

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-1**

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Tucson Electric Power

# Midtown Reliability Project

## Strategic Outreach Plan

**Revised January 2024**

Gordley Group

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## 1. Introduction

Tucson Electric Power (TEP) has initiated the Midtown Reliability Project to identify and evaluate possible routes for an overhead 138kV transmission line in central Tucson to improve electric service reliability, better satisfy central Tucson's changing energy needs and prevent power outages. The new transmission line will allow for the retirement of the aging 46kV sub-transmission infrastructure in this area. This equipment has been identified for replacement, and the new transmission line and substation will act as a replacement with increased capacity, reliability, and improvements to the distribution grid for local enhancements such as home electric vehicle charging and rooftop solar.

Customer safety is an important issue that will be addressed by the new line and substation. With increased electrical demand, the risk of blackouts increases and can be especially problematic for public safety if the outage is for an extended period during extremely hot weather. According to a May 2023 New York Times article reporting on a recent study, "If a multiday blackout in Phoenix coincided with a heat wave, nearly half the population would require emergency department care for heat stroke or other heat-related illnesses." The study emphasized the importance of investing in a stronger electrical grid.

TEP has a very strong record when it comes to service reliability and is dedicated to ensuring that it maintains this high service standard for the midtown area, and all of Tucson, with the completion of this project. During the siting process, TEP recognizes the importance of identifying the most compatible routing option that minimizes environmental and social impacts while continuing to uphold customers' expectations for reliable electrical service.

The study area for this project, which includes the area to be served by the new transmission line and substation, is shown in Figure 1. Interconnection will be made from existing substations. The exact route of the transmission line will be determined with input from the public.

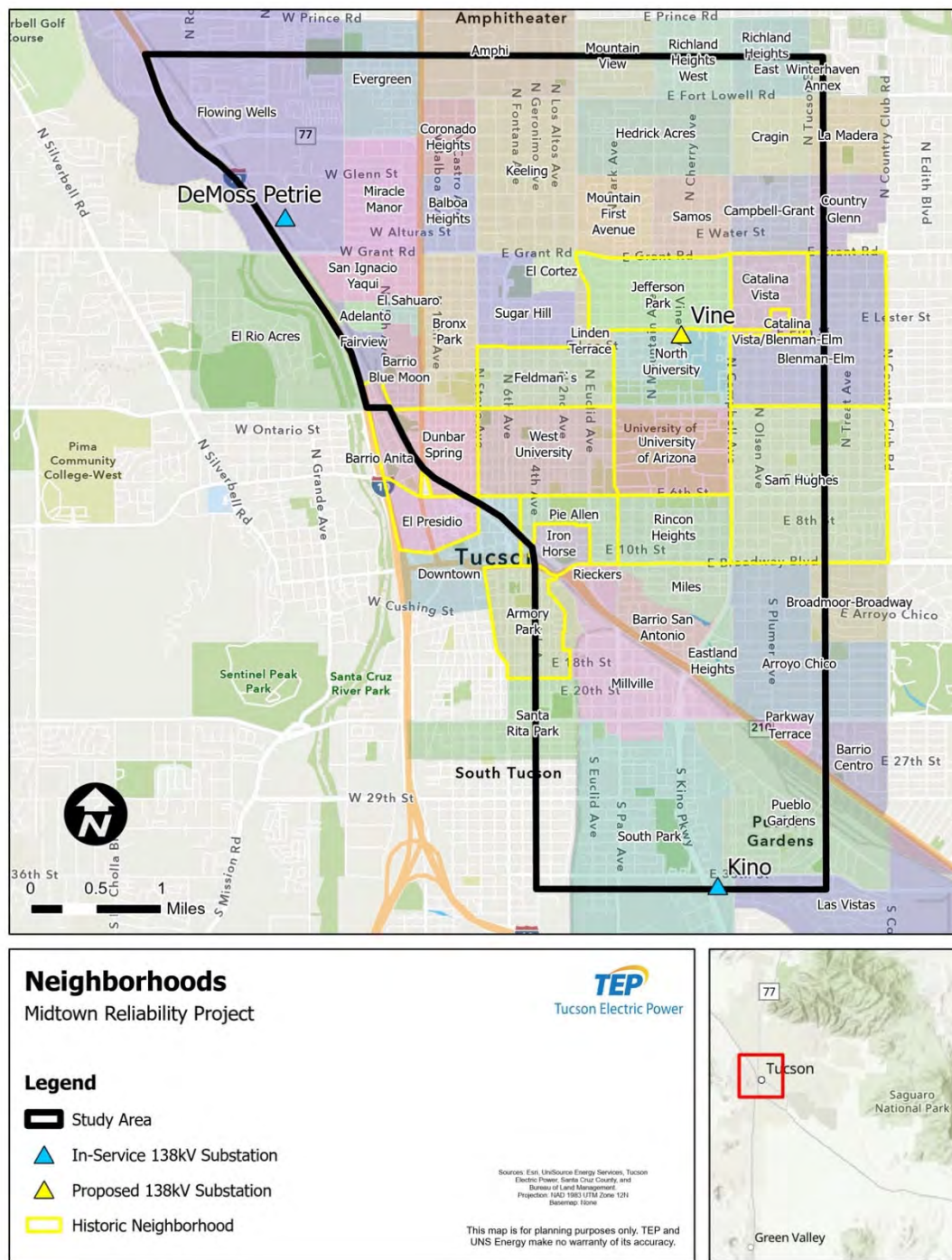


Figure 1. Project Area Map

The project will be presented in an application for a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Commission (ACC). This Strategic Outreach Plan describes the public involvement program designed to comply with the ACC expectations as well as TEP’s guidelines to obtain meaningful public participation.

Additionally, this plan fulfills the level of “involve” on the International Association for Public Participation (IAP2) Spectrum of Public Participation. The public participation level of “involve” is defined by IAP2 as: “To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.”

### **1.1 Outreach Guiding Principles**

For the Midtown Reliability Project, a strategic, responsive, dynamic and equitable process of outreach and communication is paramount to ensuring that all interested parties have access to project information, can submit comments and input about the project as well as hear how their input has been considered. This Strategic Outreach Plan has been developed to ensure an effective public outreach process is maintained based on the following guiding principles:

- Providing continuous public access to project information as relevant and available, such as public notifications, website, FAQs (Frequently Asked Questions), fact sheets, maps and public open house displays and presentations, among others.
- Providing comprehensive stakeholder outreach including informing and involving key agencies, government officials and community leaders throughout the project and receiving their comments and input.
- Providing various opportunities for public comment and input such as public open houses, comment forms at public open houses, online comment forms and project contacts via email and phone.
- Linking Strategic Outreach Plan activities to project milestones, technical activities and decision-making.
- Documenting and maintaining a record of all public comments and input in an accessible location such as the project website and available upon request.
- Providing accommodations to receive information and provide input from those with communication disabilities, mobility impairment, limited English proficiency and populations that are traditionally underserved. This would include public meeting venues that are easily accessible from public transportation and virtual meetings with technologies that enable captions for those who are deaf or hard of hearing and subtitles for language interpretation. Other reasonable accommodations can be made if requested with sufficient advance notice to TEP by calling 1-833-523-0887.
- Evaluating and adjusting the Strategic Outreach Plan periodically to ensure information is being disseminated through efficient and effective methods.
- Ensuring that all parties – including the public, stakeholders, customers, residents and TEP staff – are treated with respect in an appropriate, productive and safe manner in all communications including at meetings and open houses.

## 2. Outreach Purpose

The purpose of the Midtown Reliability Project Strategic Outreach Plan is to plan and facilitate a comprehensive public involvement program intended to inform the community about the project's purpose and need, goals, requirements and parameters and actively seek input and comments from the public for consideration and guidance in developing TEP's route evaluation criteria, route alternatives and proposed route for the new transmission line to include in the application for a Certificate of Environmental Compatibility (CEC).

Route evaluation criteria will be shared with, and added to by, elected officials, agencies, Neighborhood Working Group members and the public. These criteria may include, but are not limited to:

- existing and planned land uses
- scenic areas
- viewsheds
- wildlife
- historic and archaeological sites
- biological resources
- comprehensive environmental data
- impacts on low-income and minority populations
- FCC licensed communication sites
- proximity to sensitive receptors
- constructability data

Typically, a strategic outreach program that informs and educates the public greatly reduces the probability of project delays by resolving and addressing community concerns early. It also informs the project team about project challenges, obstacles, opportunities and alternatives to be considered. As well, the Strategic Outreach Plan public involvement program fulfills Arizona Corporation Commission (ACC) expectations and is consistent with TEP's guidelines to obtain meaningful public participation.

The following goals and objectives were developed to produce meaningful and applicable information from the public that will be reflected or incorporated where possible in the CEC application.

### **2.1 Goal 1: Facilitate Public Understanding of the Project**

#### Objectives:

- Provide information at multiple meetings and points of contact with elected officials, agencies, Neighborhood Working Groups, TEP customers and the public.



- Develop and evaluate effective informational materials that will describe the project and clarify the project purpose and need, requirements and parameters in plain language for layperson understanding available in both English and Spanish.
- Disseminate informational materials through existing TEP and agency communications channels.

## **2.2 Goal 2: Provide Opportunities for Comments and Input**

### Objectives:

- Develop a current email list of agency contact information for consistent notification about meetings and project updates. Notifications and meeting invitations can be sent directly via email or made by telephone.
- Develop a current email list of Advisory Group members' contact information for consistent notification about meetings and project updates. Notifications and meeting invitations can be sent directly via email or made by telephone.
- Develop a current email list of leadership at community organizations and social service agencies in the project area to notify traditionally underserved populations of public open houses and to provide informational materials.
- Actively gather agency, Advisory Group and public input and comments at meetings and open houses by providing comment forms in English and Spanish; posting an online comment form on the project website available in English and Spanish; and maintain a Community Tracking Database (CTD) to record public comments and TEP's responses to later provide feedback on how public input was considered in the final decision.

## **2.3 Goal 3: Maintain Accountability, Credibility and Accessibility of Project Team**




### Objectives:

- Ensure transparency in project planning and decision-making procedures.
- Post the CTD for public reference, such as on the project website and available by request to the project team.
- Provide a dedicated public telephone line for public questions and requests.
- Provide a dedicated email address for public questions and requests.
- Create a Contact Us form on the project webpage available in English and Spanish.

## **3. Outreach Stages**

The Strategic Outreach Plan includes a minimum of three stages of public outreach: (1) Information Sharing and Input Gathering, (2) Alternative Routes Identification and (3) Preferred Routes Comparison. These stages are outlined in relation to the project's overall phases shown




below. More than three rounds of briefings, meetings and open houses may be needed depending on the outcomes of the project team’s compatibility analysis.

PUBLIC OUTREACH STAGE	PROJECT PHASE
<p><b>Stage 1: Information Sharing and Criteria Input</b></p> <p><b>(2 rounds of outreach)</b></p> <ul style="list-style-type: none"> <li>Informing the Public on Project Parameters, Purpose and Need</li> <li>Gathering Input on Siting Evaluation Criteria</li> </ul> <p> Elected Officials and Agency Briefing</p> <p> Advisory Group Meeting <b>PLUS</b> Neighborhood Listening Tour</p> <p> Public Open House</p>	<p><b>Phase 1: Pre-Analysis</b></p> <ul style="list-style-type: none"> <li>Define and publicize the study area</li> <li>Consider opportunities and constraints</li> <li>Define the route evaluation criteria</li> <li>TEP conducts site visits to help apply criteria and evaluate segment options</li> </ul>



**Outcome: Preliminary Route Segments Identified**



PUBLIC OUTREACH STAGE	PROJECT PHASE
<p><b>Stage 2: Segments Evaluation</b></p> <p> Elected Officials and Agency Briefing</p> <p> Advisory Group Meeting</p> <p> Public Open House</p>	<p><b>Phase 2: Data Inventory</b></p> <ul style="list-style-type: none"> <li>TEP collects data for evaluation</li> </ul> <hr/> <p><b>Phase 3: Suitability Assessment</b></p> <ul style="list-style-type: none"> <li>Present how criteria was applied</li> <li>Analyze and consider additional input received on criteria application</li> </ul>



**Outcome: Refined Route Segments Identified**



PUBLIC OUTREACH STAGE	PROJECT PHASE
	<p style="text-align: center;"><b>Phase 4: Compatibility Analysis</b></p> <ul style="list-style-type: none"> <li>• Application of criteria to determine most acceptable overall routing alternatives, including proposed preferred route</li> </ul>



**Outcome: Route Alternatives Identified**



PUBLIC OUTREACH STAGE	PROJECT PHASE
<p><b>Stage 3: Alternative Routes Presentation</b></p> <ul style="list-style-type: none"> <li>• Show how public input for criteria was applied and receive public input on route alternatives</li> </ul> <div style="display: flex; flex-direction: column; gap: 10px;"> <div style="display: flex; align-items: center;"> <div style="background-color: #e67e22; border-radius: 50%; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center; margin-right: 5px;">SH</div> <div>Elected Officials and Agency Briefing</div> </div> <div style="display: flex; align-items: center;"> <div style="background-color: #27ae60; border-radius: 15px; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center; margin-right: 5px;">AG</div> <div>Advisory Group Meeting</div> </div> <div style="display: flex; align-items: center;"> <div style="background-color: #3498db; border-radius: 15px; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center; margin-right: 5px;">PIM</div> <div>Public Open House</div> </div> </div>	<p style="text-align: center;"><b>Phase 5: Concept Evaluation</b></p> <ul style="list-style-type: none"> <li>• Analyze and consider additional input received on route alternatives</li> <li>• File Certificate of Environmental Compatibility (CEC) Application with Arizona Corporation Commission (ACC)</li> </ul> <div style="display: flex; align-items: center; margin-top: 20px;"> <div style="background-color: #6b34a1; border-radius: 15px; width: 20px; height: 20px; display: flex; align-items: center; justify-content: center; margin-right: 5px;">PH</div> <div>Arizona Power Plant and Transmission Line Siting Committee hosts Public Hearing</div> </div>



**Outcome: ACC Decision on CEC Application**

Each outreach stage will have a briefing for elected officials, a briefing for agencies, a meeting for the Advisory Group and a public open house and/or meeting. The comments and input from the following groups are necessary and will be helpful in identifying line siting evaluation criteria and alternatives as well as questions, concerns, issues and preferences from all groups. Community knowledge will also be used to identify sensitive spaces such as historic sites or gathering places to determine alternative route options.

Comments and input will be sought from the following groups at every stage.

- Elected officials
- Agencies including government administration staff, representatives of K-12 schools, colleges, medical facilities, social service agencies and project area businesses

- Advisory Group members
- TEP customers
- The general public
- Other interested community members and groups

### **3.1 Outreach Stage 1: Information Sharing and Criteria Input**

The “Information Sharing and Criteria Input” stage coincides with the initial planning and siting project phase of "Pre-Analysis." This outreach stage refers to the process of sharing information about the project purpose and need with elected officials, agencies, Advisory Group members, TEP customers, the public and other interested community members and groups, and gathering their comments and input about potential issues, impacts and preferences. This phase will initiate an information exchange between the project team and these parties. During this phase, public involvement parameters, i.e., schedule, structure and ground rules, will be established to create productive idea exchanges for everyone involved.

This stage will consist of two rounds of outreach to these groups. Following the Stage 1 outreach activities, the project team will review and consider public input and concerns to further develop the initial evaluation criteria to be used during the project, which may be revised based on information obtained during the public involvement process. At the completion of Phase 1, TEP will have determined potential preliminary segments of the new transmission line route.

### **3.2 Outreach Stage 2: Segments Evaluation**

During the Segments Evaluation Stage, the project team will present how they used the opportunities and constraints identified from Project Phases 1 and 2 to identify potential route segments. They will also share how they used the evaluation criteria to understand the impacts of each potential segment to decide on which to keep as viable and which to eliminate from consideration. During Stage 2, the team will provide a briefing to elected officials and agencies on the routing development process based on their input.

The project team will then present updated project information and alternative route segments identified. TEP will encourage comments and input for further evaluation at this point. The project website will be updated, and updated informational materials will be disseminated through existing TEP communications channels. Comments and input will be gathered and used for Stage 3. TEP will share with elected officials, agencies and the Advisory Group their recommendations and hear input on these alternatives for consideration. The information will then be presented at a public meeting where the broader public has an opportunity to see the route segments being considered and share any other thoughts that may not have already been considered. The outcome of this process will be the identification of the most feasible route segments to pursue during Project Phase 4 and eventually the identification of feasible route alternatives.

### **3.3 Outreach Stage 3: Alternative Routes Presentation**

Stage 3 outreach will again include briefings with elected officials and agencies to share the alternative routes and the proposed preferred route. Following those meetings, TEP will present alternatives to the Advisory Group and then at a public open house. At each of these outreach meetings, TEP will consider any final input that might help improve the acceptability of the routes

under consideration. From the project process perspective, TEP will then submit its Certificate of Environmental Compatibility application. The Arizona Power Plant and Transmission Line Siting Committee will host a public hearing at the appropriate time to receive public comments on the application before making its recommendation on the application to the Arizona Corporation Commission.

### **3.4 Anticipated Strategic Outreach Plan Timeline**

#### **Outreach Stage 1:**

Elected Official Briefing #1	August 2023
Agency Briefing #1	August 2023
Neighborhood Listening Tour	August – October 2023
Public Open House #1	September 2023

Elected Official Briefing #2	October 2023
Agency Briefing #2	October 2023
Advisory Group #1	October 2023
Public Open House #2	November 2023
Advisory Group #2	November 2023

#### **Outreach Stage 2:**

Elected Official Briefing	January 2024
Agency Briefing	January 2024
Advisory Group	January 2024
Public Open House	February 2024

#### **Outreach Stage 3:**

Elected Official Briefing	March 2024
Agency Briefing	March 2024
Advisory Group	March 2024
Public Open House	April 2024

Hearing for Certificate of Environmental Compatibility	July 2024
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## **4. Activities**

The Midtown Reliability Project Strategic Outreach Plan has been designed to encourage public input and comments; provide opportunities for meaningful communication between the TEP project team, agencies, Advisory Group members, TEP customers and the public; and provide effective mechanisms to disseminate information and gather input.

The approach to public outreach will adapt throughout the project to ensure that public interests are being served; stakeholders and Advisory Group members are being informed; and public input and comments are provided to the project team and recorded.

At the onset, TEP will disseminate project information and express encouragement of public outreach to a broad audience that will include:

- Elected officials and government administration staff
- Stakeholders including property owners, representatives of K-12 schools, colleges, medical facilities, social service agencies and businesses in the project area
- Advisory Group members
- TEP customers
- The general public
- Other interested community members and groups

The email database for the first three bullets above will be continually populated to effectively provide informational updates, notifications and informational materials as interest grows throughout the process. TEP customers and project area residents will be added to the email list when they provide their contact information at outreach activities.

#### **4.1 Elected Official Briefings**

Providing proactive, informative and timely briefings to elected officials is vitally important to preserving the integrity of public outreach and government relations principles. Briefings for elected officials will be planned and conducted by the TEP Communications and Government Relations Department on an individualized basis via phone, virtual meeting, in person or other appropriate methods. The briefings are intended to provide credible, reliable information prior to agency, working group and public meetings or the dissemination of new or updated materials. Attendance and key input from each meeting will be documented and submitted as part of the CEC application.

