BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

LS-452

IN THE MATTER OF THE APPLICATION OF WEST CAMP WIND FARM II, LLC, IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES § 40-360, ET SEQ., FOR A CERTIFICATE OF ENVIRONMENTAL COMPATABILITY AUTHORIZING THE WEST CAMP 2 WIND FARM GEN-TIE PROJECT, WHICH INCLUDES THE CONSTRUCTION OF A 345 KILOVOLT(KV) OR 500 KV TRANSMISSION LINE AND ASSOCIATED INTERCONNECTION FACILITIES LOCATED WITHIN NAVAJO COUNTY, ARIZONA.	DOCKET NO. L-21204A-25-0207-00251 LS CASE NO. 251 EVIDENTIARY HEARING

At: Flagstaff, Arizona

Date: October 27, 2025

Filed: October 31, 2025

REPORTER'S TRANSCRIPT OF PROCEEDINGS

VOLUME I
(Pages 1 through 150)

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BE IT REMEMBERED that the above-entitled and numbered matter came on regularly to be heard before the Arizona Power Plant and Transmission Line Siting Committee at, Flagstaff, Arizona, commencing at 1:00 p.m. on October 27, 2025.

BEFORE: ADAM STAFFORD, Chairman

MICHAEL COMSTOCK, Arizona Corporation Commission
LEONARD DRAGO, Department of Environmental Quality
R. DAVID KRYDER, Agricultural Interests
SAL DICICCIO, Incorporated Cities and Towns
MARGARET "TOBY" LITTLE, PE, General Public
DOUGLAS FANT, General Public
GABRIELA SAUCEDO MERCER, General Public

APPEARANCES:

For the Applicant:

Albert H. Acken
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Phoenix, Arizona 85020

CHMN STAFFORD: Let's go on the record.

Now is the time set for the hearing on the application of West Camp Wind Farm II, LLC, for a certificate of environmental compatibility, Docket No. L-21204A-25-207-00251 in the Line Siting Case 251.

Let's take the roll call of the members.

Member Kryder.

MEMBER KRYDER: Here.

CHMN STAFFORD: Member Mercer.

MEMBER MERCER: Here.

CHMN STAFFORD: Member Comstock.

MEMBER COMSTOCK: Present.

CHMN STAFFORD: Member Fant.

MEMBER FANT: Here.

CHMN STAFFORD: Member Little.

MEMBER LITTLE: Present.

CHMN STAFFORD: Member Drago.

MEMBER DRAGO: Present.

CHMN STAFFORD: Member DiCiccio.

MEMBER DICICCIO: I'm here.

CHMN STAFFORD: Thank you. Let's start by taking the appearance of the applicant.

MR. ACKEN: Good afternoon, Chairman and Members of the Committee. Bert Acken of Acken Law on behalf of the applicant, West Camp Wind Farm II, LLC.

CHMN STAFFORD: Would you like to make an opening statement?

MR. ACKEN: I would if I can get that frog out of my throat. Apparently I'm not ready.

So, yes, thank you. Appreciate the committee coming up to Flagstaff. There are a few items I want to highlight in our opening. Most of this is what you expect to see. Here's our agenda for the hearing. Witness introductions. A little bit about the applicant.

This is an interconnection for a wind project, a gen-tie, and so we'll talk a little bit about the wind farm and then get into the nuts and bolts of the gen-tie project. We have a virtual tour to present to the committee today. And we will go over public notice and outreach that was done for the project. And provide testimony on environmental compatibility.

The few items I want to highlight for the committee in my opening, just to orient you. On the right is a map. You will see us go through this map in the testimony that shows the requested corridor. It's on a three-panel figure. But that's one transmission line corridor. It is unique in my cases in that it is we are 95 percent on private land. A small portion is on state trust lands.

Also of note with respect to the private

lands, they are zoned a general owned by Aztec Land and Cattle Company. Easements are placed with Aztec, and you will hear from a member of the Brophy family at public comment this evening with respect to their thoughts on the project.

Utility facilities are permitted use in this area of Navajo County. You're also going to hear a bit about the Navajo County entitlement process that the wind farm will go through, the nonjurisdictional wind farm.

But we know the Committee likes to hear that, and this team has been active in Navajo County with respect to building and operating projects for over five years, and has a deep, close working relationship with Navajo County that we will talk about.

We have two corridor options that we -- or -- I misspoke.

We are requesting authority for two interconnection options, both located within the same corridor. And we'll present testimony on that, but I wanted to preview that, that you're going to hear about Option A and Option B. They are both located in the same corridor.

So a little bit about AES.

AES is a Fortune 500 company. I have

represented them twice before this committee; once in 2019 and once in 2022 for gen-tie projects located in northern Arizona.

On the right screen you see, and we will go through all of these slides, the numbers are tied to the presentation slide. I'm kind of picking and choosing as we go through.

On the right you see, "What does AES have in operation and construction in Arizona?" And it's a mix of solar, battery, and wind generation projects, but it's thousands of megawatts.

So AES knows Arizona, has been a partner to Arizona utilities and Arizona communities for some time.

A little bit more context, I think, is useful for this project which is called West Camp 2, and what about West Camp 1? So we sited West Camp at that time in Case 206 in 2022. The map on the far left on Slide 30 shows you the footprint of the West Camp wind farm. That project is under construction nearing the completion of construction.

As you see on that far left slide -- excuse me -- the far left map, a portion of our corridor crosses through that West Camp Wind Project boundary and may use infrastructure and what's been constructed for West Camp for this project as well.

Most of West Camp is, or perhaps all of it is also largely within the boundaries of the land holdings of Aztec, so this is a landowner who the applicant has worked closely with on, this is just the second time they've gone through this process.

Again, a strong working relationship with the local landowner and the community. I've mentioned we have two interconnection options within one corridor.

Option A is an interconnection to the existing APS Sitgreaves substation which AES has built as part of West Camp 1. And so we are seeking authorization to interconnect at either 345kV or 500kV at that existing switchyard. It could be an up to 25-mile transmission line to interconnect to the APS system in the area.

Option B would be a shorter transmission line within the same corridor to interconnect with SRP's 500 Cholla-Sugarloaf-Coronado transmission line.

Option B would also include the construction of a new on-site switchyard to facilitate that interconnection. We are requesting the authority to build one or the other, and we'll explain why we're seeking the flexibility but not both at this time.

MEMBER KRYDER: But not both.

MR. ACKEN: Correct.

So why are we here? We will present

testimony as to the purpose and need that this committee hears frequently these days, perhaps even more frequently about the extensive demand for new energy resources in Arizona.

And this project fits into that solution. AES as you can see from prior slides knows Arizona, knows how to work with Arizona utilities, and has successfully put infrastructure in the ground to serve Arizona customers.

Also under Option A, it would create the ability to further utilize that Sitgreaves switchyard that was developed as part of West Camp 1. So here's an opportunity to take advantage of new infrastructure that has been built in Arizona with the intent to facilitate future growth, and Option A would provide that.

But there's still Option B. And so in Option B, the testimony will show that that creates interconnection optionality and market flexibility. We are in a dynamic, fast changing environment both with respect to getting into queues as well as future customers and the ability to interconnect at either APS or SRP with the existing network in the area.

We intend to show that that is a great benefit of this project. And as I mentioned, it allows AES to build on their proven track record.

I want to mention public involvement. And so there's a couple pieces. You will hear the applicant, again, talk about their participation in Northern Arizona, their active engagement, their investment in the communities that they are in for over the past five years.

That has given the AES team great insight into the concerns of the local community and how to build projects that address community concerns and can best meet the needs of Arizona's energy users.

Specifically for this project, the team conducted open houses, mailers to surrounding residents, not just of the corridor but of the much larger wind farm footprint.

And as a result of AES's long history in this area and this more recent outreach, the end result is we don't anticipate a negative opposition to this project. We have not seen it to date.

What we will present is we had one resident at the open house who had questions about the proximity of wind turbines to her residence. And this team sat down and met with her and addressed those concerns.

Other two comments, again, there's only three, we will talk about comments from Game and Fish, which Game and Fish provided their mitigation measures as

you would expect to see from them, and we will address that during our discussion of environmental resources as well as a letter from the City of Holbrook documenting existing plans in the area which, again, we will discuss in environmental resources.

Maybe if I hit the right button.

With respect to land use, the project is entirely located in Navajo County. And as I mentioned earlier, 95-plus percent is located on land owned by a single landowner who supports the project and will provide public comment.

But of course that's not the end of the story. We are here for a certificate of environmental compatibility. And we have a very robust analysis that has been done for this project. Both with respect to the CEC exhibits that you expect to see as well as additional analyses that have been done on the site in the years prior.

So we have a team of witnesses who are eagerly looking forward to the opportunity to share with you the results of that analysis. And you will see the summary of environmental compatibility and what we anticipate to show in testimony that the wind turbine that this gen-tie will interconnect will disturb a relatively small amount of land. It's an area as you see

on the photo on the right screen, it's an area that is existing range land.

This is a compatible use because it will allow the ranch owner the continued use of his ranch for generations to come. This project will not disturb areas of biological wealth, minimal visual impacts because it is far from any residences or any viewers other than along one state highway.

The other thing on the right screen that I want to highlight, that second photo, it looks like a rendering, but that is the newly constructed Sitgreaves Substation that was built for West Camp 1, that we may use, what we would use for the interconnection under Option A.

So with that, we look forward to the opportunity to provide testimony to you. We think that -- we hope that you agree at the end of the testimony that this project provides interconnect flexibility for needed power, and it's located in an area that has existing infrastructure, significant existing infrastructure that we can use, is adjacent to an existing wind project, the gen-tie for which this committee and Commission approved in 2022, and is environmentally compatible for the reasons that you will hear today and tomorrow.

So with that, the last thing I'll do is just kind of orient you. We have the application; should be on your tablets. We have a couple copies in the room. We also have a hearing binder with a number of exhibits that we will go through throughout the course of the hearing, which includes the slide deck, so if you wanted to follow along, that has been marked for identification as West Camp-2.

And again, there's a couple hard copies around. And we also have a placemat that shows, this is probably the best map of the corridor, this is Figure A-1 to the application, but provides a good reference when we're providing testimony, if you're visual like me and you want to see the corridor and understand the context of where we're located.

So with that, I'm ready, I think the witnesses are ready. Are there any questions from the committee that you'd like to have raised at the outset we'll be happy to address.

CHMN STAFFORD: Will you be presenting all your witnesses in a panel?

MR. ACKEN: I will. So I have Jordan Ramljak. I came close. Robert Gardner. Corinne Lytle Bonine, and Colin Agner. All four witnesses I would like to swear in as a panel.

CHMN STAFFORD: Would they like an oath or affirmation?

MS. RAMLJAK: We prefer an affirmation.

CHMN STAFFORD: All right. So this is directed to all the witnesses.

Do you affirm the testimony you will give in this matter will be the truth, the whole truth, and nothing but the truth, taking into consideration the penalty for perjury in the State of Arizona?

Mr. Agner?

MR. AGNER: Yes.

CHMN STAFFORD: Ms. Bonine?

MS. LYTLE BONINE: Yes.

CHMN STAFFORD: Ms. Ramljak?

MS. RAMLJAK: Yes.

CHMN STAFFORD: Mr. Gardner.

MR. GARDNER: Yes.

CHMN STAFFORD: And please tell me how to pronounce your last name.

MS. RAMLJAK: Ramljak.

CHMN STAFFORD: Ramljak.

MS. RAMLJAK: You can say Ramljak.

CHMN STAFFORD: Ramljak. Okay. Thank you. I shall try to pronounce that correctly henceforth.

Mr. Acken.

MR. ACKEN: Thank you, Mr. Chairman. I was actually prepped on that, and you see how well I did.

COLIN AGNER, CORINNE LYTLE BONINE, JORDAN RAMLJAK, and ROBERT GARDNER,

called as witnesses as a panel on behalf of the Applicant, having been previously affirmed by the Chairman to speak the truth and nothing but the truth, were examined and testified as follows:

DIRECT EXAMINATION

BY MR. ACKEN:

Q. So we're going to start off -- and I may be a little more informal -- Jordan, if you would please state and business address for the record.

A. (Ms. Ramljak) My name is Jordan Ramljak. My business address is 282 Century Place, Suite 2000, Louisville, Colorado, 80027.

Q. By who are you employed and in what capacity?

A. (Ms. Ramljak) I'm employed by the AES Corporation and I'm a manager of Western Wind Development.

Q. Next describe your educational and professional background.

A. (Ms. Ramljak) I received a bachelor of science

in civil and environmental engineering from Rice University in Houston, Texas. I have been working in the wind energy industry for just over eight years now. Spent most of that time at one of the largest wind turbine equipment manufacturers in the United States. And I've been at the AES Corporation for 15 months now.

Q. And what is your role with respect to the gen-tie project and the CEC application?

A. (Ms. Ramljak) I am the development manager for both the West Camp Wind Farm and gen-tie project. So I am the lead on all project-specific information for the project in the development phase.

Q. And what topics will you cover in your testimony today?

A. (Ms. Ramljak) I will provide an overview of the application and describe the West Camp 2 Wind Farm and gen-tie project. I'll also describe our two proposed route options for the gen-tie projects, the CEC corridor within which the gen-tie project will be located, and the design parameters for the gen-tie project.

Q. Next, Rob, please state your name and business address.

A. (Mr. Gardner) My name is Rob Gardner. My business address is 282 Century Place, Suite 2000, Louisville, Colorado 80027.

Q. By whom are you employed and in what capacity?
A. (Mr. Gardner) I'm employed by the AES Corporation, I'm a senior manager of Western Wind Development, working on projects throughout the western United States.
Q. Next, describe your educational and professional backgrounds.
A. (Mr. Gardner) I received a bachelor of arts in mathematical economics from Colorado College located in Colorado Springs, Colorado. I've been working for AES-affiliated companies for over six years, all of those years working on wind farms throughout the western United States. And I previously testified before this committee in Case 206 for the West Camp Wind Farm.
Q. And what is your role in this gen-tie project?
A. (Mr. Gardner) I'm responsible for the overall development and commercialization of the West Camp Wind 2 wind farm and associated gen-tie project.
Q. And what is the purpose of your testimony?
A. (Mr. Gardner) I'll provide an overview of the AES corporation, talk about the need case for this project, and discuss the public outreach that we conducted for the CEC application.
Q. Corinne, you're next. Please state your name and address.

A. (Ms. Lytle Bonine) My name is Corinne Lytle Bonine. My business address is 282 Century Place, Suite 2000, Louisville, Colorado 80027.

Q. And by whom are you employed?

A. (Ms. Lytle Bonine) I'm employed by AES Corporation as a director of environmental permitting focusing on our development and construction and operating wind projects. I'm also the environmental permitting and compliance lead for specifically the West Camp Wind 2 gen-tie project.

Q. Next describe your professional and educational background.

A. (Ms. Lytle Bonine) I received a bachelor of arts degree in environmental studies from the University of California Santa Barbara. I've spent close to 20 years working in environmental permitting and compliance, the last almost three of which have been with AES.

And I've always had a focus in energy and transmission development. I have provided testimony in other state proceedings including Wyoming and California, and also in front of the California assembly select committee on permitting reform. And I've recently elected to be the vice president of the Association of Environmental Professionals.

Q. And what has been your role in this project?
A. (Ms. Lytle Bonine) I provided review, analysis and support of the environmental analysis components of the application, and I'll continue to lead the environmental permitting and compliance efforts throughout the life of the gen-tie project.
Q. And what topics will you cover?
A. (Ms. Lytle Bonine) I will cover an overview of our environmental resources management program and how we site projects to be environmentally compatible.
As well as specifically the environmental studies completed in support of the application, including land use and recreation purposes, environmental studies in general, our biological resources and cultural resources.
Q. Thank you.
Colin, please state your name and address.
A. (Mr. Agner) My name is Colin Agner, and my business address is 343 West Franklin Street, Tucson, Arizona 85701.
Q. By whom are you employed and in what capacity?
A. (Mr. Agner) I am a lead project manager for SWCA Environmental Consultants, and I was the subject matter expert for the CEC in this case.
Q. Describe your educational and professional

background.

A. (Mr. Agner) I have a bachelor of science in environmental science from Westminster College in New Wellington, Pennsylvania, and a master of science in planning from the University of Arizona in Tucson, Arizona. I have over 15 years of experience in environmental consulting.

Q. And what is SWCA's role in this project?

A. (Mr. Agner) So SWCA was retained by the applicant to assist in the preparation of the CEC application as well as the associated environmental studies that support the CEC application.

