L-21284A-23-0335-00229  
JANUARY 9, 2024**

**STF 1.1** Were transmission system impacts for the proposed project evaluated? If so, please describe, in general terms, the results of the evaluation and provide a copy of the system impact studies.

**RESPONSE:** Yes, the Project will interconnect at the Pinal Central Substation operated by SRP. SRP has completed a System Impact Study ("SIS") (SUNDOG 000001-000065) which contains Critical Energy/Electric Infrastructure Information ("CEII") that will be provided separately pursuant to the protective agreement in this docket. The SIS concluded the Project does not create any reliability concerns.

**STF 1.2** Please provide a general description of the impact the proposed project will have on the available transmission capacity currently in the area of the proposed project.

**RESPONSE:** The Project will interconnect the SunDog Solar Energy Center, a proposed 200 MW solar photovoltaic facility with a 200 MW battery energy storage system, to the regional transmission grid at the Pinal Central Substation. The Pinal Central Substation is a major regional substation with significant transmission infrastructure interconnections. Accordingly, the interconnection of the SunDog Solar Energy will have minimal affects on available transmission capacity. The SIS provides additional information regarding the Project's interconnection.

**STF 1.3** Please explain whether the proposed project will improve system reliability. Provide any studies that have been done that indicate the proposed project would improve system reliability.

**RESPONSE:** Generally speaking, a transmission line that interconnect batteries and additional generating resources to the regional transmission grid improves system reliability



**ARIZONA CORPORATION COMMISSION  
STAFF'S FIRST SET OF DATA REQUESTS TO  
UPSTREAM HC-1 LLC  
DOCKET NO. L-21229A-23-0050-00217  
FEBRUARY 28, 2023**

**Subject:** All information responses should ONLY be provided in searchable PDF, DOC or EXCEL files via email or electronic media.

\*\*\*For all data requests for which you do not have the information requested, please state such and skip to the next data request. Also, for responses to data requests that may be voluminous or overly burdensome, please contact the assigned analyst, Tanya Pitre at 602-364-1608 to discuss.

by providing resources, backup power, and storage. This Project is no exception. The SIS provides additional information regarding the Project's interconnection to the regional grid.

**STF 1.4      Is the applicant aware of any mandate or requirement regarding transmission pole height? If yes, has the applicant obtained a variance?**

**RESPONSE:** There are no Pinal County limitations regarding tower heights.

**STF 1.5      Will this project eliminate the need to construct any transmission line(s) in the future?**

**RESPONSE:** The Applicant has no knowledge of whether the Project, which will interconnect the SunDog Solar Energy Center, will eliminate the need for future transmission lines. Generally speaking, however, the addition of local generating resources and storage systems can reduce the need for long-distance transmission lines to transmit energy from more distance generating resources.

**STF 1.6      Has the Applicant entered into a power purchase agreement with any entity? If yes, please provide the entity.**

**RESPONSE:** The Applicant has not entered into a PPA at this time for the generation and storage that the Project will interconnect.

**Colin Agner**

---

**From:** Caroline Klebacha <cklebacha@azstateparks.gov>  
**Sent:** Monday, January 22, 2024 10:52 AM  
**To:** Devin Petry  
**Cc:** Andrew Vorsanger; Colin Agner  
**Subject:** Re: SunDog Energy Center LLC, Application for a CEC (Docket # L-21284A-23-0335-00229)

Good morning,

We have reviewed the final CEC application. The recommendations for cultural resources are in line with SHPO's earlier recommendations.

One minor clarification that was missed in our earlier review, the Casa Grande Canal is determined eligible under A, C, and D. I apologize for missing it earlier. I don't think it needs to be changed for the application, but should be noted for future reports.

Thank you!

Caroline

**Caroline Klebacha, M.A.**  
**Archaeological Compliance Specialist**  
**State Historic Preservation Office**  
*A Division of Arizona State Parks & Trails*  
***Please use [azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov) for initial consultation!***

1110 West Washington Street, Suite 100  
Phoenix, AZ 85007-2957  
Phone: 602-542-7140  
Email: [cklebacha@azstateparks.gov](mailto:cklebacha@azstateparks.gov)  
Web: <http://AZStateParks.com/SHPO>



On Thu, Dec 21, 2023 at 2:45 PM AZSHPO - AZPARKS <[azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov)> wrote:

**SHPO-2023-0981 (172907)**

----- Forwarded message -----

**From:** Devin Petry <[devin.petry@swca.com](mailto:devin.petry@swca.com)>  
**Date:** Thu, Dec 21, 2023 at 12:00 PM  
**Subject:** SunDog Energy Center LLC, Application for a CEC (Docket # L-21284A-23-0335-00229)  
**To:** [azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov) <[azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov)>  
**Cc:** Andrew Vorsanger <[Andrew.Vorsanger@swca.com](mailto:Andrew.Vorsanger@swca.com)>, Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>





Good Afternoon,

On behalf of SunDog Energy Center LLC, we respectfully invite the State Historic Preservation Office (SHPO) to review the Application for a Certificate of Environmental Compatibility (CEC) for the proposed SunDog Solar 230kV Generation Tie Line Project, filed with the Arizona Power Plant and Transmission Line Siting Committee and Arizona Corporation Commission on December 20, 2023.

Please find the CEC application attached to this email. SWCA submitted a letter complying with the "ACC-SHPO Consultation Checklist" on November 2, 2023, with a response received November 30, 2023. SWCA provided a follow-up response to Ms. Caroline Klebacha on December 5, 2023. This referenced correspondence is included in Exhibit E of the attached application. We look forward continuing to consult with your office on this project.

Should you have any questions or comments regarding the CEC Application please feel free to contact me by telephone at (480) 581-5217, or via email at [devin.petry@swca.com](mailto:devin.petry@swca.com); or you may contact SWCA's Cultural Resource Team Lead, Andrew Vorsanger by telephone at (602) 887-8104, or via email at [andrew.vorsanger@swca.com](mailto:andrew.vorsanger@swca.com).

Thank you.

**Devin Petry**

Strategic Growth Director - Power

**SWCA Environmental Consultants**

20 E Thomas Rd, Ste 1700

Phoenix, AZ 85012

P 480.581.5217 C 520.403.1465



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**Colin Agner**

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**From:** Andrew Vorsanger  
**Sent:** Tuesday, December 5, 2023 11:30 AM  
**To:** Caroline Klebacha  
**Cc:** Devin Petry; Colin Agner  
**Subject:** RE: Request for Consultation – SunDog Solar Energy Generation Tie Line, Application for a Certificate of Environmental Compatibility

Hi Caroline,

1. Approximately 27 percent of the project area, specifically in and around the SRP Pinal Central Substation, has been surveyed to current standards and does not require additional survey.  
[This is consistent with SWCA's findings and recommendation.](#)
2. Approximately 73 percent of the project area has not been surveyed, for which we recommend a Class III investigation.  
[This is consistent with SWCA's findings and recommendation.](#)
3. County-owned land: County land is not private land. For our purposes, county land is not subject to compliance with SHPA; however, it is subject to compliance with the AAA. If your survey crosses county land please consult with ASM pursuant AAA.  
[Noted. Underlying land ownership and easements would be confirmed before SWCA begins any cultural fieldwork.](#)
4. Site AZ AA:2:284(ASM) is erroneously referred to as a Euro-American artifact scatter. According to records on AZSITE and our internal database, this site is multicomponent with historic and prehistoric features including three artifact concentrations associated with Hohokam occupation. Some data recovery has occurred at the site, presumably within the Pinal Central Substation or associated transmission lines. I do not have the data recovery report on hand to refer to. Our internal records show that cremations were present at the site. We recommend the project be designed to avoid ground disturbance within the site and monitoring within 50 feet of the site boundary. If ground disturbance is necessary within the site additional data recovery may be necessary, unless it can be demonstrated that the area has been previously investigated.  
[Thank you for the information. The site was noted as multicomponent in the text, but unfortunately not in the table. The discrepancy will be fixed. AZSITE did not list any testing or data recovery projects occurring at the site. Would you be able to share the reference you found that has the information? We will also revise our recommendations and conclusions to match your recommendations for this site.](#)  
[Thank you.](#)

**Andrew Vorsanger**

Senior Cultural Resources Team Lead – Arizona

[SWCA Environmental Consultants](#)

**From:** Caroline Klebacha <cklebacha@azstateparks.gov>  
**Sent:** Thursday, November 30, 2023 2:37 PM  
**To:** Andrew Vorsanger <Andrew.Vorsanger@swca.com>  
**Cc:** Devin Petry <devin.petry@swca.com>; Colin Agner <cagner@swca.com>  
**Subject:** Re: Request for Consultation – SunDog Solar Energy Generation Tie Line, Application for a Certificate of Environmental Compatibility

Good afternoon Andrew,

Thank you for consulting with our office regarding the Invenergy Sundog Solar Energy CEC. We have reviewed the documentation and have a few comments.

1. Approximately 27 percent of the project area, specifically in and around the SRP Pinal Central Substation, has been surveyed to current standards and does not require additional survey.
2. Approximately 73 percent of the project area has not been surveyed, for which we recommend a Class III investigation.
3. County-owned land: County land is not private land. For our purposes, county land is not subject to compliance with SHPA; however, it is subject to compliance with the AAA. If your survey crosses county land please consult with ASM pursuant AAA.
4. Site AZ AA:2:284(ASM) is erroneously referred to as a Euro-American artifact scatter. According to records on AZSITE and our internal database, this site is multicomponent with historic and prehistoric features including three artifact concentrations associated with Hohokam occupation. Some data recovery has occurred at the site, presumably within the Pinal Central Substation or associated transmission lines. I do not have the data recovery report on hand to refer to. Our internal records show that cremations were present at the site. We recommend the project be designed to avoid ground disturbance within the site and monitoring within 50 feet of the site boundary. If ground disturbance is necessary within the site additional data recovery may be necessary, unless it can be demonstrated that the area has been previously investigated.

Let me know if you have any questions.

Respectfully,

**Caroline Klebacha, M.A.**  
**Archaeological Compliance Specialist**  
**State Historic Preservation Office**  
*A Division of Arizona State Parks & Trails*  
**Please use [azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov) for initial consultation!**

1110 West Washington Street, Suite 100  
 Phoenix, AZ 85007-2957  
 Phone: 602-542-7140  
 Email: [cklebacha@azstateparks.gov](mailto:cklebacha@azstateparks.gov)  
 Web: <http://AZStateParks.com/SHPO>



On Thu, Nov 9, 2023 at 9:16 AM AZSHPO - AZPARKS <[azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov)> wrote:

SHPO-2023-0981 (172178)

----- Forwarded message -----

From: **Andrew Vorsanger** <[Andrew.Vorsanger@swca.com](mailto:Andrew.Vorsanger@swca.com)>

Date: Thu, Nov 2, 2023 at 12:08 PM

Subject: Request for Consultation – SunDog Solar Energy Generation Tie Line, Application for a Certificate of Environmental Compatibility

To: [azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov) <[azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov)>, Caroline Klebacha <[cklebacha@azstateparks.gov](mailto:cklebacha@azstateparks.gov)>

Cc: Devin Petry <[devin.petry@swca.com](mailto:devin.petry@swca.com)>, Colin Agner <[cagner@swca.com](mailto:cagner@swca.com)>

Hello,

On behalf of SunDog Energy Center LLC, we respectfully request that the State Historic Preservation Office (SHPO) review and provide comment on the SunDog Solar Energy Generation Tie Line Project to support the Arizona Corporation Commission's compliance with the State Historic Preservation Act (Arizona Revised Statutes 41-861 through 41-864). Please find attached the letter that contains information about the Project in accordance with the SHPO's September 2022 "ACC-SHPO Consultation Checklist for Compliance with the State Historic Preservation Act." Also included are the project location and Class I results maps. We look forward to consulting with your office on this project, and please do not hesitate to contact us with any questions.

Thank you.

**Andrew Vorsanger** | he, him, his

Senior Cultural Resources Team Lead - Arizona

**SWCA Environmental Consultants**

20 E. Thomas Road, Suite 1700

Phoenix, Arizona, 85012

P 602.887.8104 | C 917.816.3517

[Andrew.Vorsanger@swca.com](mailto:Andrew.Vorsanger@swca.com)



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November 2, 2023

Kathryn Leonard, State Historic Preservation Officer  
1110 W. Washington St., #100  
Phoenix, AZ 85007

Submitted via email to: [azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov) and [cklebacha@azstateparks.gov](mailto:cklebacha@azstateparks.gov)

**Re: Request for Consultation – Invenergy SunDog Solar Energy Certificate of Environmental Compatibility**

Dear Ms. Leonard:

Pursuant to Arizona Revised Statutes (ARS) 40-360 et seq., SunDog Energy Center LLC (SunDog or Applicant), a subsidiary of Invenergy LLC, plans to file an application for a Certificate of Environmental Compatibility (CEC) for the proposed SunDog 230-kilovolt (kV) alternating current generation intertie transmission line (Generation Tie Line) (herein called the Project or Project Area). The proposed Project is designed to deliver power from the adjacent SunDog Solar Energy Center, a proposed 200-megawatt (MW) solar photovoltaic facility (Solar Facility) with a 200-MW battery storage system. The Solar Facility would also include the construction of a proposed onsite substation (Project Substation). The Applicant proposes to construct and operate the Project to connect the Solar Facility to the regional electrical grid via the existing Pinal Central Substation.

This letter contains information about the Project in accordance with the State Historic Preservation Office's September 2022 "ACC-SHPO Consultation Checklist for Compliance with the State Historic Preservation Act" (attached hereto as Attachment 1). On behalf of the Applicant, we respectfully request that the SHPO review and provide comment on the Project to support the Arizona Corporation Commission's compliance with the State Historic Preservation Act (Arizona Revised Statutes 41-861 through 41-864).<sup>1</sup>

**GENERAL PROJECT INFORMATION**

- *Project name:* SunDog 230kV Generation Tie Line Project
- *Project location (legal description and UTM):* The project is located in Sections 25 and 26, Township 6 South, Range 7 East; Section 30 Township 6 South, Range 8 East, Pinal County, Arizona.
  - The Project Substation and western terminus of the Generation Tie Line would be in in the northeast quarter of Section 26, Township 6 South, Range 7 East, Pinal County, Arizona.
    - Western terminus coordinates: (445120 E, 3638004 N; UTM Zone 12S)

<sup>1</sup> The State Historic Preservation Act requires state agencies to consider impacts of their programs on historic properties listed in or eligible for listing in the Arizona Register of Historic Places (ARHP), and to provide the State Historic Preservation Office an opportunity to review and comment on the actions that affect such historic properties.

- The eastern terminus of the Generation Tie Line would be within the existing SRP Pinal Central Substation, which is in the southwest quarter of Section 30, Township: 6 South, Range 8 East, Pinal County, Arizona.
  - Eastern terminus coordinates: (447193 E, 3637117 N; UTM Zone 12S)
- *Funding source:* Private (no state, federal, or other public funding sources)

## PROJECT AREA INFORMATION

- *Project Area:* The term “Project Area” refers to the Generation Tie Line. The Generation Tie Line route will have an up to 100-foot-wide by approximately 1.7-mile-long transmission line right-of-way between the Project Substation and the SRP Pinal Central Substation. The proposed project route is shown on Figure 1 (see Attachment 2). Figure 1 also shows land jurisdiction in the vicinity of the Project Area.
- *Total Area:* up to 20.36 acres
- *Landownership (all involved; acres by land jurisdiction):* The Generation Tie Line will entirely be on privately owned land (Table 1), except for those portions crossing public road rights-of-way at S Tweedy Road and Eleven Mile Corner Road. Pinal County Fairgrounds is owned by Pinal County and Pinal County Fair and is considered privately owned land.

**Table 1. Project Area by Land Jurisdiction**

Jurisdiction	Area (acres)	Percent of Total
Private	20.36	100%

## SCOPE OF WORK

SunDog plans to file an application for a CEC for the Project. The proposed Project is designed to deliver power from the adjacent SunDog Solar Energy Center, a 200-megawatt (MW) solar photovoltaic facility with a 200-MW battery storage system. The Applicant proposes to construct and operate the Project to connect the Solar Facility to the regional electrical grid via the existing Pinal Central Substation. The Project would use steel monopole and multi-pole structures, with final design characteristics determined in the detailed design phase. The Applicant is seeking a CEC only for the Generation Tie Line.

## SUMMARY OF PREVIOUS ARCHAEOLOGICAL INVESTIGATIONS WITHIN THE PROJECT AREA

A records review of AZSITE identified 20 previous cultural resources surveys that have taken place within the Study Area, which is defined here as a 1-mile buffer around the Project Area (see Attachment 3). These projects occurred from 1982 to 2019 in support of irrigation improvements, telecommunications projects, transportation improvements, and electrical transmission line construction. Of these, eight cultural surveys intersect the Generation Tie Line and cover approximately 13.1 acres (28 percent) of the proposed Project Area (Table 2).

The SHPO has provided guidance for the reliance on survey data that are 10 years or older (SHPO 2004). Surveys conducted before 1995 did not use the current ASM site definition criteria (ASM 1995); one survey in the Project Area (1982-200.ASM) meets this criterion. Of the remaining seven surveys, all used a survey strategy that would meet current methodological standards for full coverage in Arizona. The principal investigators listed for these surveys meet current state and federal professional qualification

standards. Lastly, it is unlikely that there are additional resources present in the current Project Area that have become at least 50 years old since the previous surveys. SWCA believes these seven surveys, which cover approximately 12.6 acres (27%) of the proposed Project Area, can be relied on for current inventory purposes.

**Table 2. Previous Cultural Resource Projects Intersecting the Project Area**

Agency Number	Project Name	Organization	Year
1982-200.ASM	Coolidge-Saguaro 115 kV Transmission Line	CASA	1982
2001-787.ASM	Replacement of Three Structures and Placement of 1 Inset Structure on the Coolidge-ED #1 115-kV Line	Department of Energy	2001
2007-175.ASM	Pinal South Substation Survey	Desert Archaeology	2007
2007-692.ASM	Pinal West to Dinosaur Transmission Line Surveys	Desert Archaeology	2007-2009
2008-501.ASM	Caywood/Wuertz Peaking Plant Survey	Desert Archaeology	2008
2008-763.ASM	Coolidge-ED2 #1 115-kV Transmission Line	Archaeological Consulting Services	2009
2008-764.ASM	Coolidge-ED2 #2 115-kV Transmission Line	Archaeological Consulting Services	2009
2019-218.ASM	East Line Solar	SWCA	2019

Note: Shading denotes surveys that SWCS believes can be relied on for current inventory purposes.

## IDENTIFICATION OF CULTURAL RESOURCES WITHIN THE PROJECT AREA

### Historic-era Sites

The records review identified three historic-era sites within the Study Area (Table 3); one site (AZ AA:2:284[ASM]) intersects with the proposed Generation Tie Line. Site AZ AA:2:284(ASM) is a Historic period domestic refuse scatter and a Hohokam artifact scatter. The site was determined to be eligible for the ARHP under Criterion D (Clark 2007). The two other sites in the Study Area are an early twentieth century homestead and a historic-era and modern-era ranching and refuse disposal site. In 2021, the ASM issued a policy exempting historic-era waste piles (a type of refuse scatter) from the definition of cultural resource sites (ASM 2021). It is likely that the refuse scatter components (AZ AA:2:284[ASM] and AZ AA:2:370[ASM]) listed in the table below no longer qualify as sites.

**Table 3. Previously Recorded Historic-era Sites within 1 Mile of the Project Area**

Site Number	Cultural/Temporal Affiliation	Site Type	ARHP Eligibility Status	Associated Reference(s)	Distance from Project Area (miles)
AZ AA:2:284(ASM)	Euro-American / 1900–1950s	Artifact scatter	Determined eligible (Criterion D)	Clark 2007	0.00
AZ AA:2:347(ASM)	Euro-American/ ca. 1910s-1920s	Kurz Homestead	Recommended eligible (Criterion D)	Cook and Whitney (2012)	0.86
AZ AA:2:370(ASM)	Euro-American/ ca. 1950s-present	Artifact scatter	Recommended not eligible	Peterson (2019)	0.86

Note: Shading indicates site intersects the Project Area.

## Historic-era Structures

The records review identified seven historic-era in-use structures within the Study Area (Table 4). Three of these structures intersect the Project Area: Eleven Mile Corner Road (AZ AA:2:175[ASM]), the Coolidge-ED2 #1 Transmission Line (AZ AA:2:307[ASM]), and the Coolidge-Saguaro 115-kV Transmission Line (AZ AA:7:647[ASM]). These three structures are all historic-era in-use structures that have been determined not eligible for the ARHP.

**Table 4. Previously Recorded Historic-era In-use Structures within 1 Mile of the Project Area**

Site Number	Cultural/Temporal Affiliation	Site Type	ARHP Eligibility Status	Associated Reference(s)	Distance from Project Area (miles)
AZ AA:2:175(ASM)	Euro-American/ ca. 1900–1920s	Eleven Mile Corner Road	Determined not eligible	Stone (1998)	0.00
AZ AA:2:176(ASM)	Euro-American / ca. 1900–1920s	Sunshine Road	Determined not eligible	Stone (1998)	0.82
AZ AA:2:149(ASM)	Euro-American / ca. 1920s-present	State Route 87	Determined not eligible	Stone (1998)	0.05
AZ AA:3:209(ASM)	Euro-American / 1889–1920s	Casa Grande Canal	Recommended eligible (Criterion A)	Moreno (1996)	0.18
AZ AA:2:360(ASM)	Euro-American/ ca. 1920s	Unnamed road	Determined not eligible	Teeter et al. (2014a, 2014b)	0.44
AZ AA:2:307(ASM)	Euro-American / ca. 1950s-present	Coolidge-ED2 #1 Transmission Line	Determined not eligible	Shilling (2009a, 2009b)	0.00
AZ AA:7:647(ASM)	Euro-American / ca. 1950s-1960s	Coolidge-Saguaro Transmission Line	Determined not eligible	Cook and Whitney (2012)	0.00

Note: Shading indicates site intersects the proposed Project area.

The GLO plat of Township 6 South, Range 7 East, approved in 1889, depicts a road named OLD SACATON intersecting the Project Area and an unnamed road in the Study Area. A 1928 Dependent Resurvey depicts the CASA GRANDE FLORENCE CANAL in the Study Area. The GLO plat of Township 6 South, Range 8 East, approved in 1889, depicts the OLD OPEN CANAL STAGE ROAD intersecting the Project Area in the southwest quarter of Section 30, and depicts OLD ROAD and the FLORENCE CANAL in the Study Area. A 1929 Dependent Resurvey depicts the CASA GRANDE-FLORENCE CANAL and an unnamed road that follows the north side of the canal in the Study Area.

The 1922 USGS Signal Peak, Arizona, 1:62,500-scale topographic map depicts the CASA GRANDE-FLORENCE CANAL, FLORENCE ROAD (modern-day SR 287) and the intersection at Eleven Mile Corner (unnamed), multiple unnamed roads, structures and associated wells; the unnamed road on the border between Sections 29 and 30 is the modern-day Sunshine Road. One of the unnamed roads on the west half of Section 26 (likely modern-day South Tweedy Road) intersects the Project Area. A 1937 Pinal County transportation and highway map depicts modern-day Eleven Mile Corner Road extending south of Florence Road (which was incorporated into SR 287 in 1961). This segment of the road intersects with proposed Generation Tie Line.

The 1965 USGS Coolidge, Arizona, 7.5-minute quadrangle depicts multiple structures, a school, Pinal County Housing Authority, transmission lines (including Coolidge-ED2 #1 Transmission Line), and an air landing strip north of SR 287 at Eleven Mile Corner, Arizona. An unnamed road and structure intersect the Generation Tie Line component of the Project in the northwest quarter of Section 25. The 1965 USGS Eloy North, Arizona, 7.5-minute quadrangle depicts the county fairgrounds and racetrack; a substation; multiple unnamed roads, structures, and wells; a transmission line (the Coolidge-ED2 #1



Transmission Line); a road paralleling the Casa Grande Canal; the CASA GRANDE CANAL; and three spur canals. The spur canals, the fairgrounds and racetrack, and the transmission line intersect the proposed Generation Tie Line component of the Project.

A search of the NRHP database and AZSITE did not reveal any historic structures or NRHP-listed sites in the Study Area. However, the National Scenic and National Historic Trail webmap indicates that the Congressionally-designated Juan Bautista de Anza National Historic Trail (1775–1776) passes through Eleven Mile Corner, Arizona, in the Study Area (National Park Service [NPS] 2023).

## Archaeological Sites

There are seven previously recorded archaeological sites within the Study Area (Table 5); six are Hohokam artifact scatters and one has an unknown affiliation. None of these sites intersect the Project Area. (An additional previously recorded site, Site AZ AA 2:284(ASM), is a multicomponent site that is listed in the historic-era sites section and therefore is excluded from this section to avoid duplication.)

**Table 5. Previously Recorded Archaeological Sites within 1 Mile of the Project**

Site Number	Cultural/Temporal Affiliation	Site Type	ARHP Eligibility Status	Associated Reference(s)	Distance from Project Area (miles)
AZ AA:2:285(ASM)	Hohokam	Artifact scatter	Determined eligible (Criterion D)	Clark 2007	0.13
AZ AA:2:295(ASM)	Hohokam	Artifact scatter	Recommended eligible (Criterion D)	Darby 2008	0.05
AZ AA:2:346(ASM)	Hohokam	Artifact scatter	Determined eligible (Criterion D)	Cook and Whitney 2012)	0.73
AZ AA:2:364(ASM)	Unknown	Unknown	Unknown	Unknown	0.69
AZ AA:2:366(ASM)	Hohokam	Artifact Scatter	Recommended not eligible	Peterson 2019	0.42
AZ AA:2:367(ASM)	Hohokam	Artifact Scatter	Recommended eligible (Criterion D)	Peterson 2019	0.80
AZ AA:2:368(ASM)	Hohokam	Artifact Scatter	Recommended not eligible	Peterson 2019	0.97

## SUMMARY AND ASSESSMENT OF EFFECTS

The records review identified that approximately 27 percent of the Project Area has been previously and adequately surveyed for cultural resources. One previously recorded historic property (AZ AA:2:284[ASM]) intersects the Project Area; however, the site has likely been destroyed by the Pinal Central Substation expansion between 2011 and 2013.

The records review identified the Juan Bautista de Anza National Historic Trail (1775-1776), which passes through Eleven Mile Corner, in the Study Area. Juan Bautista de Anza II was a Mexican military commander who led almost 300 men, women, and children from present-day Nogales, Arizona to San Francisco, California to establish the first non-Native American settlement at San Francisco Bay (NPS 2023). In many cases, the designated National Historic Trail is an approximation of the actual historic route (NPS 2019:74). Construction of the Project would introduce a visual element to the area, which could potentially diminish the integrity of the characteristics of the trail for which it is eligible for the

ARHP. The visual impact analysis of the Generation Tie Line concluded that the lines, forms, textures, and scale of the Generation Tie Line would be similar to those of the existing nearby transmission lines already in the viewshed. Even from the relatively close vantage points, the addition of the Generation Tie Line would result in a weak degree of contrast and low visual impacts.