#### **4.2 Agency Briefings**

Similar to briefings with elected officials, the TEP Communications and Government Relations Department will schedule an agency briefing during each of the public outreach stages to provide updates, briefings and/or specific project information. Individual meetings will be set up if requested or determined prudent. These communications will serve as an opportunity for vital agencies to learn about public input, project impacts and continue a strong working relationship with the TEP project team. Agencies would include representatives of K-12 schools, colleges, medical facilities, social service agencies and businesses within the project area. Attendance and key input from each meeting will be documented and submitted as part of the CEC application.

#### **4.3 Neighborhood Listening Tour**

As part of its Stage 1 outreach, TEP will also contact neighborhoods to offer to attend one of their upcoming neighborhood meetings to share a brief summary of the Midtown Reliability Project and its planned outreach. The major focus, though, will be to listen to their members' ideas and input regarding this project. Attendance and key input from each meeting will be documented and submitted as part of the CEC application.

#### **4.4 Advisory Group Meetings**

The Advisory Group will be a key source of information representing the desires of residential property owners in their respective neighborhoods for siting of the new transmission line as well as sharing updates and information on the project's development. They will preview and comment on options being considered by the project team that will guide the team in developing its recommendations to be presented to the public for further comments.

To create an Advisory Group that can effectively share information and productively express ideas, issues or concerns, the working group would ideally be kept to a maximum of 15 people, preferably with each representing a different neighborhood coalition from within the project area.

TEP acknowledges the valuable participation received from a Community Working Group (CWG) that worked on this project previously. During the first stage of outreach, TEP will contact former members of the CWG to update them on the new project and gather any comments that will be helpful to the new Advisory Group.

The Advisory Group would meet periodically during the project line siting. A third-party moderator will conduct the meetings and will ask participants to agree upon guidelines for how the Advisory Group can effectively engage on the project and ensure an understanding of the level of influence they will have on the outcome of the transmission line route design and the parameters within which the design must be developed. Attendance and key input from each meeting will be documented and submitted as part of the CEC application.

#### **4.5 Public Open Houses and Meetings**

The public outreach process will include public open houses and meetings at various public outreach stages to distribute information regarding the background, purpose and need, scope of project work and goals and objectives of the project. These public meetings are intended to inform, discuss project criteria and alternatives and seek public input and comments about the project.

Typically, an open house allows the public to view pre-recorded and or printed information about a project and speak to individual TEP representatives directly. In some cases, a group engagement process with a formal presentation and Q&A session makes sense. A third-party moderator will lay out recommended engagement guidelines for how the project team will address public questions and comments at the open house and seek attendee cooperation. Attendance and key input received during each meeting will be documented and submitted as part of the CEC application.

#### **4.6 Market Research**

During Stage 1 of outreach, an online survey will be developed to provide public preferences and concerns during the criteria development process. The survey link will be included in the project newsletter sent to residents and businesses within the project notification area and will be made available online and to the general public through the project website, TEP social media and customer notifications as feasible. Survey takers would be self-selected; therefore, the survey cannot be considered statistically valid, but the input would still be of value. An analysis and major outcomes will be submitted as part of the CEC application.

#### **4.7 Bilingual Community Outreach**

The multicultural community outreach element will include the availability of translated informational materials posted on the project website and provided at the public open houses. Additionally, a Spanish interpreter and Spanish-speaking members of the public outreach staff will be present at each open house.

#### **4.8 Comment Management**

The Strategic Outreach Plan process requires consistent procedures for recording and responding to public comments and for relaying public comments to key project team members and decision-makers.

A standard record-of-communication Community Tracking Database (CTD) will be used to document the type of communication; actions taken; contact information; verbal comments from meetings and open houses; comments made on the website and on comment forms at meetings and open houses; and comments directed to the project team through any method. This will ensure efficient, organized, transparent and thorough record-keeping. The CTD will be updated at every phase of the public involvement period and will become part of a permanent administrative record. It can also be set up as a searchable database. This would allow the public to search for specific keywords on what is of interest to them, which will help promote project understanding and status on input already submitted.

### **5. Information Methods and Materials**

Information about the project and Strategic Outreach Plan activities will be disseminated through numerous TEP communications channels such as its email, website, social media platforms and newsletters. At 2024 open houses, registration will also ask attendees about how they heard about the event with the advertising options listed for quick reference plus an option for “other.”

#### **5.1 Informational Materials**

Initial materials will be created at the project's onset and updated throughout the project with current information. Informational materials created by the project team will include meeting summaries, fact sheets, FAQs, newsletters, bilingual public meetings notification ads and maps, and other information needed as identified during the public involvement period. Content should be clear and concise to be a source of reliable and understandable information for all audiences.

Flyers and notifications will also be distributed and posted in ward offices and community centers located within the project area.

#### **5.2 Website**

The project website is an integral part of information dissemination, accessibility and transparency. It is intended to be user-friendly and interactive to allow for an efficient means of communicating project information and gathering public comments and input. The new website will be available prior to public notifications of the project and public involvement activities. It will be designed and consistently maintained to provide up-to-date project information as described above, plus public meeting presentations and summaries. The website will include a comment form available with Spanish translation. All comments will be entered into the Community Tracking Database (CTD).



A Spanish language web page, linked from the main project webpage, will also be available.

### **5.3 Social Media Ads**

An introduction about the Midtown Reliability Project and milestone project updates, with links to the project website, will be posted to TEP social media sites as the project team deems appropriate within the TEP social media content parameters.

A paid social media advertising campaign will be developed to help increase awareness and attendance at public open houses and hearing planned in 2024.

The project team will set up two campaigns, one English and one Spanish, and will create ads for both while directing them based on members of the public that have opted into Spanish.

Recommendations will be based on objective criteria, while balancing the percentage of the target market reached and the frequency at which the target market would be exposed to the advertising, all within the set budget.

Initial Recommendations:

- Schedule: Three weeks prior and leading up to the event dates
- Potential Reach: 15-20% of available target area
- Frequency Goal: 4x/day
- Targeting: Midtown Reliability Project study area

The project team will track impressions and engagement rates to help measure the effectiveness of organic and paid social media posts. It will also measure frequency, reach, click-through rates (CTR) and cost per click (CPC) for paid social media ads.

### **5.4 Telephone: 1-833-523-0887**

A toll-free telephone information line with English and Spanish options has been established for the project. The automated message will provide basic project information. Callers are encouraged to leave a message requesting more information or a return call. The telephone number is 1-833-523-0887; it will be publicized in newsletters, on the project website and in public notifications. The information line voicemail will be checked regularly and all messages that require a response will be disseminated to the appropriate project team member(s). Comments received in voicemail and TEP response will be documented in the CTD.

### **5.5 Email: [midtownreliability@tep.com](mailto:midtownreliability@tep.com)**

A dedicated email address has been established for the project with an automated response indicating a reply will be made by the end of the next business day. All emails will be disseminated to the appropriate project team member(s). All comments that come through email and responses will be documented in the CTD.

### **5.6 Signage**

The project team will use temporary yard signage placed throughout the project area, similar to election signs, to provide notifications on public open houses.

## **5.7 Advertisements**

Print advertisements highlighting the 2024 project open houses will be created and placed in the local newspapers, Arizona Daily Star (English) and Arizona Bilingual (Spanish). The Arizona Daily Star has a daily circulation of almost 40,000 and the Arizona Bilingual Newspaper connects readers every month through 25,000 printed editions.

## **6. Conclusion**

At the conclusion of the Strategic Outreach Plan period, the project team will have actively sought comments and input about the Midtown Reliability Project from a broad range of people who have interest in and may be impacted by the Midtown Reliability Project. Through print and online informational materials, meetings and open houses, and thorough record-keeping of public comments and TEP responses, the project team will have comprehensive information to consider the most viable route of the transmission line.

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-2**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-2.1**

#### **Master Stakeholder List**

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**Midtown Reliability Project Master Stakeholder List**

<b>ORGANIZATION</b>	<b>TITLE</b>	<b>FIRST NAME</b>	<b>LAST NAME</b>
<b>PIMA COUNTY</b>			
Pima County	County Administrator	Jan	Leshar
Pima County	Administrator Chief of Staff	Monica	Perez
Pima County	Director, Department of Transportation	Kathryn	Skinner
Pima County	Director, Development Services	Carla	Blackwell
Pima County	Civil Engineer	Tom	Porter
Pima County	Regional Wastewater Reclamation Department	Kent	McRae
Pima County	Sustainability and Conservation	Sherry	Ruther
Pima County	County Administrator	Jan	Leshar
Pima County	Deputy County Administrator	Carmine	DeBonis, JR
Pima County	Senior Advisor to County Administrator	Diana	Durazo
Pima County	Facilities Director	Tony	Cisneros
Pima County	Energy Manager	Eric	Wilson
Pima County	Facilities, Construction, and Contracts Manager	Julie	Parizek
Pima County	Deputy Director, Development Services	Lauren	Ortega
Pima County	Sustainability Programs Coordinator	Jody	Dean
Pima County	Deputy Director, Department of Transportation	Paul	Casertano
Pima County		Aristidis	Stefanakis
Pima County	Natural Resources, Parks, and Recreation	Karen	Simms
Pima County	Regional Flood Control District	Eric	Shepp
Pima County	Project Design & Construction Division	Martyn	Klell
Pima County	Deputy Director, Regional Wastewater Reclamation	Jaime	Rivera
Pima County	Director, Regional Wastewater Reclamation	Jackson	Jenkins
Pima County	Director, Economic Development	Heath	Vescovi-Chiordi
Pima County	Tucson-Pima County Historical Commission	Terry	Majewski
<b>CITY OF TUCSON</b>			
City of Tucson	Mayor's Climate and Sustainability Advisor	Fatima	Luna
City of Tucson	Principal Planner	Nicholas	Martell
City of Tucson	City Manager	Michael	Ortega
City of Tucson	Historic Preservation Officer	Jodie	Brown
City of Tucson	Director, Transportation	Sam	Credio
City of Tucson	Energy Manager	Michael	Catanzaro
City of Tucson	Energy Office Inbox		
City of Tucson	Energy Office Analyst	Mandi	Leatherland
City of Tucson	Planning and Development Services Director	Kristina	Swallow
City of Tucson	Planning and Development Services Department	Elisa	Hamblin
City of Tucson	Parks & Recreation	Brent	Dennis
Tucson Water	Civil Engineer	John	Van Winkle
Tucson Water	Engineering Manager, System Planning	Kathryn	Gerber
Tucson Water	Public Information and Conservation Superintendent	James	MacAdam
City of Tucson	Tucson Historic Preservation Foundation	Demion	Clinco
City of Tucson	Public Information Officer, Transportation	Mike	Graham
City of Tucson	Planning and Development Services Department	Kristina	Swallow
City of Tucson	Zoning Administrator	Elisa	Hamblin
City of Tucson	Utility Coordinator./Dept. of Transportation	Nick	Gasior
City of Tucson	Deputy Director, Housing and Community Development	Liz	Morales
City of Tucson	Director, Parks and Recreation	Lara	Hamwey
City of Tucson	Principal Planner	John	Beall

**Midtown Reliability Project Master Stakeholder List**

<b>ORGANIZATION</b>	<b>TITLE</b>	<b>FIRST NAME</b>	<b>LAST NAME</b>
city of Tucson	Housing and Community Development, Planner	Jeremiah	Dean
city of Tucson	Transportation Administrator	Jorge	Riveros
City of Tucson	Executive Assistant to City Manager	Andrea	Flores
City of Tucson	Manager of Code Development	Dan	Bursuck
Tucson Water	Director, Tucson Water	John	Kmiec
Tucson Water	Civil Engineer	Dean	Trammel
City of Tucson	Manager, Strategic Planning and Community Engagement (SPACE)	Allison	Miller
Tucson Water		Scott	Schladweiler
<b>MISC./OTHER</b>			
Arizona Dept. of Transportation	District Engineer	Rod	Lane
Arizona Department of Transportation	Utility Engineering Coordinator	Priscilla	Thompson
Banner Health	Area Director - Facilities Operations	Herman	Johannesmeyer
Banner Health	Design & Construction Project Executive Senior Director	Steve	Eiss
Banner Health	Mechanical Engineer	Emanuel	Toth
Banner Health	Design & Construction Project Executive Senior Manager	Kristian	Watkins
Banner Health	Design & Construction Project Executive Senior Consultant	Dan	Dupaix
Banner Health	Facilities Ops, Senior Manager	Larry	Gorski
Banner Health	Facilities Ops, Senior Manager	Todd	Mencke
Banner Health	Operations Managers	Phillip	Dague
DMAFB-355 CES/CENP	Base Community Planner	Bonnie Kacey	Carter
Metropolitan Pima Alliance	Executive Director	Allyson	Karpuk
Union Pacific Railroad		Bradley	Givens
Union Pacific Railroad	Manager Electrical Design	Josh	Sauer
Union Pacific Railroad	Director of Terminal Operations	Gunner	Fowler
University of Arizona	Assistant Vice President	Christopher	Kopach
University of Arizona		Mark	St Onge
University of Arizona	Vice President Communications	Chris	Sigurdson
University of Arizona	Associate Vice President Communications	Pam	Scott
Pima Association of Governments	Communications Director	Sheila	Storm
Southwest Gas	ROW Agent	Steve	Sousa
Southwest Gas		Hector	Rivas Cabrera
Southwest Gas		Randy	Cheney
TAA	VP/Chief Financial Officer	John "Dutch"	Voorhees
TAA	Director of Properties and Concessions	Emin	Aydin



**Midtown Reliability Project Master Stakeholder List**

<b>ORGANIZATION</b>	<b>TITLE</b>	<b>FIRST NAME</b>	<b>LAST NAME</b>
TAA	Sustainability Manager	Becca	Cammack
TAA	Manager of Planning	Scott	Robidoux
Tucson-Pima County Historical Commission	Commission Chair	Terry	Majewski
Tucson-Pima County Historical Commission	Chair Transportation Subcommittee TPCHC	Carlos	Lozano
Southern Arizona Home Builders Association (SAHBA)	President & CEO	David	Godlewski
Tucson Association of Realtors	CEO	Judy	Lowe
Tucson Metro Chamber of Commerce	President & CEO	Michael	Guymon
Tucson Metro Chamber of Commerce	Business Advocacy Specialist	Stephanie	Spencer
Tucson Metro Chamber of Commerce	Vice President of Business Advocacy	Zach	Yentzer
Tucson Hispanic Chamber of Commerce	President & CEO	Rob	Elias

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-2.2**

#### **Elected Officials List**

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**Midtown Reliability Project  
Elected Officials List**

<b>ORGANIZATION</b>	<b>TITLE</b>	<b>FIRST NAME</b>	<b>LAST NAME</b>
<b>PIMA COUNTY</b>			
Pima County	Supervisor, District 2	Matt	Heinz
Pima County	Chief of Staff, District 2	David	Higuera
	Supervisor, District 3	Sylvia	Lee
Pima County	Chief of Staff, District 3	Maria	Klucarova
Pima County	Supervisor, District 5, Chair	Adelita	Grijalva
Pima County	Chief of Staff, District 5	Keith	Bagwell
<b>CITY OF TUCSON</b>			
City of Tucson	Mayor	Regina	Romero
City of Tucson	Mayor's Chief of Staff	Charlene	Mendoza
City of Tucson - Ward 1	Councilmember, Ward 1	Lane	Santa Cruz
City of Tucson - Ward 1	Ward 1, Comms & Policy Director	Antonio	Ramirez
City of Tucson - Ward 3	Councilmember, Ward 3	Kevin	Dahl
City of Tucson - Ward 3	Ward 3, Chief of Staff	Katie	Bolger
City of Tucson - Ward 5	Councilmember, Ward 5	Richard	Fimbres
City of Tucson - Ward 5	Chief of Staff, Ward 5	Lupita	Robles
City of Tucson - Ward 6	Councilmember, Ward 6	Steve C.	Kozachik
City of Tucson - Ward 6	Ward 6, Chief of Staff	Ann	Charles
City of South Tucson	Mayor	Paul	Diaz
City of South Tucson	Vice Mayor	Herman	Lopez
City of South Tucson	Councilmember	Cesar	Aguirre
City of South Tucson	Councilmember	Anita	Romero
City of South Tucson	Councilmember	Brian	Flagg
City of South Tucson	Councilmember (Acting Mayor)	Rita	Rogers
City of South Tucson	Council Member	Roxanna	Valenzuela
City of South Tucson	Interim City Manager	Veronica	Moreno
<b>State Elected Officials and Staff</b>			
Arizona Governor's Office	Governor Katie Hobbs	Marisol	Flores Aguirre
Arizona Senator	District 18	Priya	Sundareshan
Arizona Senator	District 20	Sally Ann	Gonzales
Arizona Senator	District 21	Rosanna	Gabaldón

**Midtown Reliability Project  
Elected Officials List**

<b>ORGANIZATION</b>	<b>TITLE</b>	<b>FIRST NAME</b>	<b>LAST NAME</b>
Arizona Representative	District 18	Christopher	Mathis
Arizona Representative	District 18	Nancy	Gutierrez
Arizona Representative	District 20	Betty	Villegas
Arizona Representative	District 20	Alma	Hernandez
Arizona Representative	District 21	Consuelo	Hernandez
Arizona Representative	District 21	Stephanie	Stahl Hamilton
<b>US Elected Officials and Staff</b>			
US Senate	Kyrsten Sinema	Troy	Kimball
US Senate	Mark Kelly	Karla	Avalos
US House	Juan Ciscomani/District 6	Becky	Freeman
US House	Raul Grijalva/ District 7	Ruben	Reyes

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-2.3**

#### **Neighborhood Advisory Group Members**

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**Midtown Reliability Project  
Neighborhood Advisory Group Members**

**Exhibit J-2.3**

<b>Neighborhood</b>	<b>Title/Note</b>	<b>First Name</b>	<b>Last Name</b>
Armory Park	Vice President	Maurice	Roberts
Arroyo Chico	President	Andrew	Christopher
Blenman Elm	Representative	Randy	Hotchkins
Broadmoor/Broadway	Representative	Meredith	Aronson
Bronx Park	President	Kristina	Scholz
Catalina Vista	Representative	Hank	Bogen
Country-Glenn	President	Sky	Dominguez
Dunbar Spring	Representative	Deborah	Tigue
Feldman's	President	Logan	Havens
Iron Horse	Representative	Dan	Dempsey
Jefferson Park	President	Colleen	Nichols
Keeling	Representative	Jeanne	Allen
Miles	President	Greg	Clark
North University	Vice President	Aaron	Paxton
Palo Verde	Representative	Paula	Chronister
Richland Heights East	Vice President	Jim	Cummins
Rincon Heights	Representative	Stacia	Reeves
Sam Hughes	Representative	Nancy	DeFeo
Samos	President	Barbara	Miller
South Park	President	Sara	O'Neil
West University	President	Chris	Gans

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-2.4**

#### **Tribal Outreach List**

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**Midtown Reliability Project  
Tribal Outreach List**