Q. And have you testified before the committee previously?

A. (Mr. Agner) Yes. I have testified before the Arizona Power Plant and Transmission Line Siting Committee in case numbers 219, 229, 237, and 241.

Q. And what is the purpose of your testimony today?

A. (Mr. Agner) So the purpose of my testimony today is to provide the Line Siting Committee with information about environmental studies that were done to support the CEC application.

Specifically, I will cover visual resources, which is application Exhibit E, noise and interference, which is application Exhibit I.

I'll also walk the committee through the virtual tour as well as go over the CEC notice of hearing outreach efforts.

Q. Thank you, all.

Rob, in my opening I mentioned a little bit about AES and its -- who AES is and its active presence in Arizona, but I'm not under oath, you are. So I'd like you to provide a little bit of background about the applicant, West Camp Wind Farm 2, and how that fits within the AES corporate structure.

A. (Mr. Gardner) Of course.

Let me get familiar with the clicker.

So West Camp Wind Farm 2 is an indirect subsidiary of the AES Corporation. As Bert alluded to AES is a Fortune 500 global independent power producer. We're in the business of producing and distributing electrical power throughout the world with a strong focus in the United States.

AES has global assets, over $47 billion worth, including 32 gigawatts of mixed-energy assets. So AES, as I mentioned, is not only a wind company. We are in the business of producing electrons when they're needed, where they're needed and distributing them to customers.

It's headquartered in Arlington, Virginia, and of note to this committee, AES currently owns and

operates over 2800 miles of transmission lines throughout the country along with many high-voltage substations and switchyards and just infrastructure throughout the country.

So on the right, you'll see all of the states within the U.S. where AES has operating assets and I'll focus a little bit more on Arizona in the next slide.

CHMN STAFFORD: The slide you're referring to is Number 9 of hearing Exhibit 2.

MR. GARDNER: Yes, sir. My apologies, I'll reference the slide number.

BY MR. ACKEN:

Q. So current on the screen is Slide 9 on the left and Slide 10 on the right. And the Slide 10 shows the map of U.S. assets. Is that correct?

A. (Mr. Gardner) That is correct.

Q. You mentioned the Arizona presence. Let's turn to that next.

A. (Mr. Gardner) Arizona is one of our core markets as a company. We have gigawatts of operational assets within the state. I will focus mostly on the wind aspect.

I've had the privilege of working, developing, and spending a lot of time in northern Arizona over the years working on our Chevelon Butte wind farm and our

West Camp wind farm. Chevelon Butte is currently the largest operational wind farm within the state of Arizona at 454 megawatts. That project is located in Coconino County mostly with a few turbines in Navajo County.

We are close to breaking our record with the West Camp Wind Farm. That project is 500 megawatts located entirely in Navajo County. That project is currently under construction. We are anticipating switchyard energization by the end of the year and full commercial operations in Q1 or Q2 of 2026.

MEMBER KRYDER: Mr. Chair.

CHMN STAFFORD: One second. One second, Member Kryder.

You referred to the prior slide as Slide 9. In the hearing exhibits that I have number 2 is Slide 18.

MR. ACKEN: Yeah, I see they're not matching. So we'll correct that on a break. But let's use the hard copy, and so I did, I was looking at the slide on the screen. So we should have referred to the map of the U.S. as Slide 18. And then AES in Arizona is Slide 19 and 20.

Thank you for correcting that, or catching that and that is in the West Camp-2, and what we'll try to do on the break is see to it that our numbers on the electronic version match the hard copy version.

CHMN STAFFORD: It seems like the total number of slides is what's on the hard copy and on the tablet, just the ones you have for the presentation are left and right, and they have the same number as opposed to being consecutive as they are in the exhibit, the physical exhibit.

MR. ACKEN: Yes. That'll be a fun project to fix on a break. So my apologies, but we'll get that squared away.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: Thank you for the clarification work that's coming up on the slides. That was one of my concerns.

The other is a question to Mr. Agner. I see on slide whatever that is, 11, I guess, whatever is on the right-hand screen.

CHMN STAFFORD: 20.

MEMBER KRYDER: 20, okay. That you have both wind and solar there. Are there any -- and I know this is nonjurisdictional, but do you have any battery facilities at all, Mr. Agner?

A. (Mr. Agner) So Member Kryder, thank you for that question. I think that would be best addressed by Rob, as he works for AES. He'll be able to speak to

that.

MEMBER KRYDER: If you're going to touch that later, we can pass on it till later.

MR. GARDNER: That would be fine to touch on now. We do have battery storage facilities operating within Arizona, if you want me to opine on that at all, please let me know.

MEMBER KRYDER: Yeah, at some point I'm just interested because that's always an interesting component when you see wind and solar and, again, I recognize it's nonjurisdictional, and I certainly don't mean to be a bear about it at all. So thank you.

MR. GARDNER: Not at all. We'd be happy to discuss.

MEMBER DICICCIO: Mr. Chair.

CHMN STAFFORD: Yes.

MEMBER DICICCIO: Just more of a question. The map that's up there, the red lines, I assume those are transmission lines that are coming into Arizona or around Arizona. But what are they? There's no description here as to what the red is.

MR. GARDNER: Those -- I'm not sure off the top of my head. But I believe that those are interstates, not transmission lines.

MEMBER DICICCIO: They are?

MR. ACKEN: Mr. Chair. I think you're correct that those are showing the transmission lines. So, but we'll get clarification.

MEMBER DICICCIO: Yeah, I'm just curious, you know, it's kind of impressive.

CHMN STAFFORD: Thank you.

BY MR. ACKEN:

Q. Rob, I think now is the right time to address Member Kryder's question about battery storage in Arizona to the extent you can, and if we need to run to ground, we can.

A. (Mr. Gardner) Yeah, so I can discuss this more at length, but battery storage an important aspect of the profile of energy within the state. So we do permit battery storage with most of our wind farms within Arizona. Same with our solar farms.

That's to make sure that we can deliver a product that is flatter essentially, so, you know, the wind doesn't blow all the time, the sun don't shine as night. And so those batteries help level out that curve to make sure that we can provide juice to the Arizona grid at more times throughout the day.

MEMBER KRYDER: And is there a battery component to West Camp 2?

MR. GARDNER: There is. We are permitting

a battery component to West Camp 2. However, on our previous wind farms, the Chevelon B Wind Farm and the West Camp Wind Farm, we have not constructed a battery storage facility at either of those wind farms yet. We have constructed battery storage facilities at our McFarland Solar Project.

MEMBER KRYDER: So there's a likelihood for the West Camp as well at some point in the future. And is it now moving to our jurisdiction, is it in the corridor, would the plan be to put it in the corridor so that we would -- you'd be all able to tie into it easily?

MR. GARDNER: The goal with any battery storage facility would be to site it directly adjacent to one of the project substations. So those project substations are within that corridor.

MEMBER KRYDER: Okay. Thank you.

CHMN STAFFORD: Thank you, Member Kryder.

Mr. Gardner, so refresh my memory, what is the capacity for West Camp 1 for the wind? And you said it's a solar -- is that storage component as well?

MR. GARDNER: So currently the construction, the wind farm that's under construction is a 500-megawatt project. There is a permitted battery storage project that we have worked on.

However, that is not currently being

constructed. That would be a 250-megawatt, four-hour system if it was constructed. However, the project that is going operational next year is just the wind aspect.

CHMN STAFFORD: All right. Thank you.

And then for this project.

MR. GARDNER: This would be a similar-sized project. We are permitting up to 500 megawatts of wind. The battery storage component we are permitting would be larger at 500 megawatts, four-hour system.

CHMN STAFFORD: But the wind for both West Camps will be constructed prior to the storage.

MR. GARDNER: It kind of depends on the commercial appetite. If we have a fully developed wind farm and fully developed battery storage facility, and the Arizona customers that we want to sell our juice to desires a paired project or both the wind farm and a storage facility, then we really let the market dictate what is constructed.

CHMN STAFFORD: So it's going to depend on the RFP I assume you'll be bidding into?

MR. GARDNER: Exactly.

CHMN STAFFORD: So if the RFP is just for to take all the wind power you can generate when you generate it, then you would not need to construct the storage component?

MR. GARDNER: Exactly. We will bid both the wind farm likely and the storage facility into the SRP or APS's all-source RFPs. And then work with them on what energy needs they need and what they want to procure.

CHMN STAFFORD: Okay. So the maximum output for this project would be 500 of wind and 500 of storage.

MR. GARDNER: That's correct.

CHMN STAFFORD: Okay. And then West Camp 1 is 500 megawatts of wind and then up to 250 megawatts of storage.

MR. GARDNER: That's correct.

CHMN STAFFORD: Thank you.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: Just a bit of follow-up here. Again, I know it's nonjurisdictional, it's for my education and maybe others on the committee.

Somewhere along the lines someone put into my memory that oftentimes battery storage is not allied with wind farms, but more toward the solar side of things. Is that a correct piece of information I received or do I need to modify it?

MR. GARDNER: The historical context of

storage and solar is different than wind. Historically, that is correct, that storage paired better with solar.

However, that was not a -- any electrical engineering reason. That was more of previous tax credits and how they wouldn't go together.

So previously wind farms always utilized what was called a production tax credit. That's an amount that's received per kilowatt hour that is produced by the wind farm. Storage and solar would have received the investment tax credit which is based on the millions of dollars invested for the project.

More recently, wind farms have been able to take advantage of one or the other, and so with those tax credit inconsistencies going away, wind can pair just as easily with -- with storage as solar can.

MEMBER KRYDER: Okay. That's helpful to understand. I know absolutely nothing about the tax credit and all of that piece. So I appreciate that piece of information.

I saw with Option 1 and Option 2 one would be to tie into the 500 line. So if there was a battery storage, would it be potentially filled from the line as well as sell to the line?

MR. GARDNER: So it can kind of depend on either of the grid operator's rules. But typically the

utilities want to have batteries that are able to grid charge.

MEMBER KRYDER: Right.

MR. GARDNER: That's where obviously the battery can, when there's too much generation on the system, they can take juice from the system and when there's not enough, they can give juice.

And so theoretically that's what the utilities typically want. I cannot speak specifically to SRP's process and what they would want eventually.

MEMBER KRYDER: Okay. Thank you. That clarified and helped me put together the pieces and parts here. And hopefully I can ask better questions in the future. Thank you so much.

MR. GARDNER: Of course.

MR. ACKEN: Thank you, Member Kryder, I always learn something myself in these hearings. So thank you, Rob.

BY MR. ACKEN:

Q. Next, I'd like you to talk about how West Camp 2 fits into the portfolio that we see on the screen of projects in Arizona. What's the purpose? What's the need for this project?

A. (Mr. Gardner) Of course. So Bert touched on this. However, we see that there's kind of four main

buckets for the need of this project.

So first off, I'm sure you all have heard about it nonstop, but Arizona's load growth is continuing to increase via population increases, but also from data centers. And so in order to meet the needs of the state, we see wind as being an important component of the all-the-above approach to energy.

Like I mentioned, AES is an owner-operator of all different types of energy assets. We are wind developers and we see that fitting in well with other assets that the Arizona utilities may be procuring.

The second is the switchyard that was constructed for West Camp. So the West Camp Wind Farm which is directly adjacent to us and which we would tie into under Option A, we constructed that for APS. The way that works is during construction, we build the switchyard, then we hand over the keys at operations.

This is a significant investment that not only AES had made but also Arizona ratepayers.

When we built this switchyard, the Sitgreaves Substation which is what APS calls it, which is on Slide 22, we made that investment. But it will be owned by APS, and ratepayers will pay for that.

When we were building it, APS specifically required us to build a larger switchyard to allow for

additional resources to interconnect to that switchyard.

The reason we are applying for both 345kV or 500kV at this switchyard is because in the future, APS has the optionality due to the work we did for West Camp 1 to potentially size that switchyard up to 500kV. Currently it is 345. However in the future, that is a possibility.

And on the right, I just like these photos, these bird's-eye view. This is throughout the construction and then we already saw this one, but this is the switchyard as it stands today interconnecting to APS's system.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: A question to Mr. Gardner.

Bert told us at the beginning Option 1 and Option 2. And what you just said then would be the key determiners whether you're seeking Option 1 or seeking Option 2, and we were told that there was -- they would not be seeking both. Is that still correct?

MR. GARDNER: That's correct. So under Option A, that specific option.

MEMBER KRYDER: A and B.

MR. GARDNER: Of course. Because of this switchyard and not knowing the voltage -- the APS wants

to size this up to 500kV, we want to be able to take advantage of the switchyard that we have constructed.

So Option A, that's why the multiple voltages for Option A. However, only one option, A, APS option. Or Option B, SRP option, would eventually be constructed.

MEMBER KRYDER: Nice negotiating.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: So A, whether A is chosen or B is chosen is dependent upon the offtaker?

MR. GARDNER: That's correct. So one of the, you know, needs that we see for this project is that it provides interconnection and market flexibility.

So both of, you know, the two major utilities or two of the major utilities in Arizona want -- you know, require procuring wind energy and other energy sources moving forward.

However, there can be constraints on the system whereby one may not be able to take that energy on a same time line as the other.

And so what these two options do is it provides flexibility so that when Arizona's utilities need generation, we are prepared to provide that generation to either APS or SRP.

MEMBER LITTLE: And you do not have an offtaker at this point? I notice you said will bid.

MR. GARDNER: Yes, ma'am. So currently we do not have an offtaker. We as a wind group do not sign PPAs, turbine supply agreements or engineering procurement and construction contracts until we have a fully developed project, no discretionary permits left because when we sign a PPA or we buy turbines from a manufacturer, we have requirements to meet specific deadlines.

And with Arizona utilities, both the West Camp Wind Farm and the Chevelon Butte Wind Farm, signed PPAs with APS and are delivering juice to Arizona ratepayers.

If we do not meet the guaranteed commercial operations date that is lined up in those PPAs, we face significant financial penalties because APS needs to plan for the resources coming online.

And so we do not sign those agreements until we know that we can meet them. And a big piece is that the discretionary permits from both you all and the ACC and the local jurisdiction, in this case Navajo County.

MEMBER LITTLE: Okay. That's good to know, to understand why you're coming to us at this point.

So there is -- there's no interconnect agreement or -- with either utility at this point?

MR. GARDNER: Great question. So we are currently working through both utilities processes. On APS, we have a Phase 1 and Phase 2 studies. The Phase 2 is currently going through a restudy process. We are in the Cholla cluster. And before we would sign it, that's another agreement we need before we sign a PPA. Which is an interconnection agreement.

And so at this point we do not have an interconnection agreement for either option. However, we are going through the processes that they undertake, which can take years to determine that these projects do not decrease grid reliability. In fact, they should improve grid reliability.

MEMBER LITTLE: Okay. And we'll discuss this further when we get to that point. Thank you very much.

MEMBER DICICCIO: I have a question.

CHMN STAFFORD: Member DiCiccio.

MEMBER DICICCIO: So you have two lines, A and B, and you'll make the determination on one of those.

So if we approve -- I mean, we're basically going to approve both lines, is what the ask is; correct? Can someone else come in at a later date and just

basically just because it's been approved put their line in there? If they work with the landowner.

MR. ACKEN: Let me -- I'll answer that.

CHMN STAFFORD: Well, that's going to be -- it's going to depend on how the certificate is worded. I think the way that we -- we've done it before and that we intend to do here is that they'll be -- if the certificate is granted they would be allowed to build either option, but not both. If subsequently they decide they needed to build both, they would have to go to the Commission and request an amendment to the certificate to allow them to build both. Or they can request a new certificate to construct the part that they didn't under this one.

MEMBER DICICCIO: Can a different user come in and use that line that was approved because they did all the environmental studies and everything else? I'm just asking as more of a curiosity.

CHMN STAFFORD: Certificates can be transferred, yes.

MEMBER DICICCIO: They can be.

CHMN STAFFORD: The transferee has to comply with all the conditions of the certificate.

MEMBER DICICCIO: Okay. Yeah. So another user can come in and use it. I'm good with it. I'm just

curious as to whether or not there can be another user come in, let's say, there's a higher need that would require two lines to come in. Can that be done?

CHMN STAFFORD: Well, not how the certificate -- how we contemplate wording the certificate in this matter.

If -- if they -- they would -- this applicant would have to not build one of those options. If they build one option, it's not -- the option for to build the other part doesn't exist to anyone whether it be them or somebody else.

MEMBER DICICCIO: Oh.

CHMN STAFFORD: It has to be, another party could come in and request a new certificate for the unused option under this certificate. But they couldn't use one and then sell one to somebody else.