To ensure that the current historic property as well as other potential historic properties would not be impacted within the Project Area, the Applicant will complete a cultural resources inventory of the portions of the Project Area that have not been previously adequately surveyed to identify and evaluate the cultural resources that may be present. If any historic properties are encountered, the inventory would provide recommendations on how to mitigate any adverse effects on those historic properties.

SunDog respectfully requests your review and comments on this project by December 4, 2023. Please feel free to contact me, or our Senior Cultural Resources Team Lead – Andrew Vorsanger ([Andrew.Vorsanger@swca.com](mailto:Andrew.Vorsanger@swca.com)), should you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Petry". The signature is stylized and cursive.

Devin Petry  
Project Manager, SWCA Environmental Consultants

## REFERENCES CITED/LITERATURE CITED

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2012 Cultural Resources Class III Survey for the Western Area Power Administration Proposed Pole Replacement Project: ED2 to ED4 and ED5 to SGR1, Pinal County, Arizona. Report no. 11 140. Desert Archaeology, Inc., Tucson, Arizona.

Darby, Connie A.

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2019 Cultural Resources Inventory for the East Line Solar Project, Generation-Tie Route Options C, D and E, Pinal County, Arizona. Cultural Resources Report No. 19-509. SWCA Environmental Consultants, Tucson, Arizona.

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Teeter, Sean, Grant Fahrni, and Leigh Davidson

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2014b Class I Inventory for the Western Area Power Administration Electrical District 2 Saguaro 2-115-kV Transmission Line Cultural Resources Survey. Report 2 of 2. Logan Simpson Design, Tempe, Arizona.

**ATTACHMENT 1**

**ACC-SHPO Consultation Checklist for Compliance with the State  
Historic Preservation Act**

**ACC-SHPO CONSULTATION CHECKLIST  
FOR COMPLIANCE WITH THE STATE HISTORIC PRESERVATION ACT  
(September 2022)**

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Projects requiring a Certificate of Environmental Compatibility are subject to the Arizona State Historic Preservation Act and consultation with the Arizona State Historic Preservation Officer. All submissions must include a letter on letterhead, addressed to:

Kathryn Leonard, State Historic Preservation Officer  
1110 W. Washington St., #100  
Phoenix, AZ 85007

The letter should be one or two pages (as needed) and include:

- Project Name
- Project location (please include legal description and UTM's)
- Funding source for the project, and/or the state or federal agency or program, as applicable
- Project Area description (project area dimensions, and include all alternatives, access roads, gen-tie connections, staging areas, etc)
- Total Acres in Project Area
- Landownership (all involved; provide acres by land jurisdiction)
- Scope of work (detailed description of the project)
- Summary of previous archaeological investigations within the Project Area
- Identification of cultural resources within the Project Area (brief description of site and eligibility status)
- Request for SHPO review and comment

Attachments should include:

- Location map showing where the project area is located and land jurisdiction
- Map(s) showing Class I research results for projects and cultural resources

Email to: [azshpo@azstateparks.gov](mailto:azshpo@azstateparks.gov) (no hard copies accepted)

Additional questions: [cklebacha@azstateparks.gov](mailto:cklebacha@azstateparks.gov)

**ATTACHMENT 2**

**Location map showing the Project Area and Land Jurisdiction**

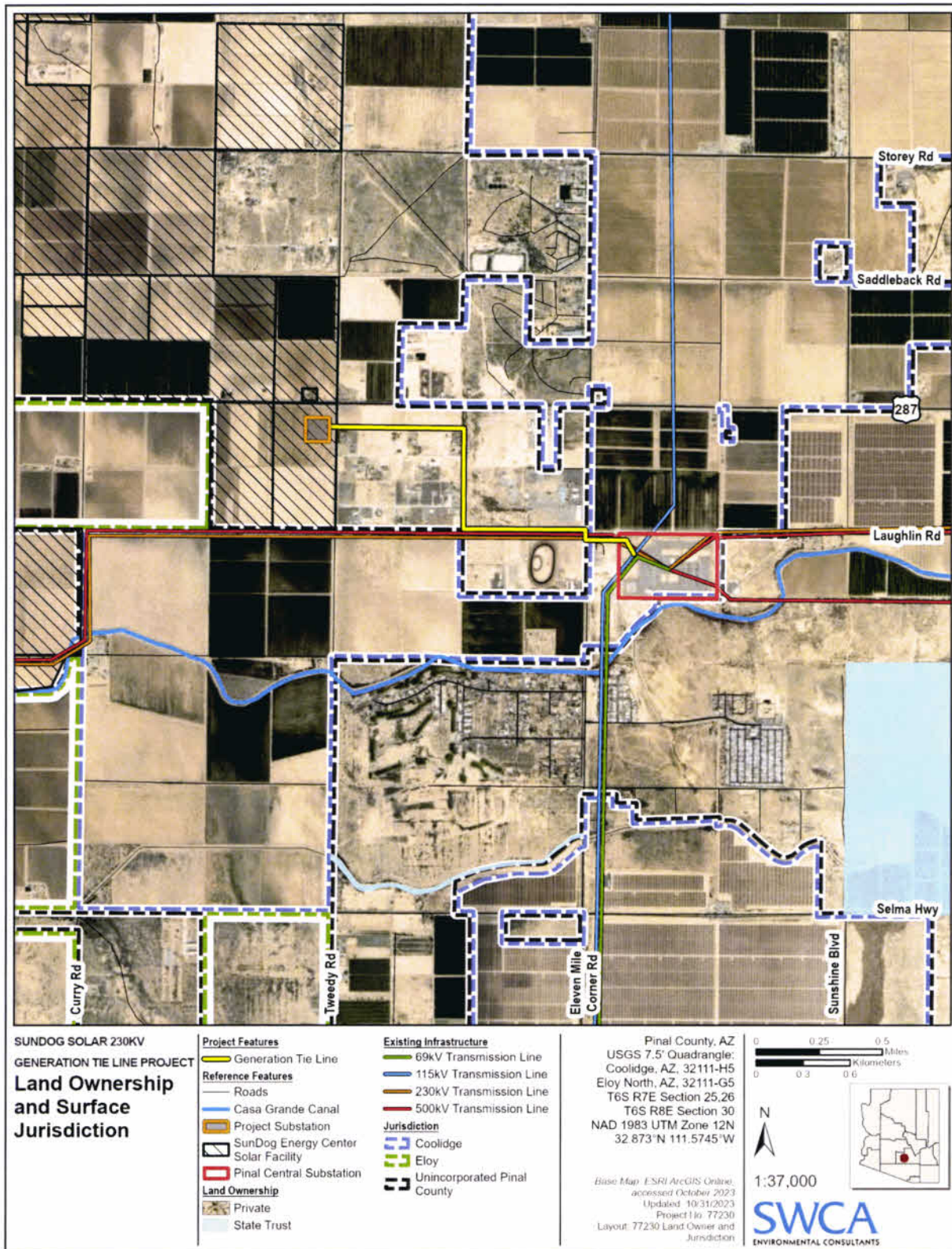


Figure 1. Project Overview and Land Jurisdiction.



**ATTACHMENT 3**

**Class 1 Previous Research Maps**

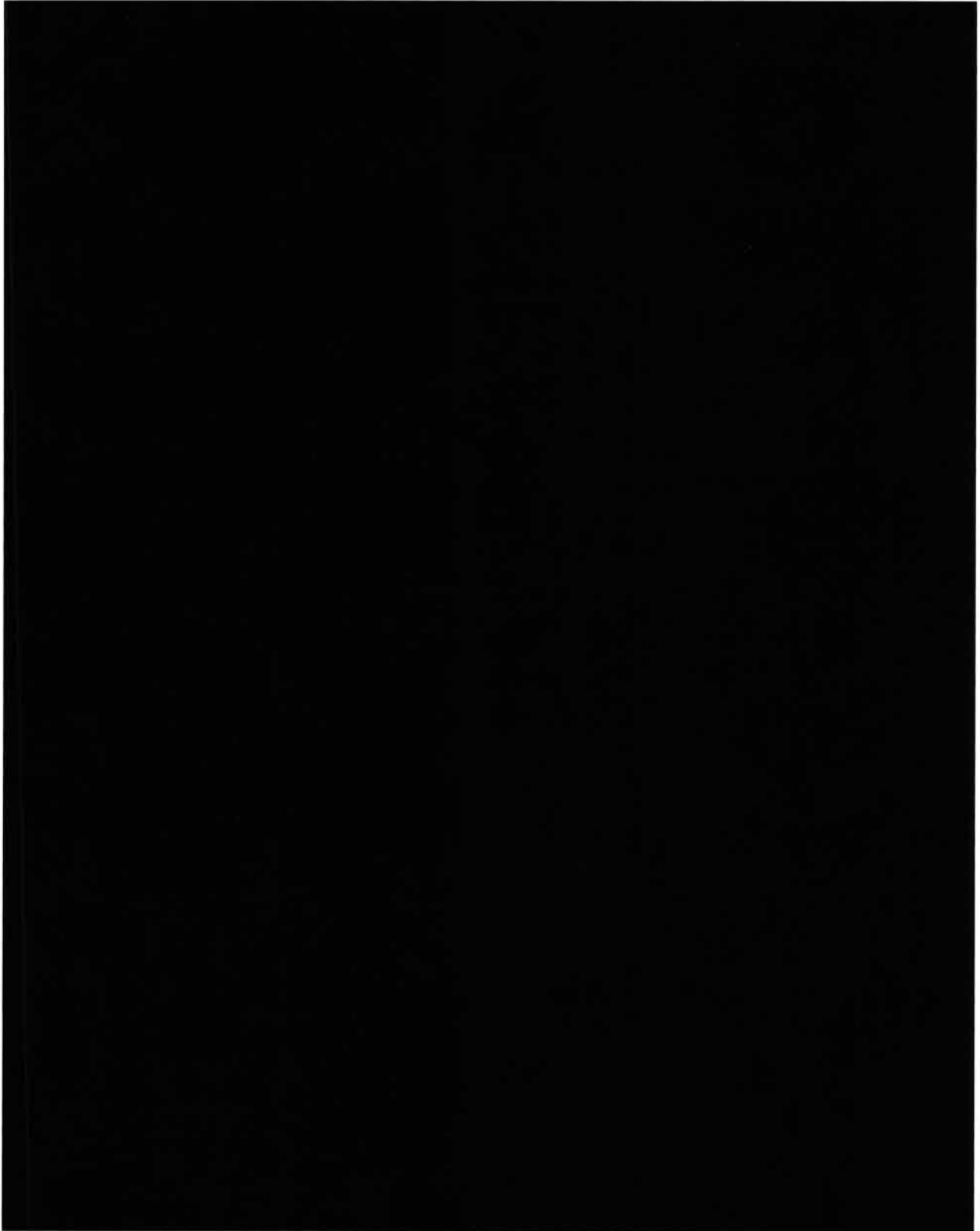


Figure 2. Class I Previous research map (1 of 2).

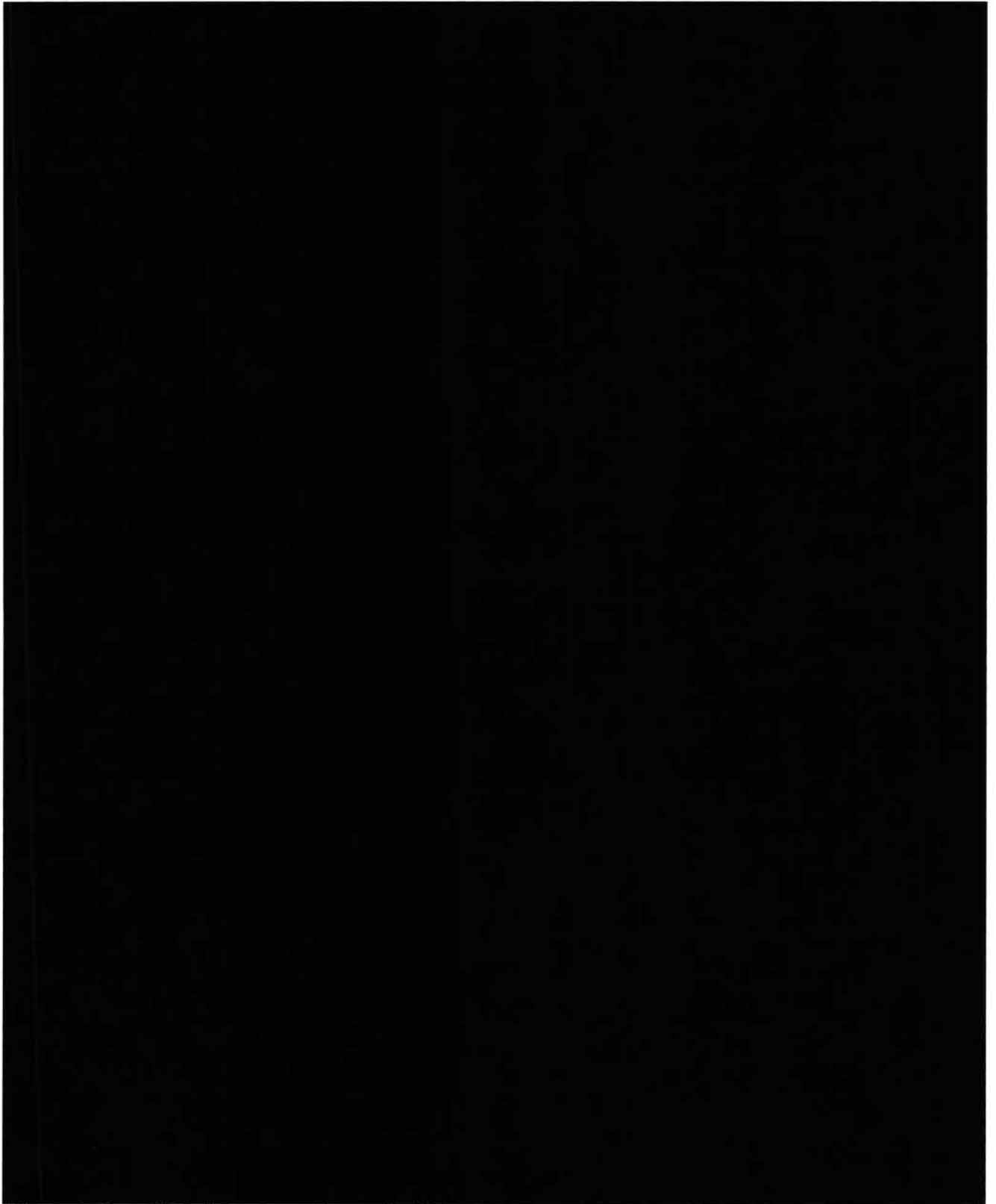


Figure 3. Class I Previous research map (2 of 2).

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

IN THE MATTER OF THE APPLICATION  
OF SUNDG ENERGY CENTER LLC, IN  
CONFORMANCE WITH THE  
REQUIREMENTS OF ARIZONA REVISED  
STATUTES, SECTIONS 40-360, ET. SEQ.,  
FOR CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY  
AUTHORIZING THE SUNDG SOLAR  
230KV GENERATION TIE LINE PROJECT  
LOCATED IN PINAL COUNTY,  
ARIZONA.

DOCKET NO.: L-21284A-23-0335-  
00229

Case No. 229

**NOTICE OF FILING  
PROPOSED CERTIFICATE OF  
ENVIRONMENTAL  
COMPATIBILITY**

Pursuant to Paragraph 22 of the December 27, 2023 Procedural Order in this matter, SunDog Energy Center LLC (“Applicant”) submits the attached proposed Certificate of Environmental Compatibility.

RESPECTFULLY submitted this 23rd day of January, 2024, by:

ACKEN LAW

BALLARD SPAHR LLP

By: /s/ Albert H. Acken  
Albert H. Acken (021645)  
111 E. Dunlap Ave, Ste 1-172  
Phoenix, Arizona 85020  
bert@ackenlaw.com

By: /s/ Sarah A. Noe  
Lea A. Phillips (029006)  
Sarah A. Noe (036283)  
1 East Washington Street, Suite 2300  
Phoenix, AZ 85004-2555  
phillipsla@ballardspahr.com  
noes@ballardspahr.com

*Attorneys for SunDog Energy Center LLC*



**CERTIFICATE OF MAILING**

**ORIGINAL and 25 copies** filed  
on January 23, 2024, with:

Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

**COPIES** of the foregoing e-mailed on  
January 23, 2024, to:

Adam Stafford, Chairman  
Arizona Power Plant and Transmission  
Line Siting Committee  
Assistant Attorney General  
Attention: Tod Brewer  
15 South 15<sup>th</sup> Avenue  
Phoenix, AZ 85004

Chief Counsel  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007  
legaldiv@azcc.gov  
Counsel for Legal Division Staff

Ranelle Paladino, Co-Director  
Brixton Baxter, Co-Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007  
utildivservicebyemail@azcc.gov

Lisa L. Glennie  
Glennie Reporting Services, LLC  
1555 East Orangewood  
Phoenix, Arizona 85020  
admin@glennie-reporting.com  
Court Reporter

By: aha

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

IN THE MATTER OF THE APPLICATION  
OF SUNDG ENERGY CENTER LLC, IN  
CONFORMANCE WITH THE  
REQUIREMENTS OF ARIZONA REVISED  
STATUTES, SECTIONS 40-360, ET. SEQ.,  
FOR CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY  
AUTHORIZING THE SUNDG SOLAR  
230KV GENERATION TIE LINE PROJECT  
LOCATED IN PINAL COUNTY,  
ARIZONA.

DOCKET NO.: L-21284A-23-0335-00229

Case No. 229

**CERTIFICATE OF  
ENVIRONMENTAL  
COMPATIBILITY**

**A. INTRODUCTION**

Pursuant to notice given as provided by law, the Arizona Power Plant and Transmission Line Siting Committee (“Committee”) held public hearings on February 5-7, 2024, in Pinal County, in conformance with the requirements of the Arizona Revised Statutes (“A.R.S.”) § 40-360 et seq. for the purpose of receiving evidence and deliberating on the December 20, 2023 Application of SunDog Energy Center LLC (“Applicant”) for a Certificate of Environmental Compatibility (“Certificate” or “CEC”) in the above-captioned case.

The following members and designees of members of the Committee were present at one or more of the hearing days for the evidentiary presentations, public comment, and/or for the deliberations:

- |               |   |
|---------------|---|
| Adam Stafford | Chairman, Designee for Arizona Attorney General |
|               | Kris Mayes                                      |
| Gabby Mercer  | Designee of the Chairman, Arizona Corporation   |
|               | Commission (“Commission”)                       |
| Leonard Drago | Designee for Director, Arizona Department of    |
|               | Environmental Quality                           |
| David French  | Designee for Director, Arizona Department of    |
|               | Water Resources                                 |

1	Nicole Hill	Designee for Director of the Energy Office of the
2		Department of Commerce
3	Scott Somers	Appointed Member, representing cities and towns
4	Roman Fontes	Appointed Member, representing counties
5	David Kryder	Appointed Member, representing agricultural interests
6	Margaret "Toby" Little	Appointed Member, representing the general public
7	Jon Gold	Appointed Member, representing the general public
8	David Richins	Appointed Member, representing the general public

9 The Applicant was represented by Bert Acken of Acken Law and Sarah A. Noe of  
10 Ballard Spahr LLP. No parties requested intervention pursuant to A.R.S. § 40-360.05.

11 At the conclusion of the hearing, the Committee, after considering the (i)  
12 Application, (ii) evidence, testimony, and exhibits presented by the Applicant, and (iii)  
13 comments of the public, and being advised of the legal requirements of A.R.S. §§ 40-360  
14 through 40-360.13, upon motion duly made and seconded, voted 7 to 0, to grant Applicant,  
15 its successors and assigns, this Certificate for construction of the SunDog Solar 230kV  
16 Generation Tie Line Project ("Project") as described below.

#### 17 **B. PROJECT DESCRIPTION**

18 The Project consists of an approximately 1.7-mile 230 kV transmission line and  
19 associated interconnection facilities to interconnect the Applicant's planned energy  
20 facilities (the non-jurisdictional "Solar Energy Station") to the regional electrical  
21 transmission grid at the Pinal Central Substation in the City of Coolidge, Pinal County.

22 All Project facilities will be located in a variable-width corridor as shown in **Exhibit**  
23 **A** (the "Project Corridor"). The Project will originate at the non-jurisdictional Project  
24 Substation proposed to be located in the northeast quarter of Section 26, Township 6 South,  
25 Range 7 East. From the Project Substation, the Project will be routed east for approximately  
26 0.6 miles, then turn south for approximately 0.4 miles, paralleling Alexis Lane. From there,  
27 the Project is routed east for approximately 0.5 miles, continuing to parallel Alexis Lane.

28

1 From there, the Project would be routed 0.05 miles south, then 0.15 miles east, and then  
2 0.07 miles southeast until it reaches the Point of Interconnection, the Pinal Central  
3 Substation.

4 The final right-of-way width for the Project within the Project Corridor will be up  
5 to 100 feet.

### 6 CONDITIONS

7 This Certificate is granted upon the following conditions:

8 1. This authorization to construct the Project shall expire ten (10) years from the  
9 date this Certificate is approved by the Arizona Corporation Commission, with or without  
10 modification. Construction of the Project shall be complete, such that the Project is in  
11 service within this ten-year timeframe. However, prior to the expiration of the time period,  
12 the Applicant may request that the Commission extend the time limitation. [\[Case 224\]](#)

13 2. In the event the Project requires an extension of the term(s) of this Certificate  
14 prior to completion of construction, the Applicant shall file such time extension request at  
15 least one hundred and eighty (180) days prior to the expiration of the Certificate. The  
16 Applicant shall use reasonable means to promptly notify [the City of Coolidge](#), the Board of  
17 Supervisors of ~~Coeonino~~[Pinal](#) County, all landowners and residents within a five (5) mile  
18 radius of the centerline of the Project, all persons who made public comment at this  
19 proceeding who provided a mailing or email address, and all parties to this proceeding. The  
20 notification provided will include the request and the date, time, and place of the hearing or  
21 open meetings during which the Commission will consider the request for extension.  
22 Notification shall be no more than three (3) business days after the Applicant is made aware  
23 of the hearing date or the open meeting date. [\[Case 224\]](#)

24 3. During the development, construction, operation, maintenance and  
25 reclamation of the Project, the Applicant shall comply with all existing applicable air and  
26 water pollution control standards and regulations, and with all existing applicable statutes,  
27 ordinances, master plans and regulations of any governmental entity having jurisdiction,  
28



1 including, but not limited to, the United States of America, the State of Arizona,  
2 ~~Coeconino~~Pinal County, the City of Coolidge, and their agencies and subdivisions, including  
3 but not limited to the following:

- 4 a. All applicable land use regulations;
- 5 b. All applicable zoning stipulations and conditions, including but not  
6 limited to landscaping and dust control requirements;
- 7 c. All applicable water use, discharge and/or disposal requirements of the  
8 Arizona Department of Water Resources and the Arizona Department  
9 of Environmental Quality;
- 10 d. All applicable noise control standards; and
- 11 e. All applicable regulations governing storage and handling of  
12 hazardous chemicals and petroleum products.

13 4. The Applicant shall obtain all approvals and permits necessary to construct,  
14 operate and maintain the Project required by any governmental entity having jurisdiction  
15 including, but not limited to, the United States of America, the State of Arizona,  
16 ~~Coeconino~~Pinal County, the City of Coolidge, and their agencies and subdivisions. [Case  
17 224]

18 5. The Applicant shall comply with the Arizona Game and Fish Department  
19 (“AGFD”) guidelines for handling protected animal species, should any be encountered  
20 during construction and operation of the Project, and shall consult with AGFD or U.S. Fish  
21 and Wildlife Service, as appropriate, on other issues concerning wildlife. [Case 224]

22 6. The Applicant shall design the Project's interconnection facilities to  
23 incorporate reasonable measures to minimize electrocution of and impacts to avian species  
24 in accordance with the Applicant's avian protection program. Such measures will be  
25 accomplished through incorporation of Avian Power Line Interaction Committee guidelines  
26 set forth in the current versions of *Suggested Practices for Avian Protection on Power Lines*  
27 and *Reducing Avian Collisions with Power Lines* manuals. [Case 224]

28

1           7.     The Applicant shall consult the State Historic Preservation Office (“SHPO”)  
2 with respect to cultural resources. The Applicant will complete a Class III cultural inventory  
3 of the portions of the final right-of-way that have not been previously adequately surveyed  
4 to identify and evaluate the cultural resources that may be present. If any archaeological,  
5 paleontological, or historical sites or a significant cultural object is discovered on state,  
6 county or municipal land during the construction or operation of the Project, the Applicant  
7 or its representative in charge shall promptly report the discovery to the Director of the  
8 Arizona State Museum (“ASM”), and in consultation with the Director, shall immediately  
9 take all reasonable steps to secure and maintain the preservation of the discovery as required  
10 by A.R.S. § 41-844. [\[Case 224\]](#)

11           8.     The Applicant shall comply with the notice and salvage requirements of the  
12 Arizona Native Plant Law (A.R.S. §§ 3-901 *et seq.*) and shall, to the extent feasible,  
13 minimize the destruction of native plants during the construction and operation of the  
14 Project. [\[Case 224\]](#)

15           9.     The Applicant shall make every reasonable effort to promptly investigate,  
16 identify and correct, on a case-specific basis, all complaints of interference with radio or  
17 television signals from operation of the Project addressed in this Certificate and where such  
18 interference is caused by the Project take reasonable measures to mitigate such interference.  
19 The Applicant shall maintain written records for a period of five (5) years of all complaints  
20 of radio or television interference attributable to operations, together with the corrective  
21 action taken in response to each complaint. All complaints shall be recorded to include  
22 notation on the corrective action taken. Complaints not leading to a specific action or for  
23 which there was no resolution shall be noted and explained. Upon request, the written  
24 records shall be provided to the Staff of the Commission. The Applicant shall respond to  
25 complaints and implement appropriate mitigation measures. In addition, the Project shall  
26 be evaluated on a regular basis so that damaged insulators or other line materials that could  
27 cause interference are repaired or replaced in a timely manner. [\[Case 224\]](#)

28

1           10. If human remains and/or funerary objects are encountered during the course  
2 of any ground-disturbing activities related to the construction or maintenance of the Project,  
3 the Applicant shall cease work on the affected area of the Project and notify the Director of  
4 the ASM as required by A.R.S. § 41-865 for private land, or as required by A.R.S. § 41-844  
5 for state, county, or municipal lands. [\[Case 224\]](#)

6           11. Within one hundred twenty (120) days of the Commission's decision  
7 approving this Certificate, the Applicant shall post signs in or near public rights-of-way, to  
8 the extent authorized by law, reasonably adjacent to the Project giving notice of the Project.  
9 Such signage shall be no smaller than a roadway sign. The signs shall advise:

- 10           a. Future site of the Project;
- 11           b. A phone number and website for public information regarding the  
12 Project; and
- 13           c. Refer the Public to the Docket.