<b>Tribe</b>	<b>Name</b>	<b>Title</b>
Pueblo of Zuni	Governor Arden Kucate	Governor
Pueblo of Zuni	Dr. Kurt Dongoske	Director, Tribal Historic Preservation Officer
Tohono O'odham Nation	Mr. Jefford Francisco	Cultural Resource Specialist
Tohono O'odham Nation	Mr. Peter Steere	Tribal Historic Preservation Officer
Ak-Chin Indian Community	Mr. Robert Miguel, Chairman	Chairman
Ak-Chin Indian Community	Ms. Elaine Peters	Director
Gila River Indian Community	Governor Stephen Roe Lewis	Governor
Gila River Indian Community	Barnaby V. Lewis	Tribal Historic Preservation Officer
Gila River Indian Community	M. Kyle Woodson	Director
Salt River Pima-Maricopa Indian Community	President Martin Harvier	President
Salt River Pima-Maricopa Indian Community	Shane Anton	Tribal Historic Preservation Officer
White Mountain Apache Tribe	Chairman Kasey Velasquez	Chairman
White Mountain Apache Tribe	Mr. Mark Altaha	Tribal Historic Preservation Officer
Mescalero Apache Tribe	Mr. Eddie Martinez, President	President
Mescalero Apache Tribe	Ms. Holly Houghten	Tribal Historic Preservation Officer
Yavapai-Apache Nation	Mr. Chris Coder	Tribal Archaeologist
Tonto Apache Tribe	Mr. Calvin Johnson, Chairman	Chairman
Tonto Apache Tribe	Ms. Jeri De Cola	Cultural & NAGPRA Representative
Pascua Yaqui Tribe	Mr. Peter Yucupicio, Chairman	Chairman
Pascua Yaqui Tribe	Mr. Karl A. Hoerig, Ph.D.	Tribal Historic Preservation Officer
Hopi Tribe	Timothy L. Nuvangyaoma, Chairman	Chairman
Hopi Tribe	Stewart Koyiyumptewa	Tribal Historic Preservation Officer

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-3**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-3.1**

#### **Agency Briefing #1 Presentation**

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# Midtown Reliability Project

CLARK BRYNER – PRINCIPAL PROGRAM MANAGER, TRANSMISSION LINE SITING

## AGENCY BRIEFING

August 10, 2023

1

### Invited Representatives:

- Arizona Department of Transportation (ADOT)
- Banner Health
- Davis-Monthan Air Force Base
- Kinder Morgan/ El Paso Natural Gas
- Metropolitan Pima Alliance
- Pima Association of Governments
- Southwest Gas
- THRIVE in the 05
- Tucson Airport Authority
- Union Pacific Railroad
- University of Arizona
- Pima County
  - County Administrator's Office
  - Department of Transportation
  - Development Services
  - Energy
  - Facilities
  - Natural Resources Parks and Recreation
  - Regional Wastewater Reclamation
  - Sustainability and Conservation
- City of Tucson
  - City Manager
  - Climate and Sustainability
  - Department of Transportation
  - Energy
  - Historic Preservation
  - Parks and Recreation
  - Planning and Development Services
  - Public Information
  - Tucson Water

### INTRODUCTIONS

Please type into the chat

- Name
- Organization
- Title/Role

2

### AGENDA

1. Project Overview
2. Project Need
3. Project Benefits
4. Required Approvals
5. Project Schedule
6. Planning and Siting Process and Timeline
7. Next Step
8. Questions and Answers

3

## Project Overview

### Components of the Midtown Reliability Project

- Vine Substation
- 138 kilovolt (kV) Transmission Line
- Distribution System Upgrades
- Retirement of Aging Assets

4

## Vine Substation

- 1.6 acre site at Vine Avenue between Lee Street & Chauncey Lane
- Gas Insulated Substation (GIS)

Tucson Substation, an air rated GIS and A Insulated Substation.

5


## 138 kV Transmission Line

### Transmission Line Specifications


- Single circuit 138kV
- Tubular steel monopole structures (weathering steel is standard)
- Typical structure heights ~75 feet
- Span length of ~600 feet (distance between poles)
- Aluminum conductor, with a non-specular finish ~1 inch in diameter

6

## Distribution System Upgrades




- Convert 4 kV distribution circuits to 13.8 kV circuits
- Replace and upgrade service transformers
- Replace existing poles, where merited




Existing 4kV distribution circuit on infrastructure at 4<sup>th</sup> St. and 9<sup>th</sup> Ave.

7

## Retirement of Aging Assets




- Replace aging wood distribution poles and transformers
- Retire up to eight 46 kV Substations
- Retire approximately 19 miles of 46 kV sub-transmission lines



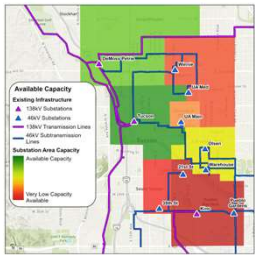
Existing 46kV system.

8

## Why is this project needed?




- Existing system was designed to serve yesterday's needs
- Increased energy demand
- Aging equipment



Available system capacity.

9

## What are the benefits of the project?



- Improved electric reliability
- Greater capacity for growing energy needs
- Greater capacity for customer-owned energy systems
- Comparable cost, greater efficiency
- Improved service citywide
- Support for economic growth and a healthy community

10

## Required Approvals



**Vine Substation**

- Special Exception Land Use Permit (City of Tucson)

**138 kV Transmission Line**


- Certificate of Environmental Compatibility (Arizona Corporation Commission)

**Distribution System Upgrades & Retirement of Aging Assets**

- No approvals, but dependent on new substation and transmission line

11

## Project Schedule\*



- Q3 '23-Q2 '24 – Transmission Line Planning and Siting
- Q2 2024 – CEC Application Submittal
- Q3 2024 – Line Siting Hearing
- Q3 2024 – ACC Open Meeting
- Q4 2024 – Vine Substation SELUP Application Submittal
- Q1 2025 – Zoning Examiner Hearing
- Q2 2027 – Transmission Line/Vine Substation In-Service
- 2027-2037 – Distribution System Upgrades and 46kV Retirements

\* Target schedule, subject to change

12



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### Next Steps

**Public Open House / Meeting**

September 21, 2023  
6:00 - 8:00pm

Doubletree - Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

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### More Project Information

For more project information please visit the project webpage:

[www.tep.com/midtown](http://www.tep.com/midtown)

Here, you will find:

- Project details
- A print copy of this presentation
- Frequently asked questions & answers

15

### How to Comment

- Mail a comment form or a letter to:
  - P.O. Box 711
  - ATTN: Midtown Reliability
  - Mail Stop CB200
  - Tucson, AZ 85701-0711
- Send comments to [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- Visit the project webpage and fill out an online comment form
- Call 1-833-523-0887 and leave a voicemail message

16

### Q&A Session

Please use the raise hand feature in MS Teams

or

Type your question into the chat

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# **Application for a Certificate of Environmental Compatibility**


## **Midtown Reliability Project**

### **Exhibit J-3.2**

#### **Agency Briefing #2 Presentation**

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**Midtown Reliability Project** 

CLARK BRYNER – PRINCIPAL PROGRAM MANAGER, TRANSMISSION LINE SITING

**AGENCY BRIEFING**

October 19, 2023

  
Tucson Electric Power

1

**INTRODUCTIONS**

Please type into the chat

- Name
- Organization
- Title/Role

**Invited Representatives:**

- Arizona Department of Transportation (ADOT)
- Banner Health
- Davis-Monthan Air Force Base
- Metropolitan Pima Alliance
- Pima Association of Governments
- THRIVE in the 05
- Tucson Airport Authority
- Tucson-Pima County Historical Commission
- Union Pacific Railroad
- University of Arizona
- Pima County
  - County Administrator's Office
  - Department of Transportation
  - Development Services
  - Energy
  - Facilities
  - Natural Resources Parks and Recreation
  - Regional Wastewater Reclamation
  - Sustainability and Conservation
- City of Tucson
  - City Manager
  - Climate and Sustainability
  - Department of Transportation
  - Energy
  - Historic Preservation
  - Parks and Recreation
  - Planning and Development Services
  - Public Information
  - Tucson Water




2

**AGENDA**

1. Project Overview
2. Required Approvals
3. Planning and Siting Process
4. Evaluation Criteria and Survey Results
5. Next Steps
6. Project Schedule
7. Questions and Answers




3

**Project Overview** 

**Components of the Midtown Reliability Project**

- Vine Substation
- 138 kilovolt (kV) Transmission Line
- Distribution System Upgrades
- Retirement of Aging Assets



4

**Required Approvals** 

**138 kV Transmission Line**

- Certificate of Environmental Compatibility (Arizona Corporation Commission)

**Vine Substation**

- Special Exception Land Use Permit (City of Tucson)

**Distribution System Upgrades & Retirement of Aging Assets**

- No approvals, but dependent on new substation and transmission line

5

**Planning and Siting Process and Timeline** 



**Phase 1: Pre-Analysis** (July – November 2023)

**Phase 2: Data Inventory** (July – November 2023)

**Phase 3: Suitability Assessment** (November 2023 – February 2024)

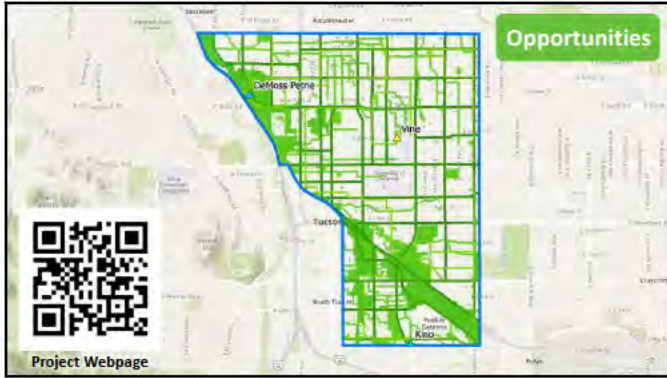
**Phase 4: Compatibility Analysis** (February – March 2024)

**Phase 5: Concept Evaluation** (March – July 2024)

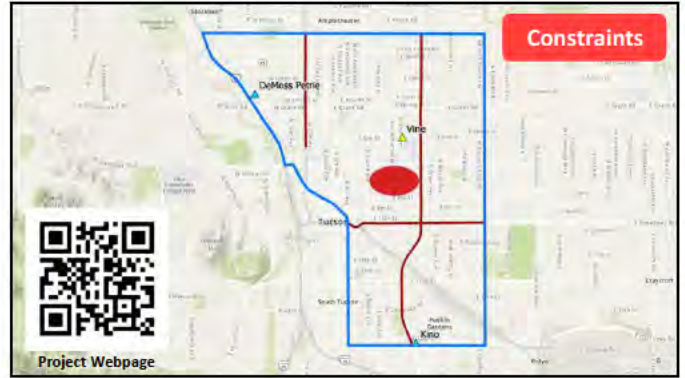
**OUTREACH**

- Neighborhood Listening Sessions
- Neighborhood Advisory Group
- Public Open House
- Elected Official Briefings
- Agency Briefings

6




7



8


### Project Criteria Survey - Results



- Open Aug 31 through Oct 15
- Sent specific link by email to ~55,000 customers in the project notification area
- Available anonymously online
- 2,792 participants
  - 2,566 from email
  - 228 from anonymous link on project webpage

9

### Project Criteria Survey - Results




**Survey Question**  
In your opinion, which criteria are most important in considering the route of the proposed transmission line for the Midtown Reliability Project? Select up to TWO (2).

**Most Important Criteria to Consider**

Criteria	Number of Responses
Impact on low-income and/or disadvantaged communities	~14,000
Use of transmission line corridors when available to avoid new corridors	~13,000
Reserve capacity within service area needed within the transmission corridor	~12,000
Ability to restore service if the transmission line	~11,000
Industry practices and height/spacing subject to the proposed project	~10,000
Impact on trees and/or landscaped areas	~8,000

10

### Project Criteria Survey - Results




**Survey Question**  
If there are other criteria you would like TEP to consider, please share your suggestion(s) in the box below

**Other Criteria to Consider:**

- Health and Safety
- Reliability and Maintenance
- Transit Impacts – Pedestrian, Public Transit, and Traffic
- Use of Existing Utility Corridors
- Avoidance of Gateway Corridors
- Impact on Native Land Uses
- Impact on Native Lands
- Impact on Water
- Length of the Project
- Overall Environmental Impact
- RFI/Communications Interference

11

### Project Criteria Survey - Results



**Survey Question**  
Please indicate your preference for pole height and number of poles per mile

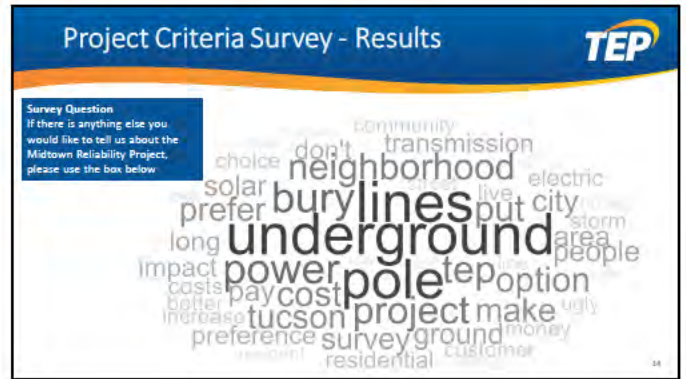
**Preference for Pole Height**

Pole Height Preference	Number of Responses
taller poles provide better spacing between poles and better support for future growth	~14,000
shorter poles	~8,000
taller poles provide better spacing between poles and better support for future growth	~4,000

12



13



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### ACC – Policy on Underground Transmission

The Commission does not have jurisdiction over the undergrounding of electric transmission lines. A.R.S. § 40-360(10).

Installing electric transmission lines underground is much more expensive than building them above ground. Underground transmission lines also can be more costly and challenging to maintain and repair.

As a general matter, utilities under the Commission's jurisdiction should avoid incurring these higher costs unless underground installation of a transmission line is necessary for reliability or safety purposes, or to satisfy other prudent operational needs. Installing a transmission line underground for other reasons, such as stakeholders' preferences, would add unnecessarily to costs recovered through rates.

Third parties, including cities, customers, and neighborhood groups, seeking to fund the underground construction of a transmission line may do so, among other ways, by forming an improvement district for underground utilities as provided in A.R.S. § 48-620 et. seq.

Docket - ALS-00000A-22-0320

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- ### Proposed Evaluation Criteria
1. Impact on low-income and/or disadvantaged communities.
  2. Cost of transmission line construction, which will be recovered through electric bills.
  3. Sensitive plant and wildlife species and/or habitat within the transmission line corridor.
  4. Residential properties adjacent to transmission lines.
  5. Historic properties and neighborhoods adjacent to the transmission line.
  6. Impact on views near transmission lines.
    - Impact on the total environment
    - Noise emission levels and interference with communication signals
    - Existing development plans
    - Engineering feasibility and challenges
    - Compliance with applicable ordinances, master plans and regulations
    - Health and safety impacts
    - Transit Impacts (Pedestrian, Public Transit, Traffic)
    - Use of existing utility corridors
    - Impact on native lands
- \* Identified, in part, through comments on past Kino-DMP Project  
 † Required per ARS 40-360.06

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### Next Steps

Public/Stakeholder Input	Public Open House / Meeting
<ul style="list-style-type: none"> <li>• Opportunities and constraints</li> <li>• Route evaluation criteria</li> </ul>	November 16, 2023 6:00 – 8:00pm  Doubletree – Reid Park 445 S Alvernon Way Tucson, AZ 85711

**Develop preliminary segments**

17

- ### Project Schedule\*
- Q3 '23-Q2 '24 – Transmission Line Planning and Siting
  - Q2 2024 – CEC Application Submittal
  - Q3 2024 – Line Siting Hearing
  - Q3 2024 – ACC Open Meeting
  - Q4 2024 – Vine Substation SELUP Application Submittal
  - Q1 2025 – Zoning Examiner Hearing
  - Q2 2027 – Transmission Line/Vine Substation In-Service
  - 2027-2037 – Distribution System Upgrades and 46kV Retirements
- \* Target schedule, subject to change

18

## More Project Information

For more project information please visit the project webpage:

**[www.tep.com/midtown](http://www.tep.com/midtown)**

Here, you will find:

- Project details
- A print copy of this presentation
- Frequently asked questions & answers



19

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## How to Comment

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  - P.O. Box 711
  - ATTN: Midtown Reliability
  - Mail Stop CB200
  - Tucson, AZ 85701-0711
- Send comments to [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- Visit the project webpage and fill out an online comment form
- Call 1-833-523-0887 and leave a voicemail message

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20

## Q&A Session



Please use the raise hand feature in MS Teams

or

Type your question into the chat

21

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-3.3**

#### **Agency Briefing #3 Presentation**

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# Midtown Reliability Project

CLARK BRYNER –MANAGER, TRANSMISSION LINE SITING

## AGENCY BRIEFING

January 10, 2024

1

## Invited Representatives:

- Arizona Department of Transportation (ADOT)
- Banner Health
- Davis-Monthan Air Force Base
- Metropolitan Pima Alliance
- Pima Association of Governments
- Southern Arizona Home Builders Association
- THRIVE in the 05
- Tucson Airport Authority
- Tucson Association of Realtors
- Tucson Metro Chamber of Commerce
- Tucson-Pima County Historical Commission
- Union Pacific Railroad
- University of Arizona

- Pima County
  - County Administrator's Office
  - Department of Transportation
  - Development Services
  - Energy
  - Facilities
  - Natural Resources Parks and Recreation
  - Regional Wastewater Reclamation
  - Sustainability and Conservation
- City of Tucson
  - City Manager's Office
  - Climate and Sustainability
  - Department of Transportation and Mobility
  - Energy
  - Historic Preservation
  - Parks and Recreation
  - Planning and Development Services
  - Public Information
  - Tucson Water

INTRODUCTIONS

Please type into the chat

- Name
- Organization
- Title/Role

2

## AGENDA

1. Project Overview
2. Required Approvals
3. Planning and Siting Process
4. Suitability Assessment
5. Preliminary Photo Simulations
6. Next Steps
7. Project Schedule
8. Questions and Answers

3

## Project Overview

### Components of the Midtown Reliability Project

- Vine Substation
- 138 kilovolt (kV) Transmission Line
- Distribution System Upgrades
- Retirement of Aging Assets

4

## Required Approvals

### 138 kV Transmission Line

- Certificate of Environmental Compatibility (Arizona Corporation Commission)

### Vine Substation

- Special Exception Land Use Permit (City of Tucson)

### Distribution System Upgrades & Retirement of Aging Assets

- No approvals, but dependent on new substation and transmission line

5

## Planning and Siting Process

```

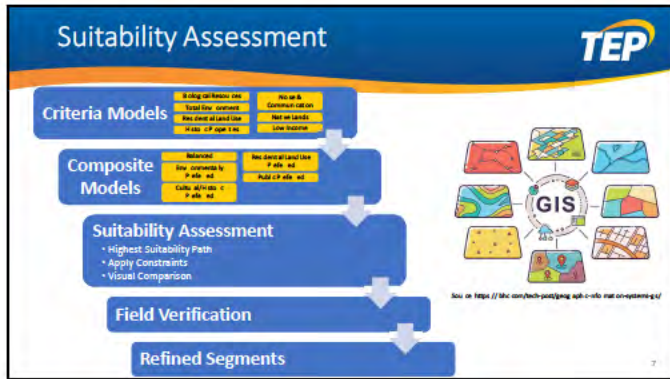
    graph TD
        P1[Phase 1: Pre-Analysis] --> P2[Phase 2: Data Inventory]
        P2 --> P3[Phase 3: Suitability Assessment]
        P3 --> P4[Phase 4: Compatibility Analysis]
        P4 --> P5[Phase 5: Concept Evaluation]
    
```