MEMBER DICICCIO: Why wouldn't we do it, I'm -- just out of curiosity? Why wouldn't we approve both?

CHMN STAFFORD: I don't know if it would be practical for them to build both of them. I'm sure --

MEMBER DICICCIO: I don't know. I'm just, it's more of a layman's question.

MR. ACKEN: I have some thoughts on this, because we -- we talked about it internally. The short

answer is, you can do a lot of different things if the CEC authorizes it; right? If we bring forward the environmental analysis and we make the ask and this committee approves it, then yes, we would have that flexibility.

Here, we have only requested in our proposed CEC only proposes one or the other. And the reason for doing that is -- because I had the same question you did, I was like, well, let's get authority for both.

Because you don't necessarily know what two would look like today.

I know what Option A or Option B looks like today, so we can present the environmental analysis to you. It gets fuzzier if I -- if we were to do both. Do we have all that information in front of you today? So that's why we didn't include it. The Chairman's correct.

You know, we could -- if circumstances change, there's ways to do it, whether it's through an amendment proceeding where you add some additional analysis, a new CEC.

It was just we weren't there yet with the analysis to ask for both lines. We thought it was appropriate to ask for the authority to build one or the other.

MEMBER DICICCIO: No, just curious. I mean, it seems to me if there is a higher need for electricity in this area, especially when it comes to generation, why not do both?

CHMN STAFFORD: Cost is one -- cost is one --

MEMBER DICICCIO: No, no, no, no, no. You're -- maybe I'm just not being clear on my end. Not the cost of doing both. But eventually if you've got one line in, then there may be the need for a second line. It keeps your options open. That's all it is. I know you're not going to build two at the same time, just because the expense of these things.

But if you kept your option open 10 years from now, 15 years from now, whatever it is, since you've already been approved, and I know the permits are only 10 years, I get all that, too.

MR. ACKEN: I think it's a great question. Because I asked the same question, so of course I think it's a good question.

But the -- what I go back to is what do we know today? We know we're likely to build one or the other.

MEMBER DICICCIO: Right.

MR. ACKEN: If and when that opportunity

comes to build the second, that's a great situation to have. And we have optionality at that time. We can submit a new application. We can seek an amendment of this one. And it will tier off the analysis that's down here. So it's really a timing issue of when you do that.

MEMBER DICICCIO: You answered my question. And so you're just basically, if you did an amendment you'd go back to the Corporation Commission and it would activate that other line if you needed it to, if they approved it.

MR. ACKEN: If they approved it.

MEMBER DICICCIO: Okay. That answers it. Thank you.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Yes, Member Comstock.

MEMBER COMSTOCK: Following up on Member DiCiccio's question. You've got to produce electrons to put on those lines whether you have one or two. How many additional wind turbines are going to be constructed in order to generate that electricity?

MR. GARDNER: The additional West Camp 2 Wind Farm?

MEMBER COMSTOCK: Yes, sir.

MR. GARDNER: So currently we are contemplating in the local discretionary permit up to 144

turbines. Now, that is very dependent on the nameplate capacity of said turbines. So these days we're seeing turbines which each one can produce between four and six megawatts of nameplate capacity.

So if the turbines, each individual one, was larger, there would be fewer turbines to make that 500 megawatts being put on the grid, up to 500 megawatts being put on the grid.

MEMBER COMSTOCK: And I assume the study's been done that there's enough wind up there to handle all that?

MR. GARDNER: Great question. On all of our wind farms, we conduct years of meteorological data collection. So on this project, Jordan, please correct me if I'm wrong, but I believe that we have five meteorological towers out there that have been collecting data for years.

We have LiDAR instruments that also correct data for years, and we cannot build our projects until we have a third-party energy estimate that is bankable, and so we take years of data, people a whole lot smarter than me put that into a third-party study. And it is bankable and we can finance based on that energy resource assessment stock. Thank you.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: Just a comment. As you were talking with Member Little a moment ago, you said how the methodology of AES was to do all the surveys, do all the building and basically get ready to pass the keys to whoever is your buyer, with a flick of the switch as it were it could be turned on.

And I really value that rather than go at it from the other direction, that would say we've got this really genius idea, and we'd like you to approve it, and sure enough we'll do all the surveys somewhere in the future, you can trust us. Thank you very much for taking the approach that you have.

MR. GARDNER: Of course.

CHMN STAFFORD: Follow-up question on that. So the years of data, so you've got West Camp 1 that's almost in operation, it's under construction. What is the -- what's the anticipated capacity factor for West Camp 1 and what's the anticipated capacity factor for West Camp 2.

MR. GARDNER: That's a great question. So West Camp 1's capacity factor, I'll start by saying that Arizona is what I would call a kind of middle-of-the-road wind resource state.

So for years there were not wind farms

constructed in the state because the technology just wasn't quite good enough to capture the lower resource.

In Arizona, the net capacity factor of West Camp 1 I believe is right in the 32 to 33 percent NCF. And West Camp 2 is similar, perhaps a little bit smaller, at approximately 30 to 31 percent NCF.

CHMN STAFFORD: That's pretty good for Arizona. I think prior ones have been in the upper 20s for capacity. So that's pretty good.

MR. GARDNER: These are good sites.

CHMN STAFFORD: And by comparison, what's the capacity factor for SunZia, the wind farm that Pattern Energy has that goes -- that was a bit higher than that I think.

MR. GARDNER: New Mexico has really good wind resource. And so I believe that the project over in New Mexico would have a higher NCF than in Arizona. New Mexico is just a little bit more windy.

CHMN STAFFORD: I think theirs is getting close to 50 percent, isn't it?

MR. GARDNER: That could be possible. The highest that I've seen in recent memory was a project that we've been working on in Montana at 48 percent. That's blowing. Yeah.

CHMN STAFFORD: Thank you.

MEMBER KRYDER: Mr. Chairman.
CHMN STAFFORD: Yes, Member Kryder.
MEMBER KRYDER: Mr. Gardner, you used an acronym, NCF.
MR. GARDNER: Net capacity fact.
MEMBER KRYDER: Tell me what that means.
MR. GARDNER: That's basically the percentage of the time that it is producing.
MEMBER KRYDER: Marketable.
MR. GARDNER: Marketable energy.
MEMBER KRYDER: Okay. So when you say something is 24 NCF, so 24 hours out of 100, it would be producing at close to its capacity? Is that correct?
MR. GARDNER: That is correct.
MEMBER KRYDER: Okay. Thank you. That's very helpful. That's very helpful.
MEMBER MERCER: Mr. Chairman.
CHMN STAFFORD: Yes, Member Mercer.
MEMBER MERCER: Just out of curiosity, Mr. Gardner, what is going to determine which route are you going to build, A or B?
MR. GARDNER: Great question. So that will really be dependent on our offtaker and the eventually buyer of the energy.
So whichever utility requires the certain

amount of wind electrons and wants to work with us, and we've been through all of the studies, surveys, signed interconnect agreement, that would be who we would work with to build this project and sign a long-term energy procurement contract with.

MEMBER MERCER: Thank you.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: Member Mercer used the term "energy" or "electrons" or something. I really prefer "juice."

MR. GARDNER: You got it.

MR. ACKEN: For the record, Mr. Gardner, will you confirm those two terms are synonymous?

MR. GARDNER: Yes, in my testimony "juice" equals "electrons."

MR. ACKEN: Thank you, Member Kryder.

BY MR. ACKEN:

Q. Mr. Gardner, anything further on the purpose and need slide? I know we talked a little bit about it, but have you touched on everything you wanted to here?

A. (Mr. Gardner) The last thing I'll mention is just the last bullet here on Slide 23 which is building on the success that we've had to this point.

We have brought two wind farms before the line

siting committee previously, one in 2019, one in 2022. We have constructed or are constructing both of those projects. This has led to significant local relationships in northern Arizona, technical capabilities, and strong operational presence in the state. We want to build upon that and we want to continue to be a partner in Arizona and deliver reliable energy resources to meet the needs that this state has. We feel honored to be a part of Arizona's energy mix at this point and we will be for decades to come. And we wish to add on to that and build upon the success we've had so far.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: One small follow-up question. I have an idea of an answer, but I'm not certain and I'm looking for confirmation. So in the event that the utility that buys the juice from AES was Salt River, going into their switching station or whatever it's properly called, you said they had a 345kV and also a 500kV, and that could you go in with one in five years or 15 years from now, switch to the other? Is that a technical capability?

MR. GARDNER: That's a great question. So quick clarification first. APS has the switchyard that

is 345kV currently and could potentially one day be sized to 500kV. SRP's line that we would tap into is already 500kV.

MEMBER KRYDER: Okay. I got them backwards.

MR. GARDNER: But in the instance where in the future APS would want to step that system up to 500kV, what would likely be required is an additional substation adjacent to the switchyard where the 345kV juice goes in, is stepped up to 500kV and then is retransmitted on to the system.

I believe it is within their technical capabilities.

MEMBER KRYDER: Okay. And would the new switchyard that is in this proposal have the capacity to do that? Or would you have to expand the footprint of it?

MR. GARDNER: So the switchyard that you'll see here on Slide 24, that switchyard was already designed for increased expansion. And so theoretically this switchyard has the capability to be stepped up to 500kV should APS want to do that for their system.

MEMBER KRYDER: Great. Thank you so much. That is really, really very helpful information.

CHMN STAFFORD: Okay. So, Mr. Gardner,

you're referring to the Sitgreaves substation that was approved in CEC 206; correct?

MR. GARDNER: That is correct.

CHMN STAFFORD: All right. So under that, with that switchyard, your West Camp 1 is going to tie in to the 345kV system; correct?

MR. GARDNER: That's correct.

CHMN STAFFORD: But the APS 500kV line passes through there, but currently it's not connected to anything else.

MR. GARDNER: That's correct. So there is an APS 500kV line that parallels the 345kV lines. It is offset from those 345kV lines. We are not connecting to that. That is a line that we had to cross and we received crossing agreements from APS for. So that is separate from the Sitgreaves switchyard which was constructed with West Camp 1.

CHMN STAFFORD: Okay. But what's the size of that Sitgreaves Substation switchyard? It says substation out here, but it's --

MR. GARDNER: That's just APS's nomenclature. We like to call it a switchyard because we have our project substation. So it's a lot easier for us to keep it straight in our head to call it a switchyard. For some reason APS just calls it the Sitgreaves

Substation. So apologies for that, a little bit of a misunderstanding.

CHMN STAFFORD: But there's not -- the transformer's at the switchyard?

MR. GARDNER: Correct.

CHMN STAFFORD: Which is what really makes the difference between a switchyard and a substation; correct?

MR. GARDNER: That's my understanding.

CHMN STAFFORD: All right. So then, so that one option is to tie in West Camp 2 to the Sitgreaves Substation switchyard on the 345 and then the other one would be to tie into it with the 500kV line into the APS Cholla-Sugarloaf-Coronado, but you'd build an additional switchyard to accommodate that?

MR. GARDNER: That's correct.

CHMN STAFFORD: Okay. Just making sure I got it all straight in my head what's going on here.

Member Little.

MEMBER LITTLE: Thank you, Mr. Chairman.

Mr. Gardner, if, however, APS decided that they wanted to tie the switchyard into their 500kV system, it would not require that you -- that this particular intertie be upgraded to 3 -- or to 500, correct, it would still be 345? If it's built at 345, it

could still remain 345? It would tie in at 345, and then APS could increase the voltage to 500 and put it on their system there.

MR. GARDNER: Great question. So, yes, in the instance that this project is built at 345kV, that would mean that we have an executed bilateral interconnection agreement with APS. That interconnection agreement will specify the voltage.

If in the future, and I'm not sure how exactly it would work, APS wants to step that system up to 500kV, that would be on them to figure out how to increase the voltage of the wind juice coming onto the system to 500kV.

MEMBER LITTLE: So when we -- if we were to issue a CEC as requested, what would get built would be either A, at either 345 or 500, or B at 500.

MR. GARDNER: That is correct.

MEMBER LITTLE: Thank you.

MR. ACKEN: Thank you, Chairman. Thank you, Member Little, for going through that. Well, actually it's good to do that now, we'll go through it a second time, because it is different, and Jordan is looking forward to that opportunity to walk through it in a little bit.

Mr. Gardner, you mentioned AES's presence

in Arizona and specifically these two wind projects in northern Arizona. I'd like you to talk a little more about AES's participation in Navajo County and northern Arizona over the last several years.

A. (Mr. Gardner) I'll start by saying that AES is an owner and operator of our assets. What this means is that the communities where we build and operate projects, we're not just going to be there for a couple years. We have our operations team that are the 10, 20, 30 year folks.

That means that we want to be a partner in the community, not just someone who's there, flip the project somewhere else. We will be there for the long haul.

That starts during construction where our construction contractors hire local subcontractors. This has happened in Navajo County and Coconino County. This is tens of millions of dollars ranging from large contracts with aggregate and concrete suppliers that are local all the way to the porta-john person that brings porta-johns out to the site and those are significant contracts for people.

More on the partnerships, long-term partnerships, we've been working with a bunch of different groups throughout northern Arizona. I'll start by mentioning the educational opportunities that we're

helping provide.

Northland Pioneer College is the local community college to these projects. We're working on STEM programming and renewable energy curriculum with them to make sure that when these projects are constructed, there's a lot coming to their area.

We want to make sure that students at both the high schools and the colleges have the necessary skill set to take advantage of the jobs that these projects will bring.

So that's with Northland Pioneer College, NPC, and Winslow and Heber School Districts, which are the closest school districts to our project. Furthering the environmental and educational beat, we've partnered with multiple environmental education centers, Willow Bend here in Flagstaff, and the White Mountain Nature Center, and that's located in Show Low.

This allows for increased education for younger folks in the communities to not only learn about energy generation, but also just environmental stewardship and how development can be compatible with the local natural landscape.

Additionally, Watts of Love is an initiative that we've been working with that provides electricity and off-the-grid solar for tribal communities and

off-the-grid communities.

And finally, economic development like I mentioned is a very key focus for us. We are working with Real AZ, which is the economic development group in Apace and Navajo Counties, we have sponsored a full-time position for them to allow for growth of their organization. And then we are members of the Chambers of Commerces of all the nearby towns to our project.

And we just want to make sure that as we build these projects, we are the quiet neighbor that also contributes to the community in a meaningful way.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: The Watts of Love point here on the screen caught my attention. How do you put electricity into an off-the-grid community?

MR. GARDNER: My understanding, and I could get more certainty from our stakeholder relations folks that have worked on this a lot, it's via small solar. So you go out with small solar panels and I think they can be as small as yea big or a little bit larger to provide electricity to off-the-grid communities.

MEMBER KRYDER: So they remain off the grid but you help them with solar --

MR. GARDNER: Energy.

MEMBER KRYDER: -- energy of some sort. Juice?

MR. GARDNER: Juice, exactly.

MEMBER KRYDER: Thank you.

MR. ACKEN: Thank you.

BY MR. ACKEN:

Q. Mr. Gardner, anything else you wanted to say in this piece of your testimony?

A. (Mr. Gardner) I don't think so, but appreciate being able to give some background about AES, our projects and some of our community partnerships.

Q. So we're going to shift gears. I'm going to turn it over to Ms. Ramljak to speak about -- a little bit more about the nonjurisdictional wind project. Mr. Gardner ended up covering quite a bit of it, but there's still additional details that we wanted to provide just some background before we get into the nuts and bolts of the project.

So with that, please provide an overview of the nonjurisdictional wind project.

A. (Ms. Ramljak) Absolutely. So the West Camp 2 Wind Farm is -- will be located entirely in unincorporated Navajo County. The project site is approximately five miles southwest of Holbrook. So you can see here in this left-hand figure on Slide 30, this

is the West Camp 2 Wind Farm site approximately five miles southwest of Holbrook.

It's also directly east of the West Camp Wind Farm we've been speaking about that's currently under construction.

The West Camp 2 Wind Farm would be located within an approximately 52,000-acre project area. That comprises of approximately 42,000 acres of privately owned land and 10,000 acres of state trust land that are administered by the Arizona State Land Department.

Most of the wind farm infrastructure would be located on that privately owned property but a small portion of infrastructure would be located on the state trust lands.

CHMN STAFFORD: Looking at the map I see the yellow squares indicate Bureau of Land Management. Based on your testimony we can infer that none of the turbines will be located on BLM land.

MS. RAMLJAK: That is correct. You took the words right out of my mouth. So although you do see the yellow BLM lands within that simplified West Camp 2 project boundary, no wind project infrastructure or gen-tie project infrastructure would be sited on federal lands.