14           Such signs shall be inspected at least once annually and, if necessary, be repaired or  
15 replaced, and removed at the completion of construction.

16           The Applicant shall make every reasonable effort to communicate the decision either  
17 approving or disapproving the Certificate in digital media. [\[Case 224\]](#)

18           12. At least ninety (90) days before construction commences on the Project, the  
19 Applicant shall provide the Board of Supervisors for ~~Coeconino~~[Pinal](#) County, [the City of](#)  
20 [Coolidge](#), and known builders and developers who are building upon or developing land  
21 within one (1) mile of the of the centerline of the Project with a written description,  
22 including the approximate height and width measurements of all structure types, of the  
23 Project. The written description shall identify the location of the Project and contain a  
24 pictorial depiction of the facilities being constructed. The Applicant shall also encourage  
25 the developers and builders to include this information in their disclosure statements. Upon  
26 approval of this Certificate by the Commission, the Applicant may commence construction  
27 of the Project. [\[Case 224\]](#)

28

1           13. The Applicant shall use non-specular conductor and non-reflective surfaces  
2 for the transmission line structures on the Project. [\[Case 224\]](#)

3           14. The Applicant shall be responsible for arranging that all field personnel  
4 involved in the Project receive training as to proper ingress, egress, and on-site working  
5 protocol for environmentally sensitive areas and activities. Contractors employing such  
6 field personnel shall maintain records documenting that the personnel have received such  
7 training. [\[Case 224\]](#)

8           15. The Applicant shall follow the most current Western Electricity Coordinating  
9 Council (“WECC”) and North American Electric Reliability Corporation (“NERC”)  
10 planning standards, as approved by the Federal Energy Regulatory Commission (“FERC”),  
11 National Electrical Safety Code (“NESC”) standards, and Federal Aviation Administration  
12 (“FAA”) regulations. [\[Case 224\]](#)

13           16. The Applicant shall participate in good faith in state and regional transmission  
14 study forums to coordinate transmission expansion plans related to the Project and to  
15 resolve transmission constraints in a timely manner. [\[Case 224\]](#)

16           17. When Project facilities are located parallel to and within one hundred (100)  
17 feet of any existing natural gas or hazardous pipeline, the Applicant shall:

- 18           a. Ensure grounding and cathodic protection studies are performed to  
19 show that the Project's location parallel to and within one hundred  
20 (100) feet of such pipeline results in no material adverse impacts to the  
21 pipeline or to public safety when both the pipeline and the Project are  
22 in operation. The Applicant shall take appropriate steps to ensure that  
23 any material adverse impacts are mitigated. The Applicant shall  
24 provide to Staff of the Commission, and file with Docket Control, a  
25 copy of the studies performed and additional mitigation, if any, that  
26 was implemented as part of its annual compliance-certification letter;  
27 and  
28

1           b.     Ensure that studies are performed simulating an outage of the Project  
2           that may be caused by the collocation of the Project parallel to and  
3           within one hundred (100) feet of the existing natural gas or hazardous  
4           liquid pipeline. The studies should either: (a) show that such simulated  
5           outage does not result in customer outages; or (b) include operating  
6           plans to minimize any resulting customer outages. The Applicant shall  
7           provide a copy of the study results to Staff of the Commission and file  
8           them with Docket Control as part of the Applicant's annual compliance  
9           certification letter. [Case 224]

10          18.     The designation of the corridor in this Certificate, as shown in Exhibit A, does  
11          not authorize a right-of-way greater than 250 feet wide for the transmission line nor does it  
12          grant the applicant exclusive rights within the corridor outside of the final designated  
13          transmission right-of-way. [Case 224]

14          19.     The Applicant shall submit a compliance certification letter annually,  
15          identifying progress made with respect to each condition contained in this Certificate,  
16          including which conditions have been met. The letter shall be submitted to Commission's  
17          Docket Control commencing on ~~December~~August 1, 2024. Attached to each certification  
18          letter shall be documentation explaining how compliance with each condition was achieved.  
19          Copies of each letter, along with the corresponding documentation, shall be submitted to  
20          the Arizona Attorney General's Office. With respect to the Project, the requirement for the  
21          compliance letter shall expire on the date the Project is placed into operation. Notification  
22          of such filing with Docket Control shall be made to the Board of Supervisors for  
23          CoeoninoPinal County, the City of Coolidge, all parties to this Docket, and all parties who  
24          made a limited appearance in this Docket. [Case 224]

25          20.     The Applicant shall provide a copy of this Certificate to the Board of  
26          Supervisors for ~~Coeonino~~Pinal County and the City of Coolidge. [Case 224]

1           21. Any transfer or assignment of this Certificate shall require the assignee or  
2 successor to assume, in writing, all responsibilities of the Applicant listed in this Certificate  
3 and its conditions as required by A.R.S. § 40-360.08(A) and R14-3-213(F) of the Arizona  
4 Administrative Code. [\[Case 224\]](#)

5           22. In the event the Applicant, its assignee, or successor, seeks to modify the  
6 Certificate's terms at the Commission, it shall provide copies of such request to the Board  
7 of Supervisors for ~~Coeonino~~[Pinal](#) County, [the City of Coolidge](#), all parties to this Docket,  
8 and all parties who made a limited appearance in this Docket. [\[Case 224\]](#)

9           23. The Certificate Conditions shall be binding on the Applicant, its successors,  
10 assignee(s) and transferees and any affiliates, agents, or lessees of the Applicant who have  
11 a contractual relationship with the Applicant concerning the construction, operation,  
12 maintenance or reclamation of the Project. The Applicant shall provide in any agreement(s)  
13 or lease(s) pertaining to the Project that the contracting parties and/or lessee(s) shall be  
14 responsible for compliance with the Conditions set forth herein, and the Applicant's  
15 responsibilities with respect to compliance with such Conditions shall not cease or be abated  
16 by reason of the fact that the Applicant is not in control of or responsible for operation and  
17 maintenance of the Project facilities. [\[Case 224\]](#)

#### 18                                   **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

19           This Certificate incorporates the following Findings of Fact and Conclusions of Law:

20           1. The Project aids the state and the southwest region of the United States in  
21 meeting the need for an adequate, economical, and reliable supply of renewable electric  
22 power.

23           2. When constructed in compliance with the conditions imposed in this  
24 Certificate, the Project aids the state, preserving a safe and reliable electric transmission  
25 system.

26           3. During the course of the hearing, the Committee considered evidence on the  
27 environmental compatibility of the Project as required by A.R.S. § 40-360 *et seq.*

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4. The Project and the conditions placed on the Project in this Certificate effectively minimize the impact of the Project on the environment and ecology of the state.

5. The conditions placed on the Project in this Certificate resolve matters concerning balancing the need for the Project with its impact on the environment and ecology of the state arising during the course of the proceedings, and, as such, serve as findings and conclusions on such matters.

6. The Project is in the public interest because the Project’s contribution to meeting the need for an adequate, economical, and reliable supply of electric power outweighs the minimized impact of the Project on the environment and ecology of the state.

7. The Project substation is not jurisdictional because the definition of a “transmission line” under A.R.S. § 40-360(10) only includes “new switchyards to be used therewith”, not substations.

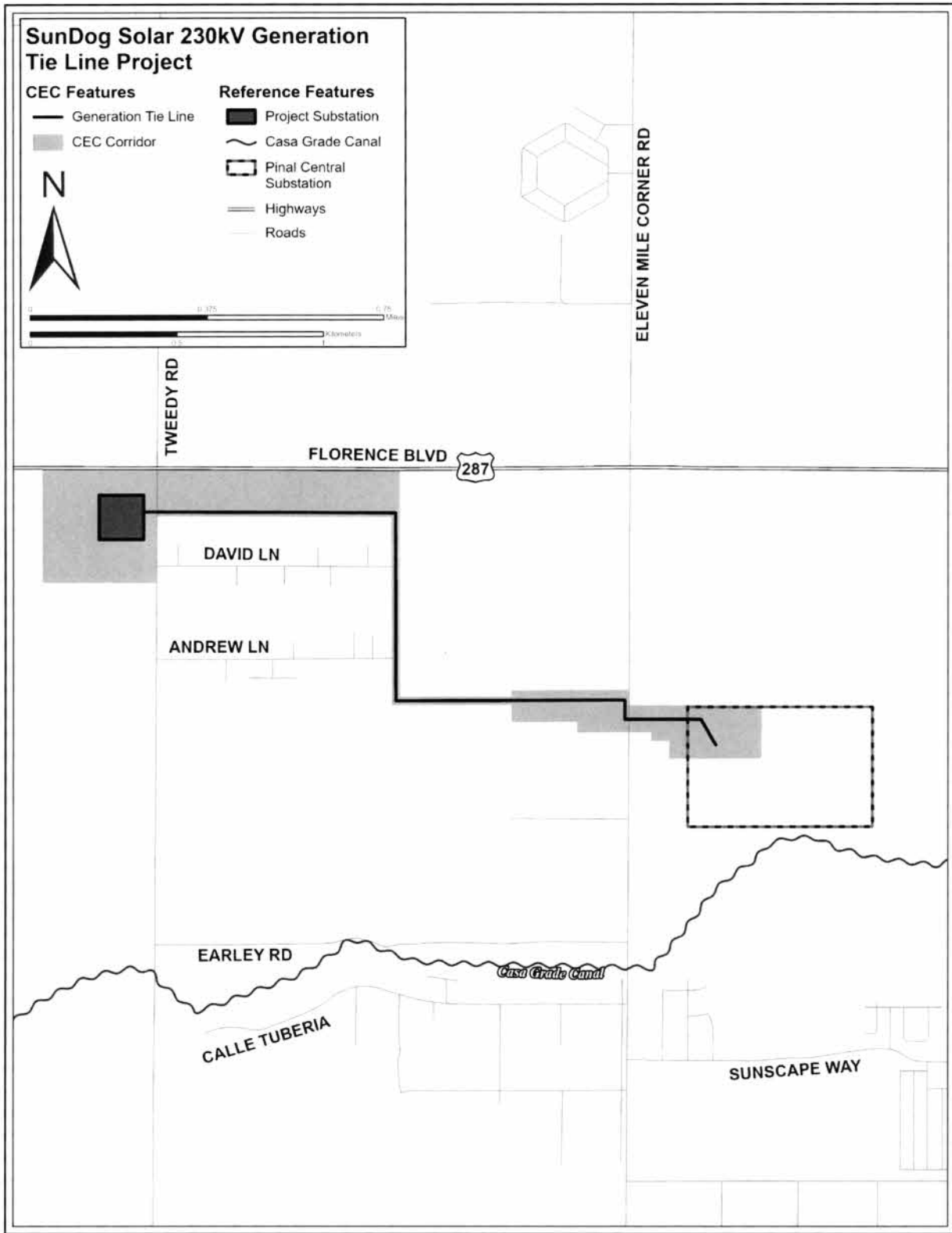
DATED this \_\_\_\_ day of \_\_\_\_\_, 2023.

THE ARIZONA POWER PLANT AND  
TRANSMISSION LINE SITING COMMITTEE

By: \_\_\_\_\_  
Adam Stafford, Chairman

**EXHIBIT A**





# SunDog Solar 230kV Generation Tie Line Project CEC Hearing Route Tour Itinerary

The route tour will begin at the Radisson Hotel Casa Grande, located at 777 North Pinal Avenue, Casa Grande, Arizona 85122. A chartered bus provided by SunDog Energy Center LLC will transport attendees. The attached route tour map shows the route tour path, and route stops that will be reviewed.

**Start of Route Tour: February 6, 2024, at 9:00 am**

**Radisson Hotel Casa Grande**

**777 North Pinal Avenue**

**Casa Grande, Arizona 85122**

**Route Stop #1: Arizona State Route 287 and South Tweedy Road (32.878204°, -111.584462°)<sup>1</sup>**

From the Radisson Hotel Casa Grande, the tour will turn south out of the parking lot onto North Pinal Avenue travel for approximately 180 feet. The tour will then turn left onto Arizona State Route 287 / Florence Boulevard and travel east for approximately 10 miles, where the tour will then turn south onto South Tweedy Road and travel approximately 485 feet. The route tour will make a left turn, stop, and safely park east of South Tweedy Road.

**Route Stop #2: Arizona State Route 287 and Alexis Lane (32.879384°, -111.576195°)**

From route stop #1, the tour will travel north on South Tweedy Road toward Arizona State Route 287 for approximately 485 feet. The tour will then take a right turn onto Arizona State Route 287 and travel east for approximately 0.5 miles. The tour will then turn right onto Alexis Lane where it will stop and safely park west of Alexis Lane.

**Route Stop #3: Eleven Mile Corner Road, South of Arizona State Route 287 at Pinal Central Substation (32.872094°, -111.567086°)**

From route stop #2, the tour will turn right off Alexis Lane and travel east along Arizona State Route 287 for 0.5 miles. The tour will then turn right onto Eleven Mile Corner Road and travel approximately 0.5 miles south. The tour will make a left turn, stop, and safely park east of Eleven Mile Corner Road near the Pinal Central Substation.

**Return to the Radisson Hotel Casa Grande**

From route stop #3, the tour will travel north on Eleven Mile Corner Road for approximately 0.5 miles before turning left onto Arizona State Route 287/Florence Boulevard and traveling west for 10 miles. The tour will then turn right onto North Pinal Avenue and travel approximately 135 feet north, where the tour will then turn left and travel west into the parking lot of the Radisson Hotel Casa Grande, located on the west side of North Pinal Avenue.

The anticipated total route tour time is approximately 2 hours and 30 minutes.

<sup>1</sup> All latitude and longitude geographic coordinates displayed as decimal degrees notation.





Pinal County, AZ  
 USGS 7.5' Topographic  
 Copied, AZ, 32111-65  
 Elroy North, AZ, 32111-65  
 T65 R7E Section 25.26  
 T65 R7E Section 30  
 NAD 1983 UTM Zone 12N  
 32.8726°N 111.5723°W  
 Base Map: Esri ArcGIS Online  
 Accessed: January 2024  
 License: ArcGIS Online  
 Project No: 23-033  
 Layout: SunDog Solar (Open File Review)  
 1:10,000  
 SWCA  
 PIONEERING. CONSULTANTS

**Project Features**  
 — Generation Tie Line

**Reference Features**  
 ■ Project Substation  
 □ Pinal Central Substation  
 — Casa Grande Canal  
 — Arizona State Route 287  
 — Roads

**Route Tour Features**  
 ▲ Route Tour Stops  
 ▲ Route Tour

SUNDOG SOLAR 230KV  
 GENERATION TIE LINE PROJECT  
**Route Tour**

COMMISSIONERS  
Jim O'Connor - Chairman  
Lea Márquez Peterson  
Anna Tovar  
Kevin Thompson  
Nick Myers

ORIGINAL



ARIZONA CORPORATION COMMISSION

R  
Utilities

January 23, 2024

Mr. Adam Stafford, Chairman  
Arizona Power Plant and  
Transmission Line Siting Committee  
Assistant Arizona Attorney General  
2005 North Central Avenue  
Phoenix, Arizona 85004-1592

Arizona Corporation Commission

DOCKETED

RE: Sundog 230kV Generation Tie Line  
Line Siting Application 229  
Docket Control # L-21284A-23-0335-00229

JAN 23 2024

DOCKETED BY

*Vm*

Dear Chairman Stafford:

On December 27, 2023, the Arizona Corporation Commission's ("Commission") Utilities Division Staff ("Staff") received your letter regarding Sundog Energy Center LLC's ("Sundog" or "Applicant") application ("Application") for the issuance of a Certificate of Environmental Compatibility ("CEC") authorizing the construction of a 230 kilovolt ("kV") Generation intertie transmission line ("Gen-Tie").

This letter is Staff's response addressing the question of whether the proposed project improves the reliability and/or safety of the operation of the grid and the delivery of power in Arizona.

**PROJECT DESCRIPTION**

On December 20, 2023, the Applicant filed an application for the issuance of a CEC for its proposed Sundog Solar 230kV Generation Tie Line Project ("Project") that will connect the Sundog Solar Energy Center, a proposed 200-megawatt ("MW") solar photovoltaic facility ("Solar Facility") with a 200-MW battery storage system, to the Salt River Project's ("SRP") Pinal Central Substation. The Solar Facility would also include the construction of a proposed onsite substation ("Project Substation"). This Project is included in the Ten-Year Plans filed with the Commission on January 31, 2023.

The proposed Project will consist of an approximate 1.7 mile-long 240kV Gen-Tie. The Project originates at the Project Substation and will be routed to the point of interconnection at the Pinal Central Substation.

The Applicant states that the need of the Project is to connect the Solar Facility and the electricity generated from the Solar Facility to the regional electrical transmission grid via the

Division Co-Directors Briton A. Baxter, Ranelle S. Paladino  
1200 W. Washington Street, Phoenix, AZ 85007 | 602-542-4251 | [azcc.gov](http://azcc.gov)



Sundog Energy Center LLC  
Docket No. L-21284A-23-0335-00229  
Page 2

Pinal Central Substation for use by electrical customers. The Project has been identified as an optimal location based on the recognized need to interconnect renewable energy sources to local electrical utilities, the existence of compatible adjacent and nearby land uses and the proximity to the existing Pinal Central Substation.

In order to fully analyze any potential effects on the bulk transmission system from the proposed Project, Staff requested the Applicant provide a copy of a System Impact Study ("SIS"). SRP conducted the SIS for the Project using 2022 Heavy Summer and 2023 Heavy Winter conditions. The studies performed include power flow, transient stability, voltage stability, and short circuit analysis. The SIS concluded that the Project does not create any reliability concerns.

### **CONCLUSIONS AND RECOMMENDATIONS**

Based on Staff's review of the Application, as well as the Applicant's response to a Staff issued data request, Staff believes the proposed Project could improve reliability, safety of operation of the grid, and the delivery of power in Arizona.

If there are any questions about this matter, please contact Chaunce De Roos at (602) 542-0941.

Sincerely,



Ranelle Paladino  
Briton Baxter  
Division Co-Directors  
Utilities Division

Sundog Energy Center LLC  
Docket No. L-21284A-23-0335-00229  
Page 3

On this 23rd day of January 2024, the foregoing document was filed with Docket Control as a Utilities Division Correspondence, and copies of the foregoing were mailed on behalf of the Utilities Division to the following who have not consented to email service. On this date or as soon as possible thereafter, the Commission's eDocket program will automatically email a link to the foregoing to the following who have consented to email service.

Lea Phillips  
1 East Washington Street  
Suite 2300  
Phoenix, Arizona 85004

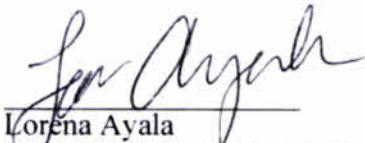
Albert Acken  
Acken Law  
111 East Dunlap Avenue PMB 172 Suite 1  
Phoenix, Arizona 85020  
[bert@ackenlaw.com](mailto:bert@ackenlaw.com)

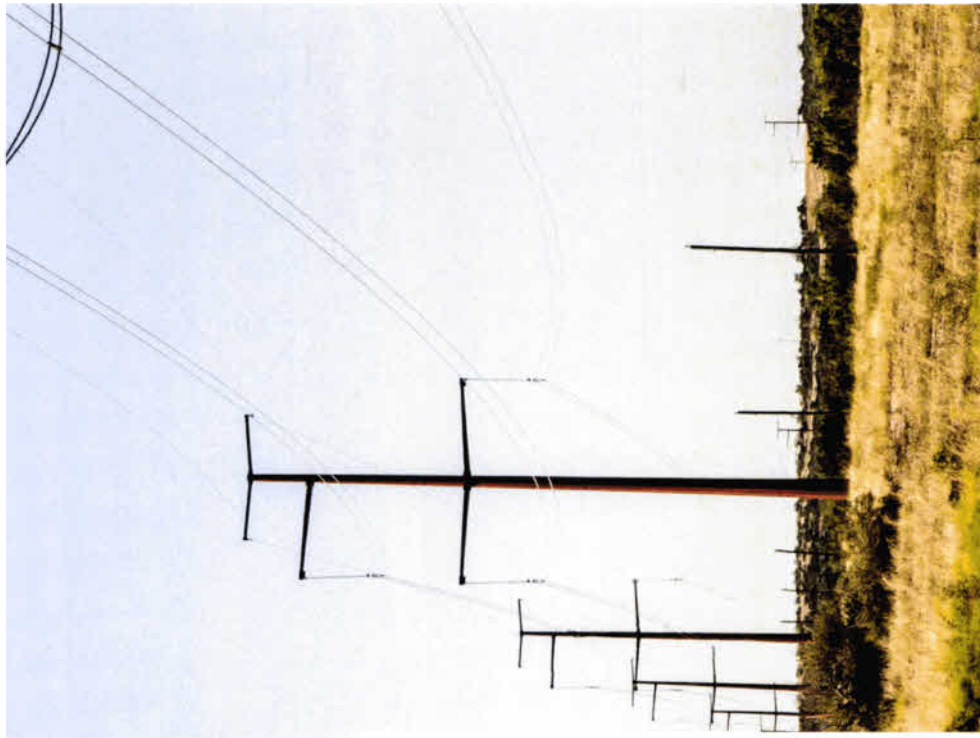
**Consented to Service by Email**

Wesley C. Van Cleve  
Interim Director/Interim Chief Counsel, Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007  
[legaldiv@azcc.gov](mailto:legaldiv@azcc.gov)  
[utildivservicebyemail@azcc.gov](mailto:utildivservicebyemail@azcc.gov)

**Consented to Service by Email**

By:

  
\_\_\_\_\_  
Lorena Ayala  
Administrative Assistant III



Case No. 229

# SunDog Solar 230kV Generation Tie Line Project

Prepared for:  
Arizona Power Plant and Transmission Line Siting  
Committee

**Invenergy**





Case No. 229

# SunDog Solar 230kV Generation Tie Line Project

Prepared for:  
Arizona Power Plant and Transmission Line Siting  
Committee

**Invenergy**



# Introduction of Witness Panel

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CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230KV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND  
 TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# Katie DeSpain, Associate, Renewable Development

---

## Education

- Rice University, Houston, Texas
- B.S. in Civil and Environmental Engineering
- Certificate in Engineering Leadership
- President of Rice Eclipse, Rocketry Team

## Professional Experience

- Associate, Renewable Development, at Invenergy – overseeing multiple solar and energy storage projects in Arizona
- Responsible for projects from conception through start of construction, including permitting, land acquisition, and environmental and engineering studies

Invenergy

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

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PREPARED FOR  
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 TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# Devin Petry, Project Manager, SWCA

---

## Education

- University of Arizona, Tucson
- B.A. in Geography

## Professional Experience

- Senior Environmental Project Manager and Strategic Growth Director at SWCA Environmental Consultants
- 16 years of environmental planning and permitting experience
- Project Manager for and provided testimony in ten previous Line Siting Cases (Nos. 162, 174, 183, 190, 194, 197, 208, 209, 210, and 219)

Invenergy

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230kV PROJECT**

**GENERATION TIE LINE**

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND  
 TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# Colin Agner, Assistant Project Manager, SWCA

---

## **Education**

- Westminster College, New Wilmington, Pennsylvania
- B.S. in Environmental Science
- University of Arizona, Tucson
- M.S. in Planning

## **Professional Experience**

- Environmental Project Manager at SWCA Environmental Consultants
- 12 years of consulting experience, including environmental planning and permitting experience
- Provided testimony in Line Siting Case No. 219

**Invenergy**

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230KV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023



# Applicant and Project Overview

---

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230kV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# World's Leading Privately Held Clean Energy Company



## Wind

117 projects  
18,676 megawatts



## Solar

52 projects  
6,618 megawatts



## Storage

21 projects  
1,817 megawatt hours  
556 megawatts



## Offshore Wind

2 projects  
4,000+ megawatts in  
development



## Transmission

4 projects  
4,100+ miles of transmission  
& collection lines developed



## Clean Hydrogen

1 pilot project in construction  
40 metric tons will be  
produced annually



## Clean Water

9 water treatment facilities  
used at our project sites  
18 million gallons per day of  
raw water capacity

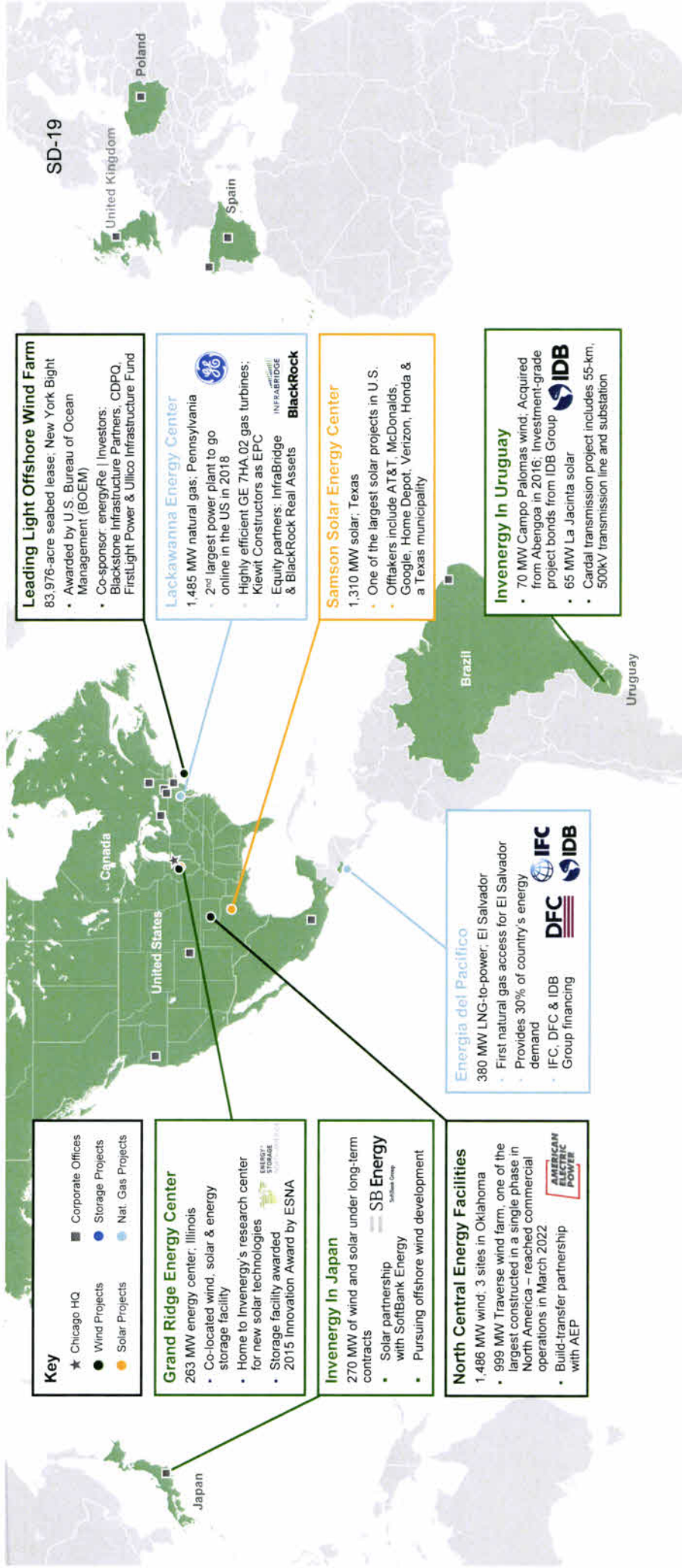


## Natural Gas

13 projects  
6,071 megawatts

## Invenergy Services

We use our 20 years of operations and maintenance experience to help you make the most of your energy center. Whether it's day one or years later, we use our owner's mindset to manage our energy centers and on behalf of our customers.