- Phase 1: Pre-Analysis (July – November 2023)
- Phase 2: Data Inventory (July – November 2023)
- Phase 3: Suitability Assessment (November 2023 – February 2024)
- Phase 4: Compatibility Analysis (February – March 2024)
- Phase 5: Concept Evaluation (March – July 2024)

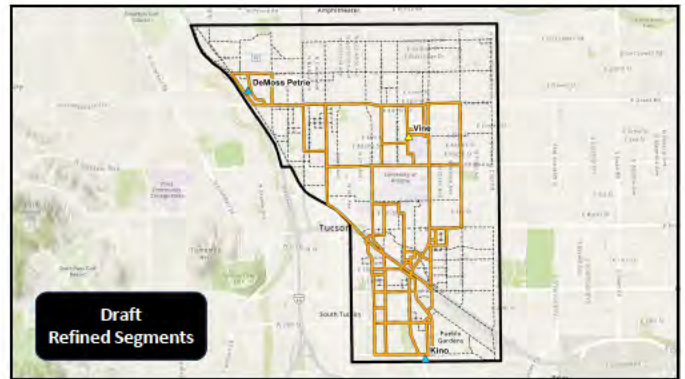
**OUTREACH**

- Neighborhood Listening Sessions
- Neighborhood Advisory Group
- Public Open House
- Elected Official Briefings
- Agency Briefings

6



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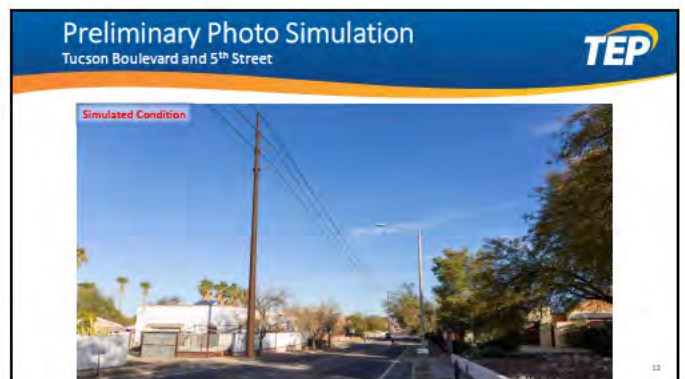
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### Next Steps

**Public/Stakeholder Input**

- Route evaluation criteria
- Results of suitability assessment

**Finalize refined segments**

**Neighborhood Advisory Group Meeting**  
January 11, 2024  
6:00 – 8:00pm

**Public Open House / Meeting**  
February 8, 2024  
6:00 – 8:00pm

Doubletree – Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

23

### Project Schedule\*

- Q3 '23-Q2 '24 – Transmission Line Planning and Siting
- Q2 2024 – CEC Application Submittal
- Q3 2024 – Line Siting Hearing
- Q3 2024 – ACC Open Meeting
- Q4 2024 – Vine Substation SELUP Application Submittal
- Q1 2025 – Zoning Examiner Hearing
- Q2 2027 – Transmission Line/Vine Substation In-Service
- 2027-2037 – Distribution System Upgrades and 46kV Retirements

\* Target schedule, subject to change

24

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- A print copy of this presentation
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25

25

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ATTN: Midtown Reliability  
Mail Stop CB200  
Tucson, AZ 85701-0711

26

26

## Q&A Session



Please use the raise hand feature in MS Teams

or

Type your question into the chat

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-3.4**

#### **Agency Briefing #4 Presentation**


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**Midtown Reliability Project** 

CLARK BRYNER –MANAGER, TRANSMISSION LINE SITING

**AGENCY BRIEFING**

February 28, 2024

  
Tucson Electric Power

1

**Invited Representatives:**

**INTRODUCTIONS**

Please type into the chat

- Name
- Organization
- Title/Role

- Arizona Department of Transportation (ADOT)
- Banner Health
- Davis-Monthan Air Force Base
- Metropolitan Pima Alliance
- Pima Association of Governments
- Southern Arizona Home Builders Association
- Southwest Gas
- THRIVE in the 05
- Tucson Airport Authority
- Tucson Association of Realtors
- Tucson Hispanic Chamber of Commerce
- Tucson Metro Chamber of Commerce
- Tucson-Pima County Historical Commission
- Union Pacific Railroad
- University of Arizona

- Pima County
  - County Administrator's Office
  - Department of Transportation
  - Development Services
  - Energy
  - Facilities
  - Natural Resources Parks and Recreation
  - Regional Wastewater Reclamation
  - Sustainability and Conservation
- City of Tucson
  - City Manager's Office
  - Climate and Sustainability
  - Department of Transportation and Mobility
  - Energy
  - Historic Preservation
  - Parks and Recreation
  - Planning and Development Services
  - Public Information
  - Tucson Water




2

**AGENDA**

1. Project Overview
2. Required Approvals
3. Planning and Siting Process
4. Compatibility Analysis
5. Draft Route Alternatives
6. Next Steps
7. Project Schedule
8. Questions and Answers




3

**Project Overview** 

**Components of the Midtown Reliability Project**

- Vine Substation
- 138 kilovolt (kV) Transmission Line
- Distribution System Upgrades
- Retirement of Aging Assets



4

**Required Approvals** 

**138 kV Transmission Line**

- Certificate of Environmental Compatibility (Arizona Corporation Commission)

**Vine Substation**

- Special Exception Land Use Permit (City of Tucson)

**Distribution System Upgrades & Retirement of Aging Assets**

- No approvals, but dependent on new substation and transmission line


5

**Planning and Siting Process** 



6

### Summary of Public Outreach



Meetings and Briefings	External Communication	Ways to Comment
<ul style="list-style-type: none"> <li>Open Houses* (4)</li> <li>Agency Briefings (4)</li> <li>Public Officials (9)</li> <li>Neighborhood Advisory Group (4)</li> <li>Neighborhood Listening Sessions (11)</li> <li>Miscellaneous</li> </ul>	<ul style="list-style-type: none"> <li>Newsletters*</li> <li>Social Media*</li> <li>Fliers*</li> <li>Signage*</li> <li>Webpage*</li> <li>Email Updates</li> <li>Newspaper*</li> <li>News</li> </ul>	<ul style="list-style-type: none"> <li>Paper Comment Form*</li> <li>Online Comment Form*</li> <li>Project Phone Line*</li> <li>Project Email*</li> <li>Mail*</li> <li>Survey</li> </ul>

\*Bilingual

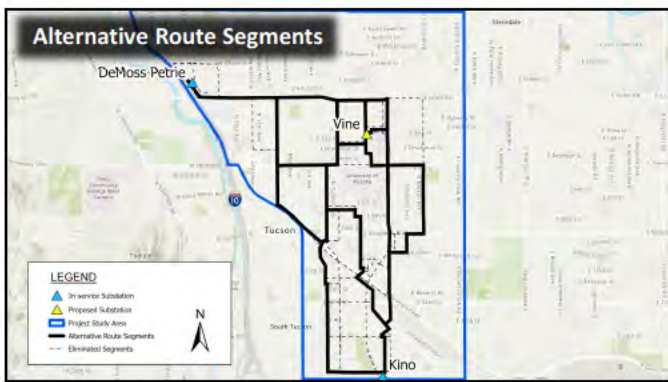
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### Criteria – Compatibility Analysis




- Impact on low-income and/or disadvantaged communities
- Cost of transmission line construction, including relocation/undergrounding of distribution lines
- Sensitive plant and wildlife species and/or habitat within the transmission line corridor
- Residential properties adjacent to transmission lines
- Historic properties and districts adjacent to transmission lines
- Impact on views near transmission lines
- Impact on the total environment
- Noise
- Communication signal interference
- Existing development plans
- Engineering feasibility and challenges
- Right-of-way acquisition
- Compliance with applicable ordinances, master plans and regulations
- Health and safety impacts
- Transit Impacts (Pedestrian, Public Transit, Traffic)
- Use of existing utility corridors
- Impact on native lands
- Public/Stakeholder Feedback

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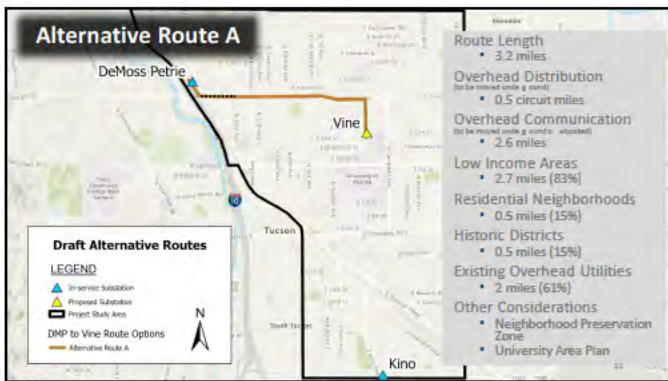
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### Midtown Reliability Project

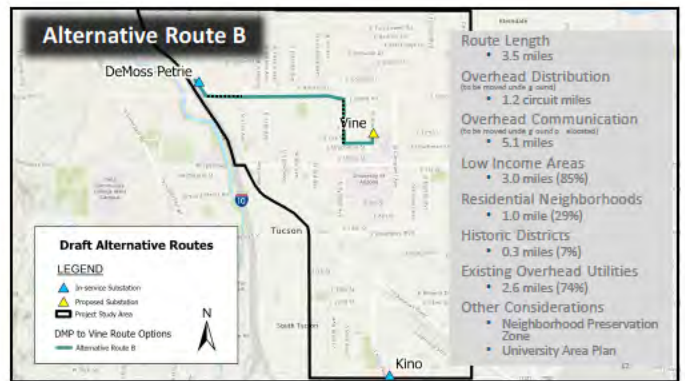


## DMP to Vine Route Alternatives

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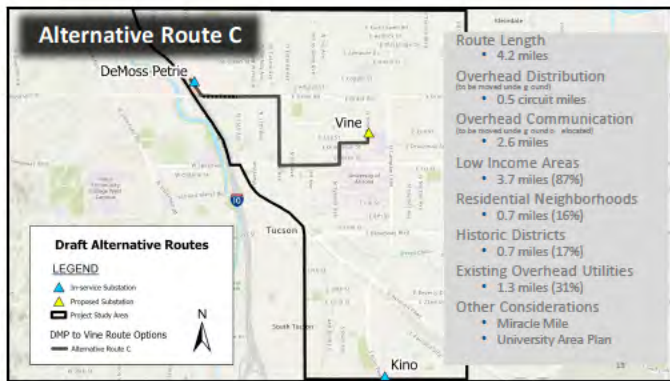


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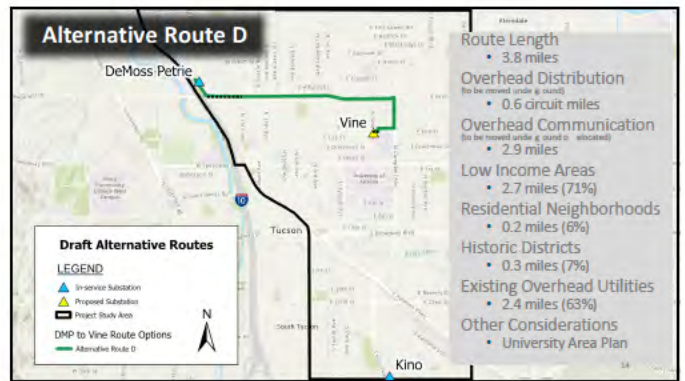


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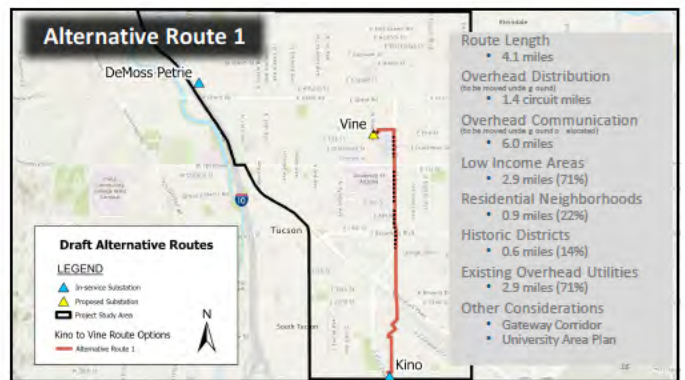
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Midtown Reliability Project

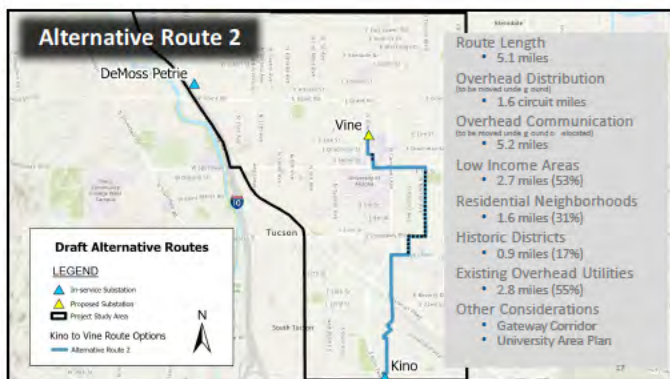
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## Kino to Vine Route Alternatives

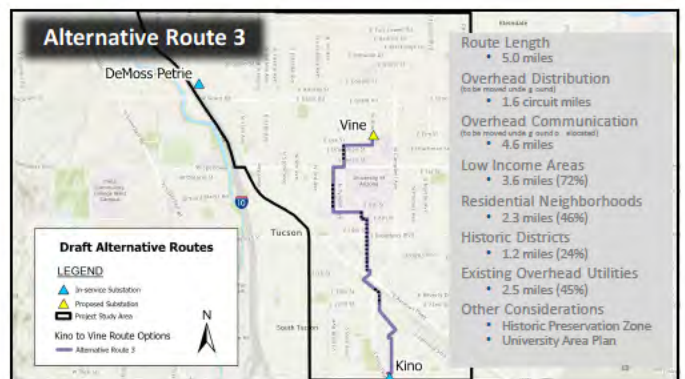
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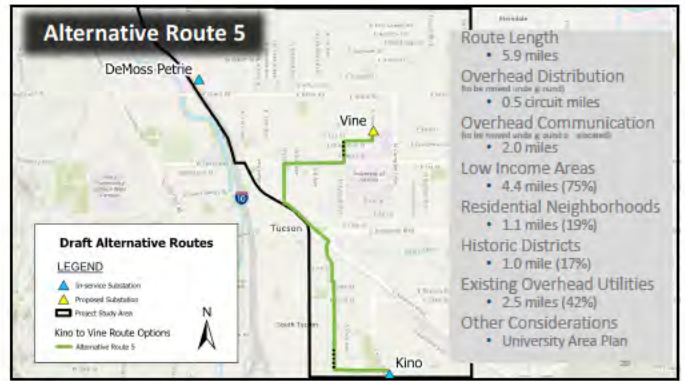
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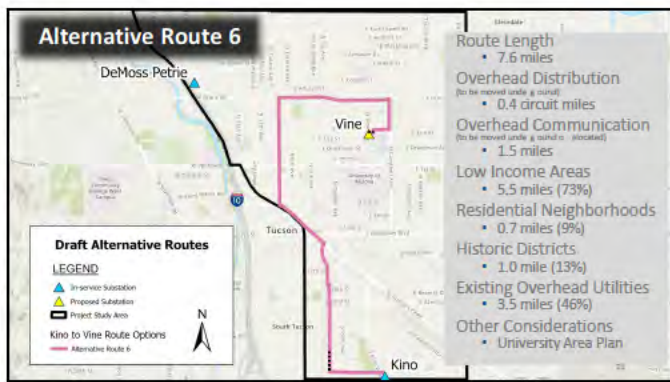
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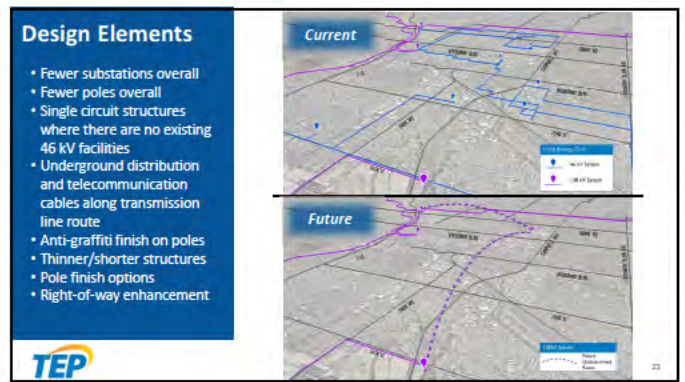
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**Next Steps** **TEP**

**Public/Stakeholder Input**

- Results of compatibility analysis
- Design elements

**Identify Preferred Route**

Neighborhood Advisory Group Meeting  
February 29, 2024  
6:00 – 8:00pm

Public Open House / Meeting  
March 28, 2024  
6:00 – 8:00pm

Doubletree – Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

23

**Project Schedule\*** **TEP**

- Q3 '23-Q2 '24 – Transmission Line Planning and Siting
- May 2024 – CEC Application Submittal
- July 8-19, 2024 – Line Siting Hearing
- Q3 2024 – ACC Open Meeting
- Q4 2024 – Vine Substation SELUP Application Submittal
- Q1 2025 – Zoning Examiner Hearing
- Q2 2027 – Transmission Line/Vine Substation In-Service
- 2027-2037 – Distribution System Upgrades and 46kV Retirements

\* Target schedule, subject to change

24


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- Interactive Google map
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- Frequently asked questions & answers


25

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  - Mail Stop CB200
  - Tucson, AZ 85701-0711

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## Q&A Session



Please use the raise hand feature in MS Teams  
or  
Type your question into the chat

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## Midtown Reliability Project

# Supplemental Material

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## DMP to Vine Route Comparison Summary

	Kino to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine
Route A	3.2	0.5	2.6	2.7	0.5	0.5	2	NPZ, Unreliable	NPZ, Unreliable
Route B	3.3	1.2	3.1	3	1	0.3	2.6	NPZ, Unreliable	NPZ, Unreliable
Route C	4.2	0.5	2.6	3.7	0.7	0.7	1.5	Middle Mile, Unreliable	Middle Mile, Unreliable
Route D	3.8	0.6	2.9	2.7	0.2	0.3	2.4	Unreliable	Unreliable

NPZ - Neighborhood Preservation Zone

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## Kino to Vine Route Comparison Summary

	Kino to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine	DMP to Vine
Route 2	4.1	1.4	6	2.9	0.9	0.6	2.9	Gateway Corridor, Unreliable	Gateway Corridor, Unreliable
Route 3	5.1	1.6	3.2	2.7	1.6	0.9	2.8	Gateway Corridor, Unreliable	Gateway Corridor, Unreliable
Route 4	5	1.6	4.6	3.6	2.3	1.2	2.5	NPZ, Unreliable	NPZ, Unreliable
Route 5	5	1.2	3.9	3.6	1.1	0.3	3.3	NPZ, Unreliable	NPZ, Unreliable
Route 6	5.9	0.5	2	4.4	1.1	1	2.5	Unreliable	Unreliable
Route 6	7.6	0.4	1.5	3.5	0.7	1	3.5	Unreliable	Unreliable

NPZ - Historic Preservation Zone

30

Midtown Reliability Project **TEP**

**PROJECT BRIEFING**

August 2023

**TEP**  
Tucson Electric Power

1

**AGENDA**

1. Project Overview
2. Illustration of Project Need and Benefits
3. Summary of Project Benefits
4. Required Approvals
5. Project Schedule
6. Planning and Siting Process and Timeline
7. Next Steps


**TEP**

2

**Project Overview** **TEP**

**Components of the Midtown Reliability Project**



- Vine Substation
- 138 kilovolt (kV) Transmission Line
- Distribution System Upgrades
- Retirement of Aging Assets



3

**Vine Substation** **TEP**

- 1.6 acre site at Vine Avenue between Lee Street & Chauncey Lane
- Gas Insulated Substation (GIS)


Tucson Substation, an existing GIS and A Insulated Substation.