CHMN STAFFORD: Thank you.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: The very small piece it seems to me it was in the range of 450 acres of Arizona land, you, as I recall reading, have that document already approved by what's the right name, Arizona Land Management?

CHMN STAFFORD: Arizona State Land Department.

MEMBER KRYDER: Yeah. Okay. And that's an already approved document that you have in hand.

MS. RAMLJAK: We have not yet received final right-of-way approval from the Arizona State Land Department. However, that right-of-way application received preliminary approvals and was approved for further processing.

We actually just met with the Land Department last week to discuss that right-of-way application. So it's pending submittal of environmental surveys from us for the CEC corridor. It's also pending an appraisal report from the State Land Department.

MEMBER KRYDER: Okay. Without getting into proprietary issues, will you be signing kind of the pro forma agreement that they have with anybody and everybody around the state of Arizona for that land? Is

it pretty much a standard deal or is this some special thing cooking?

MS. RAMLJAK: My understanding is that it's a standard deal, but if you want additional information about that right-of-way document, I would ask Rob to step in to answer those questions.

MEMBER KRYDER: If we could see a pro forma of it, that would be lovely. I had the opportunity to read one recently, and it was quite enlightening to me, and I need all the enlightenment I can get, I find. Thank you.

MR. GARDNER: Yeah, that's a great question. So I'll just kind of add to that. We've been working with the Arizona State Land Department on all of our projects up to this point on these wind farms. So the Chevelon-Butte Wind Farm, we have, I believe it's about 30 percent of turbines sited actually on state trust land.

MEMBER KRYDER: Okay.

MR. GARDNER: On West Camp it's more -- West Camp 1, it's very similar to West Camp 2 whereby we have far fewer state land sections within the project boundary, and yes, we basically signed their form right-of-way agreement for West Camp 1.

I can check and see if we're able to share

that, or if we have a memo that can be shared but would be happy to take that as an action item.

MEMBER KRYDER: Yeah, you could certainly redact anything that would be proprietary.

CHMN STAFFORD: Mr. Gardner, so for West Camp 2, the wind project, so you have site control of the lease for the private landowner?

MR. GARDNER: That's correct.

CHMN STAFFORD: And there's not -- you said there's going to be some turbines sited on state land.

MR. GARDNER: So we're currently evaluating two right-of-way options with the State Land Department in conjunction with them.

The first, and most of this is due to schedule constraints. I don't want to go into too much detail but it can just be a scheduling constraint working through full right-of-way for turbine infrastructure with the State Land Department.

And so we actually have two right-of-way options. One is for ancillary infrastructure such as roads, a small amount of roads collection and a little bit of the gen-tie under Option A or B.

The -- that is likely, you know, that's going to move through the process more quickly. There is a scenario whereby we could work through the second

right-of-way option and build a few turbines on state land. As I said, we have done that previously on Chevelon Butte, but we're still evaluating it at this point.

CHMN STAFFORD: But that would require lease more than just the right-of-way?

MR. GARDNER: So the Arizona State Land Department has multiple divisions. There's the real estate and leasing division, that's what all of the solar farms are under. Winds are actually all under the right-of-way division, so even the turbine infrastructure is under right-of-way with state land.

CHMN STAFFORD: Okay. Thank you. That's -- learned something new every time, haven't we?

MEMBER KRYDER: We learn little by little.

CHMN STAFFORD: Thank you. That answers my question. Mr. Acken.

MR. ACKEN: Thank you.

BY MR. ACKEN:

Q. Ms. Ramljak, let's talk next about the Navajo County process listed on Slide 29 if you would. What's the status of the process for that?

A. (Ms. Ramljak) Absolutely. So one thing that may be new to the committee members is that Navajo County earlier this year updated their zoning ordinance.

One thing particularly relevant to this project is in the updated zoning ordinance they introduced the development agreement as an alternative pathway to the special use permit to permit a renewable energy project.

So in that new zoning order specifically in Article 12 it specifies that renewable energy generation facilities are allowed in the A General and rural zoning districts, which you can see in the right-hand figure of Slide 30. Rural is in the teal color here. A General is in the purple.

And so renewable energy facilities are allowed in those zoning districts subject to securing a special use permit or development agreement.

And AES intends to pursue that development agreement pathway for the West Camp 2 Wind Farm. We submitted our draft application to the county earlier this month. And that development agreement would cover the proposed wind farm and battery storage facility that Rob described earlier.

Once we finished negotiating that development agreement with the county over the next couple of months, that wind and battery storage project would be heard before the Navajo County board of supervisors which we're targeting in December 2025.

CHMN STAFFORD: This may sound like a dumb

question, but what's the difference between a development agreement and a special use permit other than the name?

MS. RAMLJAK: It's not a dumb question at all. So our understanding of the two options for securing authorization for the project is that the end result is effectively the same thing.

The difference between the two is the development agreement is a bilateral agreement between us, the applicant, and the county. Because we are negotiating the agreement, the county has more opportunity to provide guidance on the community benefits they'd like to see from the project.

The other procedural nuance between special use permit and a development agreement is that under a special use permit the project has to go to the county's planning and zoning commission and board of supervisors.

Under a development agreement it skips the planning and zoning commission hearing and goes directly to the board of supervisors.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: Thank you, Mr. Chairman.

What is the difference in the opportunity for public input?

MS. RAMLJAK: Public input opportunity is

effectively the same. So under both of those pathways we're required to host two public meetings, which we'll describe later in the testimony. And at the board of supervisors hearing, my understanding is that under special use permit there is an opportunity for public comment. The nuances under a development agreement, the opportunity for public comment is at the discretion of the board of supervisors. But regardless, two public meetings are required for both pathways and there is an opportunity for public comment at the board of supervisors hearing.

MEMBER LITTLE: What about advertising to the public the opportunities?

MS. RAMLJAK: The same noticing requirements and advertising requirements apply for both of those pathways.

MEMBER LITTLE: Thank you.

BY MR. ACKEN:

Q. If I could ask a follow-up question because I think it's a great line of inquiry. The development agreement process as I understand it is a fairly new one in Navajo County; is that correct?

A. (Ms. Ramljak) That's correct, yes.

Q. Did the county engage in a stakeholder workshop process that included the public to provide input as they

developed this alternative?

A. (Ms. Ramljak) They did, yes. The most notable opportunity for public comment in that zoning ordinance update process was in March of this year.

The county hosted three different listening sessions, one was in Heber-Overgaard, one in Show Low and one in Joseph City. And invited any members of the public to speak at those hearings.

Even though the listening sessions were general to the entire zoning ordinance update, unsurprisingly a lot of the public commenters were focused on Article 12 specific to renewable energy.

In addition to those listening sessions the county also had meetings that we were not privy to with local fire jurisdictions. I can't recall off the top of my head what other stakeholder engagement they did, but the most notable opportunity for public input was those three listening sessions in March.

Q. Thank you. Mr. Gardner, do you have anything you want to add to that?

A. (Mr. Gardner) I'm just add that in addition to those listening sessions, the approval of the ordinance revisions went through planning and zoning commission and board of supervisor approval, and so there were additional public comment opportunities during those.

Q. Thank you.

Ms. Ramljak, I'll pronounce it ten different ways in this hearing. I'm on number six.

Next I'd like you to touch on the benefits of the nonjurisdictional wind project.

A. (Ms. Ramljak) Sure. So I'll start with I think the most obvious benefit which is for this proposed 500-megawatt wind farm it's estimated that the generation would power over 132,000 Arizona homes annually.

In addition, focusing more on the local benefits of the project, so during construction, a lot of these figures are based on the 500-megawatt West Camp Wind Farm under construction, we are able to validate a lot of these figure. We estimate that this would generate approximately 500 temporary construction jobs, and that's in the one to two to three-year construction period.

But also 20 to 25 permanent operations jobs. So those are well-salaried folks that would be living within Navajo County. And frankly, developers and wind farm operators prefer to hire those folks locally because the best wind turbine technician is one who's been on the project for a long time. So we are working with community colleges and schools to maximize our ability to hire those operations folks locally.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: Looking at the slide here on the left, point number 5, property tax revenue for Navajo County throughout operations.

CHMN STAFFORD: That would be Slide 31 of Hearing Exhibit 2.

MEMBER KRYDER: Okay. The question I had was going back to looking at property tax, as I understand it, across our state, the existing coal-fired plant or any big entity like that pays quite a large real estate tax bill annually.

In the case of our jurisdiction on this particular project, do the lines, obviously have a lot of value, somebody spent a big nickel to put them in place. Do they pay real estate tax on the lines?

MS. RAMLJAK: Yes. So the lines in addition to the wind farm project infrastructure, that all rolls into the cost of project infrastructure that we report to the State of Arizona.

And then Arizona mandates I think there's an assessed evaluation and there's a second factor that's applied. And so the State of Arizona mandates once we provide that cost of equipment, how to translate that into annual property tax payments, and that includes a depreciation schedule throughout the 30-year operational

life.

MEMBER KRYDER: Okay. And that would be true, as you said, on your wind, solar, and battery as well, although that's not jurisdictional for us. But all of those pieces and parts pay real estate tax; is that correct?

MS. RAMLJAK: Yes, that's correct. The only nuance I would highlight is that in the example of the Sitgreaves Substation that we're transferring to APS, once that's transferred that would be APS's property tax obligation. So that's not included, for example, in the West Camp cost for property tax calculation.

MEMBER KRYDER: That must be a big nickel annually.

MS. RAMLJAK: It sure is.

MEMBER KRYDER: Okay. Thanks.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Member Comstock.

MEMBER COMSTOCK: If we could go back to bullet point number 1. And I know the focus is on 132,000 homes. I take it the target area where this electricity, the juice would be headed is Maricopa County.

You know, there are a lot of homes in Maricopa County, but for those of us that live there and

watch what's going on, the need for commercialized electricity is far outpacing what homes is requiring.

So I'm curious why you only focused on homes as part of the study and not the percentage that might be used by the offtakes to help, say, for instance, power data centers.

MS. RAMLJAK: Yeah, that's a great point. When we perform these calculations we take the power consumed by an average Arizona home. You make a great point. Once we export energy or juice to the grid, it's up to the utility to determine where that flows.

So whether that flows to homes down in Maricopa County, some kind of commercial business, or a data center is the jurisdiction of APS or SRP, and not AES.

But you make a great point that with the changing energy demand on the Arizona grid, that it's overly simplistic to just say the number of homes that we would power, because this energy could go to commercial businesses or data centers.

MEMBER COMSTOCK: And if I may, just one follow-up. In listening to some of our other cases that we've had in the past -- and I'm the newest one on the committee, so excuse my ignorance. But --

CHMN STAFFORD: One of the newest.

MEMBER COMSTOCK: Well, one of the newest. I'm going to hold my question for a little bit if I may. Thank you.

CHMN STAFFORD: I guess another way to state it would be in an estimated number of megawatt hours annually, I guess, what the output would be.

MS. RAMLJAK: Yes.

CHMN STAFFORD: But then I guess it's -- people commonly talk about how many homes it would power annually as opposed to how many data centers it would power, because I think it's just a more familiar concept and number. But I guess if it's for this project, West Camp 2, it's not -- we don't know where the electrons will be flowing, whether to APS or SRP; correct?

MS. RAMLJAK: That is correct.

CHMN STAFFORD: Whereas West Camp 1, that's flowing to APS; correct?

MS. RAMLJAK: That will be flowing to APS in 2026; yes.

CHMN STAFFORD: Okay. And then I think APS serves load in about 13, 12 or 13 of Arizona's counties? Something like that?

MS. RAMLJAK: I'll say that Rob Gardner is nodding his head, so yes, that's correct.

MR. GARDNER: APS has a tremendously large

service area in Arizona, yes. I don't know the exact number of counties.

CHMN STAFFORD: Okay. We have to follow up with that. I think it's 12 or 13. I bet Member Little can tell us.

MEMBER LITTLE: Actually, no. I was just going to say power flows where power flows, and just because it comes from a wind farm and you say it's going to serve northern Arizona where there aren't any of these big data centers yet, doesn't mean that's where the electrons are going to go, so.

MR. GARDNER: That's exactly right. When we inject the electrons onto the grid they flow where they're needed. And we on the Chevelon Butte Wind Farm and the West Camp Wind Farm have signed long-term energy procurement contracts with APS. And so, you know, we sign that contract with APS. They ultimately determine where the energy flows. But that's what electrons do when they're put on the grid.

CHMN STAFFORD: Right. But I realize that my point was APS is sending electrons to most of the state.

MR. GARDNER: That's correct.

CHMN STAFFORD: We've been going for about 90 minutes. I think this is a good time for the break.

I'm sure the court reporter could use one. So let's take a 15-minute recess. We stand in recess.

(Recess from 2:30 p.m. to 2:55 p.m.)

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

Mr. Acken.

MR. ACKEN: Thank you, Mr. Chairman.

We're going to start talking about the gen-tie project itself. And this testimony ties to slides that begin on Slide 35 of West Camp-2 for West Camp 2 conveniently.

And we do -- over the break we were able to match and correct what you're seeing on the screen, so moving forward those numbers on the slide should match the hard copy.

BY MR. ACKEN:

Q. Ms. Ramljak, please provide an overview of the gen-tie project.

A. (Ms. Ramljak) So the gen-tie project is seeking approval of a certificate of environmental compatibility for up to 25 miles of either a 345 or a 500-kilovolt gen-tie line along with for Option B only a potential on-site switchyard.

And all components for the gen-tie project under either Option A or B would be located within the CEC

corridor, and that's entirely in unincorporated land Navajo County, Arizona.

So Rob described this earlier, but I'll say it again just for clarity. We're proposing two interconnection options for the gen-tie projects, which gives the projects flexibility to interconnect at either an APS or SRP operated transmission line.

And those two options allow the gen-tie project to meet different customer energy requirements and deliverability needs.

So in the next few slides, I'll describe options A and B, but I'll do so by using a side-by-side comparison for clarity.

Option A, as I said, that's an up to 25-mile-long gen-tie line which could be either 345 or 500 kilovolts of alternating current. The gen-tie line would begin at one of the collector substations in the southern portion of the CEC corridor. So you can see in the left-hand figure of Slide 37 a conceptual collector substation location right in that southeast portion of the CEC corridor.

That gen-tie line would then connect to a potential second collector substation in the central portion of the CEC corridor or northwest portion of the West Camp 2 project area. And then the gen-tie would run

generally west to the existing APS Sitgreaves Substation within the West Camp project area.

Under Option A no on-site switchyard is required.

So I'll mention again APS is currently constructing that 345-kilovolt Sitgreaves Substation on behalf of APS, and APS specifically requested that the design allow for future expansion to accommodate additional generation interconnections as a preferred alternative to Cholla Substation.

That future expansion of Sitgreaves may include a conversion from 345 to 500kV, so this project's interconnection voltage would depend on direction from APS under Option 1, which results from their ongoing transmission studies.

Now, I'll talk about Option B, which is an up to 10-mile-long, 500-kilovolt gen-tie line. That line would begin at a collector substation in the central portion of the CEC corridor, the northwest portion of the West Camp 2 project area. And then it would run generally southeast toward the on-site switchyard siting area.

That new switchyard and line tap would be on the existing SRP 500-kilovolt Cholla-Sugarloaf-Coronado transmission line. And that new switchyard and line tap would be constructed not only within the CEC corridor but

the more specific on-site switchyard siting area. Which it's a little hard to see up here, but in your placemat you can see that it's three public land survey system sections that are in pink-hashed fill. So those are about 640 acres each. They're one mile by one mile for each of those squares.

And Colin will show a virtual tour hopefully later today that illustrates the maximum 25-mile gen-tie route for Option A that goes over to Sitgreaves. That virtual tour will also show the Option B on-site switchyard.

So as you can see in these two figures on 37, the gen-tie route for Option B is just the subset of the Option A gen-tie route. The difference being that the Option B gen-tie would not need to span through the West Camp project area. The gen-tie and associated infrastructure would just be restricted to the West Camp 2 portion of the CEC corridor.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I have a question. Maybe this is a dumb question. But for Option A, you would pick up the power being generated at the southern end -- southernmost point there, and then it would flow over to Sitgreaves?

MS. RAMLJAK: That's correct.

MEMBER LITTLE: But for Option B you would pick it up over on the west side and it would come back around?

MS. RAMLJAK: Yes. And the reason for the difference in directionality is that the on-site switchyard under Option B would be located along this SRP 500kV transmission line on the right-hand figure of Slide 37. And so that gen-tie -- you know, the power would flow from collector substation here southeast to the switchyard.