**Key**

- ★ Chicago HQ
- Corporate Offices
- Wind Projects
- Storage Projects
- Nat. Gas Projects
- Solar Projects

**Grand Ridge Energy Center**  
 263 MW energy center, Illinois

- Co-located wind, solar & energy storage facility
- Home to Invenergy's research center for new solar technologies
- Storage facility awarded 2015 Innovation Award by ESNA

**Invenergy In Japan**  
 270 MW of wind and solar under long-term contracts

- Solar partnership with SoftBank Energy
- Pursuing offshore wind development

**North Central Energy Facilities**  
 1,486 MW wind; 3 sites in Oklahoma

- 999 MW Traverse wind farm, one of the largest constructed in a single phase in North America – reached commercial operations in March 2022.
- Build-transfer partnership with AEP

**Leading Light Offshore Wind Farm**  
 83,976-acre seabed lease; New York Bight

- Awarded by U.S. Bureau of Ocean Management (BOEM)
- Co-sponsor: energyRe | Investors; Blackstone Infrastructure Partners, CDPQ, FirstLight Power & Ullico Infrastructure Fund

**Lakawanna Energy Center**  
 1,485 MW natural gas; Pennsylvania

- 2<sup>nd</sup> largest power plant to go online in the US in 2018
- Highly efficient GE 7HA.02 gas turbines; Kiewit Constructors as EPC
- Equity partners: InfraBridge & BlackRock Real Assets

**Samson Solar Energy Center**  
 1,310 MW solar; Texas

- One of the largest solar projects in U.S.
- Offtakers include AT&T, McDonalds, Google, Home Depot, Verizon, Honda & a Texas municipality

**Energia del Pacifico**  
 380 MW LNG-to-power; El Salvador

- First natural gas access for El Salvador
- Provides 30% of country's energy demand
- IFC, DFC & IDB Group financing

**Invenergy In Uruguay**  
 70 MW Campo Palomas wind; Acquired from Abengoa in 2016; Investment-grade project bonds from IDB Group

- 65 MW La Jacinta solar
- Cardal transmission project includes 55-km, 500kV transmission line and substation

**203**

Projects Developed

**31GW**

Capacity Developed

**\$58B**

Completed Transactions

**9.4M**

Homes Powered

**10.4M**

Cars off the Road Equivalent

# Invenergy Solar Experience

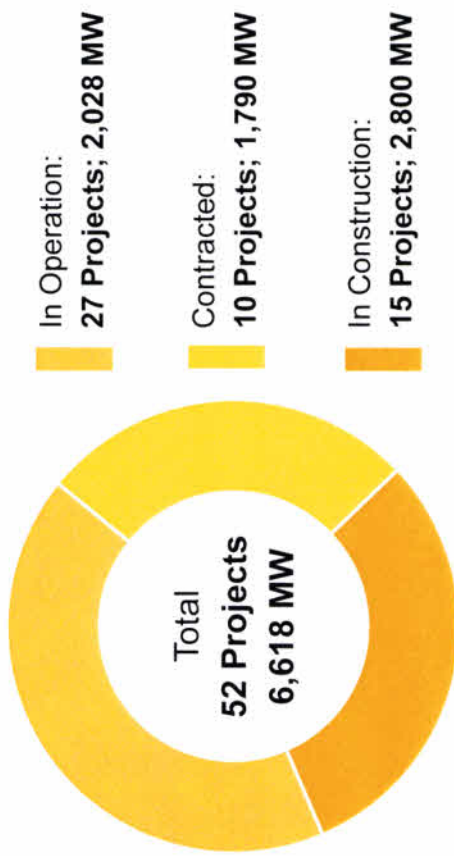
- **Cost-effective clean energy, powered by the sun**
- **Experience includes:**
  - Serving utility, public power, and corporate customers
  - Structures, including PPAs and build/development-transfer
- **Meeting growing demand for solar with:**
  - Technology innovation
  - Relationships with Tier 1 suppliers
  - Unparalleled project execution
  - Safe & reliable operations

Invenergy

SD-19



## Invenergy Solar Portfolio



# Invenery Storage Experience

- Leading privately held developer and industry pioneer of grid-scale batteries
- Over 150,000 hours of battery system runtime experience since 2012
- Experience across
  - Short-, medium- and long-duration applications
  - Major Li-ion chemistries, including nickel cobalt manganese (NMC), nickel cobalt aluminum (NCA) and lithium iron phosphate (LFP)
  - Project structures, including PPA, EPC, and merchant

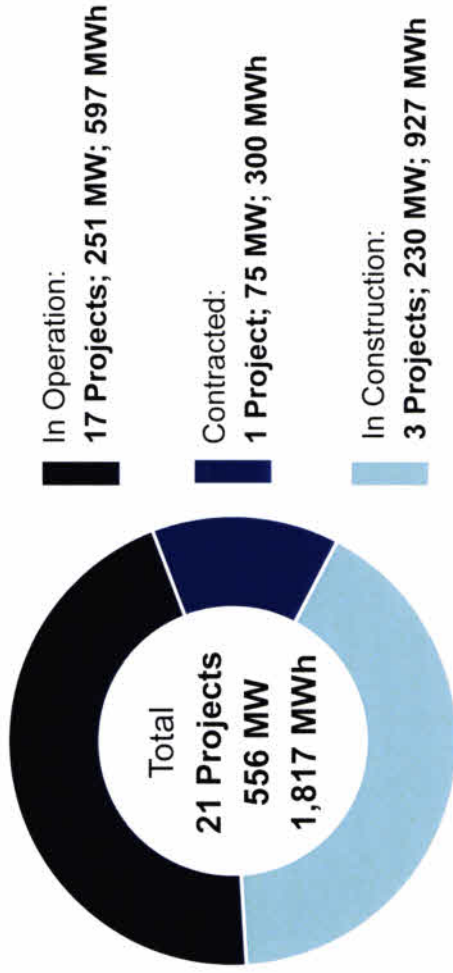


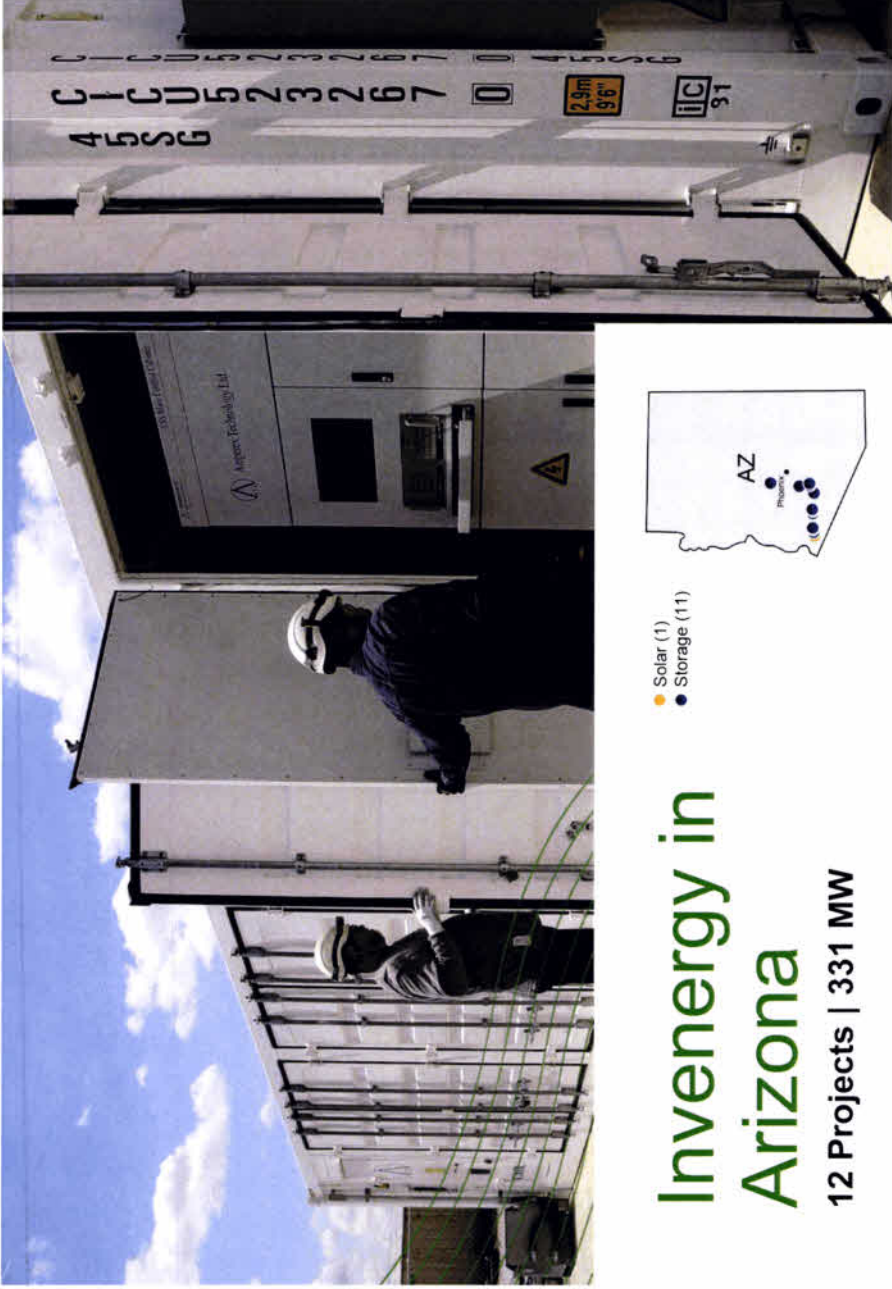
*Invenery received the U.S. Energy Storage Association's 2019 Brad Roberts Award for extraordinary industry accomplishments.*

**Invenery**



## Invenery Storage Portfolio





# Invenergy in Arizona

12 Projects | 331 MW



**\$398,000**  
invested annually in local taxes



**\$7 million**  
in annual land and lease payments



**\$480,000**  
paid in annual wages and benefits

SD-19



**1 solar project**  
totaling 70 MW



**11 energy storage projects**  
totaling 261 MW



**50,300 American homes**  
powered through electricity generated



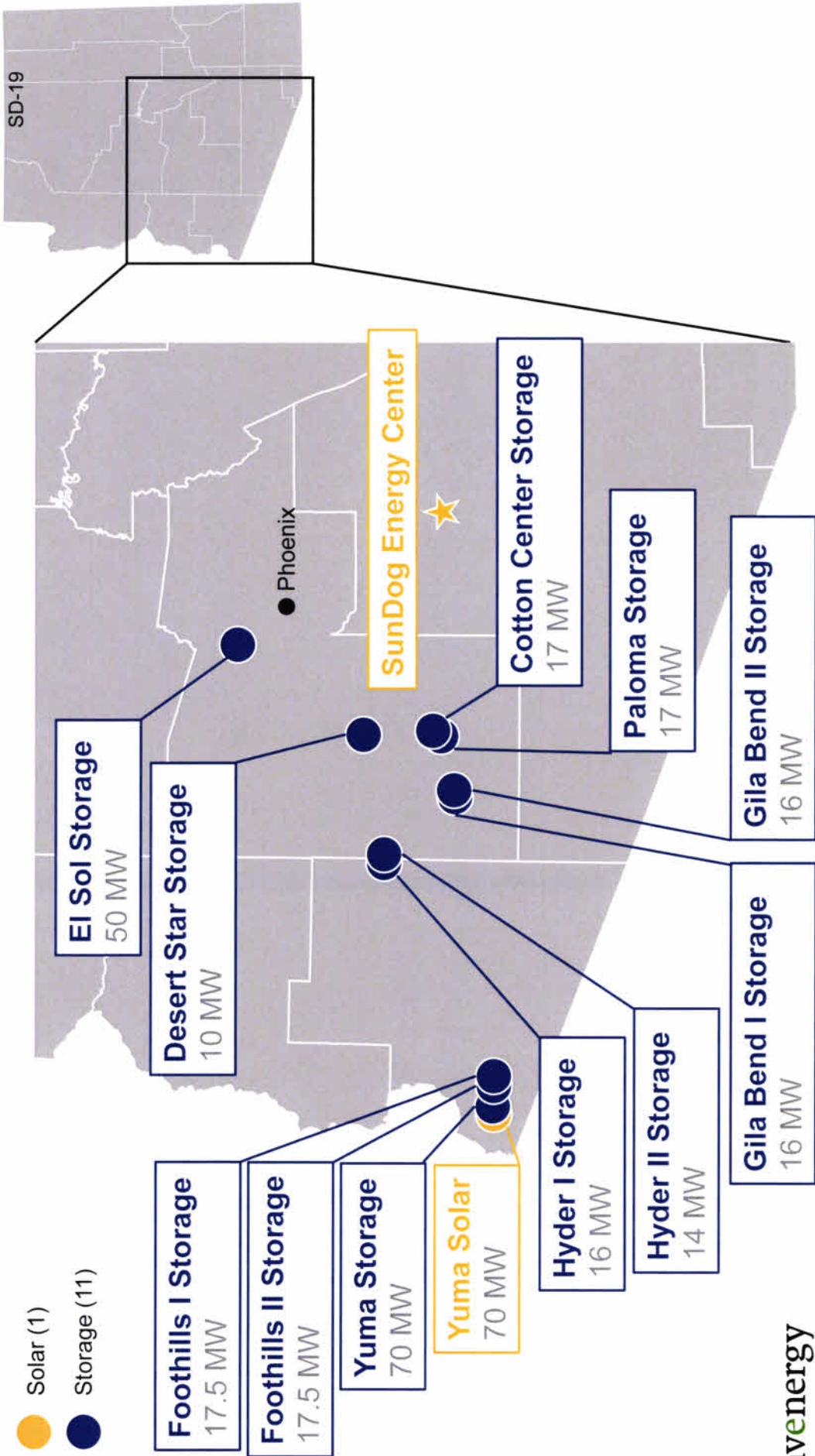
**7 full-time**  
operations & maintenance employees



**2 Arizona counties**  
Yuma and Maricopa Counties



**Annual donations**  
to local education, emergency & veteran services and environmental stewardship



SD-19



# Invenergy Impact in Arizona

---

## Support for First Responders

- Donation to support Sun City Fire Department at El Sol
- Training for Sun City Fire Department by El Sol staff on battery energy safety

## Contributions to Local Events

- Sponsorship of Pinal County Fair Small Stock Show
- Sponsorship of United Way of Pinal County Golf Tournament

## Involvement in Local Organizations

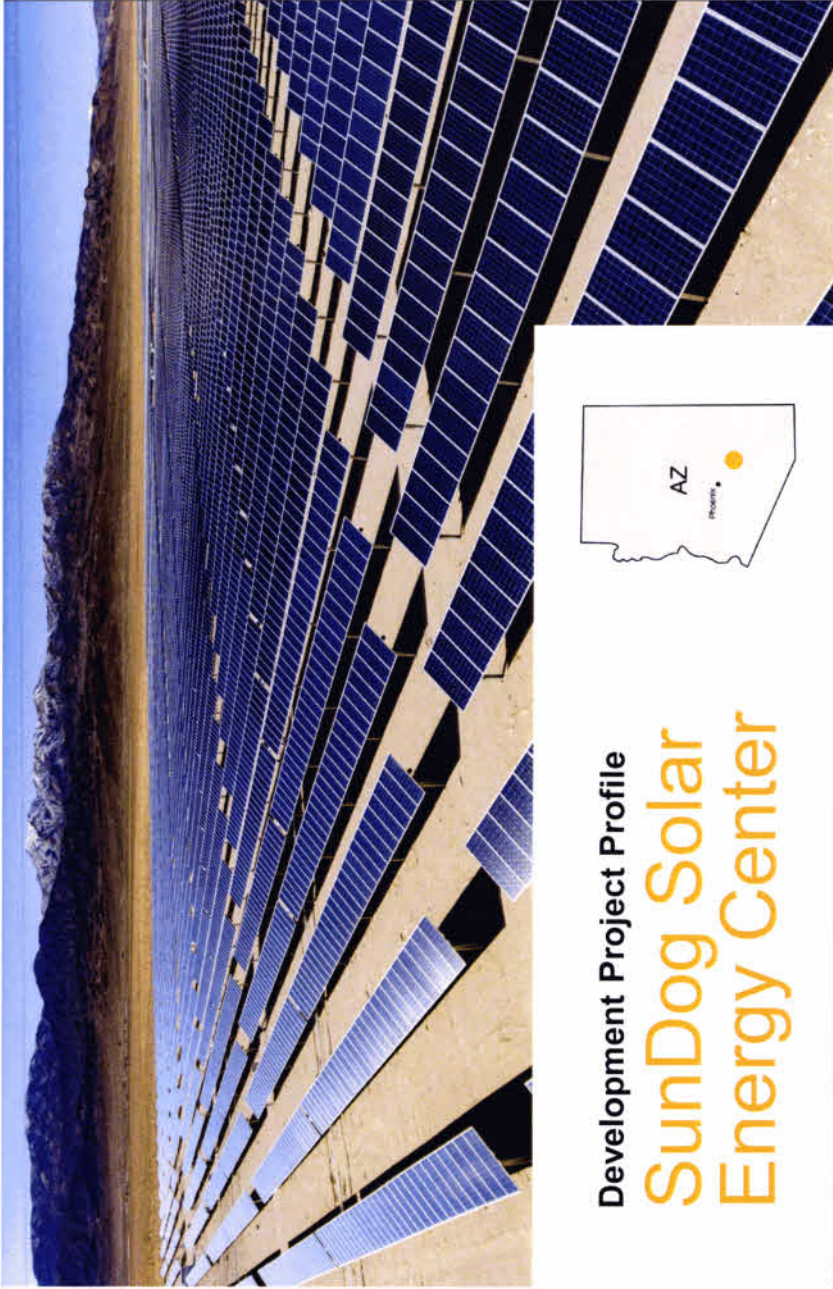
- Pinal Partnership
- WESTMARC
- United Way of Pinal County
- Coolidge Chamber of Commerce

SD-19



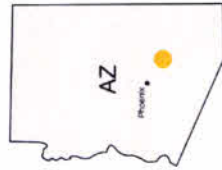
Invenergy

R-10



## Development Project Profile

# SunDog Solar Energy Center



### Development Timeline



SD-19



200 MW is enough electricity to power more than **57,000 American homes**



More than **\$211M** invested in local tax revenue, land costs, and lease payments over the life of the project



Up to **400 jobs** supported during construction



Up to **5 full-time** operations and maintenance staff



Emissions reductions equivalent to **156 million trees planted**



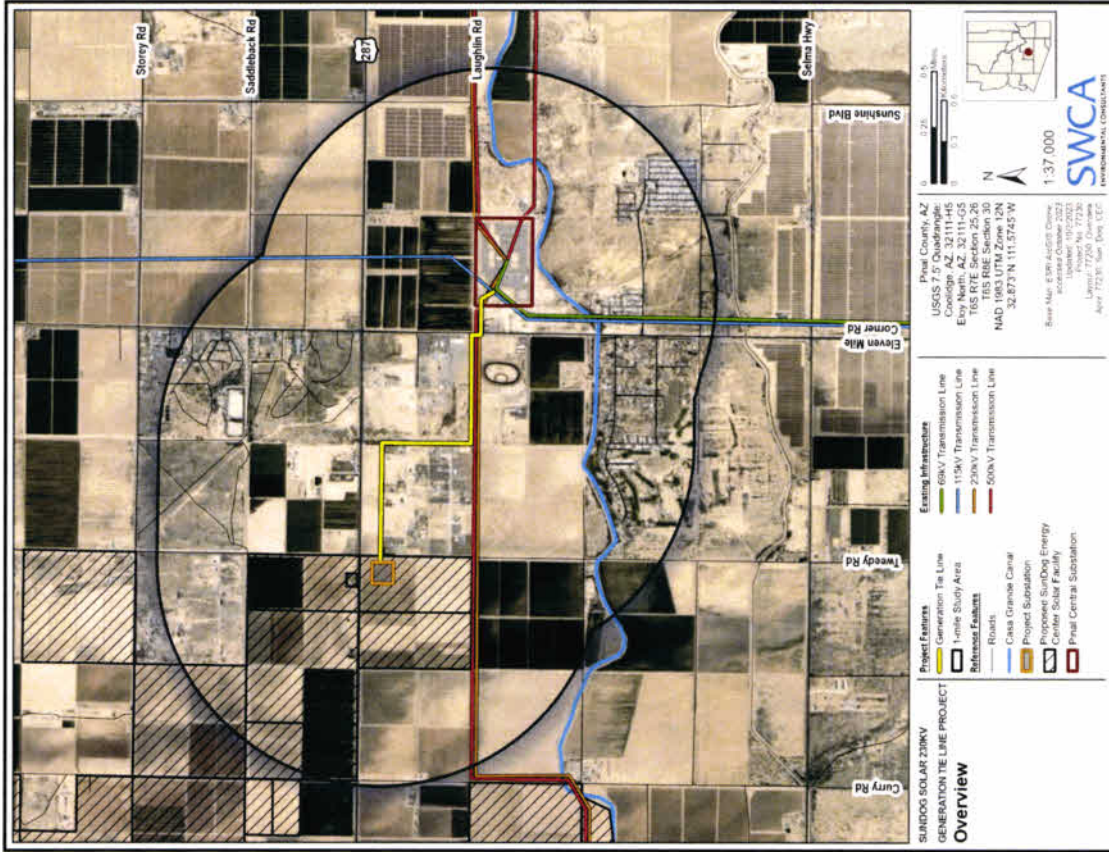
Supports local education, emergency & veteran services and environmental stewardship



Commits to developing projects while minimizing impacts to sensitive ecological resources and ensuring responsible land use



**200 megawatts** of sustainable energy

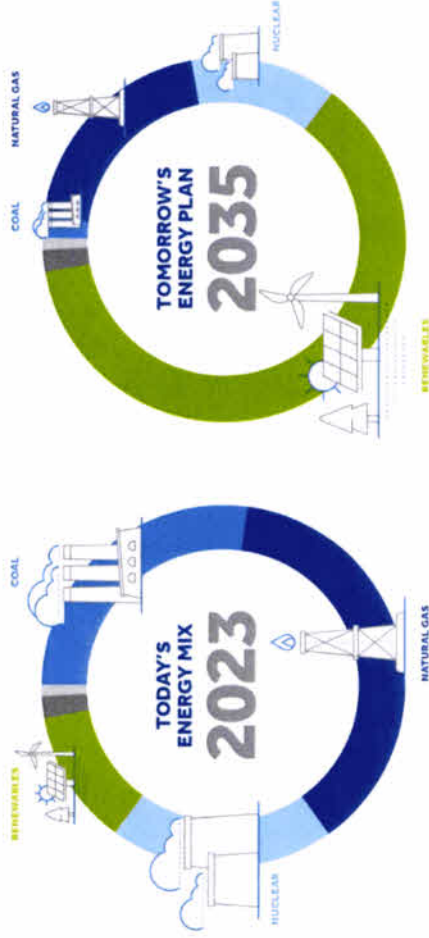


# Overview of the SunDog 230kV Generation Tie Line Project

---

- New 230kV 1.7-mile generation tie transmission line, connecting to the existing Pinal Central Substation
  - Steel or wood structures approximately 70 to 90 feet tall
  - ROW of 100 feet in most locations
  - Reduced ROW on the Pinal County Fairgrounds
- New 230kV substation (Project Substation) dedicated to serve exclusively the SunDog Solar Energy Center (Solar Facility)
  - Not requesting authorization for the Project Substation or Solar Facility
- Located within unincorporated Pinal County and the city of Coolidge, Arizona

## SRP's energy mix



As the Valley's population grows, we remain committed to meeting expanding energy needs and greening up our energy mix along the way.

## SRP Integrated System Plan (SRP Summary 2023)

- Anticipates a demand spike of 25% by 2030
- ISP process determined SRP will need to **double or triple power resource capacity** in the next decade
- SRP plans to add 6,000 MW of new, large-scale solar resources by 2035

## Invenergy

TABLE 2-1. SOURCES OF ENERGY GROWTH 2023-2038

COMPONENT	GWH
New Data Centers	12,997
Large Industrial & Manufacturing	5,843
Electric Vehicles	3,406
C&I	785
Residential	657
<b>TOTAL GROWTH</b>	<b>23,689</b>

\*Numbers in table have been rounded for ease of presentation.