4

**138 kV Transmission Line** **TEP**

**Transmission Line Specifications**


- Single circuit 138kV
- Tubular steel monopole structures (weathering steel is standard)
- Typical structure heights ~75 feet
- Span length of ~600 feet (distance between poles)
- Aluminum conductor, with a non-specular finish ~1 inch in diameter



5

**Distribution System Upgrades** **TEP**

- Convert 4 kV distribution circuits to 13.8 kV circuits
- Replace and upgrade service transformers
- Replace existing poles, where merited




Existing 4kV distribution on 17' steel utility poles at 4th St. and 5th Ave.

6

### Retirement of Aging Assets

**TEP**

- Replace aging wood distribution poles and transformers
- Retire up to eight 46 kV Substations
- Retire approximately 19 miles of 46 kV sub-transmission lines




Existing Area 46kV System  
 ● 46kV Substation  
 — 46kV Sub-transmission Lines

Existing Area 46kV System.

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### Existing System

**TEP**



Local Energy Grid  
 ● 46 kV System  
 ● 138 kV System

8

### Future System

**TEP**

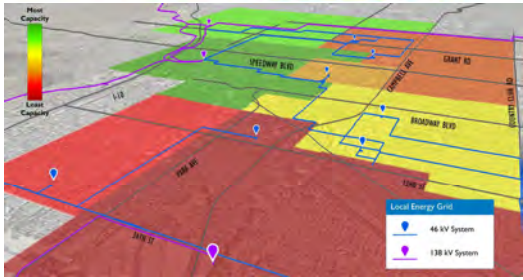


138kV System  
 - Future Sub-transmission Route

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### Current Capacity

**TEP**




Most Capacity  
 Least Capacity

Local Energy Grid  
 ● 46 kV System  
 ● 138 kV System

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### Future Capacity

**TEP**




Most Capacity  
 Least Capacity

Local Energy Grid  
 ● 138 kV System  
 - Future Undetermined Route

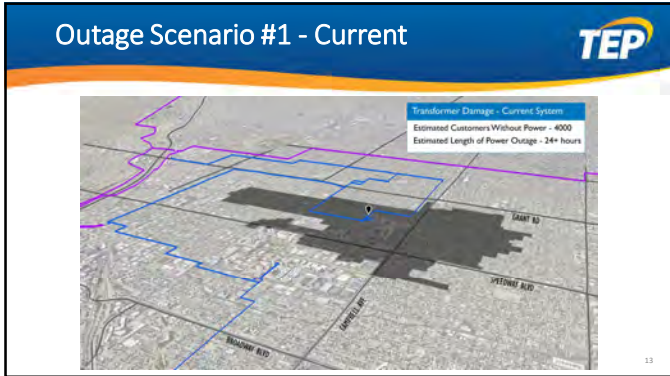
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### Outage Scenario #1 - Current

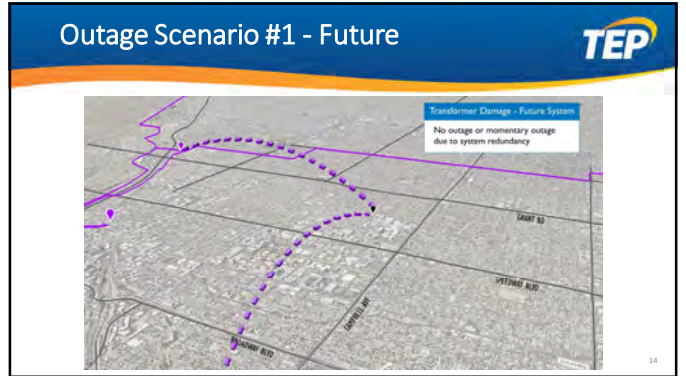
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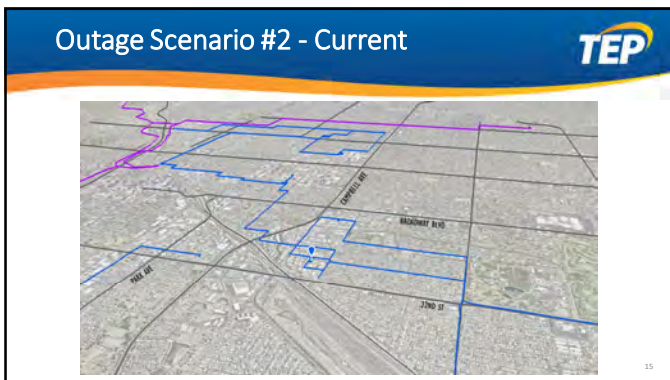
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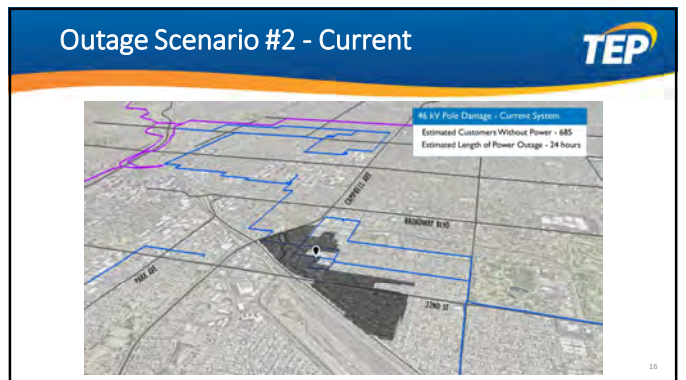
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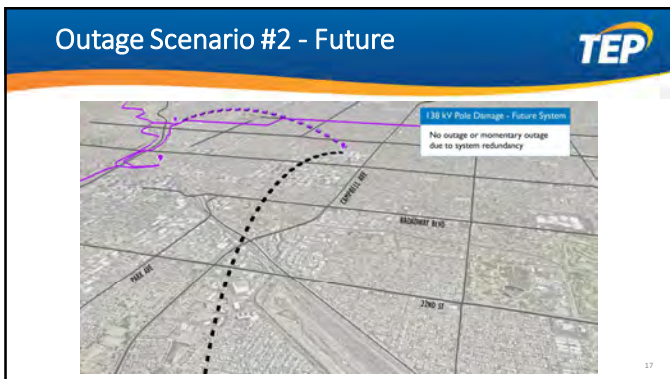
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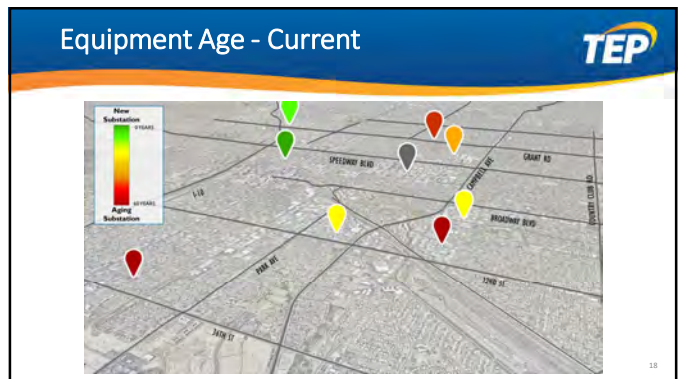
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- ### Summary of Project Benefits
- Improved electric reliability
  - Greater capacity for growing energy needs
  - Greater capacity for customer-owned energy systems
  - Comparable cost, greater efficiency
  - Improved service citywide
  - Support for economic growth and a healthy community

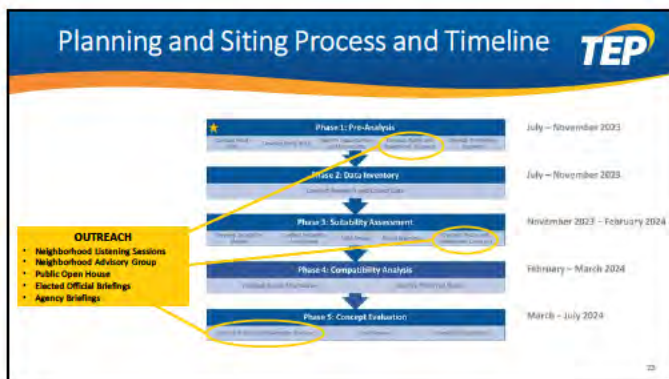
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- ### Required Approvals
- Vine Substation**
- Special Exception Land Use Permit (City of Tucson)
- 138 kV Transmission Line**
- Certificate of Environmental Compatibility (Arizona Corporation Commission)
- Distribution System Upgrades & Retirement of Aging Assets**
- No approvals, but dependent on new substation and transmission line

21

- ### Project Schedule\*
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22



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### Next Steps

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Tucson, AZ 85701-0711
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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-4**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-4.1**

#### **Agency Briefing #1 Notes**

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# Agency Briefing 1

August 10, 2023

Stakeholders in Project Study Area

*Meeting via Microsoft Teams – 10:00-10:50am*

## Attendees

### **Stakeholders**

Paul Klumb	Banner Health	
Kristian Watkins	Banner Health	Senior Manager, Facilities, Design & Construction
John Beall	City of Tucson	Entitlements Section Manager, Planning & Development Services Department
Jodie Brown	City of Tucson	Historic Preservation Officer
Michael Catanzaro	City of Tucson	Energy Manager, Environmental and General Services Department
Nick Gasior	City of Tucson	Utility Coordinator, Department of Transportation
Elisa Hamblin	City of Tucson	Zoning Administrator, Planning and Development Services Department
Tristan Hites	City of Tucson	Staff Assistant
Mandi Leatherland	City of Tucson	Energy Office Analyst
Nicholas Martell	City of Tucson	Principal Planner, Planning & Development Services Department
Alison Miller	City of Tucson	Strategic Planning and Community Engagement Manager, Housing and Community Development
Alfred Zuniga	City of Tucson	Transportation Administrator
Stephen Cassidy	Davis-Monthan Air Force Base	Energy and Utilities Management
Benjamin Fernandez	DM50	Vice President
Abid Bokhari	GLHN Architects & Engineers	Senior Electrical Engineer
Michelle De Blasi	Law Office of Michelle De Blasi	Attorney for Banner Health
Allyson Solomon	Metropolitan Pima Alliance	Executive Director
Paul Casertano	Pima County	Deputy Director, Department of Transportation
Linda Mayro	Pima County	Director, Sustainability and Conservation

Tucson Electric Power – Midtown Reliability Project

Lauren Ortega	Pima County	Deputy Director, Development Services
Julie Parizek	Pima County	Manager, Facilities, Construction, and Contracts
Eric Wilson	Pima County	Energy Program Manager, Facilities Department
Emin Aydin	Tucson Airport Authority	Director of Properties and Concessions
Scott Robidoux	Tucson Airport Authority	Manager of Planning
Kathryn Gerber	Tucson Water	Engineering Manager, System Planning
Scott Schladweiler	Tucson Water	Deputy Director
John Van Winkle	Tucson Water	Chief Engineer
Christopher Bansil	University of Arizona	Assistant Director for Utility Services, Facilities Management
Chad Brandt	University of Arizona	Utilities Project Manager
Ryan Goodell	University of Arizona	Vice President, Facilities, Operations, and Campus Planning
Jeremy Heston	University of Arizona	Medium Voltage Supervisor, Facilities Management
Michael Hoffman	University of Arizona	Campus Energy Manager
Julie Katsel	University of Arizona	Assistant Vice President, Community Relations
Christopher Kopach	University of Arizona	Associate Vice President, Facilities Management
J.J. Lamb	Vail Preservation Society	Director

**TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Brian Pugh	T&D Supervisor
Aracely Lucero	Senior Key Account Manager
Joe Barrios	Media Relations & Regulatory Communications
Gannon McGhee	Supervisor, T&D Engineering
Amanda Bruno	Government Relations Representative
Ryan Anderson	Manager, Business Development
Geovanna Moreno	Account Manager
George Larrinaga	Account Manager
Donovan Sandoval	Manager, Engineering
Manny Romero	Account Manager
Rustyn Sherer	Senior Key Account Manager
Michael Riesgo	Lead Associate Engineer
Steven Eddy	Director, Public Affairs
CeCe Aguda	CEC Specialist
Michelle Adams	Public Outreach Assistant
Keri Tallorin	Environmental Land Use Planner

## Notes

Clark began the meeting and showed a PowerPoint presentation detailing the proposed new substation and overhead steel monopole transmission line within the study area. The upgraded system would be retiring current aging infrastructure, including eight existing substations and their 46kV lines. The project need is a result of rising energy demand as the current circuits are at or near capacity. The proposed 138kV looped system would triple the capacity of the existing 46kV lines which would support economic growth by allowing further expansion for customers' EV and solar systems. Applications and required approvals for the project include a Special Exceptions Land Use Permit and a Certificate of Environmental Compatibility through the Arizona Corporation Commission. The next step in the project schedule is the Public Open House being held on September 21, 2023. All residents and customers within one mile of the project study area were sent invitations to attend and to comment. The project website contains all relevant information as well as the ways comments may be submitted.

## Questions/Comments from Attendees

1. Chris Kopach: Thank you for the presentation. Reliability is a major benefit. We look forward to working with TEP. Looking forward to participating in the project.
2. Allyson: Will this project improve the use of EV in the project area?
  - Donovan: We have the expansion of the integration of EVs in the long-term plan. This project will be able to support future growth and reliability.
3. J.J.: Is it possible to include the Tucson-Pima County Historical Commission in the notification list of stakeholders? I'll provide contact information for Terry Majewski, the Commission Chair, her email is tmajewski@srcrm.com.
4. Eric: Are energy storage systems considered at this time as part of the distribution upgrade?
  - Donovan: It will be part of future modeling of system growth.
5. Michelle De Blasi: Will the PPT be provided to call participants?
  - Clark: It will be posted to the project website.
6. Abid: Much needed upgrade.
7. Eric: Am I correct in understanding that the smaller substations are being upgraded with larger 138kV and smaller 46kV distribution system will be retired?
  - Clark: 46kV system slide was shown and explained the current system and how that will change when the 138kV is constructed. System upgrades are needed to meet the current and future energy loads. MRP is more than a transmission line. It is an entire system upgrade in the midtown area of Tucson.

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-4.2**

#### **Agency Briefing #2 Notes**

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## Agency Briefing 2

October 19, 2023

Stakeholders in Project Study Area

*Meeting via Microsoft Teams – 10:00am*

### Attendees

#### **Stakeholders**

John Beall	City of Tucson	Entitlements Section Manager, Planning & Development Services Department
Jodie Brown	City of Tucson	Historic Preservation Officer
Michael Catanzaro	City of Tucson	Energy Manager, Environmental and General Services Department
Elisa Hamblin	City of Tucson	Zoning Administrator, Planning and Development Services Department
Mandi Leatherland	City of Tucson	Energy Office Analyst
Fatima Luna	City of Tucson	Mayor's Climate and Sustainability Advisor
Nicholas Martell	City of Tucson	Principal Planner, Planning & Development Services Department
Alison Miller	City of Tucson	Strategic Planning and Community Engagement Manager, Housing and Community Development
Timothy Thomure	City of Tucson	Assistant City Manager
Stephen Cassidy	Davis-Monthan Air Force Base	Energy and Utilities Management
Paul Casertano	Pima County	Deputy Director, Department of Transportation
Tony Cisneros	Pima County	Facilities Director
Diana Durazo	Pima County	Senior Advisor to County Administrator
Richard Foitik	Pima County	
Kent McRae	Pima County	Regional Wastewater Reclamation Department
Lauren Ortega	Pima County	Deputy Director, Development Services
Kathryn Skinner	Pima County	Director, Department of Transportation

Scott Robidoux	Tucson Airport Authority	Manager of Planning
Kathryn Gerber	Tucson Water	Engineering Manager, System Planning
John Van Winkle	Tucson Water	Chief Engineer
Christopher Bansil	University of Arizona	Assistant Director for Utility Services, Facilities Management
Jeremy Heston	University of Arizona	Medium Voltage Supervisor, Facilities Management
J.J. Lamb	Vail Preservation Society	Director

**TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Aracely Lucero	Senior Key Account Manager
Joe Barrios	Media Relations & Regulatory Communications
Geovanna Moreno	Account Manager
George Larrinaga	Account Manager
Manny Romero	Account Manager
Rustyn Sherer	Senior Key Account Manager
Teresa Bravo	Government Relations Representative
Jesus Martinez	Civil/Transmission Engineer
Michelle Adams	Public Outreach Assistant
Keri Tallorin	Environmental Land Use Planner
Tom Baca	Community Relations
Cheryl Eamick	Right of Way Agent
Kaitlin Pierce	Right of Way Agent

**Notes**

Clark began the meeting and showed a PowerPoint presentation detailing the project overview, line siting process and timeline, opportunities and constraints, survey results, the ACC policy statement, proposed evaluation criteria, next steps, and project information.

**Questions/Comments from Attendees**

1. J.J.: Hi, thank you very much. I'm here today on behalf of the Tucson Pima County Historical Commission and I would like to extend an invitation for you to attend one of our Commission Meetings. I just wanted to put that out there and I can send you an e-mail to connect you with Teresita Majewski, the Commission Chair, to help set that up. I'll just add that, you know, really I absolutely and the Commission understands the Arizona Corporation Commission policies. I would just like to add though that despite that, this particular area is an area that I would say contributes to a sense of place for all of Tucson and the surrounding area people who visit there. So, I would just like to register that we still would encourage further exploration of underground siting. Thank you and I'll be sending you an e-mail to connect you with Terry.
  - Clark: Thank you for your comment, J.J. and we'll be in touch.
2. Christopher: Could you back up on Slide 15 please? I would like to ask about the funding for underground construction, who's responsible for that?