MEMBER LITTLE: But if you're going to have a collector -- if you go Option A, you'll have a collector substation that's basically looks like it's about at the same place where the proposed switchyard would be?

MS. RAMLJAK: That's correct.

MEMBER LITTLE: So why can't you have a collector substation next to the switchyard and not have a gen-tie at all?

MS. RAMLJAK: The reason being is that for turbines sited in this northwest project area they're medium voltage, so 34.5kV lines. Their collection lines would all route to the substation in the northwest area. And then the gen-tie would run that power at the higher

500kV voltage over to the switchyard.

MEMBER LITTLE: Okay. But under Option A, the turbines that are in that same area would -- you'd send it at 34.5 over to the collection substation on the other side; right?

MS. RAMLJAK: Not quite. So under Option A I know it's difficult to see, but we have two conceptual substation locations along that gen-tie route. So the gen-tie line would originate at the first of those two substations, and at that substation that's where the lower voltage collection lines from turbines in the southeast would run into that first collector substation.

MEMBER LITTLE: Okay. So you're going to basically have two collector substations, one in the northwest corner and one down at the southern end of the line?

MS. RAMLJAK: Yes. That's that our expectation.

MEMBER LITTLE: Under either scenario?

MS. RAMLJAK: That's correct. But I would say that's contingent on us siting turbines in both of those areas of the project.

MEMBER LITTLE: And how do you plan on just using a line tap from the collector substation if you're under Option A just using a line tap to the gen-tie then?

MS. RAMLJAK: So under Option A the line tap is -- already exists on that APS line at Sitgreaves Substation.

MEMBER LITTLE: No, no. I mean, at the collector substation that's in the northwest corner of the wind site, you said you'd have two collector substations, one -- one at the southern or at the very beginning of Option A, I guess, and then one someplace along the line.

MS. RAMLJAK: Uh-huh, that's right. I understand the question now.

So, yes, that second collector substation would tap into the same gen-tie line.

MEMBER LITTLE: Okay. Thank you.

BY MR. ACKEN:

Q. Anything further on this slide?

A. (Ms. Ramljak) The only other thing I would add is that we'll collectively refer to options A and B throughout remainder of the testimony as the gen-tie project, but, of course, if you have questions on the specific Option A or B, please continue to ask.

Q. Next I'd like you to describe the proposed CEC corridor that we are requesting here.

A. (Ms. Ramljak) Sure. The CEC corridor consists of 10,473 acres of private lands owned by a single

landowner being Aztec Land and Cattle Company and 482 acres of Arizona State Trust Lands. So Bert mentioned in his opening that's over 95 percent private land, which spans both the West Camp and West Camp 2 Wind Farm project areas.

In these figures on the right-hand side, Slide 40, state trust land is shown in blue, so you can see on this right-hand figure on Slide 40 this three-quarter section of state trust lands that's within the CEC corridor. That's the 482 acres that I mentioned.

The gen-tie project will likely need to cross the state trust section under both options with A and B with that routing that we were just talking about. But we anticipate no more than one mile of the gen-tie line would cross that state trust land section.

There are no federal lands within the CEC corridor.

We also generally restricted the CEC corridor to half sections, so that's approximately a half mile or 2,640 feet in width except where areas where greater siting flexibility is needed such as the full section surrounding Sitgreaves Substation to allow for flexibility for precise routing into that switchyard.

All private lands within the CEC corridor are zoned as general and owned by Aztec. We have easement

agreements in place with Aztec to allow siting of the gen-tie project on these private lands. We also, as we discussed earlier, submitted a right-of-way application to the State Land Department for siting of the gen-tie project on that small portion of state trust lands within the CEC corridor.

The Navajo County zoning ordinance also specifies that permitted uses within the A General zoning district include utility facilities, and that encompasses the gen-tie line, possible on-site switchyard and the nonjurisdictional collector substations.

So just to wrap that up, under either Option A or B all of the gen-tie project infrastructure would be located within the CEC corridor outlined in pink. And under Option B the new switchyard would be located within this more specific on-site switchyard siting area shown in pink hash on the right-hand figure on Slide 40.

The final locations of the gen-tie project infrastructure within the CEC corridor will be based on further electrical engineering and siting surveys. We just showed a conceptual gen-tie route and collector substations in the earlier slides for illustration.

Q. And I think this has been covered, but just to be thorough, can you confirm you're requesting the authority to build only Option A or B?

A. (Ms. Ramljak) That's correct.
Q. And what will be the determination as to which option you select?
A. (Ms. Ramljak) Rob described this a bit earlier, but selection between the two options will be driven by commercialization of the project. That strategy will be largely informed by the results of interconnection studies performed by both APS and SRP on their respective transmission systems. Also, largely driven by the cost and time line of network upgrades determined by the utilities through those studies.
CHMN STAFFORD: Yes, Member Fant.
MEMBER FANT: Thank you, Mr. Chair. Two quick things.
CHMN STAFFORD: Your mic's not working.
MEMBER FANT: Button's on. Oh, there it goes.
I assume that the decision based on economics, et cetera, operational concerns to pick A or B will be made by AES; right?
MS. RAMLJAK: That's correct.
MEMBER FANT: Okay. So we might want to make sure we put language -- you know, it's implicit here, but we may want to put express language in the CEC saying "in their discretion."

So, number two, on that one state trust parcel that you cross, have you thought about going to State Land and bidding it out and trying to buy that parcel or at least buy half the parcel if not the whole square mile?

MS. RAMLJAK: We haven't contemplated that with the State Land Department.

MEMBER FANT: Just a thought too and then own the route in toto.

MR. ACKEN: Thank you.

BY MR. ACKEN:

Q. If the committee and the Commission approve a CEC for the gen-tie, is the map that is shown at the end of West Camp-5, which is our proposed CEC and is largely if not completely identical to the placemat, is that the map you would request that the committee approve to show the requested corridor?

A. (Ms. Ramljak) Yes, it is.

Q. We're going to shift down to discussion of Ten-Year Plan filings and Staff's analysis.

So did you submit a Ten-Year Plan for this project?

A. (Ms. Ramljak) Yes. West Camp Wind Farm II, LLC, the project company, filed its Ten-Year Plan for the gen-tie project on January 31 of this year. Slide 42 on

right-hand side here shows the letter accompanying that filing.

I want to explain that at the time of the filing we only included the APS interconnection at 345kV because at the time we anticipated that the current construction of Sitgreaves would allow West Camp 2 to interconnect to APS's system at 345kV in a timely manner.

However, given the number of APS interconnection requests in the area, the ability for this project to interconnect at Sitgreaves has been delayed. And so also given the latest study results we've received from APS on their transmission system, we wanted to also incorporate the option to interconnect at Sitgreaves at 500kV. So that is not in the current ten-year filing but that would be our intention in the next filing.

The January 31, 2025, ten-year filing also did not include Option B to interconnect at SRP's 500kV Cholla-Sugarloaf-Coronado transmission line. That would also be our intention to include that in the future filing.

Q. Has Corporation Commission Staff had an opportunity to review your interconnection plans and the available system impact studies?

A. (Ms. Ramljak) Yes. They've had an opportunity to review the plans as well as the system impact studies

that we provided. I should also caveat that those system impact studies were only for interconnection to APS's transmission system. We don't yet have system impact studies from SRP.

We did note in our response to Staff's data request that we intend to enter SRP's interconnection queue during their next cluster window that we anticipate to open in January 2026. After that point, SRP would be in their transmission system studies, and we would have results to share with Staff at that time.

On Slide 41 here you can see an excerpt from Staff's response to our provision of interconnection information. What I'll highlight here is it kind of -- in the middle of this paragraph specific to Option A, "Staff believes that Option A for the proposed project could improve the reliability and safety of the grid and delivery of power in Arizona as long as the upgrades identified within the transition cluster system impact study, or SIS, are properly implemented."

Staff was understandably unable to comment on the reliability impact of SRP Option B given the current lack of interconnection studies for the project.

Consistent with other recent CECs approved in scenarios where all system interconnection studies were not yet complete at the time of the approval, our

proposed CEC includes a condition which would require us, the applicant, to submit final interconnection studies that show the reliability impact of the project to Commission Staff for their review.

Q. And that is found in proposed Condition 17 the proposed CEC marked for identified as WC-5?

A. (Ms. Ramljak) That's right.

Q. And does the Staff letter that you referenced contained as Exhibit West Camp-8, WC-8?

A. (Ms. Ramljak) Yes.

Q. Thank you.

What additional authorizations are required for -- are required for the project?

A. (Ms. Ramljak) So first the gen-tie project would require a right-of-way from the Arizona State Land Department as we discussed. We submitted that application in April of 2025. It received initial approvals but is awaiting finalization.

ASLD has to complete their appraisal report process. AES also needs to submit the results of environmental surveys that we conducted within the CEC corridor.

We expect to receive the State Land Department's final right-of-way approval on this application by February of 2026. Important to note I'm talking here

about the -- one of the two right-of-way applications that Rob had mentioned. So this is the right-of-way application that would cover collection roads and gen-tie siting on state trust lands. The time line for a potential right-of-way application for turbine siting we would expect approval later than February 2026.

So this right-of-way time line combined with the time line of this hearing in our anticipated Navajo County board of supervisors hearing in December of 2025 would enable start of construction for the gen-tie project and wind project as earlier as mid 2026. That time line would then enable commercial operations in 2028.

Once the project gets closer to construction, there are two more permits mentioned in the bottom two rows of Slide 43. That's an encroachment permit from the Arizona Department of Transportation and building and commercial permits from Navajo County.

Consistent with prior AES projects, we would procure those permits as the project gets closer to construction.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Member Kryder.

MEMBER KRYDER: Just to follow up on that, please, Jordan. It says you've not started the last two

items here. How long do they typically take to get through Department of Transportation and building and commercial permits? Are we looking at six months or are you looking at two years or two weeks?

MS. RAMLJAK: I think it's closer to between two weeks and six months. The exact processing time line I'm not sure for this particular project. Maybe Rob can speak to that more.

But I think the time line here is more dependent on AES's advancement of our engineering design for the project, so that's more so why we haven't submitted those yet. We want to advance our engineering design more before submitting for those permits.

MEMBER KRYDER: Okay. So that's then in the hands of APS, really, is your current speed bump? Is that what I heard correctly?

MS. RAMLJAK: I would say, yeah, right now the project's development schedule the largest constraint is certainty on the interconnection time line and offtake agreement.

MEMBER KRYDER: Okay. Thank you.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Member Comstock.

MEMBER COMSTOCK: As you talk about -- I take it you're going to talk about the project design

soon?

MS. RAMLJAK: The gen-tie project design?

MEMBER COMSTOCK: Oh, sorry, can you talk about supply chain issues that you may be running into? It seems to me that there are a lot of people putting towers and wires up and where your supply chain is in regards to completing the project during your time frame?

MR. GARDNER: Yep. That's a great question.

So we have seen supply chain constraints in our industry. A lot of those constraints are on nonjurisdictional equipment such as main power transformers. In a lot of scenarios those are taking years to procure.

As far as transmission line and jurisdictional equipment, that is part of our contracting process to lock the supply of those specific pieces of equipment throughout construction. And so when we hire an Insureon (phonetic) procurement construction contractor, that is part of our contracting is to buy that equipment on a time line that is guaranteed to be delivered in the time line that we need, and thus far we have not had any issues with transmission poles, lines, and substation switchyard equipment delays schedule.

MEMBER COMSTOCK: Thank you.

BY MR. ACKEN:

Q. And if I could follow up with that curiosity question, throughout the construction of West Camp 1 it has always been at a time of supply chain constraints. How has that affected your ability to construct West Camp 1 in a timely manner?

A. (Mr. Gardner) So West Camp 1 is what I would call ahead of schedule currently. The biggest constraint with West Camp was the changes to the switchyard design to ensure that future projects could connect to that switchyard after it was constructed.

So just as an update on West Camp 1, we have all of the turbines topped out, and we are nearing energization of that switchyard. During construction we have not had significant delays due to equipment deliveries. Most of it was more on the design phase of the switchyard and those changes to make sure that we were building a switchyard that was adequate for APS's option for the long-term.

Q. Thank you.

So, Jordan, that's a great segue to talk about gen-tie project design and structure types, if you would.

A. (Ms. Ramljak) Sure. So for the gen-tie project, specifically for the structures we anticipate to primarily use steel monopoles. But other structure types

like H-frames, three-pole structures, steel lattice towers and tubular steel towers may be required as determined by final engineering. And that determination will be made based on the gen-tie voltage and single versus double-circuit applications.

At this time as discussed, we're considering either a 345 or 500kV gen-tie line. Our primary design assumes single-circuit applications, but in our CEC application, we did specify flexibility for either single-circuit or double-circuit applications.

You can see in Slide 48 here on the right-hand side. And when I advance the slide there will be more figures on Slide 50, diagrams of typical gen-tie project structures that may be used. Exhibit G of our CEC application includes a full list of possible structures.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Member Little.

MEMBER LITTLE: For the -- if you go with Option B, you're going to come into the switchyard and back out of the switchyard from the SRP line; correct?

MR. GARDNER: Yes, that's correct.

So the switchyard effectively cuts that line, and so the 500kV will come -- and from the south it will come into the switchyard, and then it will go out of the switchyard and continue on that line.

MEMBER LITTLE: Right. So are you planning a double-circuit line or two separate lines, the in and the out?

MR. ACKEN: Member Little, I'm going to give them an opportunity to gather their thoughts. I think the answer is that, you know, it's early in the process, right, as far as they haven't even submitted the interconnection request to SRP to know what SRP is going to want.

I think the answer is going to be they'll do what SRP tells them to do; right?

MEMBER LITTLE: That makes sense.

MR. ACKEN: And so, Mr. Gardner, I'd ask you to confirm one of the reasons that you've included a variety of structure types is to provide that flexibility to design and implement an interconnection that fits the needs and demands of the interconnecting utility.

MR. GARDNER: That's correct.

MEMBER LITTLE: That makes sense. Thank you.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Member Kryder.

MEMBER KRYDER: In one of the -- well, the geographic location of this gen-tie line is a bit -- is pretty cold in the wintertime. Does your wind generation

system run year-round or is it more in the winter, the summer or more in the summer than the winter, et cetera, et cetera?

I'm looking at really the issue of icing the lines. Could you talk to that?

MS. RAMLJAK: When you're talking about icing of the lines, you're talking icing of the gen-tie line?

MEMBER KRYDER: Correct.

MS. RAMLJAK: I would ask maybe Rob to speak to more of the specifics of the temperature rating of the gen-tie line, but at least for the nonjurisdictional wind turbines when we select the wind turbine configuration to use for the project, part of the assessment is we look at the operating temperature range of the wind turbines.

And we ensure that -- you know, up in northern Arizona it gets really cold in the winter. It also gets really hot in the summer. And so we ensure that the turbines can operate within the expected temperature range, but we also look at under very cold weather conditions and very hot weather temperature the turbines do derate. And so we would also factor that in. We look at the annual temperature profile of the site, and if there is expected turbine derating, that's

something we factor into our energy estimates for the project.

There are also -- especially because of the recent events specifically in Texas there's been a lot of advancements in wind turbine deicing technology that if appropriate we would look to incorporate on this project.

MR. GARDNER: I can get more information from our engineering team on the specific -- specifications of the gen-tie lines. What I can speak to is the significant amount of transmission infrastructure already in this part of Arizona. I don't believe there have been any issues with icing on any of our projects' gen-ties up to this point or on APS's system stemming from the Cholla Power Plant. But I'm taking that as a follow-up with our engineering team to make sure that I can give you the information on the specific gen-tie rating for temperature.

MEMBER KRYDER: Thank you very much. That would be helpful. I think everybody is a bit sensitized to the thing coming out of the Texas news.

MR. ACKEN: Thank you.

BY MR. ACKEN:

Q. Ms. Ramljak, if you would continue with your discussion of gen-tie project design and structure.

A. (Ms. Ramljak) Sure. I'll also talk about the

potential on-site switchyard which may be constructed under interconnection Option B. If constructed, that would consist of many of the same components as a nonjurisdictional collector substation. The exception being that no main power transformers would be installed at the switchyard.

That 500-kilovolt switchyard next to the SRP transmission line would be enclosed by an eight-foot-tall fence for security and would occupy a siting footprint of up to 30 acres.

And as you asked, Member Little, to interconnect that new switchyard to the transmission grid the existing SRP transmission line would be severed and the two ends would be looped into the switchyard.