## APS Integrated Resource Plan (11/2023)

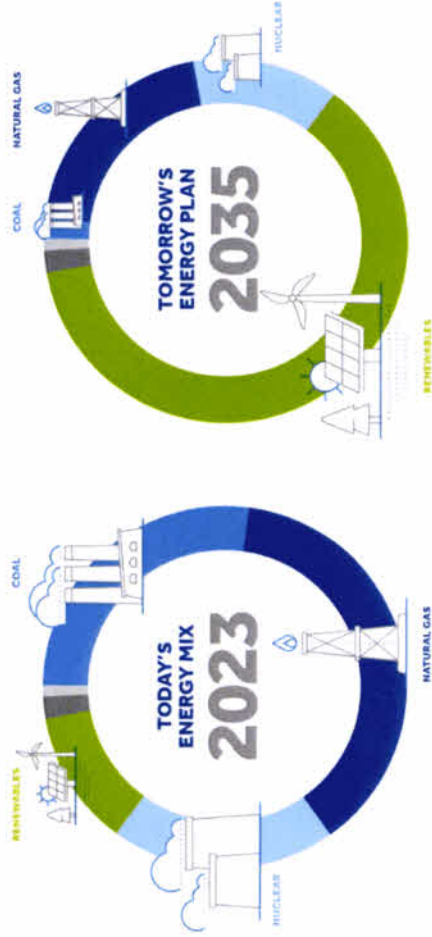
# SunDog Generation Tie Line Purpose and Need

---

- The Project is needed to connect the Solar Facility to the regional electrical transmission grid
- The purpose of this CEC application is to secure approval of the Project, which would connect the Solar Facility to the regional transmission system
- SRP 2023 Integrated System Plan (ISP)
  - SRP's plan prepares to add 7,000 MW of new renewable resources, which includes 6,000 MW of new large-scale solar resources by 2035
- APS 2023 Integrated Resource Plan (IRP)
  - APS projects similar growth of 3,400 MW of capacity needs or nearly 230 MW annually by 2038

## SRP's energy mix

### POWER



As the Valley's population grows, we remain committed to meeting expanding energy needs and greening up our energy mix along the way.

## SRP Integrated System Plan (SRP Summary 2023)

- Anticipates a demand spike of 25% by 2030
- ISP process determined SRP will need to **double or triple power resource capacity** in the next decade
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## Invenergy

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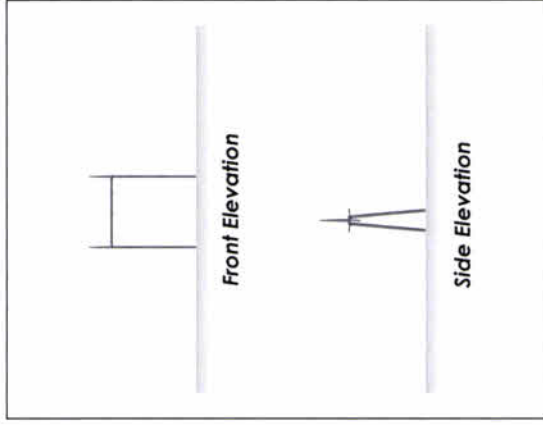
## APS Integrated Resource Plan (11/2023)



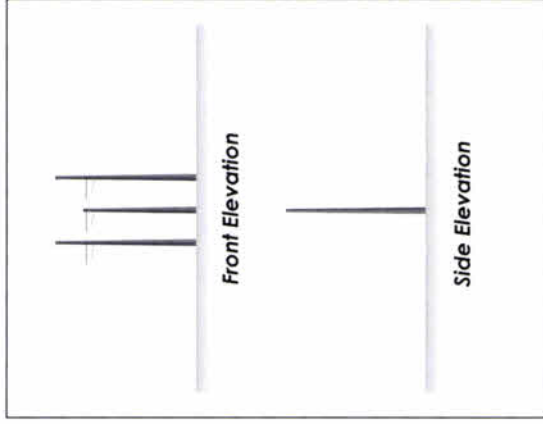
## SunDog Generation Tie Line Structures

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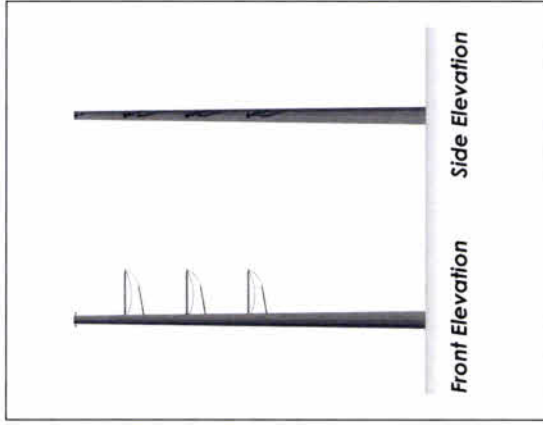
- Approximately 1.7-mile-long 230kV Generation Tie Line
- Galvanized or weathered steel or wood monopole and multipole structures approximately 70 to 90 feet tall
- Span length between structures of approximately 600 to 700 feet



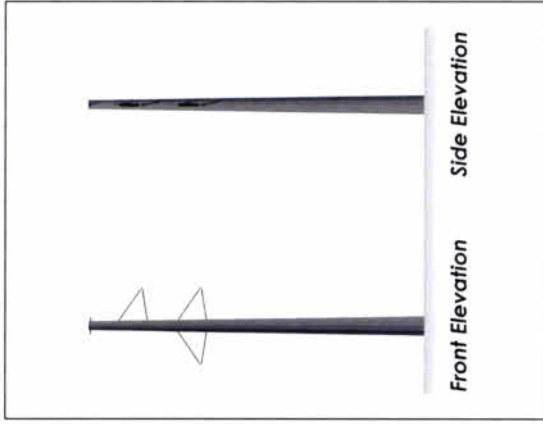
Typical 230kV A-frame  
dead-end structure



Typical 230kV  
three-pole dead-end  
self-supporting  
monopole structure



Typical 230kV angle  
self-supporting  
monopole structure



Typical 230kV tangent  
self-supporting  
monopole structure

# Proposed Route, Corridor, and Right-of-Way

---

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230kV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

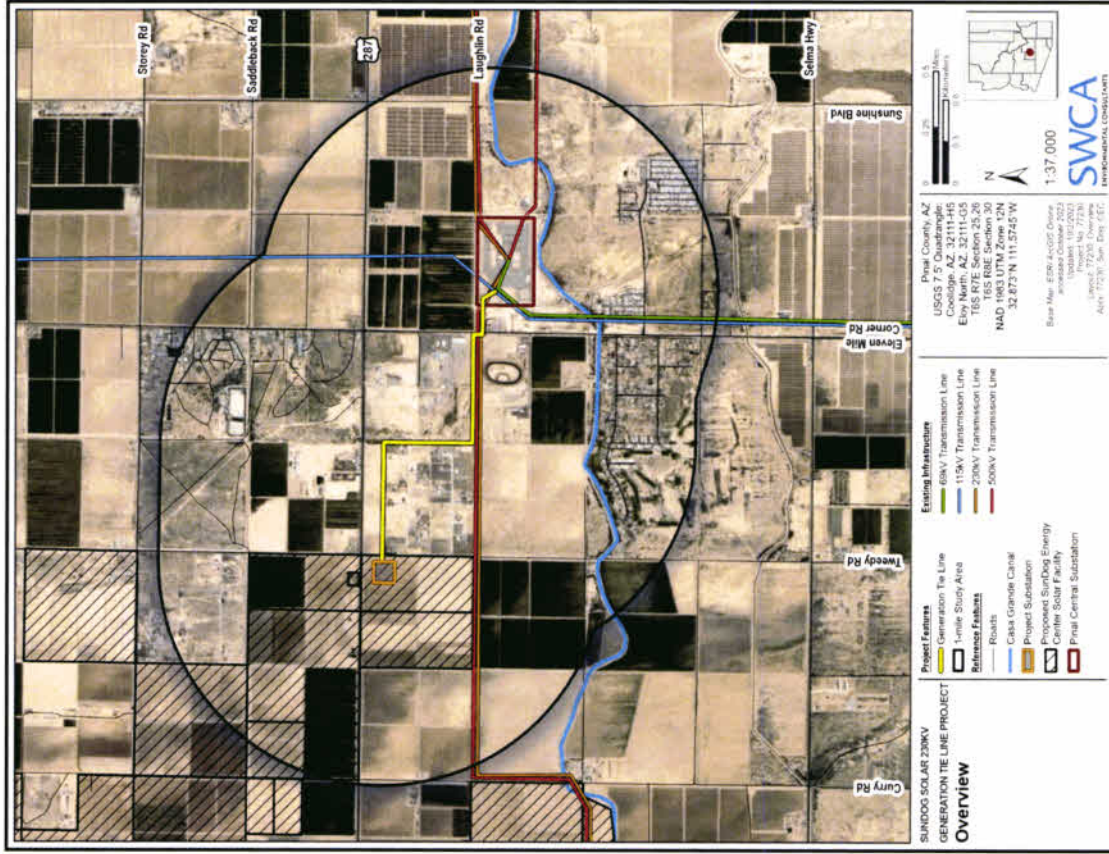
SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

## SunDog Generation Tie Line Project Route

---

- Approximately 1.7-mile-long 230kV Generation Tie Line connecting the Project Substation to the existing Pinal Central Substation
  - Originate at the Project Substation and routed east for about 0.6 miles
  - Turn south for about 0.4 miles
  - Routed east for approximately 0.5 miles
  - Routed 0.25 miles southeast until it reaches the point of interconnection, the Pinal Central Substation
- The Generation Tie Line engineering design would be finalized in the detailed design phase after land negotiations and permitting are complete



# SunDog Generation Tie Line Proposed Corridor / Right-of-Way

---

- Variable-width Project corridor
- Allows flexibility in coordination with landowners, utilities, and other operators in the region
- Portion of corridor established pursuant to Condition 24 in CEC Case #212
  - Eleven Mile Solar, up to 0.73 miles

## **Affected Jurisdictions:**

- Pinal County (1.5 miles, 88% of Project Route)
- City of Coolidge (0.2 miles, 12% of Project Route)





# SunDog Generation Tie Line Proposed Corridor / Right-of-Way

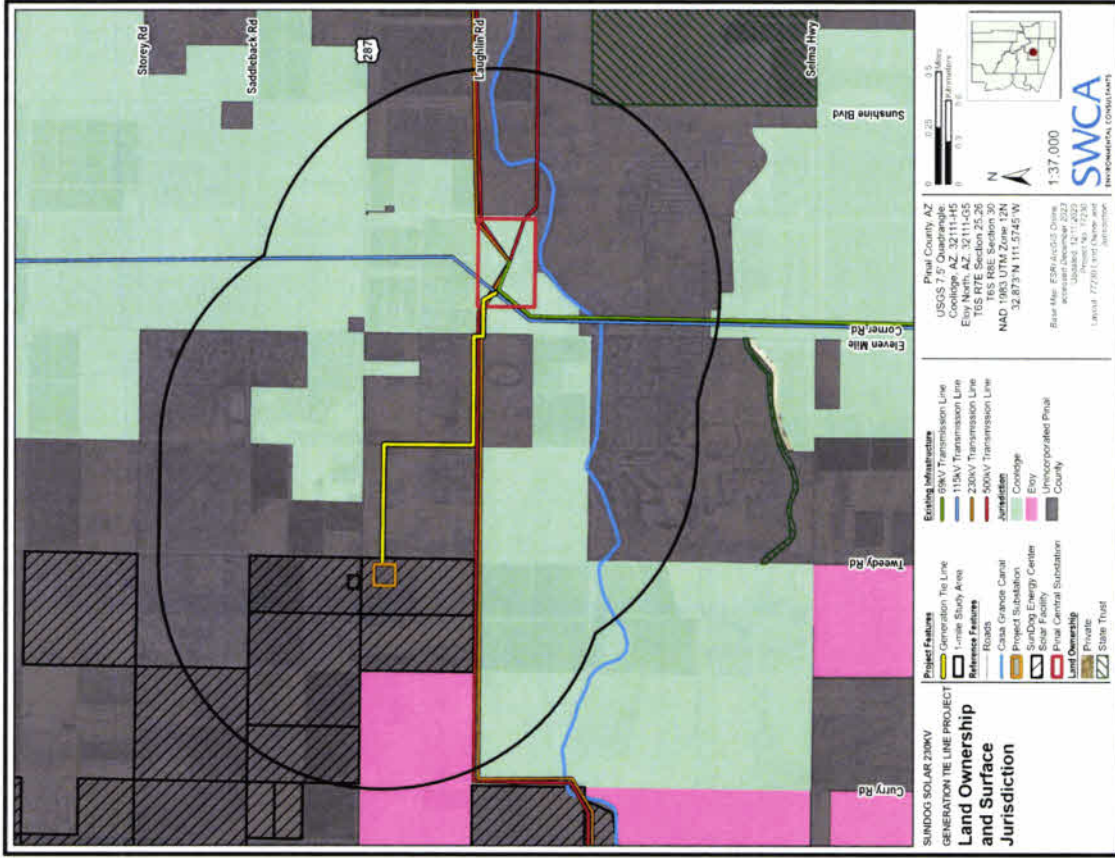
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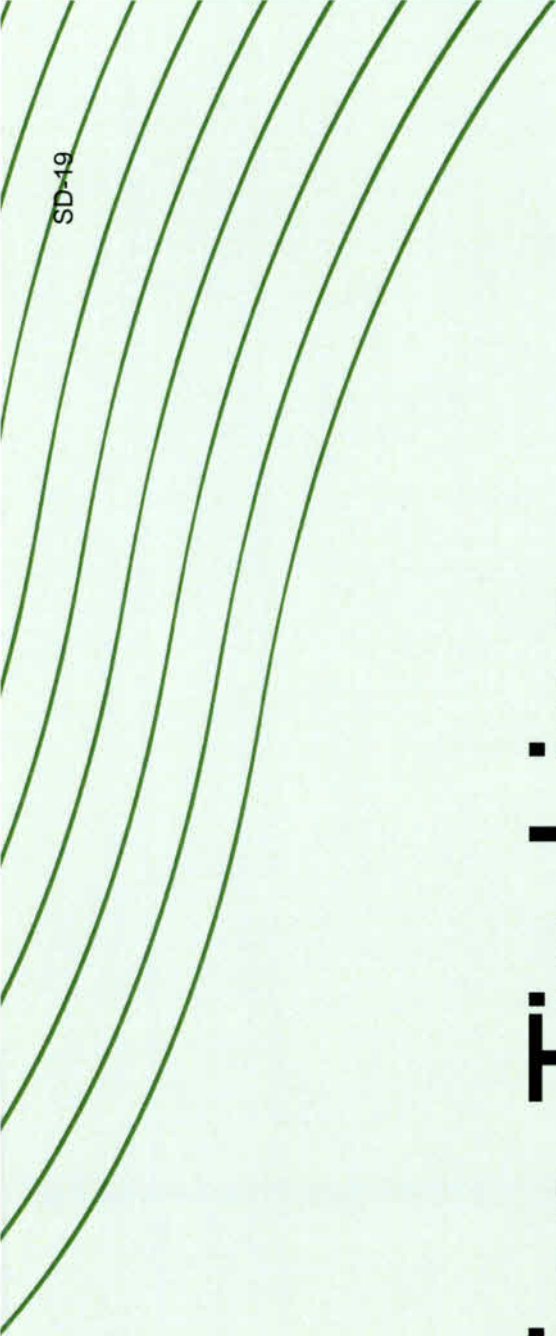
- Variable-width Project corridor
- Allows flexibility in coordination with landowners, utilities, and other operators in the region
- Portion of corridor established pursuant to Condition 24 in CEC Case #212
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## **Affected Jurisdictions:**

- Pinal County (1.5 miles, 88% of Project Route)
- City of Coolidge (0.2 miles, 12% of Project Route)

**Invenergy**





# SunDog Generation Tie Line Virtual Tour

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Invenergy

SD-19

1-19

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230KV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND  
 TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# Application and Notice Requirements

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Invenergy

SD-19

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230KV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND  
 TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# Application and Notice

---

- **Application**
  - Filed on December 20, 2023
- **Newspaper Publication of Notice of Hearing**
  - Casa Grande Dispatch – December 26, 2023
  - Tri-Valley Dispatch – December 28, 2023
- **Posting of Signs**
  - January 10, 2024
- **Public Posting of Application**
  - Eloy Public Library
  - Coolidge Public Library

Invenergy

Tri-Valley Dispatch Ad and Affidavit

STATE OF ARIZONA } ss.  
COUNTY OF PINAL

**Affidavit of Publication**


Kara K. Cooper, first being duly sworn deposes and says: That the/She is a native born citizen of the United States of America, over 21 years of age, that I am an agent and/or publisher of the Tri-Valley Dispatch, a newspaper published in the County of Pinal, Arizona. The date of each week, a full, true and complete printed copy of which is herewith attached, was printed in the regular edition of said newspaper, and not in a supplement or other publication, on the following date:

12/28/2023


**TRI-VALLEY DISPATCH**

I, \_\_\_\_\_, agent and/or publisher of the Tri-Valley Dispatch, sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, A.D. 2023.

Notary Public in and for the County of Pinal, State of Arizona




**Best stories**



**AND THE ANTI-TRUMP COMMITTEE**

**Subscribers**



Casa Grande Dispatch Ad and Affidavit

STATE OF ARIZONA } ss.  
COUNTY OF PINAL

**Affidavit of Publication**


Kara K. Cooper, first being duly sworn deposes and says: That the/She is a native born citizen of the United States of America, over 21 years of age, that I am an agent and/or publisher of the Casa Grande Dispatch, a newspaper published in the County of Pinal, Arizona. The date of each week, a full, true and complete printed copy of which is herewith attached, was printed in the regular edition of said newspaper, and not in a supplement or other publication, on the following date:

12/28/2023

**CASA GRANDE DISPATCH**

I, \_\_\_\_\_, agent and/or publisher of the Casa Grande Dispatch, sworn to before me this \_\_\_\_\_ day of \_\_\_\_\_, A.D. 2023.

Notary Public in and for the County of Pinal, State of Arizona



**Nation**

**Kennedy Jr. draws Biden, Trump voters united by distrust**



**Dispatch**





# Application and Notice

---

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Invenergy



## NOTICE OF PUBLIC HEARING

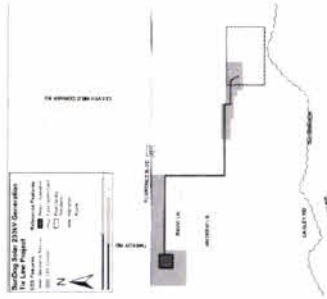
### SunDog Energy Center LLC SunDog Solar 230KV Generation Tie Line Project

SunDog Energy Center LLC invites the public to participate at a public hearing before the Arizona Power Plant and Transmission Line Siting Committee.

February 5 <sup>th</sup> , 2024	1:00PM--5:00PM	Radisson Hotel Casa Grande 777 N Pinal Avenue Casa Grande, AZ 85122
February 6 <sup>th</sup> - 7 <sup>th</sup> , 2024, as needed	9:00AM--5:00PM	

If any revisions to the hearing schedule are required, they will be notified on the Project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com) and on the ACC website at <https://www.arzcc.gov/arizona-power-plant/meeting-schedule>

The Transmission Line Siting Committee will hear public comments on February 5<sup>th</sup>, 2023, beginning at 5:30PM. Comments may be presented in-person at the Radisson Hotel Casa Grande or virtually. To present virtually, please visit [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com) and click on the meeting link provided.



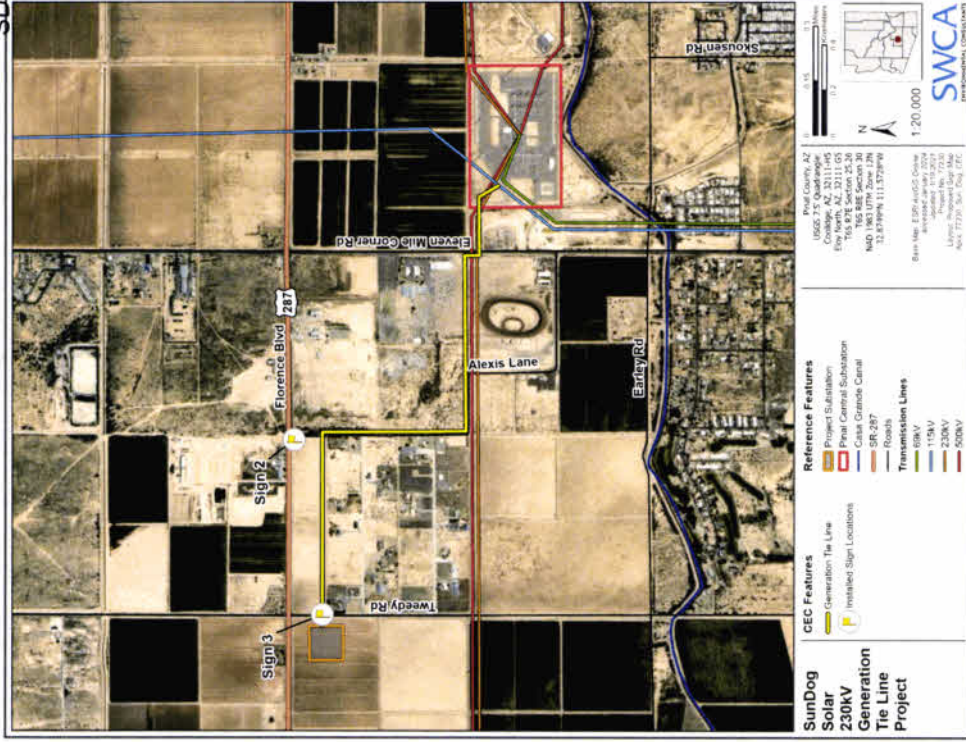
For more information, call the project information line at (866) 786-8656, or visit the project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com).

Arizona Corporation Commission Docket Number: L-21284A-23-0335-00229

Case Number: 229

Invenergy

SD-19



R-22

# Application and Notice

---

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  - Filed on December 20, 2023
- **Newspaper Publication of Notice of Hearing**
  - Casa Grande Dispatch – December 26, 2023
  - Tri-Valley Dispatch – December 28, 2023
- **Posting of Signs**
  - January 10, 2024
- **Public Posting of Application**
  - Eloy Public Library
  - Coolidge Public Library

Invenergy

**Colin Agner**

**From:** Chad Price <cp@EloyAZ.gov>  
**Sent:** Wednesday, January 3, 2024 9:16 AM  
**To:** Colin Agner; Paul Anchondo  
**Cc:** Devin Petry  
**Subject:** RE: Eloy Library Document Hosting Request - State Permit

Colin,

We did receive the CEC document and it is on display at our library. Let me know if you need anything else.

Thanks,

**Chad Price**

City of Eloy  
Community Services Manager  
100 E. 7th St.  
Eloy, AZ 85131  
(Main) 520-468-7351  
(Direct) 520-464-3431  
(Email) [cp@EloyAZ.gov](mailto:cp@EloyAZ.gov)  
(Website) [www.elyoiaz.gov](http://www.elyoiaz.gov)

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**From:** Colin Agner <cagner@swca.com>  
**Sent:** Tuesday, January 2, 2024 2:18 PM  
**To:** Paul Anchondo <panchondo@EloyAZ.gov>  
**Cc:** Chad Price <cp@EloyAZ.gov>; Devin Petry <devin.petry@swca.com>  
**Subject:** RE: Eloy Library Document Hosting Request - State Permit

**CAUTION:** This email originated from outside of the City of Eloy. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Hi Paul-

**Colin Agner**

**From:** Joyce Baker <joyce.baker@spinal.gov>  
**Sent:** Tuesday, January 2, 2024 2:32 PM  
**To:** Colin Agner  
**Subject:** Re: Coolidge Library Document Hosting Request - State Permit

Colin,

I want to check on it last week and got interrupted. We received the binder and it is on display. However the rings of the binder are damaged so you can't easily turn the pages to read them. I don't have any spare binders but I'll order some so I can transfer it to a working binder. Did you want me to send you a picture to prove it is on display?

Thanks,

**Joyce Baker, MLIS**  
Library Manager  
Coolidge Public Library  
1001 Central Ave  
Coolidge, AZ 85128  
(520) 741-0030 FAX: (520) 725-7026

On Tue, Jan 2, 2024 at 2:19 PM Colin Agner <cagner@swca.com> wrote:

Hi Joyce,

I am just following up to see if the Coolidge library received the CEC document okay and if it is on display at the Coolidge library?

Thanks!!

-Colin

**Colin Agner, M.S.**  
Project Manager

**SWCA Environmental Consultants**  
343 West Franklin Street  
Tucson, Arizona 85701

# Public and Stakeholder Involvement

---

Invenergy

SD-19

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230kV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# Public Involvement Summary

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- Informational Letters
- In-Person and Virtual Public Open Houses
- Newspaper Advertisements
- Project Website
- Project Telephone Line
- Project Email
- Social Media

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

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PREPARED FOR  
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SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023



# Public Involvement Summary

---

- **Informational Letters – first mailed July 2023**
  - Two informational letters sent to all identified landowners, residents, and relevant stakeholders within the Project Study Area (approximately 435 recipients)
  - First mailing provided notice of the Project and a map and invited comments/questions and attendance at the Virtual Public Open House and In-Person Open House
  - Second mailing provided additional opportunity for comments/questions and notice of the Line Siting Committee Hearing

**Invenery**

1461 17th Street, Suite 1100, Denver, Colorado 80202  
T 303.900.9341

July 17, 2023

Invitation to learn about the proposed SunDog Solar 230kV Generation Tie Line Project

Dear interested Party,

Invenery is seeking your input on the proposed SunDog Solar Generation Tie Line Project in Pinal County and Coalgate, Arizona. Invenery is proposing to build a 230-kilovolt, alternating current generation intertie transmission line (gen-tie) approximately 1.5 miles long (project). The proposed gen-tie would connect the future SunDog Solar Energy Center, a proposed 200-megawatt (MW) solar and 200 MW battery energy storage facility, to the existing Pinal Central Substation via a step-up substation. More information about the project is available at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com).

Invenery is hosting an open house on Wednesday, July 26, 2023, from 4:30pm – 6:30pm, for the community to learn about the project, meet the project team and provide comments. Information will be on display and light snacks will be provided. No formal presentation is planned. The open house will be at Mary C. O'Brien Elementary School, 1400 North Eleven Mile Corner Road, Casa Grande, AZ 85194.

There will also be a virtual open house hosted at [www.SunDogSolarOpenHouse.com](http://www.SunDogSolarOpenHouse.com).

Invenery will be applying for a Certificate of Environmental Compatibility with the Arizona Power Plant and Transmission Line Siting Committee to allow for the construction and operation of the project. SunDog Energy Center LLC (SunDog) and SWCA Environmental Consultants (SWCA) are in the process of analyzing the project gen-tie (Figure 1).

As part of this analysis, we are soliciting public and stakeholder input. Please submit a comment or question through one of the following methods.

**Mail:** SunDog Solar Energy Center  
c/o SWCA Environmental Consultants  
20 East Thomas Road, Suite 1700  
Phoenix, Arizona 85012  
**Email:** [SunDogSolarHotline@Invenery.com](mailto:SunDogSolarHotline@Invenery.com)  
**Voicemail:** (605) 786-8656  
**Project Website:** [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com)

The comment period for the project will extend from July 16, 2023, to August 18, 2023. We look forward to receiving your input.