- Clark: So that would be if the city, neighborhoods, members of the community in that area, if they wanted to get together and pursue creating an underground utility district, they can do so. And then those funds would then be allocated toward paying that differential cost. Essentially, I'm confident that you're familiar with the Prop 412 that failed earlier in the year. So that was sort of a different way of going about raising those funds, was through an increase to the franchise payments that TEP gives to the City of Tucson for the right to operate within the road rights-of-way, so this would be a different way of raising those funds. So, it doesn't involve the utility at all, it doesn't necessarily even need to involve the city or another jurisdiction. If you go to that statute that's mentioned right there, it lays out pretty clearly the steps that need to occur.
3. Teresa: I don't know if the group would like to engage in this conversation but a question that comes up a lot from the different groups we've been talking to is the cost. What's the difference between the cost with undergrounding versus overhead? Is that something that you think would be beneficial to discuss?
- Clark: I know this came up with the franchise agreement but basically the cost to build an overhead 138kV transmission line is around \$2 million a mile. To do that same transition line underground, if it was a nice clean trench and easy going where we didn't run into a lot of obstacles, it would be around \$20 million for that same mile. But knowing some of the obstacles that are likely or would occur in this area with streets that existed for a very long time, many utilities are probably there that are abandoned and exist, also probably archaeological sites and different things that we would come across, so those costs would definitely go up from there. Not knowing where the ceiling is at, it's variable how much would cost. I think another thing to point out is that this transmission line is, basically if you take the most direct route, about 7 miles long. We have around 800 miles of similar transmission lines going through the city, not directly in the City of Tucson, but in the metropolitan area. So, if you took the cost of this and then once you kind of open Pandora's box and say, "yeah it's okay, we can build it underground for this case," well there's another place that's also very special to someone else or for some reason and if you were to extrapolate that out, it becomes just incredibly, incredibly costly. So projects like this from going from around \$20 million to \$150 million plus, just for the transmission line portion, but if you take that for our transmission system as a whole or even just future projects, you're easily getting to the billions and billions of dollars and that all has an impact on the bills of our customers who, like all of us, we've enjoyed inflation and other things and that's the last thing we're looking for is an increasing and our expenses.
4. Cheryl: In addition to Teresa's comment about the cost to build it, are there additional cost to maintain an underground line that would affect people's utility bills?
- Clark: Yes, an underground line, there are some advantages. No doubt there's pros and cons to everything. An underground line is not going to be susceptible to storm damage and things like that, so that that would be a pro to the underground. But in a large part, our overhead transmission lines don't incur a whole lot of damage from storms. It's generally when we have those power outages associated with our monsoon storms, it's on our distribution system. But the big difference is, on an underground line versus overhead line is when there is some issue that comes up, a fault or something like that, well it's 20 feet under a roadway. You've got to go dig everything up to get to that to make that repair and so the repairs are going to be much more costly, take a lot longer, than if something occurs on an overhead line that we can pull

truck up to, run up there on a bucket and take care of it. So yeah, any of those costs, those do go on to our customers to take care of it.

5. Richard: So, what happens when everybody in this area says no to this proposal, “not in my backyard.” What happens then?
  - Clark: That's the case on any project, nobody ever wants a transmission line in their backyard or their neighborhood, but we all have the power that comes from it. So that's why we're going to this robust siting process because it will have impact. It will impact somebody somewhere, so we want to try to minimize those and try to find that balance of, “hey, we can go here, we can go there.” There are multiple options and put those on the table, make the recommendation that, based on thorough analysis, is the most compatible for the area and we'll make that recommendation to the Arizona Power Plant and Transmission Line Siting Committee and then it will be in a public hearing where we'll present our case, the evidence for our recommendation. The public will all have an opportunity there as well to either become a formal party to that hearing or to participate just through public comment and share their voice and that body will make a recommendation, but it will ultimately be the decision of the Corporation Commission on which route to approve or to deny all routes and say, “go back and redo something, you didn't do your homework properly.”
6. Richard: Okay, so assuming you do everything correctly, which I'm sure you will, and it's still shot down, does this mean that people would be going without power? Maybe blackouts? But as the infrastructure ages, is that part of the discussion?
  - Clark: So certainly, I don't want to paint the picture that everybody's going to be out of power. We do have a system, our 46kV subtransmission system, is what provides the area with power today. But that system, like you mentioned there, is older. Most of that infrastructure, the substation, the lines, are between 60 and 70 years old. It has a life cycle, it's essentially at the end of that that life cycle. So, if we were not to have approval for this project, we would need to go in and replace that equipment so that it can continue to operate for another 60-70 years. The reason we're not proposing that as our solution here is because of two things. One, it will cost essentially the same amount of money to replace that 46kV system as it would to build this 138kV system. But while doing that, it would provide us with any of the additional reliability benefits that we'll get from now creating a looped transmission system, full redundancy of our equipment that has the ability to pick up and serve all the load in the area, and it increases our capacity to serve by three times. So that means that it doesn't matter really what growth occurs in this area, be that residential growth, business growth or just us using more electricity for new appliances, new gadgets, electric vehicles, whatever that is, we will have the infrastructure to be able to serve that. So, we're getting that for the same price as we'd otherwise have to invest in just rebuilding our current infrastructure. And the other thing I think that's worth mentioning is, there's 8 substations and 19 miles of 46kV infrastructure to provide today's system. In the future we would have 7 miles of transmission and 1 substation to serve that same area. So, it's actually an overall reduction in the infrastructure, the overall footprint, for the area of utility infrastructure to get something that's better.

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-4.3**

#### **Agency Briefing #3 Notes**

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# Agency Briefing 3

January 10, 2024

## Stakeholders in Project Study Area

*Meeting via Microsoft Teams – 9:00am*

### Attendees

#### **Stakeholders**

Jodie Brown	City of Tucson	Historic Preservation Officer
Michael Catanzaro	City of Tucson	Energy Manager, Environmental and General Services Department
Dean Jeremiah	City of Tucson	Housing and Community Development Planner
Mandi Leatherland	City of Tucson	Energy Office Analyst
Fatima Luna	City of Tucson	Mayor's Climate and Sustainability Advisor
Nicholas Martell	City of Tucson	Principal Planner, Planning & Development Services Department
Jorge Riveros	City of Tucson	Transportation Administrator
Nick Ross	City of Tucson	Lead Planner
Allyson Solomon	Metropolitan Pima Alliance	Executive Director
Diana Durazo	Pima County	Senior Advisor to County Administrator
John Lizardi	Pima County	Engineering Plans Technician
Kent McRae	Pima County	Regional Wastewater Reclamation Department
Jaime Rivera	Pima County	Deputy Director, Regional Wastewater Reclamation
Kathryn Skinner	Pima County	Director, Department of Transportation
Aristidis Stefanakis	Pima County	
Heath Vescovi-Chiordi	Pima County	Director, Economic Development
David Godlewski	Southern Arizona Home Builders Association	President & CEO
Emin Aydin	Tucson Airport Authority	Director of Properties and Concessions
John Voorhees	Tucson Airport Authority	VP/Chief Financial Officer
Dean Trammel	Tucson Water	Civil Engineer
John Van Winkle	Tucson Water	Chief Engineer

Christopher Bansil	University of Arizona	Assistant Director for Utility Services, Facilities Management
Michael Hoffman	University of Arizona	Campus Energy Manager

**TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Brian Pugh	T&D Supervisor
Aracely Lucero	Senior Key Account Manager
Joe Barrios	Media Relations & Regulatory Communications
Ryan Anderson	Manager, Business Development
George Larrinaga	Account Manager
Donovan Sandoval	Manager, Engineering
Manny Romero	Account Manager
Rustyn Sherer	Senior Key Account Manager
Teresa Bravo	Government Relations Representative
Todd Stocksdale	T&D Supervisor
Matthew Miller	Principal, Economic Development
Karen Kansfield	Manager, Regulatory Services
Bonnie Medler	Lead Policy Analyst
CeCe Aguda	CEC Specialist
Michelle Adams	Public Outreach Assistant
Keri Tallorin	Environmental Land Use Planner
Tom Baca	Community Relations
Cheryl Eamick	Right of Way Agent

**Notes**

Clark began the meeting and showed a PowerPoint presentation detailing the project overview, required approvals, planning and siting process, suitability assessment, draft refined segments, preliminary photo simulations, next steps, and the project schedule. Stakeholders were informed that the presentation will be on the project website, as well as a revised interactive map in a few weeks. Clark offered to meet with any of the stakeholder organizations separately.

**Questions/Comments from Attendees**

1. Allyson: What kind of feedback are you looking for?
  - Response: Looking for feedback on refined segments. Also looking for suggestions on who we should be meeting with.
2. Dean: How will you pay for UG telecom? How do you know it's cheaper?
  - Response: Todd Stocksdale to follow up.
3. Jorge: Can you provide more information about the Advisory Group, Listening Sessions, and Public Officials briefings? What is the makeup of the Advisory Group? How are you working with the groups to make sure there's enough input?
  - Response: Every NA within study area was invited to participate (62 NAs in total), about 50 are active. About 20 of them have selected a representative to participate. They represent different areas within the study area. The advisory group has met three times and will be meeting

tomorrow night to conduct their own suitability assessment. We've extended an open invitation to neighborhoods and have had 9 listening sessions. Regular updates have been provided to elected officials on the federal, state, and local levels, and we've briefed many officials separately as well.

4. Dean: The online interactive map shows Oracle Road as a challenge, but it's listed on this (refined segment) map. Why was that overruled?
  - Response: Oracle is a designated gateway corridor. It's listed as a challenge because that's a challenge we need to overcome. TEP is currently challenging the legality of the Scenic and Gateway Corridor Ordinance. Kino/Campbell, Broadway, and Oracle are designated corridors within our Study Area. We've included them because we want to play that out. If the challenge cannot be overcome, they'll go away. A third newsletter, with the refined segment map, will be mailed to residents, property owners, businesses, and other stakeholders in the project study area.

### Action Items

- Clark to email map of draft refined segments to the group.
- Todd to follow up on telecom question.

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-4.4**

#### **Agency Briefing #4 Notes**

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# Agency Briefing 4

February 28, 2024

Stakeholders in Project Study Area

*Meeting via Microsoft Teams – 9:30am*

## Attendees

### **Stakeholders**

Kristian Watkins	Banner Health	Senior Manager, Facilities, Design & Construction
Jodie Brown	City of Tucson	Historic Preservation Officer
Michael Catanzaro	City of Tucson	Energy Manager, Environmental and General Services Department
Elisa Hamblin	City of Tucson	Zoning Administrator, Planning and Development Services Department
Dean Jeremiah	City of Tucson	Housing and Community Development Planner
Allyson Solomon	Metropolitan Pima Alliance	Executive Director
John Lizardi	Pima County	Engineering Plans Technician
Lauren Ortega	Pima County	Deputy Director, Development Services
Tom Porter	Pima County	Civil Engineer
Eric Shepp	Pima County	Regional Flood Control District
Eric Wilson	Pima County	Energy Manager
Fernando Soto	Southwest Gas	Distribution Engineer
Becca Cammack	Tucson Airport Authority	Sustainability Manager
Zach Yentzer	Tucson Metro Chamber of Commerce	Vice President of Business Advocacy
Carlos Lozano	Tucson-Pima County Historical Commission	Chair, Transportation Subcommittee
Kathryn Gerber	Tucson Water	Engineering Manager, System Planning
Bill Hunter	Tucson Water	Civil Engineer
Kris LaFleur	Tucson Water	Lead Management Analyst
Patrick Bunn	University of Arizona	Senior Research Scientist/Principal Investigator, Power Forecasting Group
Christopher Kopach	University of Arizona	Assistant Vice President

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
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Adriana Martinez	Project Manager, Transmission Line Siting
Brian Pugh	T&D Supervisor
Donovan Sandoval	Manager, Engineering
Gannon McGhee	Supervisor, T&D Engineering
Jesus Martinez	Civil/Transmission Engineer
Teresa Bravo	Government Relations Representative
Aracely Lucero	Senior Key Account Manager
Bonnie Medler	Lead Policy Analyst
CeCe Aguda	CEC Specialist
Michelle Adams	Public Outreach Assistant
Keri Tallorin	Environmental Land Use Planner
Tom Baca	Community Relations
Cheryl Eamick	Right of Way Agent
Kaitlin Pierce	Right of Way Agent

## Notes

Clark began the meeting and showed a PowerPoint presentation detailing the project overview, siting process, summary of public outreach, compatibility analysis, route alternatives, and design elements. Clark encouraged meeting participants to provide input.

## Questions/Comments from Attendees

1. John: Do you have shape file of proposed routes?
  - Response: Yes, we have that. We'll get that to you. (Sent 2/29)
2. Eric Wilson: Among the various routes how is risk being addressed. In terms of timeline, and in terms of material capacity at these sites. Are some routes “less risky?”
  - Response: We can take risk in a number of ways. I'll first address the timeline. This project was first proposed in 2018/2019 and we expected to have it service already. The equipment is not getting any younger. We have contingency plans to replace failed equipment. Risk associated with lines, each route has its own set of challenges and risk. Some avoid a lot of impacts while minimizing risks.
3. Carlos: Are you familiar with the "halfway" alternative (Route A only)? The historical commission hasn't picked a route because it's unethical for us to make you steer clear of historical areas because it pushes the routes to disadvantaged areas. Any route you suggest is going to affect historic districts. Maybe you can look at properties 50 years or older, which might be more fair. That's the reason why we haven't picked an alternative. It's a real challenge to protect.
  - Response: The route to DMP to Vine is perfectly fine. We have a disagreement on undergrounding. They're (UG Coalition) proposing we only construct half of the project which does not meet the need. That approach would leave the south side on a radial feed.
4. John: Do you have any impact studies on underground transmission lines? I read up on heat buildup from undergrounding electrical line.
  - Response: We have a study we put together to identify costs. I'd be happy to share that with you. Heat dissipation is a consideration. It has to escape somewhere. We can share that document. (Sent 2/29)



# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-5**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-5.1**

#### **Tribal Meeting Notes**

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# Pascua Yaqui Tribe

April 2, 2024

## Pascua Yaqui Tribal Council

*Hybrid Meeting at 7474 S Camino de Oeste, Tucson AZ 85757 – 10:00am*

### Attendees

#### ***Pascua Yaqui Tribe***

Catalina Alvarez	Council Member
Mary Jane Buenamea	Council Member
Antonia Campoy	Council Member
Herminia Frias	Council Member
Andrea Gonzales	Council Member
Amanda Sampson Lomayesva	Casino Del Sol General Counsel
Angelina Matus	Council Member
Francisco Munoz	Council Member
Alfred Urbina	Attorney General
Francisco Valencia	Secretary
Robert Valencia	Vice Chairman
Sergio Varela	Treasurer
Peter Yucupicio	Chairman

#### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

### Notes

Clark provided an overview of the project through a PowerPoint, followed by a discussion focused mostly on the area of Grant and I-10. This is where their village is located and where their new Casino will be built.

### Questions/Comments from Attendees

1. Is the substation on Grant and I-10 (DMP) increasing in size - regardless of this project?
2. What will happen in the Village (Old Pascua) area? All 4 alternative routes cross that area.
3. Tribe owns ROW near train tracks.
4. Would this project remove lines on Grant on the south side?
5. Are you undergrounding? Can it be done in the new Casino area?
6. How far west is the Vine Substation?
7. What will be the down time of service during construction of this project - should we expect short outages?
8. Are you removing old equipment on the south side area (Grant/I-10)? Would TEP consider giving up easement on the south?

9. Please keep us in the loop as this project moves forward - particularly impacts in the village area.
10. When do modifications start?
11. How much does it cost to underground? Can TEP work with the city as part of the Grant widening project? Why do other areas get undergrounded?
12. Peter: It's good this project is happening! (Grew up in that area).
13. Is there any funding available for solar and/or to help reduce energy use in the village area?

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-5.2**

#### **Federal Meeting Notes**

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# United States Senate

August 16, 2023

United States Senate Staff

*Meeting via Microsoft Teams – 11:00am*

## Attendees

### ***United States of America***

Karla Avalos	Southern Arizona Director for Senator Mark Kelly
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### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative
Steven Eddy	Director, Public Affairs

## Notes

TEP shared a PowerPoint presentation detailing the project purpose and need, project components, the Vine substation, transmission line aesthetics, 4kV upgrades, retirements, current verses future capacity, outage scenarios, project benefits, timeline, and schedule.

## Questions/Comments from Attendees

1. Karla: What did the community want in the past, taller/fewer poles, or shorter poles?
  - Response: In general, we heard from vocal residents who wanted shorter poles.
2. Karla: What happens to old substations?
  - Response: In the past we've sold substation sites. Adriana will look into that and get examples.
3. Karla: What happens to old equipment?
  - Response: A lot of it isn't salvageable, but if it is we'll repurpose it.
4. Karla: Why is there red/orange, is it infrastructure/age?
  - Response: Yes.
5. Karla: How long does Banner's backup generation last?
  - Response: We don't know.
6. Karla: What does the outreach process look like?
  - Response: Reviewed siting process/timeline (neighborhood listening sessions, NAG, open house, etc.)
7. Karla: What federal support/investment do you need? Do you need support from the delegation? Will there be other projects like this somewhere else?
8. TEP: Regarding outages, we would be changing out old wooden poles with steel poles that are stronger.
  - Karla: We want to be as supportive as possible. Thank you for taking the time to explain this to me. It's important.

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-5.3**

#### **State Meeting Notes**

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# Arizona Senate & House of Representatives

August 15, 2023

State Senator and Representative

*Meeting via Microsoft Teams – 3:30pm*

## Attendees

### **State of Arizona**

Priya Sundareshan	Senator, District 18
Stephanie Stahl Hamilton	Representative, District 21

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative
Steven Eddy	Director, Public Affairs

## Notes

TEP shared a PowerPoint presentation detailing the project purpose and need, project components, the Vine substation, transmission line aesthetics, 4kV upgrades, retirements, current versus future capacity, outage scenarios, project benefits, timeline, and schedule.

## Questions/Comments from Attendees

1. Is location of Vine substation important where it is?
  - Response: Yes, it needs to be central to where we have the need. The further you go, you'll have less capacity there will be (like pressure on a pipeline).
2. Does the project help support DG?
  - Response: Yes. We have some capacity constraints in the city, and this will allow for more capacity.
3. Is there such a thing as too much capacity?
4. Was this already approved at the state level and the city held it up?
  - Response: No, we pulled our application.
5. Where will the announcements be posted for the meeting?
  - Response: We're sending a mailing/newsletter, there will also be a notice in the newspaper, social media.
6. Reviewed transmission versus distribution.
7. GIS Substation - Tucson substation near residential and industrial zones, just like Vine will be.
8. TEP follows a national code that guides clearance standards (affecting height).
9. Stephanie: This is good. You've got a robust process. We expect our power to work, without thinking how the energy gets from one place to the next. We know if we have or don't have reliable Wi-Fi, but it's not as clear with energy. Hopefully people can connect the dots with energy (need for EVs). Appreciate the website with QR codes. Will try to make neighborhood meeting(s).

# Arizona Senate

October 9, 2023

State Senator

*Meeting via Microsoft Teams – 10:00am*

## Attendees

### **State of Arizona**

Rosanna Gabaldon	Senator, District 21
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### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative
Steven Eddy	Director, Public Affairs

## Notes

TEP shared a presentation detailing the project purpose and need, project components, the Vine substation, transmission line aesthetics, 4kV upgrades, retirements, current versus future capacity, outage scenarios, project benefits, timeline and schedule, the study area, survey, and the upcoming meeting.

## Questions/Comments from Attendees

1. What's already on that property (Vine Substation)?
  - Response: Old UofA facilities building. They've since relocated and built a new building.
2. Can we provide an overview of public comments?
  - Response: The survey has resulted in about 3,000 responses. We asked if they prefer taller or shorter poles, steel vs. galvanized, and what criteria was important to them. Survey results will be made available soon. Clark also reviewed concerns over GIS substation.
3. How long will it take to retire equipment?
  - Response: 10-15 years before completion
4. How long does it take to make the application?
  - Clark reviewed the project schedule slide.
5. Can you share this PPT?
  - Response: Yes, we will share a copy.
6. How will this impact rates? Will that be included in the presentation?
  - Response: Rates are recovered after investments are made. We don't know if we can recover these rates, but it won't be known until we move forward with the next rate case.
7. Regarding the City of Tucson and how they use electricity for their wells, have you talked to the city about the benefits this will have with their wells?

- Response: We're looking at serving their facilities with cleaner energy, similar to the agreement we have with the U of A.
8. What kind of changes have contributed to Increased demand?
- Response: Increase in our temperatures and energy usage. The system was built in 50-60s and built for usage at the time. Demand has gone up by 200% since the 80s. Rooftop solar and EVs also add to demand.
9. Rosanna was happy to see the video and how it stresses the need for the project (and shows Banner). Very supportive of clean energy, but understand it takes time.