BY MR. ACKEN:

Q. Next, describe the specific design specifications that you're currently anticipating as well as any additional tower structures that my be used.

A. (Ms. Ramljak) The structure height can range anywhere from 115 feet to no more than 195 feet in height. The visual simulations included in our application assume that 195-foot height or as otherwise noted in those visual simulations.

In terms of the number of structures, we anticipate needing about six structures per mile of line,

so that's about a thousand feet of spacing between each structure, but the locations of those structures and the specific distance between them will be dictated by the final gen-tie project design.

One of the constraints driving the siting of those structures is a minimum ground clearance of at least 30 feet at the lowest sag point.

And once operational, the final right-of-way for the gen-tie project will be 150 feet wide within that CEC corridor.

So we're almost at the portion of the testimony where Colin will show a virtual route tour. That illustrates our anticipated mix of gen-tie structures for a single-circuit 345kV gen-tie line. So, like I said, that's primarily steel monopoles.

There's some specific locations where we need turning structures, dead-end structures, and three-pole structures so, for example, we may use three-pole structures to cross under existing transmission lines.

If the gen-tie line is 500 kilovolts, we anticipate steel lattice towers may be required to provide adequate spacing between the conductor cables, so that's one key difference in the design between the 345 and 500kV gen-tie lines.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I'm just curious. I've not seen the tubular structure before, and I'm wondering where that might be needed.

MS. RAMLJAK: So this would only be used my understanding if we were to have a double-circuit application, which is not our current baseline design, but we're requesting flexibility in the event that that's needed.

MEMBER LITTLE: Thank you.

MR. ACKEN: Ms. Ramljak, anything further on design or are we ready to move to the virtual tour?

MS. RAMLJAK: I think we're ready for the virtual tour.

MR. ACKEN: Okay. Thank you.

So for the virtual tour Mr. Agner has been patiently waiting for his opportunity, so we'll get that loaded and turn the mic over to him. Thank you.

MR. AGNER: Okay. Peaks, I have my computer plugged in.

Okay. I'll go ahead and get us started.

So as we're loading in here as we do with most of our virtual tours, we'll start with a high-level overview. And once we get into that high-level overview, I'll kind of pause here for a moment and go over some

features that are being highlighted.

So in the outer black boundary is the West Camp 2 Wind Farm boundary. The outer pink boundary is the CEC corridor. The green line is the center line for the gen-tie project. We do note that it's conceptual because, again, the gen-tie itself could be sited anywhere within the CEC corridor. We just want to note that this is centerline now, but it is -- can be put anywhere within the corridor.

We also have our on-site switchyard location. Again, it's conceptual, but it can be sited anywhere within the on-site switchyard siting area, which is in the solid pink.

We also have the existing APS and SRP transmission and distribution lines noted out as well, and those will be 3D rendered as well.

So just to give the committee a preview of what's about to occur, we're going to start from the southeast portion of the corridor, and we're going to generally make our way west to the APS Sitgreaves Substation, so we'll do a flyover of the entire gen-tie first, and then we'll systematically go through KOPs 1 through 4, and I'll pause at each of those, and I'll discuss that in a little detail, but also I will describe the visual impacts at each KOP in greater detail whenever

I get to my visual resource testimony.

So I'll go ahead and advance the virtual tour. And, like I said, we are going to start in the southeast corner near collector project substation number 1. And we will be quickly advancing towards the on-site switchyard which we will have 3D rendered as well.

Given that switchyards are jurisdictional for the committee, we went ahead and rendered that for you all, and I'll go ahead and briefly pause whenever we get to it just so that you all can take a look at it.

And we also have the wind facility turbines 3D modeled for contextual purposes.

CHMN STAFFORD: About approximately how big will the new switchyard for Option B have to be?

MS. RAMLJAK: The siting footprint? That would be up to 30 acres.

CHMN STAFFORD: Thank you.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Member Kryder.

MEMBER KRYDER: Could I ask to back up just a little bit so we can see the battery -- there that piece.

That's a lot smaller footprint than I had anticipated. Is that proportionally correct?

MS. RAMLJAK: The estimated siting

footprint for the battery storage facility would also be up to 30 acres.

MEMBER KRYDER: About how many acres?

MS. RAMLJAK: 30.

MEMBER KRYDER: 3-0?

MS. RAMLJAK: 3-0, yes.

MEMBER KRYDER: Okay. Thank you.

MR. AGNER: I'll go ahead and keep advancing the tour.

And you can see there's also a legend at the top right-hand screen, and that corresponds to the colors of the various outlines that you see on the ground.

So we'll start to head our way in a more northerly direction, and this is where we would cross SR 377. And once we've kind of reached this more northerly direction, we'll start to head more of a south to southwest direction. And you can start to see more of the wind facility turbines coming into view as we kind of get a little bit closer to where they would be potentially developed.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Yes, Member Comstock.

MEMBER COMSTOCK: If we could back up just a -- I hate to stop you, you're doing such a good job.

Is that a river that we're crossing?
What is that?
Is it a canyon?
MS. RAMLJAK: That's Porter Canyon.
MEMBER COMSTOCK: And what's the span on that canyon?
MS. RAMLJAK: I can look at a map real briefly and --
MEMBER COMSTOCK: Thank you.
MS. RAMLJAK: -- get you an answer.
MR. ACKEN: And, Member Comstock, we actually have pictures of that canyon that we'll present later in the testimony to provide context of its scale.
MEMBER COMSTOCK: I'll wait. Thank you.
MR. AGNER: Okay. And now that we've reached the southwest direction, it starts to head more directly west. And it's reaching collector substation number 3.
And I'll go ahead and hit pause here for a second and just, again, briefly note to the committee this is at least from the western perspective the furthest that Option B would go. Anything here west would be exclusively for Option A to connect in to the APS Sitgreaves Substation.
And then I'm actually going to again pause

here for another quick second. As you can see in the solid black boundary that is the West Camp 2 Wind Farm, this is where the CEC corridor exits the West Camp 2 Wind Farm. Any of the CEC corridor from here to the APS Sitgreaves Substation is in the West Camp 1 Wind Farm. So between the West Camp 1 Wind Farm and West Camp 2 the CEC corridor is in -- within both those wind farms.

And, like I said, we'll continue to head west towards the APS Sitgreaves Substation. And as that comes into view, I will go ahead and pause there to show what that looks like, and then we will start to systematically move through KOPs 1 through 4.

And so I'll pause here. Again, you can see the APS Sitgreaves Substation in view as well as the potential design to connect the gen-tie project into the Sitgreaves Substation would likely involve some sort of expansion to be able to put the gen-tie project into the APS Sitgreaves Substation.

So we'll now turn towards KOP 1, and, again, I'll briefly describe the existing and simulated conditions and some of the highlights of each of those, but I'll go into greater detail during my Exhibit E testimony.

So at KOP 1 at the existing condition photograph, you can, again, see the APS Sitgreaves

Substation is well into view as well as the existing APS transmission infrastructure is already prominent within the landscape.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I gathered from the application in reading about these KOPs that this road, which looks pretty well maintained, is used mostly for maintenance on the West Camp 1 --

MR. AGNER: That is correct.

MEMBER LITTLE: -- wind facility?

So it's not open to the public?

MR. AGNER: That's our understanding is that it is not. It might also be used by livestock grazing operators, but that's about it.

MS. RAMLJAK: Yeah, it's located on the Aztec's property, and so the users of that road would be wind farm operators and grazing lessees on Aztec's property.

MEMBER LITTLE: Who maintains it?

MS. RAMLJAK: The wind farm.

MEMBER LITTLE: Do you want to maintain my road?

MS. RAMLJAK: If you want to let us build wind turbines on your property.

MR. AGNER: So we'll go ahead and move on to the proposed conditions at KOP 1.

And, again, here you can see that there are some additional structures that are visible in the landscape as well as that potential buildout for the APS Sitgreaves Substation. But, again, this type of infrastructure is already pretty dominant in the landscape.

And, again, this KOP would only be for Option A as Option A is the only one that is connecting into the APS Sitgreaves Substation.

We'll now turn to KOP 2. KOP 2 is also a dirt access road that is also on Aztec property. And as we move towards it, you will see that it is further east from conceptual project collector substation 3, so this condition would be for both options A and B when we get to the simulated condition.

So I'll go ahead and pause here. As you can see in the KOP 2 existing condition, there is some existing SRP transmission infrastructure that is still visible in the background.

And then when we move to the simulated condition, you'll again see that we've simulated the wind facility turbines for contextual purposes. But this is actually the portion of the gen-tie line as it's starting

to move southwest, and it's just before it kind of turns more in a directly western direction. So that's --

MEMBER KRYDER: Oh. Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: I didn't mean to cut into your -- I'm sorry, Mr. Agner.

The question I had was given the roads like this and the fact that you're going to be bringing quite a bit of steel in for the several structures, will these roads serve as the -- to bring in the steel and the other things that are necessary for the structures?

MS. RAMLJAK: So the road pictured in this particular simulation is within the West Camp 2 project area. So it hasn't been upgraded yet for wind turbine deliveries. So if we were to utilize existing ranch roads for turbine deliveries, we would upgrade them to ensure that they're capable of supporting the trucks required.

MEMBER KRYDER: Okay. So what does upgrading mean? You put stone on or are you going to actually pave them or how does that look in the final -- the final when you're working and constructing?

MS. RAMLJAK: Typically that involves the widening of road, compacting of roads, leveling if required. But we also typically use an aggregate. I

would not expect to pave any of the wind farm roads for turbine deliveries.

MEMBER KRYDER: Okay. So these roads then improved would serve as the transport roads for the tractor-trailers that bring in the component parts and such.

Do you then have to build spurs off of them to get to each of the several structures that you put off?

MS. RAMLJAK: Yes. So we anticipate State Route 377, which runs through the project area, would be our primary access route for turbine deliveries. But we would need to build spur roads that access all of the turbine locations, so it ends up looking like a web of access roads, so those do need to reach every turbine for deliveries.

MEMBER KRYDER: Okay. And I see there is a, I guess, a fence. It looks a bit primitive, but it looks like it would stop cattle.

MS. RAMLJAK: Correct.

MEMBER KRYDER: So if we were to say just randomly we go up to the first curve here that looks another 150 feet ahead and take a hard left to get off and build a spur road, do you have to put gates and all of that in?

MS. RAMLJAK: Yes. We would work with Aztec who then would loop in their grazing lessees to ensure that during construction and operation of the wind farm they can continue cattle grazing operations, but that would most likely involve installing cattleguards or other gates at those types of crossings.

MEMBER KRYDER: Okay. So that's -- that's just a part of the lease that you have with Aztec or whatever?

MS. RAMLJAK: That's correct.

MEMBER KRYDER: Okay. Thank you.

MR. AGNER: Okay. I'll proceed.

So the next two KOPs, KOP 3 and KOP 4, are both along State Route 377, the main travel route around this area. And KOP 3, which is going to come first, is for southbound traffic along SR 377. And we'll go ahead and head into that view.

And as you can see here, again you can continue to see the SRP transmission infrastructure there in the background. It's a little bit hard to make out in this image to fill in the color and the time of day right now, but the existing West Camp wind farm turbines are actually over here in the background.

And now we'll move to our simulated condition at KOP 3. And, again, you can see the turbines

simulated for context. But our structures are more in the background area of the currently simulated condition.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Yes, Member Comstock.

MEMBER COMSTOCK: In the foreground probably 50 feet in front of that picture, are those natural gas line markers?

MEMBER KRYDER: It sure looks like it.

MR. GARDNER: I believe that is correct.

MEMBER COMSTOCK: Do you intersect that line at all in the project?

MR. GARDNER: So the gen-tie project I would need to confirm whether that crosses or not. However, for the wind farm, I'm sure that we would have some overlap.

And we've faced this before, and we have always secured crossing agreements with any pipeline owners for construction and operations of the project.

MEMBER COMSTOCK: And I know my fellow members know this, but I would love to hear what your plans are for that and how you plan on AC mitigation should any lines intersect with your project with natural gas lines.

MR. GARDNER: I will have to talk with our engineers on the specific mitigation techniques if the

transmission line does cross any of the pipelines.

However, for the project infrastructure and turbines we will always set back above tip height from the turbine -- or from the pipeline with our turbine infrastructure to make sure that there is no impact.

But let me make a note and I will get back to you with the specific mitigation techniques if we do cross that pipeline.

MEMBER COMSTOCK: And to AC mitigation just isn't necessarily with a perpendicular crossing. It could be parallel with the line as well. And AC mitigation is one of the most detrimental effects on the natural gas steel pipeline that can be found in corrosion issues, so it's an important issue that you need to address or that we need to know how you will address that in the future. Thank you.

MR. AGNER: Thank you.

I'll move on to KOP 4.

KOP 4 is also along SR 377, but now we will be looking at it from the perspective of northbound traffic. And as we come into this KOP, you can see that we are much closer to the SRP transmission line. And that is reflected in the existing condition photograph as well.

The existing SRP transmission line is much

more prominent in this KOP. And then when we move on to the simulated condition, you will again see our -- the gen-tie project is behind the SRP transmission line. And, again, we've simulated the wind facilities for contextual purposes.

And that was the conclusion of the virtual tour. It will now start to zoom back out to the original extent that we started with. I'm happy to go back to any portion of the virtual tour or answer any questions that committee members may have.

MEMBER DICICCIO: Mr. Chair, just a quick one.

CHMN STAFFORD: Member DiCiccio.

MEMBER DICICCIO: The transmission lines, they're about 400 feet up; correct?

MEMBER KRYDER: We can't hear you.

MEMBER DICICCIO: Oh, sorry.

MEMBER KRYDER: Sorry.

MEMBER DICICCIO: The transmission lines -- well, I did that on purpose -- no.

So the transmission lines are about 400 feet, correct, and you guys are about 600-plus?

MS. RAMLJAK: The turbine tip height --

MEMBER DICICCIO: Yeah.

MS. RAMLJAK: -- would be roughly 600-plus.

That is accurate.

The existing height of the high-voltage transmission lines I think is closer to 250 feet.

MEMBER DICICCIO: 250?

So go back to that one -- I mean, for whatever reason it just doesn't fit at least for me as a visual. Oh, I see -- well, I don't know it doesn't -- I don't know, it looks like it should be a lot taller than that.

CHMN STAFFORD: Are you talking about the turbine?

MEMBER DICICCIO: Yes, the turbine.

MR. ACKEN: Mr. Agner, can you describe how these renderings are prepared and address Member DiCiccio's question, which is a good one, I think that goes to, you know, field of view, distance, but I think it would be helpful to go over and how are these prepared.

MEMBER DICICCIO: Yeah, I'm okay with this just so you know. I'm just curious about the visual part of this.

MR. AGNER: No, so it is a matter of distance and perspective. And so whenever we go out, we do on-site field verification where we use cameras to take a panoramic photograph of the area.

We then use the location and data provided by AES to be able to 3D render these in the environment. And so these do take into things -- take things into account such as field of view, distance, topography to vegetation. A variety of factors that could otherwise make it not look like it's a directly apples-to-apples distance comparison.

MEMBER DICICCIO: No. It just doesn't look proportionate to me even from here even with the explanation because you've got that wind farm or the wind turbine in the front. And I know it's from the very tip.

And you said that the transmission line is about 250 feet; correct?

MS. RAMLJAK: That's my estimate just based on the fact that our gen-tie structures I know are shorter --

MEMBER DICICCIO: Yeah.

MS. RAMLJAK: -- and would cross under the 500kV line.

MEMBER DICICCIO: Yeah, it just doesn't look proportionate to me is all.

MR. GARDNER: I believe -- and, Mr. Agner, please confirm -- that that turbine is actually behind the gen-tie line. It's really hard to see.

MEMBER DICICCIO: The first one?

MR. GARDNER: The simulated gen-tie line.
MR. AGNER: Yes. Yeah. The simulated gen-tie line is behind --
MR. GARDNER: It's in front of the turbine.
MEMBER DICICCIO: It's in front?
MR. GARDNER: Yes.
MR. ACKEN: The existing is in front.
MR. GARDNER: Both are in front.
MR. AGNER: Both -- the SRP transmission line, which is existing, the gen-tie project is behind the SRP, and then the wind turbine is even further behind that.
MEMBER DICICCIO: Okay. Thank you.
CHMN STAFFORD: Member Fant.
MEMBER FANT: Thank you, Mr. Chair.
Just one question.
Are there any low-level military flying exercises out in this area?
MS. RAMLJAK: No, none.
MEMBER FANT: All right. Thank you.
MS. RAMLJAK: I also have a follow-up to Member Comstock's question about the width of Porter Canyon. It's approximately 200 feet where the gen-tie would cross.
MEMBER COMSTOCK: Is there water in the

bottom of that canyon or is it dry?