Sincerely,

Katie DeSpain  
Associate, Renewable Development  
Invenery

**Invenery**

1461 17th Street, Suite 1100, Denver, Colorado 80202  
T 303.900.9341

January 4, 2024

Notice of Hearing for the Proposed SunDog Solar 230kV Generation Tie Line Project (Docket No. L-21284A-23-0335-00223)

Dear interested Party,

SunDog Energy Center LLC (SunDog), an affiliate of Invenery LLC, is proposing to build a 230-kilovolt, alternating current generation intertie transmission line (Generation Tie Line) approximately 1.7 miles long (Project) (see Figure 1). The proposed Project is designed to deliver power from the adjacent SunDog Solar Energy Center, a proposed 200-megawatt (MW) solar photovoltaic facility (Solar Facility) with a 200-MW battery storage system, to the existing Pinal Central Substation via a step-up substation. More information about the project is available at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com).

SunDog filed an application for a Certificate of Environmental Compatibility (CEC Application) with the Arizona Corporation Commission to construct and operate the Project. The Project is docketed as L-21284A-23-0335-00229 and the case number is 229. The Arizona Power Plant and Transmission Line Siting Committee (Committee) will initially evaluate the CEC Application and, after holding public hearings, will make a recommendation to the Arizona Corporation Commission. This letter provides notice of the public hearing related to the CEC Application.

A copy of the CEC Application can be found on the Project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com) at the Arizona Corporation Commission Docket Control, Phoenix Office, located at 1200 West Washington Street, Suite 200, Phoenix, AZ 85001. The Project is also available at the following locations: the SunDog Energy Center Public Library located at 1000 North Main Street, Suite 4, Coalgate, AZ 85126; and at the Coalgate Public Library located at 160 West Central Avenue, Coalgate, AZ 85126.

A public hearing regarding the CEC Application has been scheduled before the Committee on February 5, 2024, at the Radisson Hotel Casa Grande located at 774 A Final Avenue, Casa Grande, AZ 85122. The public hearing will start at 11:00 a.m. on February 5, 2024. The hearing will be held in person or virtually. Information regarding virtual access, as well as any additional hearing information will be posted on the project website at [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com), at least 24 hours prior to the event.

You may reach the project team or the SunDog Project Manager through one of the following methods:

**Mail:** SunDog Solar Energy Center  
c/o SWCA Environmental Consultants  
20 East Thomas Road, Suite 1700  
Phoenix, Arizona 85012  
**Email:** [SunDogSolarHotline@Invenery.com](mailto:SunDogSolarHotline@Invenery.com)  
**Voicemail:** (605) 786-8656  
**Project Website:** [www.SunDogSolarEnergyCenter.com](http://www.SunDogSolarEnergyCenter.com)

Sincerely,

Katie DeSpain  
Associate, Renewable Development  
Invenery

# Public Involvement Summary

---

## In-Person Open House

- Held July 26, 2023 at the Mary C. O'Brien Elementary School
- Informal open-house arrangement with Project representatives present
- Information provided:
  - Background of the Applicant, Solar Facility, and Generation Tie Line
  - Visual simulations of the Generation Tie Line
  - Project permitting
  - Opportunities for providing questions or comments on the Project
- 10 people signed in and 3 formal comments provided  
(see CEC Exhibits J-5b through J-5d for full copy of the formal comments)

Invenergy | SunDog Solar Gen-Tie Project



# Welcome!

**Invenergy**  
July 26, 2023

**SunDog Solar 230kV Generation Tie Line Project**  
**Public Hearing Sign-In Sheet**

Mary C. O'Brien Elementary School  
1400 11-Mile Corner  
Casa Grande, AZ 85194

Full Name	Email Address	Telephone	Would you like to receive project updates?
Chip Wilson	[Redacted]	[Redacted]	
Philip Coffman	[Redacted]	[Redacted]	
Sherry Davis	[Redacted]	[Redacted]	
KARL MANN	[Redacted]	[Redacted]	YES
KEN THAYER	[Redacted]	[Redacted]	YES
DEBRA D...	[Redacted]	[Redacted]	Yes
Alan S...	[Redacted]	[Redacted]	Yes
Carol...	[Redacted]	[Redacted]	YES
Alex Gilson	[Redacted]	[Redacted]	YES
Ray W...	[Redacted]	[Redacted]	

# Public Involvement Summary

---

## Virtual Public Open House

- Posted September 19, 2023 through completion of CEC Process
- A 1-month comment period was initiated after posting, but comments will continue to be accepted
- Information provided:
  - Background of the Applicant, Solar Facility, and Generation Tie Line
  - Visual simulations of the Generation Tie Line
  - Project permitting
  - Opportunities for providing questions or comments on the Project
- During 1-month comment period: 86 viewers attended the virtual open-house meeting. No comments were provided.

SD-19



# Public Involvement Summary

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## Newspaper Advertisements

- Placed in the *Casa Grande Valley Newspaper* on July 13 and July 20, 2023
- Information provided:
  - Description of the Project and associated solar facilities
  - Announced in-person and virtual open house
  - Presented opportunities for providing questions or comments on the Project

# Birthplaces are as varied as our US presidents



A 19th-century white, two-story house with a porch, likely a presidential birthplace. The house has a prominent chimney and a small porch with a railing. The surrounding area appears to be a well-maintained lawn or garden.

A large, multi-story brick building with a prominent chimney and a small porch. The building has a classic architectural style with multiple windows and a well-maintained facade.

A variety of the 19th-century President Birthplace locations can be seen in the highlights of Independence, Kentucky. The birthplaces of our presidents are as varied as the presidents themselves. Some were born in grand mansions, while others were born in simple log cabins or small houses. The locations range from the White House in Washington, D.C. to a log cabin in a remote corner of the wilderness. Each birthplace has its own unique history and significance, reflecting the diverse backgrounds and experiences of our nation's leaders.

**City of Cooniligs Come Grow With Us**  
 1. No extra maintenance / 2. No extra water / 3. No extra fertilizer / 4. No extra labor / 5. No extra equipment / 6. No extra time / 7. No extra money / 8. No extra hassle / 9. No extra stress / 10. No extra worry / 11. No extra trouble / 12. No extra pain / 13. No extra suffering / 14. No extra death / 15. No extra hell.

**City of Cooniligs Come Grow With Us**  
 1. No extra maintenance / 2. No extra water / 3. No extra fertilizer / 4. No extra labor / 5. No extra equipment / 6. No extra time / 7. No extra money / 8. No extra hassle / 9. No extra stress / 10. No extra worry / 11. No extra trouble / 12. No extra pain / 13. No extra suffering / 14. No extra death / 15. No extra hell.

# Ford Bronco Wildtrak, Maverick Tremor can handle the tough trails

With over 40 years of off-road experience, Ford's Bronco Wildtrak and Maverick Tremor are built to handle the toughest trails. The Wildtrak is a mid-size SUV with a powerful 2.7-liter EcoBoost engine and a 10-speed automatic transmission. It features a 4x4 drivetrain, a locking rear differential, and a suspension system designed for off-road performance. The Maverick Tremor is a compact SUV with a 2.0-liter EcoBoost engine and a 10-speed automatic transmission. It also features a 4x4 drivetrain, a locking rear differential, and a suspension system designed for off-road performance. Both vehicles are available in a variety of colors and trim levels, and they offer a range of features and options to suit your needs.



**Journal Downumy**  
**Be Safe, Speed Smarter. It's Simple!**  
 Our Downumy Speed Smarter is designed to help you drive safely and smartly. It features a variety of features and options, including a speed limiter, a fuel economy monitor, and a safety alert system. It is available in a variety of colors and trim levels, and it offers a range of features and options to suit your needs.



**Progressives back Biden, but reservations do exist**  
 A new survey shows that while many progressives support Joe Biden, they also have reservations about his policies and leadership. The survey found that 65% of progressives support Biden, but 35% have reservations. The most common reservations are about Biden's handling of the economy, his relationship with the media, and his approach to foreign policy. The survey also found that 45% of progressives believe Biden is not doing enough to address the climate crisis, and 55% believe he is not doing enough to address the racial justice crisis.

# Notice of SunDog Solar Generation Tie Line Project Public Open House

**Invenergy**  
 Notice of SunDog Solar Generation Tie Line Project Public Open House. The project is located in the State of Arizona, and it involves the construction of a solar generation facility and a tie line to the existing power grid. The project is expected to be completed by the end of 2023, and it will provide a significant amount of clean energy to the region.

**Invenergy**  
 Notice of SunDog Solar Generation Tie Line Project Public Open House. The project is located in the State of Arizona, and it involves the construction of a solar generation facility and a tie line to the existing power grid. The project is expected to be completed by the end of 2023, and it will provide a significant amount of clean energy to the region.

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# Public Involvement Summary

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## Project Website

- Notice in informational letters, website, and in-person and virtual public open-house meetings
- Posted July 2023
- Information provided:
  - Project overview
  - Community benefits
  - Solar energy information
- Presented opportunities for providing questions or comments on the Project
- Notice of hearing
- 35 total website views from 7 visitors

Home Energy Center   Home Energy   Home Energy   Home Energy   Home Energy



# SunDog Solar Energy Center

**About the Project**

SunDog Solar Energy Center is an opportunity to boost the local economy of Paul County and create jobs, all while generating clean, renewable energy to meet America's growing electricity demand.

The proposed project is located east of Clark Station, northwest of the corner of SR Highways 287 and 2074.

Home

⚡ **200** megawatts

🏠 **55,000** homes powered annually

Home Energy Center   Home Energy   Home Energy   Home Energy   Home Energy



# About The Project

**Current Efforts**

Inventory larger development of SunDog Solar Energy Center with the goal to begin construction in 2021. Inventory all utility and energy providers for the project, including all other providers. Analyze to ensure all the project facilities in the most appropriate and responsible locations and timing.

**Building Solar Generation: The SunDog Project Update**

SunDog Solar Energy Center is an opportunity to boost the local economy of Paul County and create jobs, all while generating clean, renewable energy to meet America's growing electricity demand.

The project is located east of Clark Station, northwest of the corner of SR Highways 287 and 2074. The project includes the development of a new 200 MW solar generation facility. The project is currently in the permitting phase and is expected to begin construction in 2021. The project is currently in the permitting phase and is expected to begin construction in 2021.

Home

Date: Wednesday, July 25, 2021

Name: A. Baker - 31368

Location: 10000 E. Evans Road, Clark Station, Clark County, MO 64514

There is a link to our report form at [www.sunenergy.com](http://www.sunenergy.com)

Home Energy Center   Home Energy   Home Energy   Home Energy   Home Energy



# About Solar Energy

**Why Solar?**

Home Energy Center is an opportunity to boost the local economy of Paul County and create jobs, all while generating clean, renewable energy to meet America's growing electricity demand.

The project is located east of Clark Station, northwest of the corner of SR Highways 287 and 2074. The project includes the development of a new 200 MW solar generation facility. The project is currently in the permitting phase and is expected to begin construction in 2021. The project is currently in the permitting phase and is expected to begin construction in 2021.

**Solar Energy's Success**


According to the **Home Energy Industry Association**, home energy-related sales reached \$1.6 billion in 2017, up from \$1.1 billion in 2016. The industry is expected to continue to grow, with sales reaching \$2.1 billion by 2021.

**How Solar Works**

Home Energy Center is an opportunity to boost the local economy of Paul County and create jobs, all while generating clean, renewable energy to meet America's growing electricity demand.

The project is located east of Clark Station, northwest of the corner of SR Highways 287 and 2074. The project includes the development of a new 200 MW solar generation facility. The project is currently in the permitting phase and is expected to begin construction in 2021. The project is currently in the permitting phase and is expected to begin construction in 2021.

Home Energy Center   Home Energy   Home Energy   Home Energy   Home Energy



# Contact Us

Contact Us

Send Us a Message

Name:

Phone:

Email:

Message:

Send

# Public Involvement Summary

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## Project Telephone Line

- Notice in informational letters, website, and in-person and virtual public open house meetings
- Provides pre-recorded message with a Project overview and opportunity for leaving a message with questions or comments on the Project. Announced the 30-day comment period.
- Following the comment period, the pre-recorded message was updated to request callers leave a message and the Applicant will return their call. The caller was also invited to visit the Project website.
- No comments provided through Project Telephone Line

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230kV PROJECT**

**GENERATION TIE LINE**

PREPARED FOR  
STATE OF ARIZONA POWER PLANT AND  
TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# Public Involvement Summary


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## Project Email

- Notice in informational letters, website, and in-person and virtual public open house meetings
- Provides an opportunity for leaving a message with questions or comments on the Project
- 1 comment provided through email (see Table J-1 in Exhibit J)

## Project Social Media

- Facebook advertisements ran from July 18 to July 25, 2023
- Announced in-person open house and project website information
- Link clicks: 38, Accounts reached: 1,223, Impressions: 7,940, Likes: 1, Comments: 0



**SWCA Environmental  
Consultants**  
Sponsored

... **X**

Invenergy is hosting in-person and virtual open houses for the SunDog Solar Gen-Tie Project in Pinal County, AZ. Visit us online at [SunDogSolarOpenHouse.com](http://SunDogSolarOpenHouse.com) or see below for details on how to attend in person.


**SunDog Solar Energy Center**

**Gen-Tie Project**

**Open House**

---

**Wednesday July 26 | 4:30-6:30pm**





**Mary C. O'Brien**  
**Elementary School**  
 1400 N Eleven Mile Corner Rd  
 Casa Grande, AZ 85194


Invenergy

virtual360experience.com

**Invenergy's SunDog Solar  
Gen-Tie Project**

**Learn more**

 Like
  Comment

 Share

# Public Involvement Summary

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## Public Comments Received:

- 9 total comments received (6 from the same neighboring homeowners)
- Comments/questions received were related to:
  - Pinal County Fairgrounds and Event Center
  - General Opposition
- Applicant has consulted with (and will continue to consult with) appropriate officials regarding the Fairgrounds to minimize impacts to the recreational uses in this area
- Applicant has attempted to meet with neighboring homeowners that expressed general opposition to understand the specific concerns and discuss options to address their concerns
- The Applicant is requesting a wider corridor near this residential area to allow for siting further away from residences

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230kV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND  
 TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023



# Other Permitting Requirements

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Invenergy

SD-19

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230kV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND  
 TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# Other Permitting Requirements

PROJECT	JURISDICTION	PERMIT/PROCESS NAME	STATUS
Affiliated Solar Facility	Pinal County	Major Comprehensive Plan Amendment	<b>Complete</b> Approved December 2020
Affiliated Solar Facility	Pinal County	Rezone/Planned Area Development (PAD)	In Progress (Application Submitted August 2022)
Affiliated Solar Facility	Bureau of Reclamation	Hohokam Irrigation and Drainage District (HIDD) Canal Crossing	To Be Submitted (Application Preparation Initiated December 2023)
Affiliated Solar Facility	Various	Pre-Construction Permits	To Be Submitted Near Construction Start
Generation Tie Line Project	Bureau of Indian Affairs	San Carlos Irrigation and Drainage District (SCIDD) Canal Crossing Coordination	To Be Coordinated Following CEC process



Invenergy

SD-19

# Environmental Studies

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Invenergy

10/18

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230kV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
 STATE OF ARIZONA POWER PLANT AND  
 TRANSMISSION LINE SITING COMMITTEE

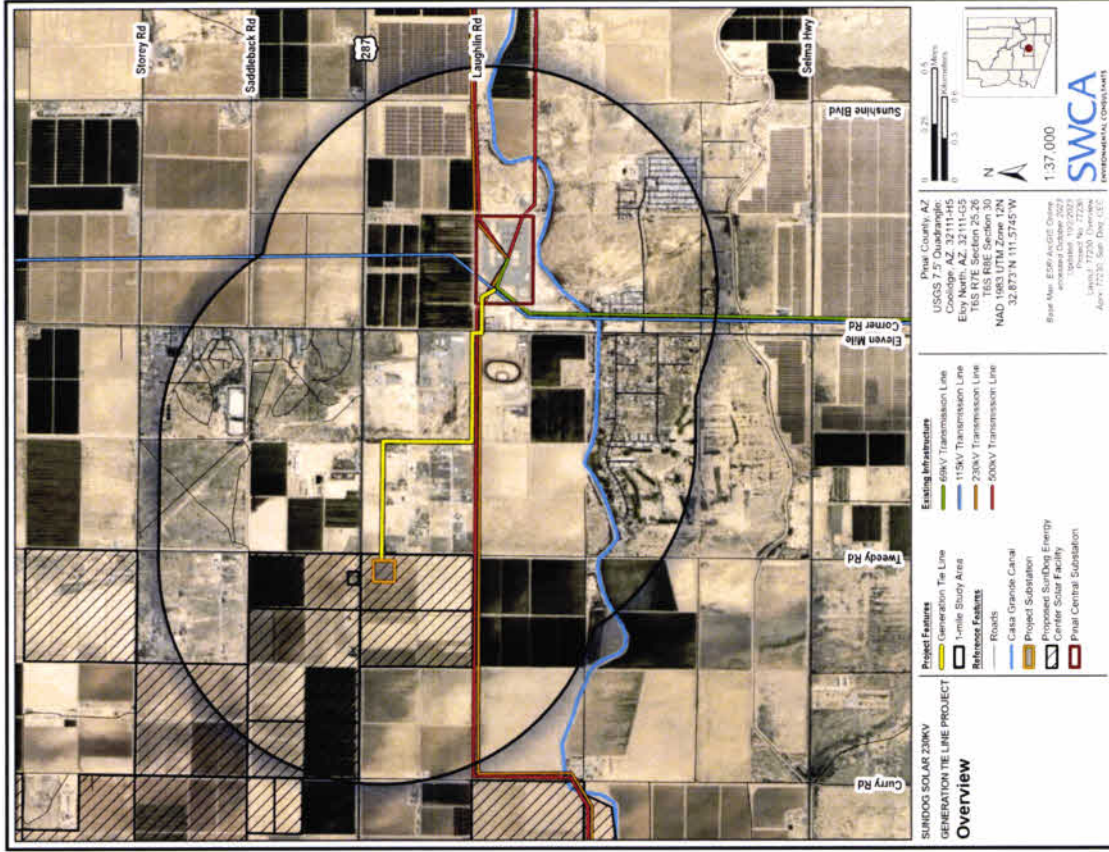
SUBMITTED BY  
 SUNDOG ENERGY CENTER LLC

DECEMBER 2023

# Overview of the Environmental Studies

---

- **Certificate of Environmental Compatibility Application**
  - Land Use, Recreation, and Existing Plans (Exhibits A, B, F, and H)
  - Biological Resources (Exhibits C and D)
  - Visual Resources (Exhibits E and G)
  - Cultural Resources (Exhibit E)
  - Noise and Interference (Exhibit I)
  - Public Involvement (Exhibit J)

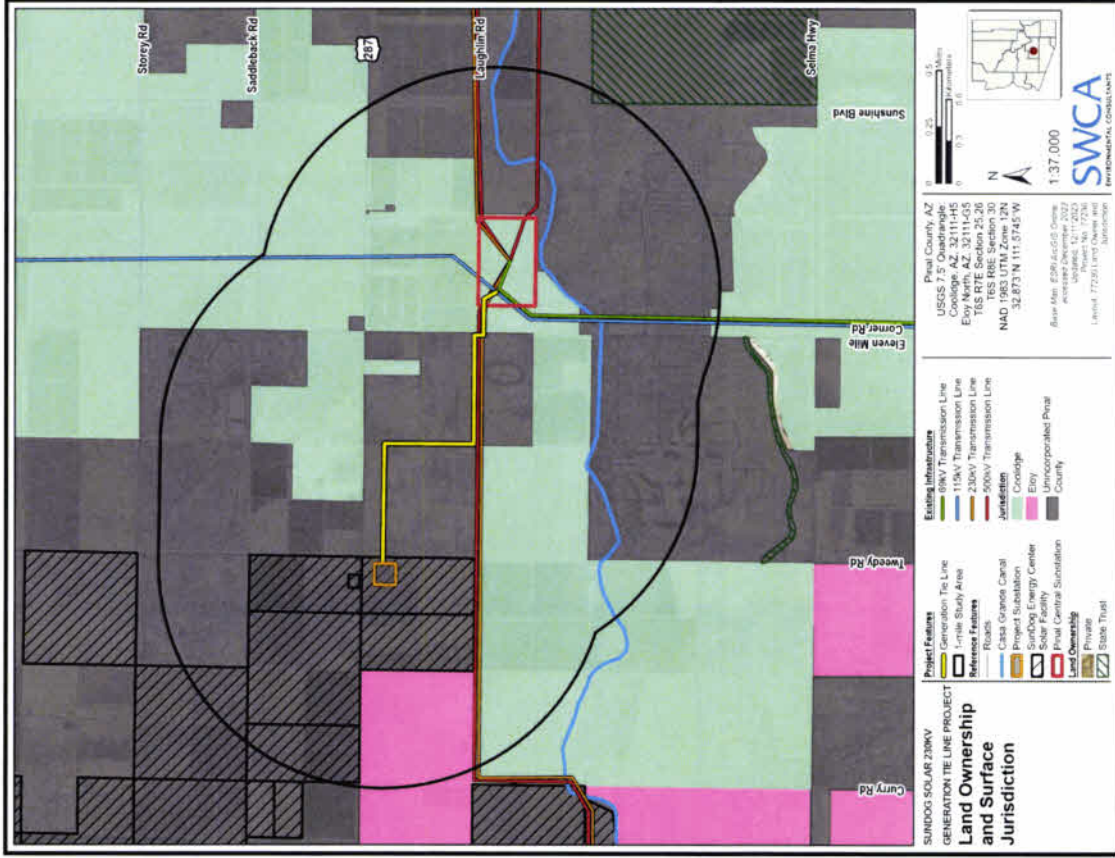




## Existing Land Use Summary

---

- The Generation Tie Line is in unincorporated Pinal County and city of Coolidge, Arizona
- Primary existing land uses in the Study Area (defined as a 1-mile buffer around the Generation Tie Line) include agricultural, residential, utilities, and vacant
- Three 500kV transmission lines, two 230kV transmission lines, one 115kV transmission line, and one 69kV transmission line in the Study Area. Pinal Central Substation and WAPA ED-2 in the Study Area.
- Overall, the Study Area can be described as mixed use in character with utilities, agriculture, public facilities, residential, and vacant land being the primary uses



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---

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# Existing Land Use – Utilities

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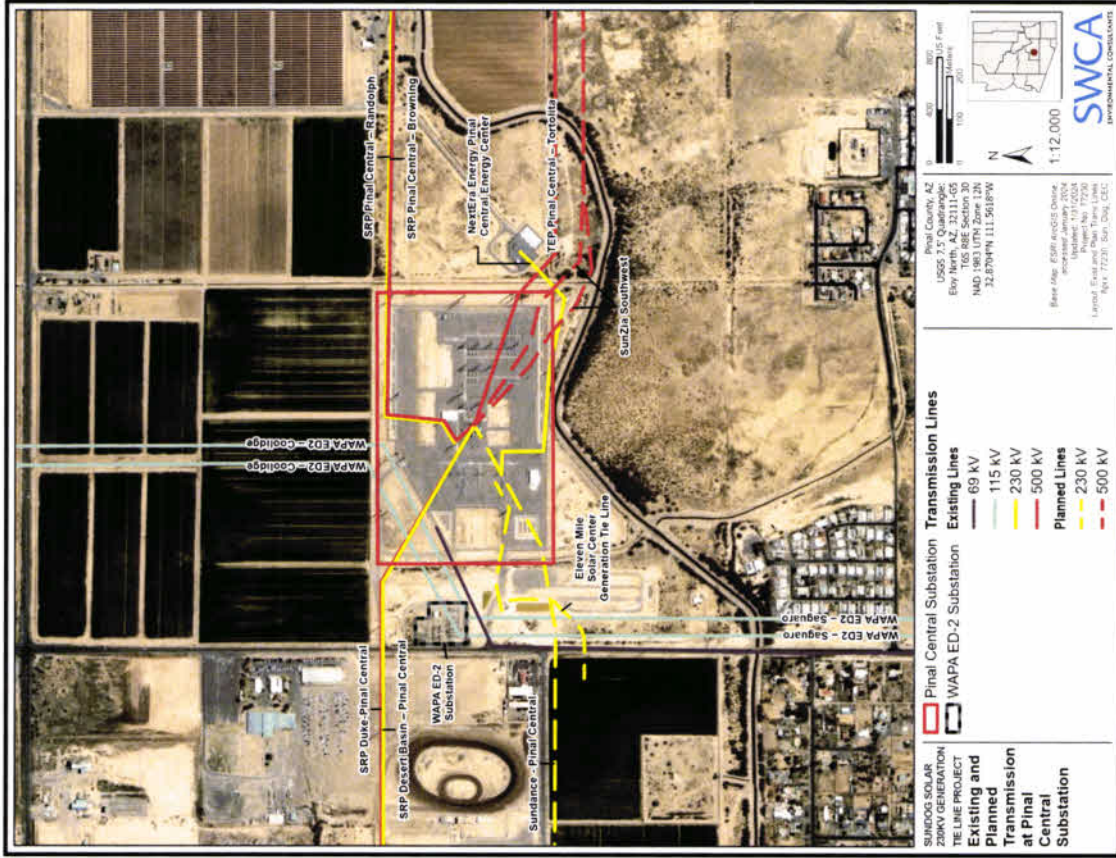
- There are numerous existing and planned transmission lines at or near the **Pinal Central Substation**

## Existing Transmission Lines

- SRP Duke – Pinal Central 500kV
- SRP Desert Basin – Pinal Central 230kV
- WAPA ED-2 – Saguaro 115kV
- WAPA ED-2 – Coolidge 115kV
- SRP Pinal Central – Browning 500kV
- SRP Pinal Central – Randolph 230kV
- NextEra Energy Pinal Central Energy Center – 230kV
- TEP Pinal Central – Tortolita 500kV