# Arizona Office of the Governor

March 20, 2024

Arizona Governor’s Staff

*Meeting at 400 W Congress St, Tucson AZ 85701 – 3:00pm*

## Attendees

### **State of Arizona**

Marisol Flores-Aguirre	Director, Southern Arizona Office
Patrick Robles	Business & Community Relations Liaison, Southern Arizona Office
Nathalia Untiveros	Deputy Director, Southern Arizona Office

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative
Steven Eddy	Director, Public Affairs
Karen Kansfield	Manager, Regulatory Services

## Notes

Clark shared the project video, discussed the project need, the approval process, the cost differential of overhead and underground lines, provided an overview of public outreach, and reviewed the design considerations that TEP is hoping to adopt.

## Questions/Comments from Attendees

1. Will it look the same or different?
  - Response: Some of it will look the same, some are upgrades.
2. Who pays for UofA Med?
  - Response: The UofA does. Two substations are there (near Vine) now and two will remain. One will be retired.
3. How many substations do you have?
  - Response: Hundreds. Eight within the study area.
4. What do substations look like?
  - Response: Described Tucson Substation. Substations are surrounded by large block walls.
5. Do you need special land use?
  - Response: A Special Exception Land Use Permit is needed for the Vine substation.
6. What are people saying?
  - Response: There have been concerns about aesthetics, property values and EMF. There isn't much consensus, even among neighborhoods.
7. What do transmission lines look like?
  - Response: Showed a line from outside the window.



8. What data do you have about property values?
  - Response: There's no correlation with property values lowering.
9. What do the Mayor and Council say? Are they making concessions?
  - Response: Not currently. We are meeting with CM Fimbres next week. We are challenging the Gateway Corridor ordinance since we believe transmission lines are under the state's purview.
10. If Campbell was approved would that override the ordinance?
  - Response: We'll know more at the hearing which the public is invited to attend in July.

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-5.4**

#### **Local (Elected Offices) Meeting Notes**

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# City of South Tucson

August 14, 2023

City of South Tucson Vice Mayor

*Meeting at 88 E Broadway Blvd, Tucson AZ 85701 – 10:00am*

## Attendees

### **City of South Tucson**

Herman Lopez	Vice Mayor
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### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Clark shared a PowerPoint presentation detailing the project purpose and need, project components, the Vine substation, transmission line aesthetics, 4kV upgrades, current versus future capacity, outage scenarios, project benefits, timeline, and schedule.

## Questions/Comments from Attendees

1. How do we know how old a pole is? There's an old pole that looks like it needs to be replaced in South Tucson.
  - Response: We conduct regular patrols. Older poles are tested. VM will send the pole location and TEP will look into his concern.
2. Vice Mayor was surprised by the height of the lines, was picturing something much bigger.
3. He understood the need for the project and was supportive.
4. Recommendations on community partners to reach out to: South Tucson festivals, Sunnyside Foundation

# Pima County

August 16, 2023

Pima County Staff for Supervisor Matt Heinz

*Meeting via Microsoft Teams – 11:30am*

## Attendees

### **Pima County**

David Higuera	Chief of Staff, Board of Supervisors, District 2
Shaq McCoy	Military Affairs Advisor/Constituent Services & Business Outreach, Board of Supervisors, District 2
Kylie Walzak	Transportation Policy Advisor/Constituent Services, Board of Supervisors, District 2

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

TEP shared a PowerPoint presentation detailing the project purpose and need, project components, the Vine substation, transmission line aesthetics, 4kV upgrades, retirements, current verses future capacity, outage scenarios, project benefits, timeline, and schedule.

## Questions/Comments from Attendees

1. How are the public forums going so far?
2. What's located within the Vine substation parcel boundary now?
  - Response: Buildings are abandoned, we'd tear them down.
3. How much shorter would the spans be if we reduced height?
4. How were the current distribution facilities affected by the recent storms?
  - Response: They weren't really impacted by the latest storms, but this equipment is in similar, if not worse, condition. Our facilities need to be upgraded.
5. What happens to retired substations?
  - Response: We don't have a plan. They may be sold, or we may keep them.
6. Will this affect customer bills?
  - Response: Any investments we make we try to recover in our rates. Same price as doing 46 kV upgrades. Roughly the same investment.
7. How often is your equipment replaced?
  - Response: Not very often, wood poles last 60 years, transformers 65 years. All 46 kV equipment is at that age now; it was built out in the mid-60s, so we can take advantage of the timing now.
8. Strength of poles – if drivers hit them, do they snap? What are the requirements to withstand hits? Does person who hits it have to pay?

- Response: We'll circle back.
- 9. Strategically, absolutely right to have the bigger conversation first. I'll be curious to see what the public says in terms of pole height. Sounds like how you're getting public input and about what sounds right to me. Public will be able to fill out survey. Let us know the trend of comments you're getting.

# City of South Tucson

September 5, 2023

South Tucson City Council

*Meeting at 1601 S 6th Ave, Tucson AZ 85713 – 6:00pm*

## Attendees

### **City of South Tucson**

Cesar Aguirre	Council Member
Paul Diaz	Mayor
Brian Flagg	Council Member
Herman Lopez	Vice Mayor
Rita Rogers	Acting-Mayor
Anita Romero	Council Member
Roxanna Valenzuela	Council Member

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Brian was concerned about the recent rate case and the council as a whole appeared to be supportive of TEP not pursuing undergrounding as it would result in further costs to customers. If TEP chooses a route through South Tucson, a Council Member was interested to know how TEP could partner with the city in making the transmission line corridor beneficial to the community.

## Action Items

- Teresa will follow up and provide information on assistance available to low-income customers regarding the impact of new rates.



# City of Tucson Office of the Mayor

September 11, 2023

Tucson Mayor's Staff

*Meeting at 88 E Broadway, Tucson AZ 85701 – 3:00pm*

## Attendees

### ***Tucson Mayor's Office***

Diana Amado	Chief of Staff, Ward 6
Steve Kozachik	Vice Mayor

### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative
Joe Salkowski	Senior Director, Communications & Public Affairs

## Notes

TEP shared a presentation detailing the project purpose and need, project components, project video, the Vine substation, transmission line aesthetics, 4kV upgrades, retirements, current versus future capacity, outage scenarios, project benefits, timeline and schedule, the study area, survey, and the upcoming meeting.

## Questions/Comments from Attendees

1. Diana: How many people did the survey go out to?
  - Response: 55,000 customers within the project study area via email. It was also posted to website and advertised on mailer.
2. Diana: Did we pick Vine Substation to serve Banner?
  - Response: No. We're landlocked, there weren't many options. The site was identified in discussions with the U of A.
3. Steve: How does this tie into the BOA hearing?
  - Response: We planned to appeal the Zoning Administrator's decision long ago but delayed the appeal in order to negotiate with the city on the franchise. We are seeking the appeal to make sure the Campbell route really isn't available to us.
4. Steve: Would we appeal the decision to Superior Court?
  - Response: We haven't made that decision yet.
5. Steve: Which are the lines being removed? Most of the 46kV system is west of my district and would only really benefit Wards 3 and 5.
  - Response: All the blue lines indicated in the presentation/video (46kV only, not distribution).
6. Steve: Is the purpose to expand the study area past Country Club to go further east/west?

- Response: It would allow for a north/south route along Country Club. More people would be affected with the longer line.
7. Steve: What other areas are we seeing these type of overload challenges?
    - Response: On the southeast side of Vail, we had overload conditions with newer subdivisions being developed until we were able to develop the infrastructure. We also have a mobile substation in southwest Tucson, near Ajo and in Sahuarita, etc. There was a mobile substation located in Ward 6 for a period of time.
  8. Steve: Do we still own that land (mobile substation site near Country Club and Speedway)?
    - Response: We aren't sure.
  9. Steve: Where are we in the process? Who will be included in the Advisory Group meetings and when will they meet? What is their purpose?
    - Response: We're currently in the first phase of the project. We'll start the advisory group meetings in October and will have a round of public outreach with every subsequent phase. Each NA within the study area can designate one representative. The advisory group will meet about one month before each open house (except for the first) and will act as a focus group.
  10. Diana recommended explaining why the Vine Substation site was selected (not to only serve Banner).
  11. Steve: You know my position and I know yours.
  12. Steve: TEP will hear concerns about the GIS, especially from Jefferson Park.
  13. Steve recommended that we clarify that not all poles will be going away. Suggested verifying/clarifying which lines/poles will be removed.
    - Response: They'll remain if other lines are attached.
  14. Steve: The reality is that residential area has not grown, it's been Banner and the U of A. TEP pointed out solar, EVs, and ACs contribute to the load demand. He suggested explaining the impacts EV has on the need for the project.
  15. Steve: Neighborhood Advisory Group - How do you select the advisory members? What is the purpose?
    - Response: NA presidents or their designee and they'd provide feedback.
  16. Steve suggested route from Country Club to Grant with a special exception to link to Vine substation.

# City of Tucson Office of the Mayor

January 31, 2024

Tucson Mayor's Staff

*Meeting via Microsoft Teams – 1:00pm*

## Attendees

### ***Tucson Mayor's Office***

Eryck Garcia	Community Engagement Advisor
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### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Clark showed the project video and displayed a presentation detailing the project overview, required approvals, TEP's outreach summary, and refined segments.

## Questions/Comments from Attendees

1. Clark: We'd like to do everything to reach out to those who haven't been involved in the Neighborhood Advisory Group.
2. Eryck: "You've come to a roadblock I've come to myself." At the beginning, we reached out to all NAs and sent multiple emails asking to attend their meetings. When we advertised us participating in certain neighborhood meetings/events in our newsletter, we heard from about 6 NAs asking, "why haven't you reached out to us?" The list of neighborhoods wasn't regularly updated in the past. Can you send me the list of those who haven't responded? I can try to help. I recommend going to community events. I've met some leaders coincidentally that way. You can also try working with the city ward offices, county district offices, local schools, PTAs, and looking for community groups on social media. Out of the 151 NAs, we've attended 51 different meetings. The total number of registered NAs is probably around 140 now since some have been eliminated. Some neighborhoods meet very infrequently. Bronx Park only meets once a year. Part of the challenge is that even when you do hear from them, they aren't always representative of the neighborhood. Most are older, retired and more affluent than their neighbors. Have you contacted Rebecca Roupp from COT Community Services? She might also be helpful in reaching some of the neighborhoods.

# City of Tucson Council

April 1, 2024

City of Tucson Ward 5 Staff

*Meeting via Microsoft Teams*

## Attendees

### **City of Tucson**

Richard Fimbres	Council Member, Ward 5
Mary Kuchar	Council Aide, Ward 5
Lupita Robles	Chief of Staff, Ward 5

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Clark provided a briefing by sharing the project PowerPoint presentation.

## Questions/Comments from Attendees

1. Which Wards will be underground?
2. When will the project be completed?
3. Does this cause cancer? (EMFs)
4. What does Sam Hughes NA feel about this project?
5. How do the other Wards feel about this project? Do they support it?
6. Are telecoms being undergrounded?
7. When is TEP selecting preferred route?
8. Please reach out to Pastors in Ward 5.
9. Richard seemed supportive and asked that we reach out to him if we need any support.

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-5.5**

#### **Local (Agencies) Meeting Notes**

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# Tucson/Pima County Historical Commission

December 13, 2023

## Members of the Commission and Underground Coalition

*Meeting held at 12:00pm*

### Attendees

#### ***Tucson/Pima County Historical Commission***

Carol Griffith	Archaeologist
Tim Hagyard	Realtor, Developer or Appraiser
Kathe Kubish	Ward 2
Carlos Lozano	City of South Tucson
Jan Mulder	Landscape Architect

#### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
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Approximately 30 participants total. Attendance was not taken.

### Notes

The Underground Coalition shared a presentation countering TEP’s statement that undergrounding lines can’t be done or is too expensive, as it is done in other locations. Clark shared a presentation detailing the project overview, project benefits, required approvals, planning and siting process, timeline, preliminary segments, evaluation criteria, project schedule, and how to comment. Clark thanked the commission for their letter and stated that TEP disagrees with the Underground Coalition as they have looked into ways to underground the line. The ACC created a policy that does not allow costs to be based onto customers. Additionally, the proposed line is relatively short and placing this line underground would result in having to underground other lines.

### Questions/Comments from Attendees

1. Jan: Thinks that costs should be shared.
2. Carlos: Disappointed it has become so controversial, we should all be working toward a solution. I’m not ready to look at routes, I want to stick with undergrounding. We know other communities have done it. Can you point to a community that has successfully done it? If we have to make another proposition (to pay for it), I advocate for that. Otherwise, it’ll just go into lower income communities. Should we be directing our question to the ACC?
  - Response: It is very rare to have transmission underground, it is focused more on distribution. Paradise Valley created an underground improvement district. Intel partnered with the city and SRP. TEP is regulated by the ACC and SRP is not. Regarding the ACC, you can file comments on this project specifically once we file for the CEC and there’s an open docket.
3. Kathe: Is it possible for you to underground only a portion of the line?
  - Response: Yes, it’s just a matter of how you pay for it.
4. Kathe: How far will the poles be away from homes? No route yet? How tall will they be?

- Response: The poles will be about 75 feet tall, and our spans are about 600 feet apart. We’re trying to avoid residential areas. Homes can be fairly close, but we don’t want the conductors over the homes. We’re looking to place the lines in the road right of way. If poles come down, they could damage historical homes. These will be steel poles which are very reliable.
- 5. Tim: It’s about aesthetics.
  - Response: The ACC has mandated us to provide reliable service at the lowest possible costs. We can build an above ground line that will be reliable.
- 6. Carol: It’s not just aesthetics issues. We have safety issues with having the poles above ground. There’s an awful lot of new communities that have underground lines.
- 7. Carlos: Why didn’t you make the public meetings hybrid?
  - Response: We felt like in-person was most effective.

### Action Items

- Attend transportation subcommittee meeting.



# City of Tucson Planning and Development Services

January 29, 2024

Planning and Development Services Staff

*Meeting via Microsoft Teams – 10:00am*

## Attendees

### **City of Tucson**

Elisa Hamblin	Zoning Administrator
Koren Manning	Deputy Director, Planning and Development Services
Kristina Swallow	Director, Planning and Development Services

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Brian Pugh	T&D Supervisor
Teresa Bravo	Government Relations Representative
Keri Tallorin	Environmental Land Use Planner

## Notes

The TEP team reviewed the project need and sought input from the city regarding the General Plan, Area Plans, Neighborhood Plans, Gateway Overlay Zones, and Map Tucson Private Development Plans. TEP requested input on the city’s major concerns regarding Gateway Corridor Zones, Historic Preservation Zones, and Neighborhood Preservation Zones. The group reviewed the current routes and discussed how TEP cannot avoid the zones entirely and asked the city how they can minimize concerns. TEP asked for feedback and any thoughts or preferences on specific routes.

## Questions/Comments from Attendees

1. Kristina: Why not go underground to use the ideal Kino-Campbell gateway route?
  - Clark: Cost, civil work to trench, and cultural resources would likely be run into once dig underground. No additional benefits for TEP to underground, more difficult to maintain, then would be more costly to fix.
2. Clark: If we end up going through HPZ or overlay zone, etc., are there ways to minimize impacts?
  - Koren: Likely correct where SE would apply on gateways. Context sensitive, will have more feedback/ideas when TEP has final routes/alternatives
3. Transmission line overhead forces some distribution underground; cost of underground distribution is significantly less than transmission undergrounding
  - Reduce visual clutter
4. PDS to reach out to DTM to chat internally – policy directives
5. When we have routes, will come back to PDS with segments that qualify for SE (why we can go overhead here)
  - Packaged in with proposed alternatives.

6. City preference on pole materials?
  - Galvanized steel or painted harder to maintain. Tend to prefer weathered steel (Hamblin’s personal preference). Demonstrate consistency that improves visual quality. Size and scale are not out of sync with neighboring developments.
7. Elisa: Does the size of the transmission lines make it more possible to plant vegetation under them that doesn’t interfere with the lines? Tree canopy possible?
  - Clark: Yes, still need to maintain clearances but if trees have mature height under the line, we could do that. Plan to be in city ROW, potential to partner with city for plantings in ROW. How to partner with DTM to green corridors? Lines over 200kV maintain clear cut ROW due to NERC (federal regulations).

# City of Tucson Department of Transportation and Mobility

February 9, 2024

Department of Transportation and Mobility Staff

*Meeting via Microsoft Teams – 10:00am*

## Attendees

### **City of Tucson**

Nick Gasior	Utility Coordinator, Department of Transportation
Robin Raine	Deputy Director, Transportation and Mobility
Jorge Riveros	Transportation Administrator

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Clark provided an overview of the project, required approvals, suitability/compatibility analysis, and showed the refined segments.

## Questions/Comments from Attendees

1. Clark asked if a road could be closed to place a transmission line/walking path.
  - Per Robin, a lane could only be closed if we could demonstrate that the traffic on that road does not need the lane. Robin recommended TEP work with Blake Olofson [blake.oloofson@tucsonaz.gov](mailto:blake.oloofson@tucsonaz.gov) to get the data needed to show where they would/wouldn't consider closing a lane. We would also need to consider ADA requirements and maintain a 4' wide sidewalk at a minimum.
2. Clark asked who from DTM could review route alternatives.
  - Jorge and Nick can review and comment. Clark committed to getting them the routes as soon as they were available.
3. Jorge mentioned the Grant Road PI project and mentioned DTM can collaborate with TEP on phases 5 and 6, between Country Club and Campbell. The public improvement PM should have the plans for these phases.
4. Clark mentioned that TEP tries to avoid placing trees under our lines, but that we could consider that if they are compatible trees that wouldn't grow too tall.
  - DTM recommended that TEP reach out to Nicole Gillett ([nicole.gillett@tucsonaz.gov](mailto:nicole.gillett@tucsonaz.gov), 520-603-4854) to discuss trees.
5. Clark asked if there were any DTM guidelines TEP should consider.
  - Nick mentioned the DTM Utilities Manual and participating in the utility coordination meetings.
6. Projects planned throughout the COT can be found here:  
<https://cotgis.maps.arcgis.com/apps/dashboards/c10dbf19ae2442a59629c549859828df>

7. The group discussed Prop 411 and how 80 percent of the funding will be used for neighborhood improvements (projects will move quickly). Teresa will include Clark and Adriana in a 411 briefing with DTM.
8. Clark asked if DTM would entertain infrastructure in road medians.
  - DTM's preference is not to because it's problematic with maintenance (feels more disruptive in median).
9. Clark asked if DTM had a stance on diagonal pole crossing of the road.
  - Nick will look into it but doesn't think there's a standard.
10. Jorge mentioned TEP is "doing all the right things" in terms of outreach and just asked to be kept in the loop.
11. Nick requested a GIS layer once route(s) are selected. (sent 3/4/2024)
12. Nick would like layer of GIS once route is selected.
13. Robin recommended TEP reach out to Bob Roggenthen (bob.roggenthen@tucsonaz.gov, 520-349-3963) to discuss road ROW on Grant (between Campbell and Park).

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-6**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-6.1**

#### **Newspaper Public Notice September 2023**

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# Arizona Daily Star

4061 W Costco Place, Tucson, AZ 85741

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TUC-Arizona Daily Star

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TUCSON, AZ 85702

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Order # TUC0051368 # of Affidavits: 1  
P.O # Election Notice

Issues Dated:  
09/17/2023

STATE OF WISCONSIN }  
COUNTY OF BROWN } SS.