MS. RAMLJAK: Not from our site observations, no.

MEMBER COMSTOCK: Thank you.

MR. AGNER: Unless there are any other questions, that concludes the virtual tour.

MR. ACKEN: Thank you, Mr. Agner.

BY MR. ACKEN:

Q. We're now going to shift to public outreach and involvement.

And we're going to start that with Mr. Gardner. I'd like you to talk about the involvement for this project, tie that in to your efforts in this area over the past several years.

A. (Mr. Gardner) Yeah. So over the last few years obviously with the development of West Camp and Chevelon Butte we've been significant members of the local communities and have gained a really good understanding of how to share and transmit information in these communities where there just aren't that many folks living in the area or with great access to Internet in the area, so with that in mind we developed a public outreach strategy with the assistance from SWCA to ensure that local jurisdictions, public, and any other key stakeholders were aware of both the wind farm and this

gen-tie project.

And so some of the pieces of that would be our project website, which is updated with all relevant information to the project including hearing links and application materials, sending out informational letters to all property owners within a mile of the full wind farm, so not just the smaller CEC corridor, but as you can see on Slide 56 -- is that right -- oh, sorry, the buzzer -- this thing just buzzed on me -- on the right figure of Slide 56 a significantly larger portion of land, and landowners were notified of both the gen-tie project and the wind farm.

Additionally, we published legal notices with the project and meeting details in local newspapers, and we held two in-person open house meetings in Holbrook, Arizona to make sure that folks could come talk about the project and learn about what we were up to.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Yes, Member Kryder.

MEMBER KRYDER: I was looking for it here, and I couldn't find the exact page. But I recall reading in the materials we got that there were two residences within, like, two miles -- mile eight or something like that, and there was an interesting little cryptic note that said there were two authorized residences, and the

implication to me was there must be some outlaw residences there also.

I use that in terms -- living in Pima County we have I'm not sure how many but quite a number -- or quite a large number of the desert areas away from the main population centers, people just came in and were outlaws. They never got any county permitting or anything, but they showed up there. And then after some time, I guess the authorities just chose to ignore them or something.

And so with that background, are there outlaw residences in the area?

MR. GARDNER: That's a great question. So there are permitted residences and unpermitted residences in this whole region. I would just say that in the area where the nearest residences are there are very few structures.

And so we don't go out and knock on every structure's door to see if someone's living in it. But in the area near the project, there are very few structures. And we want to make sure that the folks that are living in permitted residences can come and talk to us about the project.

That being said, we send letters to any landowners in that area permitted or not. Whoever's on

the register they get a letter and they can show up and talk to us about the project.

Does that answer your question?

MEMBER KRYDER: It certainly does. And it addresses for me the difficulty had I been sitting in your chair to try to realistically touch all the humans that are out there and try to sort out the difference between the permitted ones. You used a nicer term than I did, permitted and nonpermitted residences of the area.

Thank you very much for the work that that must be.

MR. GARDNER: Of course. And we work hand in hand with Navajo County to make sure that the permitted residences are permitted and those are the folks, you know, that we can really reach out to. But we reach out to everyone no matter permitted or not.

MEMBER KRYDER: Thank you.

CHMN STAFFORD: Is all the land private land that's for the gen-tie? Is that all owned by the same property owner?

MR. GARDNER: Yes, sir. All of the private land is owned by Aztec Land and Cattle.

CHMN STAFFORD: Are there squatters living on Aztec Land and Cattle's Land?

MR. GARDNER: No, sir. I don't think they

would like that very much.

CHMN STAFFORD: Okay.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I noticed when I was reviewing the application that you didn't use social media at all in your outreach. I was wondering why.

MR. GARDNER: Yeah, good question. So I can chalk that up to kind of what I mentioned about we've been in the area for a long time, and as a practice AES has never really used social media.

That has never stopped us from having significant input with the local communities. And so at our open house we sent out 88 letters. And we had nine people show up, which doesn't -- may not sound like a lot, but it's a pretty a high hit rate for this area.

MEMBER KRYDER: 10 percent.

MR. GARDNER: And so we evaluated after that -- those open house meetings if we should try and do a social media campaign. However, we felt like we were able to speak with the most impacted people. And those folks that have a residence nearest the project showed up, and we had dialogue and engaging conversations with them. And so we felt that our, you know, public outreach campaign was sufficient to reach the most folks in the

area that would be impacted.

MEMBER LITTLE: Thank you.

CHMN STAFFORD: Yes, Member Fant.

MEMBER FANT: Thank you, Mr. Chair.

Just for the record, Holbrook and two ghost towns west of Holbrook called Rimmy Jim's and Two Guns were three of the wildest towns in the wild west. In 1884, Holbrook had 250 citizens, and they were proud that they got their murder rate down to 26 people. So 10 percent of the citizens of Holbrook were killed in 1884, and they came from the Hashknife Outfit.

MR. GARDNER: I'm sure the Hashknife Outfit was a big part of that.

MEMBER FANT: Outfit, yeah, who were a den of bank robbers, cattle wrestlers and other hell-raisers.

MR. GARDNER: This project is located on the Hashknife Ranch.

MEMBER FANT: Right. Legendary.

MEMBER KRYDER: And, Mr. Fant, they all moved to New Orleans after they moved out?

MEMBER FANT: Springerville.

MR. ACKEN: I'm not sure how I'm supposed to follow that or segue that. I'm sorry, I won't try.

BY MR. ACKEN:

Q. Mr. Gardner, I'd like you to describe the

project website, please.

A. (Mr. Gardner) So as I previously stated, the project website -- or the website provides the public and all relevant stakeholders and interested parties with key project information not only about the wind farm but also specifically about the gen-tie project.

The website provides a forum for public comment whereby anyone can go in and type a public comment, and that public comment goes directly to us as the project team.

This website was updated throughout the CEC application as more information was available like the application, dates of the open meetings, and this hearing and links to this hearing and public comment period.

Q. You mentioned the mailers that you did to nearby residences. I want you to talk about that a little more.

And if you spoke with Navajo County about this outreach process, discussed with them their thoughts on a public engagement social media campaign, I'd like you to share your thoughts about that as well.

A. (Mr. Gardner) Yeah. So the informational letter that we sent out introduced the gen-tie project and also gave people information on how to get in touch with us and when the meetings were and how to engage with the project team.

We go through an extensive citizen participation plan with Navajo County. Navajo County provides feedback on that plan to make sure that our public participation plan is in line with the goals and needs of the county. So, yes, we engaged significantly with the county on this.

And just to restate, we did send these letters to all property owners within one mile of the proposed West Camp Wind Farm and gen-tie project, and that totaled about 88 mailings. Additionally, we did send letters to all municipalities within five miles of the project.

And on the Slide 60 you will see the informational letter and then the affidavit of the legal advertisement.

Q. And I'd like you to remind the committee or maybe talk a little bit more about that legal advertisement that went to provide notice as well.

A. (Mr. Gardner) Yep. So we published the legal advertisement in the Tribune, which serves -- it's a local newspaper in Navajo County, and we did publish that on August 20, 2025, which was seven days prior to the public meetings.

And, as I said, you can see a copy of the legal affidavit of that legal advertisement on the right side of Slide 60.

Q. Next, describe the in-person open houses that you held?

A. (Mr. Gardner) The in-person open houses were both held in Holbrook, Arizona at the American Legion Post. We captured multiple times during the day one during lunchtime from 12 to two and another after work hours from five to seven.

This was an informal open house whereby folks could come, and we had I think seven -- eight project members there that were available for questions. We had poster boards that were not only about the wind farm but a lot about the gen-tie project.

In addition to the visual simulations that you saw during the virtual tour we also had visual simulations of the wind farm and maps of all the routing.

There, comment forms were available for anyone in person to show up and write a public comment that we would address and talk to. And, like I said, we had good engagement here. We got to talk to a lot of the folks that we had been trying to get ahold of that were living -- or that lived nearby the wind farm.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: Mr. Gardner, can I ask you to maybe tell us -- I didn't find anywhere in the

application any of the comments or your responses or -- and it sounds like maybe it was mostly just verbal exchange.

Can you give me a sense of what -- what the public was telling you?

MR. GARDNER: Yes.

MEMBER LITTLE: A lot of us are curious about that.

MR. GARDNER: Yes. 100 percent. So we will go through the three formal public comments that we received. But I can give you a broader idea of the sentiment at these meetings and other meetings that we've had.

So for a lot of people that live near the project they are thinking about property values and making sure that the project won't impact those. In a lot of cases we will work with them to understand what their specific concerns are.

So one of the comments we received was from one of the landowners that live nearby the project. They were concerned about the setback from their barn and their house from turbines. We voluntarily increased the setback to accommodate their concerns to one mile from their barn. And so that's kind of -- a lot of that is from the public.

And then we've had a lot of meetings with local business owners, school districts, et cetera. It's a little bit of a different beat there where because we have already brought the Chevelon Butte Wind Farm and West Camp Wind Farm, folks have a pretty good understanding of the real economic benefit of the projects. And so a lot of people that we meet with, especially business owners, they want to understand the timing of the project and how they can get involved with the project and see some of the benefits that they bring economically.

Does that answer your question?

MEMBER LITTLE: It helps, yes.

Can you tell me how much noise the wind turbines make?

The people that live next door to me have a wind turbine in their front yard. It's an old one. It drives me crazy. I'm glad it's broken right now.

MR. GARDNER: Sure. So I can talk through the requirements in Navajo County. So Navajo County has one of the more strict noise ordinances that I have seen. And I reserve the right to correct this, but I believe that the requirement is 50 decibels at any sensitive receptors near them.

50 decibels, the equivalent is akin to a

refrigerator running. And so there would never -- and I don't know about you all but I don't hear my refrigerator very loud. We would not be allowed to build a project that exceeds that threshold at any receptor. So that's the nearest noise receptor to our whole project could not exceed that volume, if that helps.

MEMBER LITTLE: It does. Thank you.

MEMBER COMSTOCK: Mr. Chairman.

CHMN STAFFORD: Yes, Member Comstock.

MEMBER COMSTOCK: I'm trying to determine if inside the CEC application or -- is there any tribal land in there?

MS. RAMLJAK: There's no tribal land in this CEC corridor or its vicinity.

MEMBER COMSTOCK: Thank you.

MR. GARDNER: Can I correct myself? It's actually 45 decibels, so it's even quieter than 50. My apologies.

MR. ACKEN: And, Member Comstock, we will talk about cultural resources and tribal outreach in Ms. Lytle Bonine's testimony later today or tomorrow.

MR. GARDNER: And additional noise surveys that we've conducted for the gen-tie project.

MR. ACKEN: Yes, that too. Thank you.

So you mentioned the public comment from

the nearby residents. I would like you to talk about those -- one of the three, quote, formal comments that you received on this project. I'd like you to discuss that now for the committee.

CHMN STAFFORD: Oh, Mr. Acken, are those detailed in your hearing Exhibit 3, the public outreach summary?

MR. ACKEN: So everything that Mr. Gardner is discussing is detailed in West Camp-3.

Also, we will cover -- Mr. Agner will cover some additional topics that relate to the specific notice for this hearing that's also contained in West Camp-3.

But, yes, Mr. Gardner's testimony is supplemented by that.

CHMN STAFFORD: Thank you.

MR. GARDNER: Yeah, I can briefly cover it. It won't take too much time. But as we -- I think, you know, we've stated we received three public comments, one from Arizona Game and Fish, one from the City of Holbrook and then that comment that I just discussed from the nearby resident at the open house. And the first two comments will be discussed in greater detail later in the testimony.

MR. ACKEN: Thank you.

//

BY MR. ACKEN:

Q. So now we are going to turn to the public notice for the CEC hearing itself. And for that, I'm going to turn -- we're going to turn back to Mr. Agner.

Mr. Agner, how has the applicant provided public notice to have the application as required by law in the procedural order in this matter?

A. (Mr. Agner) Yes. So the applicant provided notice of the CEC hearing through several formats. These methods included sending out an informational letter, publishing the notice of hearing as a legal affidavit in local newspapers, the installation of notice of hearing signs along the gen-tie project, and the public posting of the CEC application.

I'll describe each of these in greater detail shortly.

Q. I'd like you to start with the informational letter. Can you describe the letter in greater detail?

A. (Mr. Agner) I can.

So the informational letter was sent out on September 22, 2025, and we used the same mailing list that was used for the in-person open house letter.

The CEC hearing informational letter provided project information and also informed the reader that the CEC application has been filed. The letter also provided

key CEC hearing information, and it also indicated where to find a hard copy of the CEC application.

And if you look on Slide 70, it shows a copy of the notice of hearing informational letter.

Q. Describe the newspaper publication to provide notice of this hearing.

A. (Mr. Agner) Yes. So the applicant published the notice of hearing as a legal advertisement three times in two publications. The notice of hearing was published as a legal advertisement in the Arizona Republic on September 19, 2025, and September 20, 2025.

The applicant also published the notice of hearing as a legal advertisement on the Painted Desert Tribune September 24, 2025.

Slide 72 shows copies of the affidavits as well as the notices in the newspapers themselves.

I do want to note that all three advertisements were published within ten days of the CEC filing, which occurred on September 15, 2025.

Q. Describe the --

CHMN STAFFORD: And at least 30 days before this hearing; correct?

MR. AGNER: Yes.

BY MR. ACKEN:

Q. That's the one we can't miss.

Next describe the availability of the public to review the application at a local library.

A. (Mr. Agner) Yes. So a copy of the CEC application was made available at the City of Holbrook public library. And, in addition, the application was also made available on the project website, and it was also available on the Arizona Corporation Commission's docket control.

WC-3 includes e-mails from the Holbrook library manager confirming receipt of the CEC application, and Slide 74 on the screen shows pictures of the CEC application as it sits in the Holbrook library.

Q. And did the applicant post signs along the gen-tie route for travelers along public right-of-ways?

A. (Mr. Agner) Yes. The applicant installed signs on September 26, 2025. WC-3 includes greater detail about this. And Slide 76 shows a map, a representative picture, and the notice of hearing sign text.

Q. What are the affected jurisdictions in this case to which notice had to be provided?

A. (Mr. Agner) Yes. So the affected jurisdictions included the Arizona State Land Department and Navajo County. Both of who have land management authority.

However, because the CEC corridor crosses Arizona State Route 377 we also included the Arizona

Department of Transportation as an affected jurisdiction.

WC-3 includes confirmation of service to the affected jurisdictions that was filed in the docket on September 22 and 23, 2025.

Q. And has the applicant received any concerns or further comments regarding the application from affected jurisdictions?

A. (Mr. Agner) No, they have not.

Q. And did the applicant keep the project website updated as well to receive feedback for any to come?

A. (Mr. Agner) Yes. The project website was updated to include key CEC hearing information, including virtual participation links as well as other hearing links.

Q. And no further comments were received beyond what Mr. Gardner provided testimony on; is that correct?

A. (Mr. Agner) That is correct.

Q. Thank you.

MEMBER DRAGO: Mr. Chairman.

CHMN STAFFORD: Yes, Member Drago.

MEMBER DRAGO: Yeah, it looks like you did a lot of activity in the City of Holbrook.

While they're not an affected jurisdiction, did you get any interest from City council to present there or anything like that?

MR. ACKEN: That may be a question best for Rob or Jordan, and I will note that they did receive the response from the City of Holbrook that I believe Ms. Lytle Bonine will provide testimony on further.

But specifically as whether a request to present I'd turn that over to the AES team.

MR. GARDNER: We have not had a request to present. However, we've engaged with both the Holbrook School District and local elected officials, and they're aware of the project. And the mayor of Holbrook spoke at one of the Navajo County renewable energy listening sessions in support of renewable energy in the local area.

MEMBER DRAGO: Thank you.

MEMBER DICICCIO: Mr. Chair, it does look like you did present in front of the --

CHMN STAFFORD: Mr. DiCiccio, can you please get close to the microphone.

MEMBER DICICCIO: Oh, yeah, I keep doing that.

So it does look like you did present in front of the County at least from one of the things I saw in here.

MR. GARDNER: We have presented in front of the county and had many meetings with Navajo County.

However, the specific Holbrook city council we have not had any requests to have specific project meetings.

MEMBER DRAGO: Thank you.

CHMN STAFFORD: Does that conclude your public notice section of the testimony, Mr. Acken?