## Planned Transmission Lines

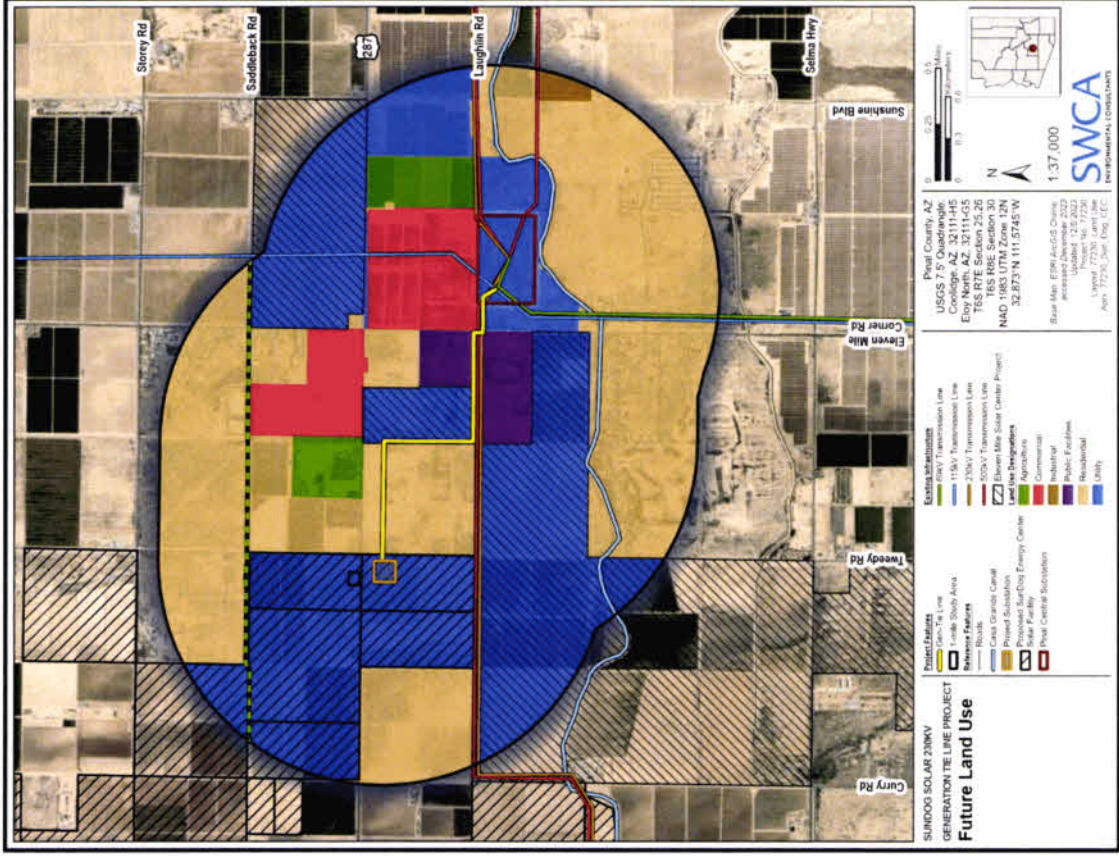
- APS Sundance – Pinal Central 230kV
- Eleven Mile Solar Center Generation Tie Line – 230kV
- Sunzia Southwest – 500kV



## Future Land Use Summary

---

- The Generation Tie Line is in unincorporated Pinal County and city of Coolidge
- **The Generation Tie Line is compatible with the Pinal County Comprehensive Plan**
- **The Generation Tie Line is compatible with the City of Coolidge 2025 General Plan**
- A Comprehensive Plan Amendment has been approved by Pinal County for the Solar Facility
- The Applicant is in the process of Planned Area Development/Rezoning for the Solar Facility





## Future Land Use Summary

---

- **Letters sent to 12 entities requesting information on any existing or planned developments**
  - Responses received from:
    - Arizona Game and Fish Department
    - Western Area Power Administration (see Exhibit H for full responses)



August 18, 2023

SunDog Solar Energy Center  
% SWCA Environmental Consultants  
20 East Thomas Road  
Suite 1700  
Phoenix, Arizona 85012

Electronically submitted to: [SunDogSolarHotline@azgameandfish.com](mailto:SunDogSolarHotline@azgameandfish.com) and [azgameandfish@swca.com](mailto:azgameandfish@swca.com)

RE: SunDog Solar Energy Center and Generation Tie Line Project

Dear Ms. DeSpain and Mr. Petry:

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the proposal by SunDog Solar, LLC for the SunDog Solar Energy Center and Generation Tie Line Project. The Department understands that this is a proposed 200 MW solar photovoltaic (PV) facility with battery storage on 1,642 acres of private land east of Casa Grande in Pinal County, Arizona. An approximately 1.5-mile-long 230 KV generation intertie (gen-tie) transmission line would connect to the existing Pinal Central Substation through a step-up substation. The project would be constructed north and south of Highway 287 within unincorporated lands that are currently used for agriculture. The Department previously reviewed the SunDog Solar Energy Center and provided comments to the Pinal County Planning Division on November 3, 2022. The recommendations provided in the aforementioned letter as well as recommendations for the gen-tie line are provided below.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission, has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

The Department recognizes the importance of planning efforts to develop renewable energy locations that contribute to regional and state economic growth needs and would like to work closely with Invenergy, Pinal County, and SWCA Consultants during the planning and development of this economically-important facility. The Department recognizes that appropriate coordination, proper planning, and voluntary implementation of best management practices allow projects to be developed that avoid, minimize, or offset potential impacts to wildlife and

[azgfd.gov](http://azgfd.gov) | 480.981.9400

MESA OFFICE 7200 E UNIVERSITY DRIVE, MESA AZ 85207

GOVERNOR KATE HOBBS COMMISSIONER CHARMAN TODD C. GELBER PRESIDENT CLAY HERNANDEZ TUCSON MARSHA RETIRE SUE SCOTTDALE  
JEFF BUCHANAN PATAGONIA JAMES E. COUGANOUR RAYSON DIRECTOR TY E. GRAY DEPUTY DIRECTOR TOM P. FINLEY

From: [Becky.Hopkins@wapa.gov](mailto:Becky.Hopkins@wapa.gov)  
To: [SunDogSolar@swca.com](mailto:SunDogSolar@swca.com)  
Subject: [EXTERNAL] SunDog Solar Generation Tie Line Project  
Sent: Tuesday, August 15, 2023 2:37:01 PM  
Attachments: ms20230815.docx

Hello,

Thank you for the notification letter dated 7/17/2023 regarding the SunDog Solar Generation Tie Line Project.

Western Area Power Administration (WAPA) appreciates being kept updated on projects in the vicinity of WAPA's transmission lines. Please continue to keep WAPA updated on the project.

Thank you.

**Becky Hopkins | Environmental Project Manager**

Civil Design & Engineering (CD&E) on contract to  
Western Area Power Administration | Desert Southwest Region | Phoenix, AZ  
(M) 470.922.1736 | [Becky.Hopkins@wapa.gov](mailto:Becky.Hopkins@wapa.gov)



## Recreational Summary

---

- The Project crosses one recreational facility: the Pinal County Fairgrounds and Event Center, which includes the Central Arizona Raceway

### **Pinal County Fairgrounds and Event Center**

- The Applicant has been coordinating with Pinal County and the Central Arizona Fair Association
- The Applicant has sited the Project to parallel existing transmission line facilities and reduce the Generation Tie Line ROW as it crosses the Fairgrounds
- The Generation Tie Line avoids crossing the Central Arizona Raceway track



Invenergy

## Land Use Summary

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- Project is within an area with existing and planned transmission and solar development
- Applicant continues to coordinate with land-managing/owning agencies and entities and other developers
- Wider corridor established to accommodate coordination with landowners, agencies, and other developers
- **Project would be compatible with existing and planned land uses**



Invenergy

## Biological Resources Summary

---

- Conducted field survey and obtained information from the Arizona Game and Fish Department and the United States Fish and Wildlife Service
- No designated or proposed critical habitat in the Project or Study Area
- **No areas of biological wealth were identified as being present within the Study Area**

SD-19



Invenergy

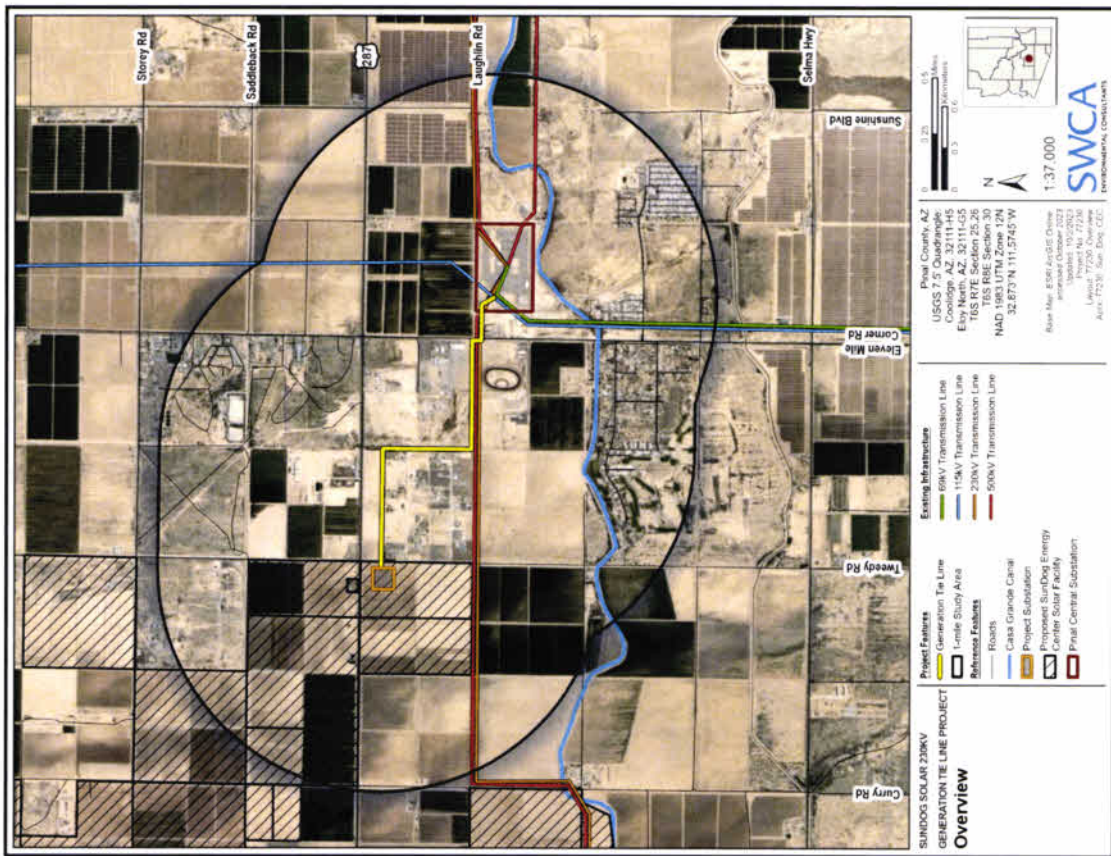
R-45



## Biological Resources Summary

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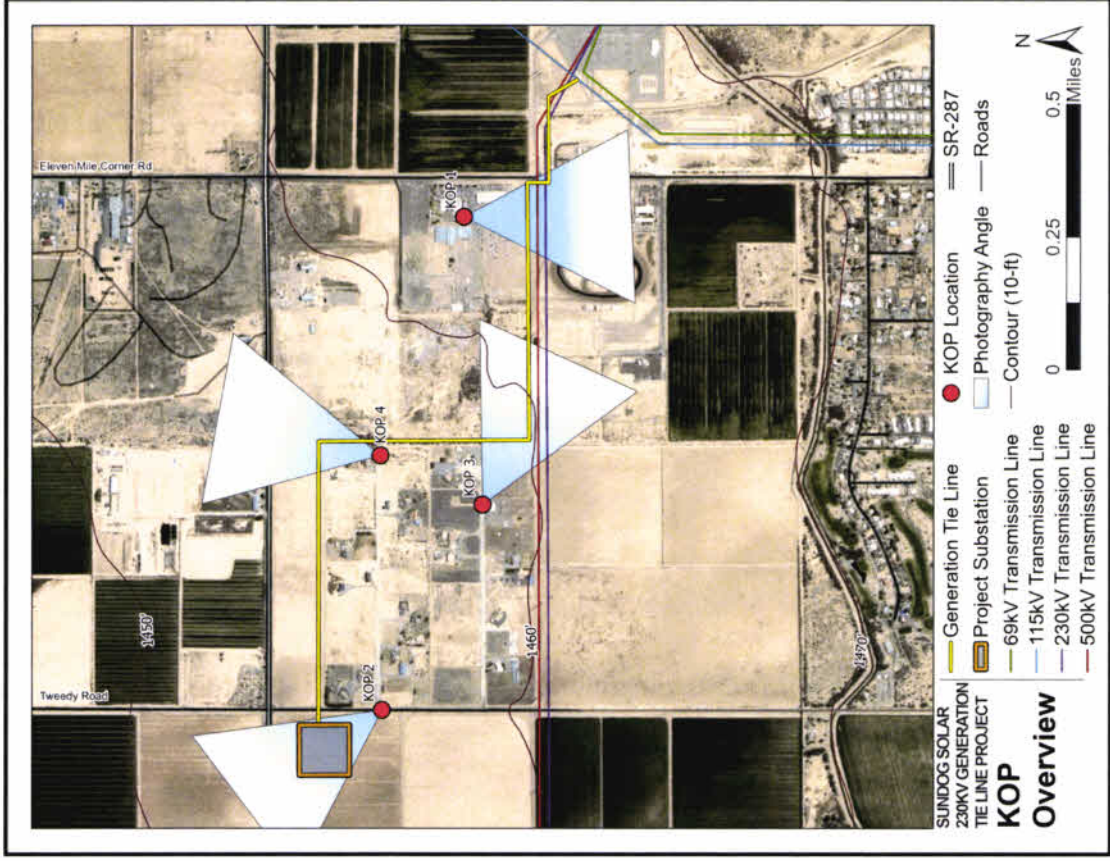
- Conducted field survey and obtained information from the Arizona Game and Fish Department and the United States Fish and Wildlife Service
- **No adverse effects to Threatened and Endangered Species or associated habitats**
- Minor impacts to vegetation and wildlife expected
- The Project may impact individual organisms but would be unlikely to result in impacts at the population level for any species.
- **The Project would be compatible with wildlife and plant species, as well as the affected habitat**



## Visual Resources Summary

---

- The Project is in a rural setting with active agricultural land dominating the developed portion of the Study Area
- Views from the analysis area are mostly open and include:
  - Views of adjacent mountains (including Sacaton Mountains, Picacho Mountains, and Silver Bell Mountains)
  - Existing transmission infrastructure
  - Agricultural operations
  - Dispersed residences
- Visual simulations completed from 4 Key Observation Points (KOPs)



## Visual Resources Summary

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### **KOP 1** – View of the Generation Tie Line from the Pinal County Fairgrounds and Event Center (Recreational Users)

- The Generation Tie Line would be visible and would begin to attract attention but would be subordinate to other built facilities within the landscape, resulting in a weak degree to contrast
- Visual impacts to recreational users at the Pinal County Fairgrounds and Event Center are anticipated to be low




**Existing Condition**

KOP 1: View from within the Pinal County Fairgrounds and Event Center looking south

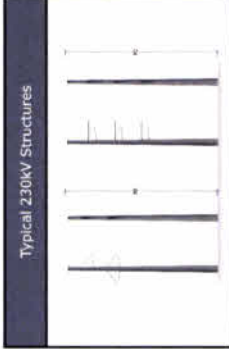


**Simulated Condition**

KOP 1: View from within the Pinal County Fairgrounds and Event Center looking south of the proposed Generation Tie Line



**Viewing Location**



**Typical 230kV Structures**

*Photo Date and Time: April 25, 2023, 10:10 am*

*View Location: Approximate distance to nearest new structure from photo location is 0.1 miles.*

*Simulations were prepared using information provided by Invenergy. Structure locations, colors, and heights may be different based on final engineering and design.*

**Invenergy** **SWCA**  
ENVIRONMENTAL CONSULTANTS

**SunDog Solar 230kV Generation Tie Line Project | July 2023**

Simulation from KOP 1: View from within the Pinal County Fairgrounds and Event Center

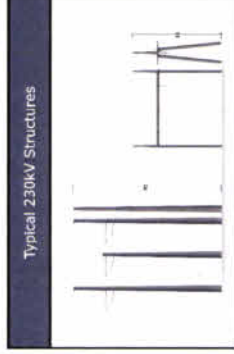
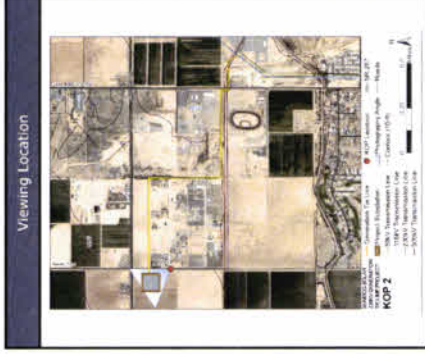
# Visual Resources Summary

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**KOP 2** – View of the Generation Tie Line from the South Tweedy Road and David Lane intersection (Vehicular and Residential Viewers)

## **Vehicular Viewers**

- The Generation Tie Line would be visible but consistent with existing distribution line and infrastructure in the area, resulting in weak contrast
- Visual impacts to vehicular viewers would be low



**Photo Date and Time:** April 25, 2023, 12:20 pm  
**View Location:** Approximate distance to nearest new structure from photo location is 0.3 miles.  
 Simulations were prepared using information provided by Invenergy. Structure locations, colors, and heights may be different based on final engineering and design.  
**This simulation is intended to be representative of proposed Project solar and battery energy storage facilities. Proposed Project transmission and substation facilities have not been simulated. Visual perimeter screening, required by Pinel County.**

**Invenergy** **SWCA**  
 ENVIRONMENTAL CONSULTANTS

**SunDog Solar 230kV Generation Tie Line Project | July 2023**  
 Simulation from KOP 2: View from residence at South Tweedy Road and David Lane



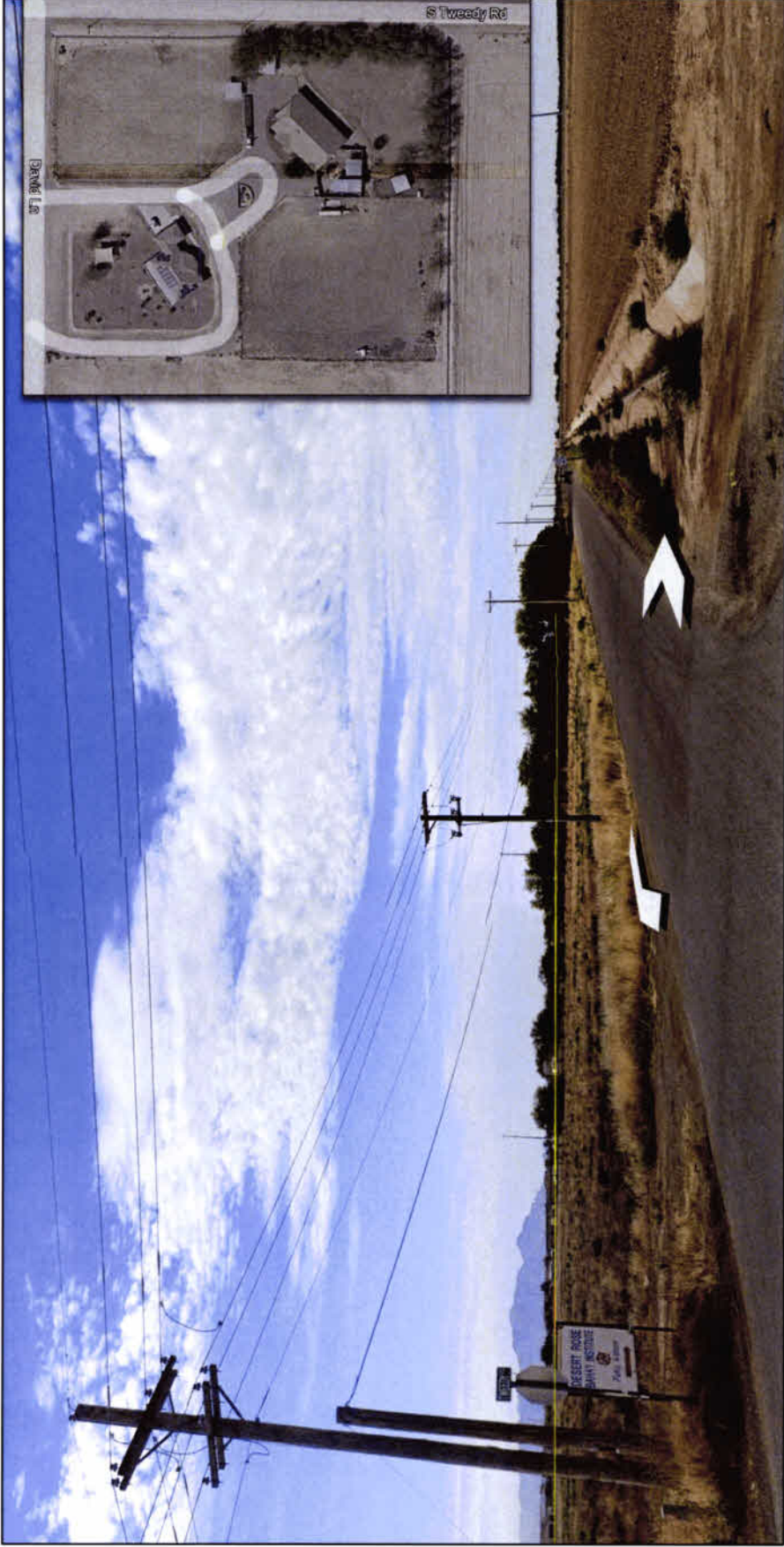
# Visual Resources Summary

---

**KOP 2** – View of the Generation Tie Line from the South Tweedy Road and David Lane intersection (Vehicular and Residential Viewers)

## **Residential Viewers**

- The Generation Tie Line would be visible but similar to the existing distribution line and infrastructure in the area, resulting in a weak to moderate degree of contrast
- Visual impacts to residential viewers would be low to moderate



SD-19



Invenergy

R-50

# Visual Resources Summary

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## **KOP 3 – View of the Generation Tie Line from Andrew Lane (Vehicular and Residential Viewers)**

### **Vehicular Viewers**

- The Generation Tie Line would be visible but appear co-located with and shorter than existing 500kV facilities in the area, resulting in weak contrast
- Visual impacts to vehicular viewers would be low

### **Residential Viewers**

- The Generation Tie Line would be visible but appear co-located with but shorter than existing 500kV facilities within the area, resulting in weak contrast
- Visual impacts to residential viewers would be low

**Invenergy**

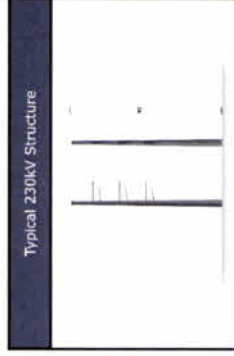
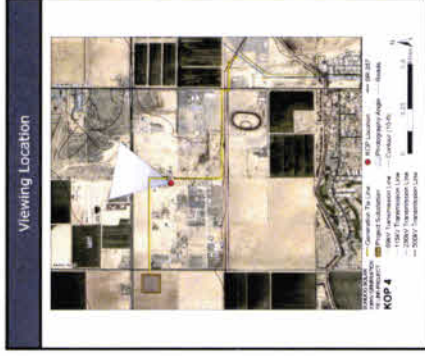


# Visual Resources Summary

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## **KOP 4** – View of the Generation Tie Line from Andrew Lane (Residential Viewers)

- The Generation Tie Line would:
  - Be visible to the north and east
  - Attract attention
  - Be prominent to other built facilities within the landscape
- Moderate to strong degree of contrast
- Visual impacts to residential viewers would be medium to high



**Photo Date and Time:** April 25, 2023, 12:00 pm  
**View Location:** Approximate distance to nearest new structure from photo location is 0.1 miles.  
 Simulations were prepared using information provided by Invenergy. Structure locations, colors, and heights may be different based on final engineering and design.