MR. ACKEN: It does, Mr. Chairman.

CHMN STAFFORD: I think this looks like a nice place to take a break before you get into the environmental studies.

Member Fant.

MEMBER FANT: Yes. I just wanted to clarify a comment I made about Springerville. I was deadly serious what I said. Everybody thinks Tombstone was violent in the 1880s, but Holbrook, Rimmy Jim's, Two Guns, and Springerville were the wild frontier towns in Arizona. So they were cowboy shoot 'em up places, so --

CHMN STAFFORD: Thank you. Thank you very much.

With that, we'll take a 15-minute recess.

(Recess from 4:15 p.m. to 4:34 p.m.)

CHMN STAFFORD: It's getting late in the day, so I think what we need to do next before we talk about environmental studies is talk about the potential for a tour.

I believe the tour protocol proposal has

been marked as Exhibit WC-7.

Mr. Acken.

MR. ACKEN: Yes, that's correct. We did put together a tour protocol consistent with direction in the procedural order and longstanding practice.

A couple things I want to highlight from this, and I say "we put it together." Ms. Ramljak put it together, so I may ask her to follow up after I provide some comments.

It's not an easy tour to do from a distance standpoint. It's about two hours away, up to two hours away. So we'd looking at a seven-hour tour. So it would take the day in order to do that.

We'd leave here at 9 a.m. The first stop -- we would be able to reach the first stop around 10:30, which is that switching -- the on-site switchyard area we talked about with respect to Option B.

But then it's an hour drive on the interior roads to reach the project substation and another 40 minutes to reach the Sitgreaves Substation. An hour and a half to get back to Holbrook from there.

And then by that time it's lunch. And then, you know, we'd get back to this area by about four o'clock.

So it would be an all-day tour. This is as

the testimony indicated still an active construction site for West Camp 1. So it's manageable, but it would require perhaps some safety training and protocols. But so that's the high-level discussion of it.

Jordan, is there anything you want to add?

MS. RAMLJAK: No. The only thing I would add is the three proposed tour stops are under this on-site switchyard siting area Bert mentioned, which is under the existing SRP 500kV line, the project substation, and then Sitgreaves switchyard.

So we would have to have personal protective equipment for anyone leaving the van at stops 2 and 3 within the West Camp construction site.

MEMBER DICICCIO: Mr. Chair.

CHMN STAFFORD: Yes, Mr. DiCiccio.

MEMBER DICICCIO: I'm okay. I mean, they did an amazing presentation today. They've touched on everything. They had a really good virtual tour. I'm good without having to do the tour tomorrow.

CHMN STAFFORD: Member Little.

MEMBER LITTLE: I'd love to see the area.

You don't have a helicopter to get us there faster?

MR. ACKEN: I will answer that. No.

There are alternative ways at alternative

times perhaps. You know, if it is the election of individual committee members to see a working wind project, this team can do that. Whether that's tomorrow or at a time of your choosing, you know.

MEMBER KRYDER: Mr. Chairman.

CHMN STAFFORD: Member Kryder.

MEMBER KRYDER: I would agree with Member DiCiccio that I think the virtual tour did a fine job. And as much as I would like to see it as Member Little stated, I think that the juice ain't worth the squeeze.

CHMN STAFFORD: And this time you're not talking about electricity as juice.

MEMBER KRYDER: Right.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I would agree. I will stop by there on -- next time I head east.

CHMN STAFFORD: Thank you. Yes, I think seven hours is -- that's quite the time commitment for three stops.

Member Fant.

MEMBER FANT: Mr. Chair, I'd point out that area also might be haunted.

CHMN STAFFORD: Well, I think it's probably best that we not do a tour. I don't think it's necessary

for this particular case. Haunted or not, I think a better use of our time would be to continue with the presentation of evidence and not spend seven hours, most of which would be spent driving.

So with that, I think we can recess for the evening to come back at 5:30 for public comment. We will stay on the record until six o'clock to take public comment.

And then we'll come back in the morning at 9 after the conclusion of the public comment. So unless there's anything further from members.

MEMBER LITTLE: Mr. Chairman.

CHMN STAFFORD: Yes, Member Little.

MEMBER LITTLE: I would just like to say for the record that if there was reason to feel like there -- this was a contentious project in any way that there were -- that the public was interested in and had concerns that perhaps we might change our minds about the public -- or the tour.

But in light of the fact that there's already so many projects out there, and this one doesn't seem to be -- have a lot of disagreement from the public. I just wanted that on the record, please.

CHMN STAFFORD: Thank you.

And the fact that it's a single landowner

for the gen-tie project certainly mitigates the impacts of having multiple different landowners with competing points of view on the project.

So anything else?

Mr. Acken?

MR. ACKEN: Nothing further at this time. Thank you.

CHMN STAFFORD: All right. Thank you.

With that we'll recess until 5:30 when we come back for public comment.

(Recess from 4:40 p.m. to 5:30 p.m.)

CHMN STAFFORD: Let's go on the record. It is now 5:30, the time for public comment for line siting case 251.

Do we have any members of the public in the room to make comment? We have one. Would you please approach the podium and tell us your name and spell your last name for the court reporter. You have three minutes.

MS. MEIXLER: Good evening, Commissioners. My name is Kelly Meixler from Navajo County, and I'm here because something is wrong and it's happening fast. West Camp 2 isn't another wind farm, it's potentially 500 megawatt battery storage and towers taller than downtown Phoenix sprawled across 500 -- or 50,000 acres, most of

it's private land, leased quietly.

This is intentional so they avoid national and federal -- federal and state regulation. No one is finding out about this. None of the citizens are paying attention. Those who are paying attention can't see what's happening. I found the Painted Desert little notice that 3800 people may have seen.

But they didn't do anything in Snowflake. They didn't put anything out in the White Mountain Independent, which gets a far larger circulation than 3800 people. They haven't done anything on social media and I think this is all intentional.

It's all to obfuscate what's happening. We just found out today about the new eight-mile -- or the new solar farm eight miles from Snowflake. So this is happening all around us. Citizens are not being -- you can tell us that you gave us two hours on this day and two hours on that day, but I'm paying attention.

I didn't know it was happening. I'm a member of the Civic Integrity Alliance of Northeastern Arizona. I have been asking the board of supervisors there to have this conversation about all these renewables and just put a pause until we finish the Section 230 review that is being done at the federal level concerning the national security issues of using

commercial off-the-shelf products in these wind turbines and these BESS systems.

I'm just saying can we wait? Do we have to chase this tax subsidy? Is there any money in the tax subsidy for fire suppression? Because I didn't hear anything mentioned about fire suppression. I heard they talked to people within a mile of those homes or of those future towers.

But these boondoggles at 700 feet have a debris field of bigger than two to three miles from what I'm to understand. And a debris field of two to three miles means two to three miles worth of people should have been informed. They should have a voice here. And besides that, our skies are going to be blinking with red lights. It's going to affect a lot of people.

A lot of people.

And we're not being consulted. We're not being asked. This isn't right.

Commissioners, please pause this. Demand the full county get notice, not 88 neighbors. Get either the environmental studies. Let's not sign it, say yes and then it all comes out later.

Today Eli Crane praised NAU for canceling its contract with GQUPT [sic] after it was flagged in a national security review. Please give Eli Crane another

reason to applaud what's happening in Flagstaff by denying -- delaying approval until we know that the commercial off-the-shelf products that will go into these systems are not going to contain spyware. Please help us. For the people of Navajo County who were not consulted, I'm here to confidently tell you that this juice is not worth the squeeze to us. Thank you.

CHMN STAFFORD: Thank you. Are there any more members of the public to make comment here in the room. All right. Do we have some online? I see Aztec Land and Cattle Company on Zoom. Do you wish to make public comment?

MR. O'HACO: Hello.

CHMN STAFFORD: Hello. Who is speaking?

MR. O'HACO: My name is Jim O'Haco, I'm a rancher southwest of Winslow.

CHMN STAFFORD: Could you please spell your name for the record?

MR. O'HACO: O, apostrophe H-a-c-o, O'Haco.

CHMN STAFFORD: What's your first name again?

MR. O'HACO: Jim.

CHMN STAFFORD: Jim?

MR. O'HACO: Yes, sir.

CHMN STAFFORD: Okay. Thank you. Please

proceed. You have three minutes.

MR. O'HACO: Okay. We have a ranch southwest of Winslow, about 35 miles, that AES has put a wind farm on. It's a 500-megawatt project, 103 turbines, I believe. And they finished it last spring. They did it in two phases, about half and half. The first contractor was Mortenson Construction, and the second contractor was Wanzek Construction.

But I would just like to say we've been ranching in that area for years and years, even before Arizona was a state. And I was apprehensive at first of the project, but we had a good experience all the way through.

AES, the parent company, has done a remarkable job. They tore up a lot of country at first but they've restored it to, you can't hardly tell they've been there other than the turbines are sticking up there. But they reseeded it.

They took care of the wildlife. They got the ranch rules, they followed those. Cattle wasn't a problem getting mixed up. The roads, they've built very good. They've built them up and used gravel. So when it does rain, they're all-weather roads. I had no problem with AES. They've been good farmers with me. If anybody's got any questions, I'll try to answer them.

But thank you very much.

CHMN STAFFORD: Thank you.

Up next I see a number, 602390. Do you wish to make public comment?

Hearing none, I see a Lisa Vincente. Do you wish to make public comment?

MS. VINCENTE: I would. Thank you.

CHMN STAFFORD: Please proceed.

MS. VINCENTE: Hi. So I have been following this wind -- the renewable ordinances for a long time. And we have been trying to have dialogue with the board of supervisors for a year and a half and they kept pushing off that it wasn't time, it wasn't time, and we've never gotten on the agenda.

We've sent you all a formal complaint. We would like to have resolution 172025 reopened so that we can discuss the ordinances properly before you proceed to make decisions about this project.

There -- it's drafted up in the e-mail that was sent, the bottom line is that the public has not been notified properly and they are 15 different violations from federal, state, local, county, all the way down. So we would highly recommend, Civic Integrity Alliance, we would really like it if you considered our concerns that the public is not being involved enough.

I could say more. I'm frustrated. Because not -- our county assessor did not even know that the West Camp 2 project was going on until a week ago. I think that's strange and troubling. Thank you.

CHMN STAFFORD: Thank you. Up next we have Jacob Prochnow.

MR. PROCHNOW: Good evening, everyone. Like you mentioned, Adam, my name is Jacob Prochnow, I'm with Mortenson Construction, and we are the general contractor that's currently involved in erecting the construction of the wind turbines for West Camp 1.

And I just wanted to talk today and share my viewpoint. Like I said, I am with the general contractor and when we do come into the job site, we do try to make the places, Navajo County, better than where we found it. We try to stimulate the local economy by using local contractors, Perkins Cinders, GWR, the local Snowflake Smokehouse, Barbie Drilling, on and on and on, as many local subcontractors that we can use that are awarded thousands, millions of dollar contracts to help promote them.

In addition to just the local restaurants and R.V. parks and grocery stores and all the local amenities that Navajo County has to offer and all the hundreds of people that come here are providing the money

that goes into the local economy to help out Navajo County.

And not just from a financial aspect, but we really have the people-first mentality and have participated in many local charities throughout Navajo County, the Trunk-and-Treat in Show Low we have done both last year and this year, bike helmet drives, Heber-Overgaard funds, just really people-first mentality. And had the opportunity to have Monte Heber and had the local group of local boys at the LDS community come out to the site and showcase what careers on the wind farm essentially look like in Mortenson Construction and outside Mortenson Construction.

So those groups really come into the community and leaving it a better place than where we left it, both because we're here for a short time but we want the impacts that we make to be everlasting in a positive way. So thank you for your time.

CHMN STAFFORD: Thank you. Are there any other members of the public that wish to make comment? Either online, on the phone or in the room?

MS. BELLENDIR: This is Claire with Aztec Land and Cattle and I'd love to comment when appropriate.

CHMN STAFFORD: Now is a good time. Can you please spell your last name for the court reporter?

MS. BELLENDIR: Sure. Bellendir. Claire Bellendir. B-e-l-l-e-n-d-I-r.

CHMN STAFFORD: Please proceed.

MS. BELLENDIR: Thank you for having this hearing, for listening. I am in support of this project and the transmission line. I wanted to reiterate what we wrote in our letter of support. This project, this transmission line specifically is in -- it's within the bounds, it is supported by -- it is contemplated in the Aztec area plan, and that plan is a document that was adopted by the Navajo County board of supervisors in 2011.

It outlines development for the area, general guidelines for development. And the purpose of the plan is to ensure that future proposed uses are compatible with existing uses. Given the transmission infrastructure and the generation that is currently in the area, I think an additional transmission line is absolutely appropriate and necessary.

And then I guess I would add I'm not sure what you've discussed in your hearings thus far, but just a comment, the transmission line connects into the newly built substation, which was sized to accommodate future uses.

So anyway, thank you for listening. I

appreciate your time. And if you don't mind whenever appropriate, my dad also is Aztec, is on now. He was that phone number that couldn't talk, the 602-390 number, so when you'd like to hear from him he's ready.

CHMN STAFFORD: I think now would be a great time.

MR. BROPHY: My name, Chairman, is Steve Brophy. Can you hear me okay?

CHMN STAFFORD: Yes, can you please spell your last name for the court reporter.

MR. BROPHY: B-r-o-p-h-y. And I'm president of Aztec Land and Cattle Company.

And I'd like to bring perhaps the obvious, but to me important facts to the attention of the Commission.

Number one, our land since the early '60s has been increasingly crisscrossed by high-voltage transmission lines. There's two -- there are two, three 500kVA lines crossing our land and there are two 345kVA lines crisscrossing our land. All were built in service of the existing and then expanded power generation at Cholla, and all of them serve the Phoenix metropolitan area to the south and west and to the northeast out towards Hoover Dam. You all understand, I'm sure, the course of those transmission lines.

My point in raising that is that as was mentioned, there is an existing Sitgreaves transmission, or substation to the east of the line that you're considering. And it's sized to allow capacity from other wind projects.

I'm not if sure your role is to rule or consider the rights and wrongs of wind projects, but rather to husband the use and location of power lines. And that's, forgive me for saying what I think your role is, but with that in mind, these power transmission lines are really an asset of the public.

And if you were to replace them today, they'd cost billions of dollars. And they've been built and paid for by the electrical power-using public of Arizona.

And so to simply have Cholla shut down and say these power transmission assets can no longer be used simply doesn't make any sense and it's not fair to those who have paid for them in their electrical use and the future generations who will need the power from them.

Another point I'd like to make is that of the 10-mile or so line that you're considering, nine of the 10 miles is on Aztec land. Land that we've owned since 1884.

We support wind energy development because

it's the future of power in Arizona, particularly with the demands placed on the power grid by AI and chip manufacturing just coming to our shores so to speak. And it simply can't be a wise use of public resources to then declare off limits and unused the existing power transmission resources which need to connect to generation.

So I urge your approval of this.

CHMN STAFFORD: Thank you. Are there any other members of the public on the line to make comment?

AV TEAM MEMBER: I believe that's everyone, Mr. Chairman.

CHMN STAFFORD: All right. We will stay here until at least six o'clock to allow additional members of the public to make comment if they choose. So until such time as more members of the public show up to make comment we'll go off the record and then if someone shows up to make comment we'll go on the record to take that comment. Let's go off the record.

(Recess from 5:48 p.m. to 6:00 p.m.)

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

It is now six o'clock. Are there any other members of the public who wish to make comment?

(No audible response.)

CHMN STAFFORD: There appears to be no one in the room.

Is anyone online or on the phone that wants to make comment?

(No audible response.)

CHMN STAFFORD: Seeing none, this will conclude the public comment this evening. We will recess until we come back in the morning at nine a.m. to resume the hearing on the application. We stand in recess.

(Proceedings recessed at 6:00 p.m.)

STATE OF ARIZONA)
)
COUNTY OF MARICOPA)

BE IT KNOWN that the foregoing proceedings were taken before me; that the foregoing pages are a full, true, and accurate record of the proceedings, all done to the best of my skill and ability; that the proceedings were taken down by me in shorthand and thereafter reduced to print under my direction.

I CERTIFY that I am in no way related to any of the parties hereto nor am I in any way interested in the outcome hereof.

I CERTIFY that I have complied with the ethical obligations set forth in ACJA 7-206(F)(3) and ACJA 7-206(J)(1)(g)(1) and (2).

Dated at Phoenix, Arizona, October 31, 2025.

JENNIFER HONN, RPR
Arizona Certified Reporter
No. 50885

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