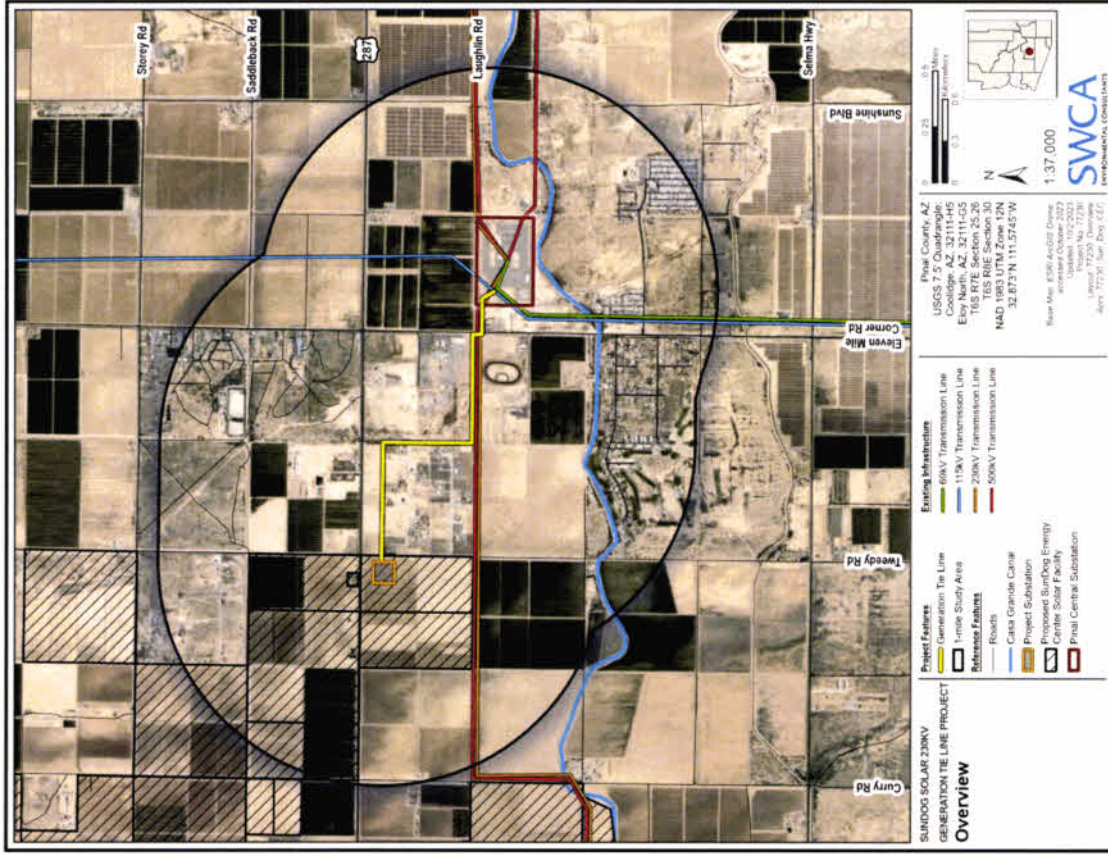
**Invenergy SWCA**  
 ENVIRONMENTAL CONSULTANTS

**SunDog Solar 230kV Generation Tie Line Project | November 2023**  
 Simulation from KOP 4: View from residence at David Lane

## Visual Resources Summary

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- Impacts to sensitive viewers at residences would be low to high due to close proximity to the project and long duration of views
- As seen from the public viewpoints in the surrounding area, the overall Project would be similar in form, line, color, and texture, compared with other transmission infrastructure in the analysis area, which would result in low to moderate impacts to scenery
- Views from public roadways and recreation areas would result in low to moderate impacts
- **Project would be compatible with existing visual setting**





# Cultural Resources Summary

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- Conducted inventory of previously identified historic sites, structures, and archaeological sites
- Consulted with the Arizona State Historic Preservation Office
- One previously recorded historic site with prehistoric mortuary features (AZ AA:2:284[ASM]) intersects the Project at the Pinal Central Substation interconnection
  - To mitigate adverse effects at this site:
    - If the site cannot be avoided, ground disturbance within 50 feet of the site boundary will be monitored by a qualified archaeologist.
    - If ground disturbance within the site is necessary, additional data recovery will be performed before construction begins, excluding any areas that have been previously investigated
    - **These recommendations are consistent with the recommendations provided by SHPO**
- The Applicant would complete a cultural resources inventory of those portions of the Project that have not been "adequately" surveyed previously
- **Project would have limited impacts to known archaeological or historical sites**

## Applicant Proposed Condition

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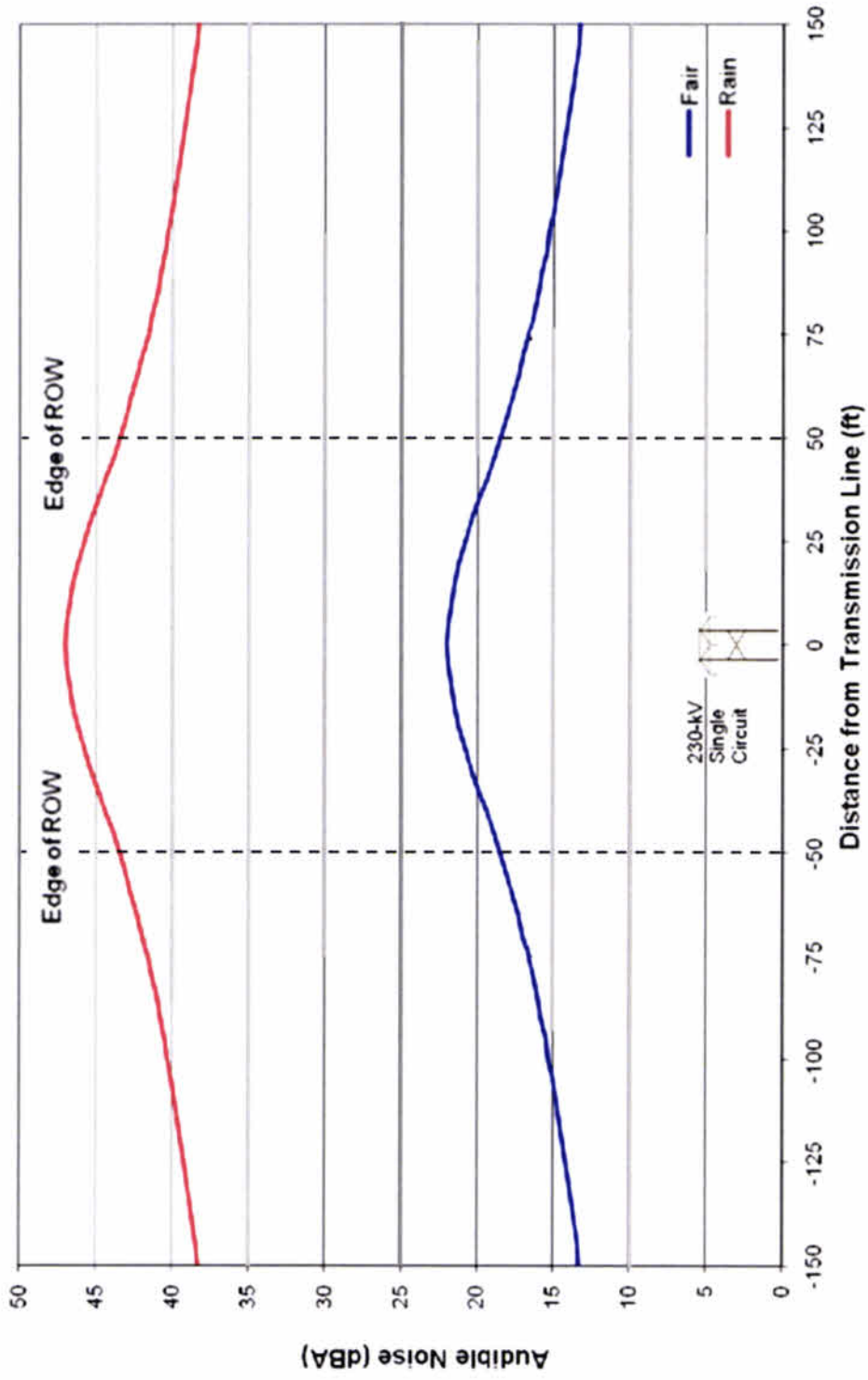
*“...to mitigate potential effects on site AZ AA:2:284(ASM), any ground disturbance within 50 feet of the site boundary shall be monitored by a qualified archaeologist. If ground disturbance within the site is necessary, additional data recovery shall occur within the Project footprint prior to construction, excluding any areas that have been previously investigated.”*

- **Project would have limited impacts to known archaeological or historic sites**

## Noise Analysis

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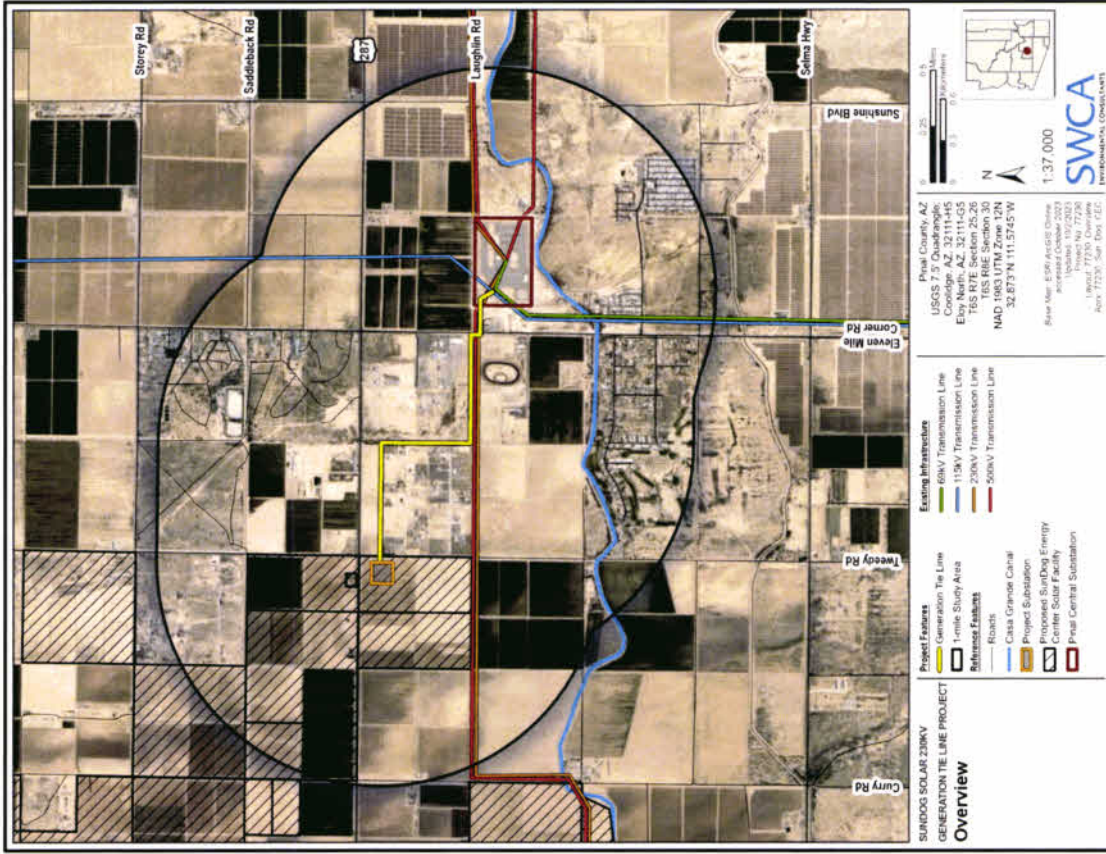
- Operational noise is below the existing noise levels in the Project vicinity
- Existing noise within the Project is typical of “very quiet suburban and rural residential”
  - Primarily from sporadic traffic along Highway 287
  - Other sources include current electrical infrastructure, the Pima County Fairgrounds and Event Center, and the Central Arizona Raceway
- Construction noise would be temporary and adhere to local regulations and guidelines
- **Project would be compatible with existing noise levels of Study Area**



# Analysis of Interference with Communication Signals

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- Radio interference unlikely but possible for nearby AM broadcast receivers
- Television interference unlikely due to distance from receptors and increasing use of alternate technologies (satellite, cable, etc.)
- No interference with communication systems anticipated within the Study Area
- Project would be compatible with nearby existing communication signals



# Environmental Conclusion

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- **The Project is Environmentally Compatible**
- The Project:
  - Is compatible with existing plans in the vicinity of the proposed site
  - Would not disturb any areas of unique biological wealth and would not impact special-status species
  - Would have limited visual effects and limited impacts to known archaeological or historical sites of significance
  - Is compatible with recreation opportunities in the area
  - Is not anticipated to result in significant impacts associated with noise or signal interference





# Commission Staff Review

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Pinal Central Substation for use by electrical customers. **The Project has been identified as an optimal location** based on the recognized need to interconnect renewable energy sources to local electrical utilities, the existence of compatible adjacent and nearby land uses and the proximity to the existing Pinal Central Substation.

## CONCLUSIONS AND RECOMMENDATIONS

Based on Staff's review of the Application, as well as the Applicant's response to a Staff issued data request, **Staff believes the proposed Project could improve reliability, safety of operation of the grid, and the delivery of power in Arizona.**

Sincerely,



Ranelle Paladino  
Briton Baxter  
Division Co-Directors  
Utilities Division

Invenergy



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# Conclusions

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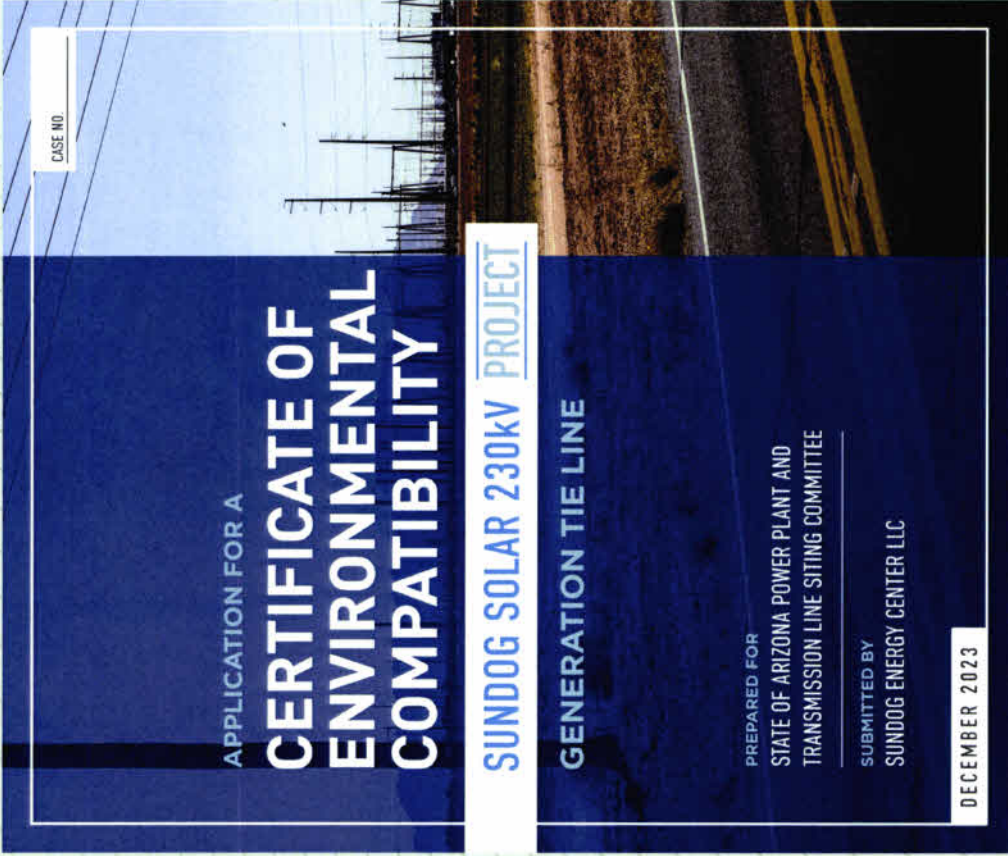
- **The Project:**
  - Is optimally located near the Pinal Central Substation
  - Has Positive System Impact Study results
  - Helps address the need for more renewable power in Arizona
  - Will improve reliability, grid operational safety, and power delivery in Arizona



# Thank You!

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CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

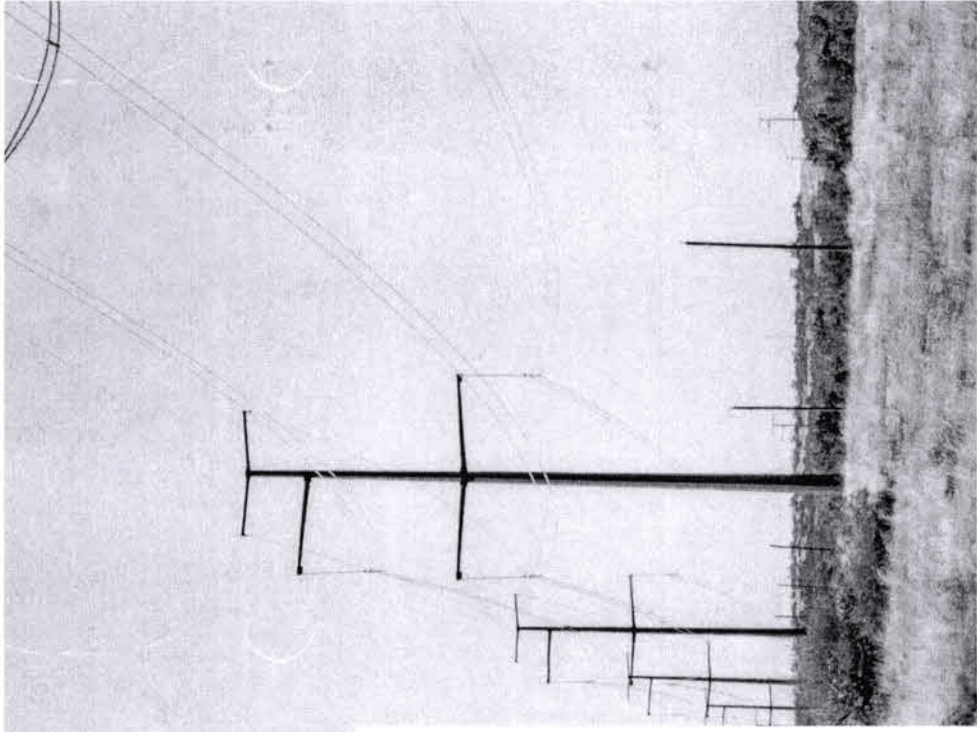
**SUNDOG SOLAR 230kV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
STATE OF ARIZONA POWER PLANT AND  
TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
SUNDOG ENERGY CENTER LLC

DECEMBER 2023



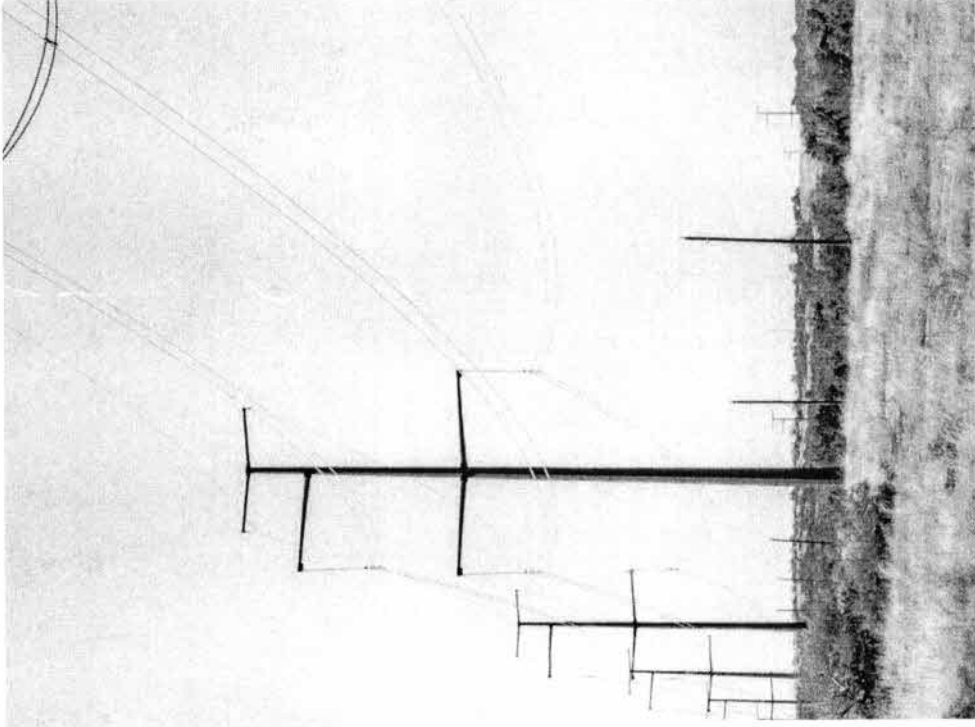
Case No. 229

# SunDog Solar 230kV Generation Tie Line Project

Prepared for:  
Arizona Power Plant and Transmission Line Siting  
Committee

**Invenergy**





Case No. 229

# SunDog Solar 230kV Generation Tie Line Project

Prepared for:  
Arizona Power Plant and Transmission Line Siting  
Committee

**Invenergy**



## Is It a Feasible Route?

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- Is it environmentally compatible?
- Is the landowner willing?
- Can the engineers make it work?

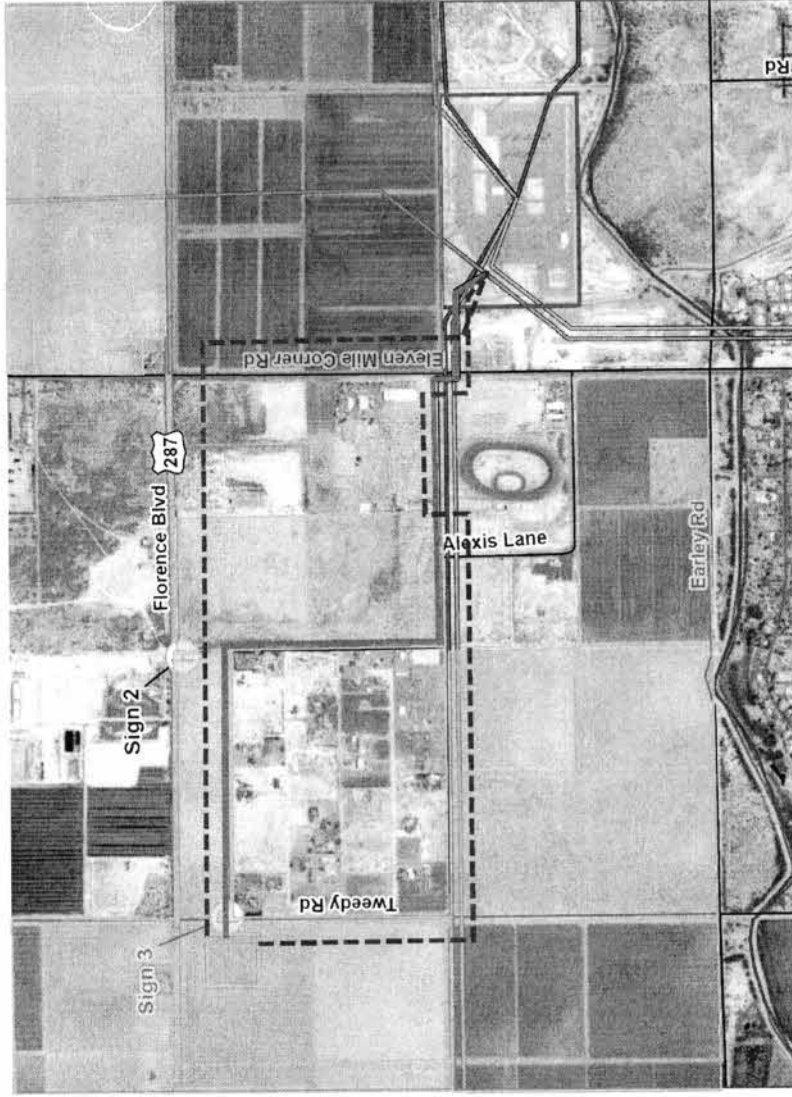
# Is It a Feasible Route?

## SunDog Solar 230kV Generation Tie Line Project

- | Reference Features       | CEC Features             |
|--------------------------|--------------------------|
| Project Substation       | Generation Tie Line      |
| Pinal Central Substation | Installed Sign Locations |
| Casa Grande Canal        |                          |
| SR-287                   |                          |
| Roads                    |                          |
| Transmission Lines       | Supplemental Features    |
| 69kV                     | Orsted Property          |
| 115kV                    | Caywood Property         |
| 230kV                    | Invenergy Property       |
| 500kV                    | Proposed Route           |
|                          | Infeasible Route         |

Pinal County, AZ  
 USGS 7.5 Quadrangle  
 Coolidge, AZ, 32111-H5  
 Ely, North, AZ, 32111-05  
 T65 R7E Section 25, 26  
 T65 R8E Section 30  
 NAD 1983 UTM, Zone 12N  
 32,87691N, 111,57281W

File: Map\_ESRI\_ArcGIS\_Online  
 Accessed January 2024  
 Updated: 1/19/2024  
 Project No.: 7152  
 Location: Sun Dog CEC  
 Alex: 77220 Sun Dog CEC



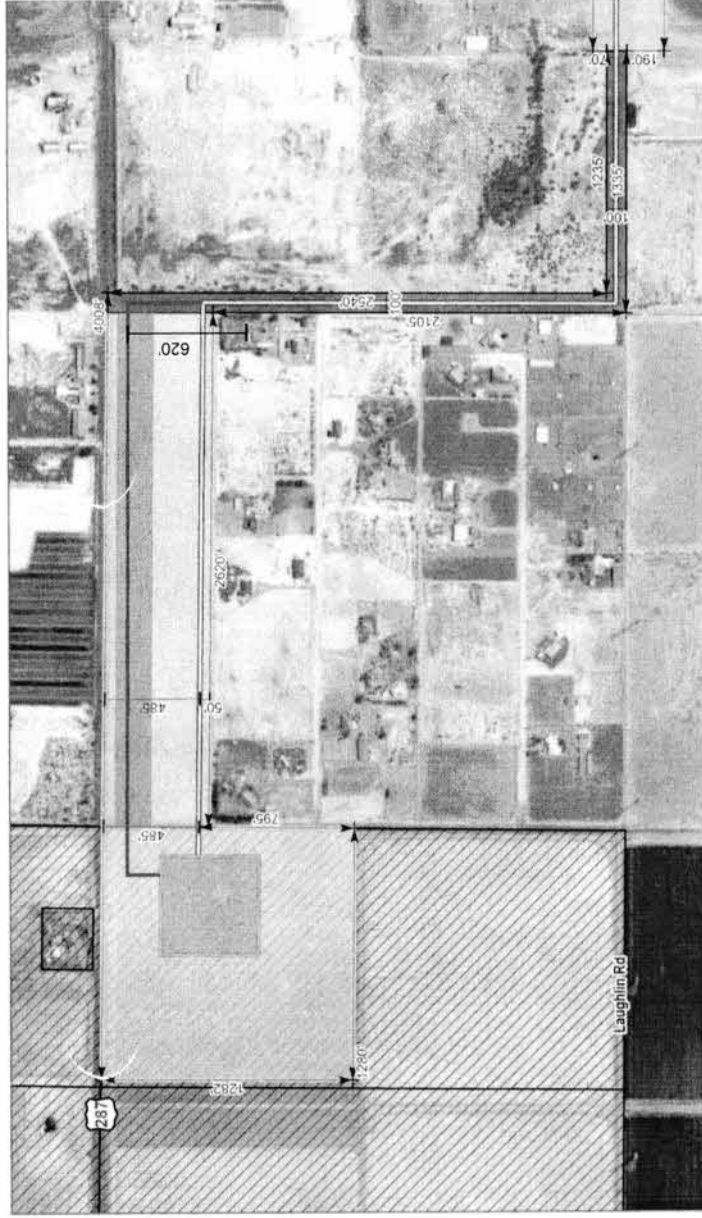
## Routing Considerations

- Right-of-way width
- Number of structures
- Height of structures

# Routing Considerations

## SunDog Solar 230kV Generation Tie Line Project

- Project Features**
  - Generation Tie Line
  - Generation Tie Corridor
  - Generation Tie Corridor-  
Decided by CEC Case No. 212
- Reference Features**
  - Project Substation
  - SunDog Energy Center Solar  
Facility
  - Pinal Central Substation
- Supplemental Features**
  - Reduced 200' Corridor
  - North Route



SD-20

# Thank You!

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Invenergy

CASE NO. \_\_\_\_\_

APPLICATION FOR A  
**CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY**

**SUNDOG SOLAR 230KV PROJECT**

GENERATION TIE LINE

PREPARED FOR  
STATE OF ARIZONA POWER PLANT AND  
TRANSMISSION LINE SITING COMMITTEE

SUBMITTED BY  
SUNDOG ENERGY CENTER LLC

DECEMBER 2023

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**From:** Jayson B Carpenter <[Jayson.Carpenter@srpnet.com](mailto:Jayson.Carpenter@srpnet.com)>  
**Sent:** Tuesday, February 21, 2023 4:02 PM  
**To:** Burman, Paul <[PBurman@invenergy.com](mailto:PBurman@invenergy.com)>  
**Cc:** Henry A Soliz <[Henry.Soliz@srpnet.com](mailto:Henry.Soliz@srpnet.com)>; DeSpain, Katie <[KDeSpain@invenergy.com](mailto:KDeSpain@invenergy.com)>; King, EvaMarie <[EKing@invenergy.com](mailto:EKing@invenergy.com)>  
**Subject:** [EXTERNAL] RE: SRP 230kV - Pinal

Paul,

I was able to confirm that SRP is not willing to allow another entity to attach to our transmission poles or towers or occupy the easement on this parcel. We need to maintain all of our options for SRP's future growth needs.

**Jayson Carpenter, SR/WA**

Supervisor – Transmission & Distribution Support  
SRP | Land Department | PAB10W  
P.O. Box 52025, Phoenix, AZ 85072-2025  
P: (602) 236-3490