I, being first duly sworn deposes and says:  
That I am the legal clerk of **TNI PARTNERS**, a  
General Partnership organized and existing  
under the laws of the State of Arizona, and  
that it prints and publishes the Arizona Daily  
Star, a daily newspaper printed and  
published in the City of Tucson, Pima  
County, state of Arizona, and having a  
general circulation in said City, County,  
State and elsewhere, and that the  
attached ad was printed and published  
correctly in the entire issue(s) of the  
said Arizona Daily Star on each of the  
above dates.

Subscribed and sworn to before me this  
17TH day of SEPTEMBER 2023

Notary Public, State of Wisconsin County of Brown

My Commission expires: 9/19/25  
AD NO. TUC0051368 \_\_\_\_\_

## Public Notice Midtown Reliability Project

Tucson Electric Power (TEP) is helping Tucson thrive by building a stronger, smarter grid that supports our community's growth, facilitates additional use of clean energy resources and maintains reliability during extreme weather conditions.

TEP's Midtown Reliability Project will strengthen systems that ensure electric reliability in the heart of Tucson, giving midtown residents the same reliability benefits that residents of other areas already enjoy. These upgrades include a new transmission line, new substation and significant investments in distribution systems that link customers' homes and businesses to our local energy grid.

Please visit our project website for an interactive map and more information. TEP encourages customers and other stakeholders in the project study area to attend an upcoming open house to learn more.



[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

### Public Open House

Thursday, Sept. 21 | 6-8 p.m.  
DoubleTree by Hilton Hotel Tucson - Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

*El Proyecto Midtown Reliability de Tucson Electric Power fortalecerá los sistemas que garantizan la fiabilidad eléctrica en el centro de Tucson, proporcionando a los residentes del área central de la ciudad los mismos beneficios de fiabilidad que ya disfrutan los residentes de otras áreas. Estas mejoras incluyen una nueva línea de transmisión, una nueva subestación e inversiones significativas en sistemas de distribución que vinculan los hogares y las empresas de los clientes con nuestra red energética local. TEP anima a los residentes y otras partes interesadas del área de estudio a asistir a la reunión abierta que se detalla aquí para que obtengan más información sobre el proyecto. Visite el sitio web del proyecto para ver un mapa interactivo y más información. Si tiene preguntas, llámenos al 1-833-523-0887. Gracias por su interés en el proyecto.*



VICKY FELTY  
Notary Public  
State of Wisconsin

## WEEK IN REVIEW

VISIT OUR WEBSITE TO VIEW MORE WEEK IN REVIEW CONTENT

## IN THE NEWS

## Impeachment inquiry begins

Speaker Kevin McCarthy said Tuesday he directed a House committee to open an impeachment inquiry into President Joe Biden over his family's business dealings, launching historic proceedings ahead of the 2024 election.

McCarthy said the House Oversight Committee's investigation so far has found a "culture of corruption" around the Biden family as Republicans probe the business dealings of the president's son, Hunter Biden, from before the Democratic president took office.

**HUNTER BIDEN:** Hunter Biden was indicted Thursday on federal firearms charges, the latest and weightiest step yet in a long-running investigation into President Joe Biden's son. Hunter Biden is accused of lying about his drug use when he bought a firearm in October 2018.

**GEORGIA:** Donald Trump will not face trial next month in Georgia after a judge ruled Thursday that the former president and 16 others accused of illegally trying to overturn the results of the 2020 election will be tried separately from lawyers Sidney Powell and Kenneth Chesebrough, who filed demands for a speedy trial.

**MITT ROMNEY:** Utah Republican Sen. Mitt Romney said Wednesday he will not run for reelection in 2024. Romney, 76, a former presidential candidate and governor of Massachusetts, made the announcement in a video statement. He said after he leaves the Senate he plans to focus on getting more young people involved in the political process.



MATT ROURE, ASSOCIATED PRESS

## AFTER TWO WEEKS ON THE RUN, ESCAPED KILLER CAUGHT

Law enforcement officers escort Danilo Souza Cavalcante from a Pennsylvania State Police barracks Wednesday in Avondale, Pa. Cavalcante, 34, was captured Wednesday after eluding hundreds of searchers for two weeks. Law enforcement's big break came Tuesday night as a plane fitted with a thermal imaging camera picked up Cavalcante's heat signal, allowing teams on the ground to secure the area, surround him and move in with search dogs. "Our nightmare is finally over, and the good guys won," Chester County District Attorney Deb Ryan said Wednesday.

## BIG NUMBER

**11,300** Death toll in Derna, Libya, from massive flooding caused by Mediterranean storm Daniel, which hit the area last Sunday. About 10,000 people were reported missing.

## HE SAID ...

“For those of us who lost people on that day, that day is still happening. Everybody else moves on. And you find a way to go forward, but that day is always happening for you.”

— Edward Edelman, whose brother-in-law died on 9/11 at the World Trade Center. Monday marked 22 years since the terrorist attacks.

## THE WATER COOLER

**AARON RODGERS:** Aaron Rodgers' debut season with the New York Jets didn't even last one quarter. On the fourth snap of Monday night's game against the Buffalo Bills, the 30-year-old quarterback suffered a torn left Achilles tendon that will require season-ending surgery, coach Robert Saleh said Tuesday.

**NEW IPHONE:** Apple on Tuesday unveiled its next generation of iPhones, a lineup that will boast better cameras, faster processors, a new charging system and a price increase for the fanciest model. Investors apparently weren't impressed; the company's shares fell nearly 2% Tuesday, a steeper decline than the major market indexes.

**CABLE DEAL:** Disney and Charter Communications on Monday settled a business dispute that left some 15 million cable TV customers without ESPN and other Disney channels. The deal guarantees Disney roughly \$2.2 billion in fees from Charter while giving the communications company an entry into the streaming world that has encouraged cable customers to cut the cord.

**US OPEN:** Novak Djokovic won the U.S. Open tennis tournament last Sunday for his 24th Grand Slam title by defeating Daniil Medvedev 6-3, 7-6 (5), 6-3 in the final at Flushing Meadows, New York. The victory makes Djokovic, 36, the oldest man to win the U.S. Open in the professional era.

## IN THE NEWS

## Health officials OK COVID shot

Most Americans should get an updated COVID-19 vaccine, health officials said Tuesday.

Advisors to the Centers for Disease Control and Prevention endorsed the new shots for everyone 6 months and older and the agency's director quickly signed off Tuesday on the panel's recommendation.

The severity of the COVID-19 pandemic has faded, but there are still thousands of hospitalizations and hundreds of deaths in the U.S. each week.

**IMMIGRATION:** U.S. District Judge Andrew Hanen on Wednesday declared illegal a revised version of the Deferred Action for Childhood Arrivals, or DACA, program, but he declined to order an immediate end to the program and the protections it offers to recipients. The judge's ruling was expected to be appealed to the Supreme Court.

**PRISONER SWAP:** Congressional lawmakers were informed Monday that the Biden administration cleared the way for the release of five American citizens detained in Iran by issuing a waiver for international banks to transfer \$6 billion in Iranian money from South Korea to Qatar. As part of the deal, the administration agreed to release five Iranian citizens held in the United States.

**NORTH KOREA:** North Korea's Kim Jong Un vowed "full and unconditional support" for Russia's Vladimir Putin on Wednesday as the two leaders held a summit in the U.S. war-torn country had long dealt to supply ammunition for Moscow's war in Ukraine.

Associated Press

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**Application for a Certificate of Environmental  
Compatibility**

**Midtown Reliability Project**

**Exhibit J-6.2**

**Newspaper Public Notice November 2023**

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# Arizona Daily Star

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Order # TUC0052617 # of Affidavits 1

P.O # PUBLIC NOTICE

Issues Dated:

11/12/2023

STATE OF WISCONSIN }  
COUNTY OF BROWN } SS.

I, being first duly sworn deposes and says:  
That I am the legal clerk of **TNI PARTNERS**, a  
General Partnership organized and existing  
under the laws of the State of Arizona, and  
that it prints a publishes the Arizona Daily  
Star, a daily newspaper printed and  
published in the City of Tuscon, Pima  
Country, state of Arizona, and having a  
general circulation in said City, Country,  
State and elsewhere, and that the  
attached ad was printed and published  
correctly in the entire issue(s) of the  
said Arizona Daily Star on each of the  
above dates.

Subscribed and sworn to before me this  
14 TH day of NOVEMBER 2023

Notary Public, State of Wisconsin County of Brown

My Commission expires:

AD NO. TUC0052617

## Public Notice Midtown Reliability Project

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TEP is working to identify areas in central Tucson that are most compatible with new, urgently needed transmission facilities. TEP encourages customers and other stakeholders in the project study area to attend an upcoming open house and help shape our future energy grid.

### Public Open House

Thursday, Nov. 16 | 6-8 p.m.

Open house begins at 6 p.m.

Presentation begins at 7 p.m.

DoubleTree by Hilton Hotel Tucson - Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711



[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

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VICKY FELTY  
Notary Public  
State of Wisconsin

# Biden AI order sets up battle over reach

GOPAL RATNAM  
CO. Roll Call

President Joe Biden's executive order on artificial intelligence is setting up a tug of war between those who fear agencies empowered under it will overstep their bounds and those who worry the government won't do enough.

Last month's order requires multiple departments to collect public comments, draw up new regulations and prepare a plan of reports. It hands significant responsibilities to the Homeland Security and Commerce departments, including the National Institute of Standards and Technology, which is charged with developing safety standards.

The secretary of Homeland Security is directed to establish an advisory AI Safety and Security Board to improve security. The Defense, Veterans Affairs, and Health and Human Services departments must develop regulations for responsible use of AI in their respective fields.

The order directs the Federal Trade Commission, the Consumer Financial Protection Bureau and the Federal Housing Finance Agency to draw up regulations to address bias and other harms by artificial intelligence systems. The FTC must also examine whether it could enforce fair competition among AI companies using existing authorities.

It sets a timeline of three to nine months for the various agencies to submit reports to produce several reports. They must also call for public comments before drawing up new regulations while identifying new funding opportunities for AI in several fields.

The volume of activity is drawing attention from a spectrum of special interests. The U.S. Chamber of Commerce, which represents the largest U.S. companies, welcomed the executive order, saying that it could help the United States set a global standard for AI safety while

funding a slew of new projects.

But Jordan Crenshaw, a senior vice president at the chamber, said he was concerned about multiple new regulations as well as the number of public comments required by various agencies. He said agencies like the FTC, CFPB and FHFA, "which have already been shown to have exceeded their authority for trying to grab power, may use this (order) as a justification to continue how they have operated."

Crenshaw gave the example of the FTC's consideration of rules on commercial surveillance and data security, in which it asks the public whether such rules could be applied across the economy. He said any attempt by the FTC to impose such broad rules, without clear new authorities granted by Congress, could run afoul of the Supreme Court's so-called major questions doctrine. The court, in *West Virginia v. EPA*, ruled in 2022 that the EPA went too far in its attempt to regulate greenhouse gas emissions without explicit authority from Congress.

Biden's order creates as many as 90 different requests for comments by the various agencies that are tasked with drawing up regulations, Crenshaw said. "And with very short comment time frames, we might get comment overload and stakeholders may actually miss opportunities to weigh in just because of the massive amount of comments that we have to track," he said.

Some digital rights groups fear that the order could result in little oversight.

"Biden has given the power to his agencies to now actually do something on AI," Caitlin Seeley George, managing director at Fight for the Future, a nonprofit group that advocates for digital rights, said in an email. "In the best case scenario, agencies take all the potential actions that

could stem from the executive order, and use all their resources to implement positive change for the benefit of everyday people."

"But there's also the possibility that agencies do the bare minimum, a choice that would render this executive order toothless and waste another year of our lives while vulnerable people continue to lose housing and job opportunities, experience increased surveillance at school and in public, and be unjustly targeted by law enforcement, all due to biased and discriminatory AI," she said.

NIST is likely to play a pivotal role in creating new safety standards on AI.

Vice President Kamala Harris announced at the Global Summit for AI Safety in the U.K. last week that under Biden's order NIST will establish an AI Safety Institute, which she said "will create rigorous standards to test the safety of AI models for public use." But a study of NIST's physical and financial needs mandated by Congress and completed by the National Academies of Sciences, Engineering, and Medicine in February found serious deficiencies at the agency.

Congress appropriated \$1.65 billion for NIST in fiscal 2023. A spokesperson for NIST did not respond to questions on whether the agency plans to seek an increase in funding to meet the new requirements under the order.

But NIST will likely need to double its team of AI experts to 40 people to implement the president's order, said Divyansh Kausik, the associate director for Emerging Technologies and National Security at the Federation of American Scientists, who has studied NIST's needs.

The agency will also need about \$10 million "just to set up the institute" announced by Harris, Kausik said. "They don't have that money yet?"

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## Public Notice Midtown Reliability Project

Tucson Electric Power (TEP) is helping Tucson thrive by building a stronger, smarter grid that supports our community's growth, facilitates additional use of clean energy resources and maintains reliability during extreme weather conditions. TEP's Midtown Reliability Project will strengthen energy systems in the heart of Tucson, giving midtown residents the same reliability benefits that residents of other areas already enjoy.

TEP is working to identify areas in central Tucson that are most compatible with new, urgently needed transmission facilities. TEP encourages customers and other stakeholders in the project study area to attend an upcoming open house and help shape our future energy grid.

### Public Open House

Thursday, Nov. 16 | 6-8 p.m.  
Open house begins at 6 p.m.  
Presentation begins at 7 p.m.

DoubleTree by Hilton Hotel Tucson - Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711



tep.com/midtown-reliability-project

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-6.3**

#### **Newspaper Public Notice February 2024**

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# Public Notice

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TEP's Midtown Reliability Project will reinforce the local energy grid that supports electric reliability for nearly 37,000 households and more than 6,800 businesses in the heart of Tucson. The project will include a new higher-voltage overhead transmission line, a new substation and other upgrades to replace older, lower-voltage equipment that can't keep pace with increasing energy use.

Using input from midtown residents and other stakeholders, Tucson Electric Power has identified more than 100 segments that could be combined to form potential transmission line routes. TEP encourages customers and other stakeholders in the project study area to attend an upcoming open house and help shape our future energy grid.

### Public Open House

Thursday, February 8, 2024 | 6-8 p.m.  
 Open house begins at 6 p.m.  
 Q&A begins at 7 p.m.  
 Light refreshments will be provided.

DoubleTree - Reid Park  
 445 S Alvernon Way  
 Tucson, AZ 85711



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Utilizando los aportes de los residentes del centro de la ciudad y otras partes interesadas, Tucson Electric Power ha identificado más de 100 tramos refinados que podrían combinarse para formar rutas potenciales para una nueva línea de transmisión aérea que preste servicio al centro de la ciudad de Tucson. TEP alienta a los clientes y otras partes interesadas en el área de estudio del proyecto a asistir a una próxima reunión abierta y ayudar a dar forma a nuestra futura red eléctrica. Participarán miembros del equipo bilingües y un intérprete de español. Gracias por su interés en el proyecto..

### Reunión abierta pública

Jueves, 8 de febrero de 2024 |  
 6-8 p. m.

La reunión abierta comienza a las 6 p.m.

Las preguntas y respuestas comienzan a las 7 p.m.

Se proporcionarán refrigerios livianos.

DoubleTree - Reid Park  
 445 S Alvernon Way  
 Tucson, AZ 85711



[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](https://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)



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MARY ALTAFFER, ASSOCIATED PRESS

Former President Donald Trump holds up a copy of a story featuring New York Attorney General Letitia James while speaking during a Jan. 11 news conference in New York.

### Trump

From A12

of felony charges and lawsuits as part of an attempt to upend his presidential bid. The Trump campaign did not respond to a request for comment on the legal spending.

Several of his most prominent lawyers surpassed \$5 million each in payments, all footed by the former president's campaign donors, according to the FEC filings. Alina Habba, whose New Jersey-based law firm represented Trump in the sexual assault and defamation suit brought by advice columnist E. Jean Carroll, earned the most: \$6 million.

Trump suffered a stinging loss in the Carroll case. Juries awarded her more than \$88 million.

The criminal cases carry greater political and personal risk for him. Even as the former president drains his campaign coffers to pay for his personal attorney fees, he's sought to transform the legal woes into an opportunity by portraying himself as the victim of a corrupt justice system.

Reporters and cameras

often show up in large numbers when he makes a courtroom appearance, as he's done in the Carroll and New York fraud cases, and he seizes the stage to pound the message that his political enemies are aiming to silence him and his supporters.

"It's a terrible thing that's happening here," Trump told reporters in early November after exiting the courtroom where the New York fraud case was being held. "I think it's a very sad day for America."

Trump is battling two sets of federal charges over his retention of classified records at his Mar-a-Lago resort in Florida and for his alleged role in seeking to undermine the 2020 election.

He faces state charges in Georgia that he illegally schemed to overturn the election in the state. He has been charged by New York City prosecutors with making hush money payments during the 2016 presidential campaign to keep a sexual relationship from becoming public.

Chris Kise, who left the megafirm Foley & Lardner to be one of Trump's attorneys, was paid \$5.1 million

in donor dollars over the past two years, according to the FEC filings. Kise and Habba represented Trump in the New York fraud lawsuit, which could end up banning him from doing business in the state and requiring him to pay several hundred million dollars in penalties.

Continental PLLC, a Florida law firm Kise joined after leaving Foley & Lardner, separately received \$5.4 million in Trump donor money, according to the records.

Trump's campaign paid Atlanta attorney Steven Sadow \$1.5 million in the second half of 2023. Trump hired Sadow to represent him in the Georgia election subversion case.

Campaign money was also used to pay attorneys who represented co-defendants and potential witnesses in the Trump cases. Brand Woodward Law in Washington received \$660,000, with the bulk of that money coming in 2023. One of the firm's clients, Trump valet Walt Nauda, is accused of scheming to conceal Mar-a-Lago security camera footage from government investigators.

### Charged

From A12

hours, included rants about the government, a theme he also embraced in writings published online. Schorn said authorities took possession of the video but expressed concern over the hours that it remained online.

"It's quite horrifying how many views we understand it had before it was taken down," she said.

Justin Mohr faces charges of first-degree murder, abusing a corpse and possession of instruments of crime. He is being held without bail.

Michael Mohr worked

as an engineer with the geoenvironmental section of the U.S. Army Corps of Engineers' Philadelphia District.

In the YouTube video, Justin Mohr picked up his father's head and identified him.

Police said it appeared he was reading from a script as he encouraged violence against government officials and called his father a 20-year federal employee and a traitor.

He also espoused a variety of conspiracy theories and rants about the Biden administration, immigration and the border, fiscal policy, urban crime and the war in Ukraine.

Police said Denise Mohr arrived at their home in the

suburb of Levittown about 7 p.m. Tuesday and found her husband's body, but her son and a vehicle were missing. A machete and bloody rubber gloves were at the scene, according to a police affidavit.

In August 2020, Mohr wrote that people born in or after 1991 — his own birth year — should carry out a "biopsy revolution."

Mohr apparently drove his father's car to Fort Indiantown Gap in central Pennsylvania and was arrested. Cellphone signals helped locate him, according to Angela Watson, communications director for the Pennsylvania Department of Military and Veterans Affairs.

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Se proporcionarán refrigerios y bebidas.

DoubleTree - Reid Park

445 S Alvernon Way

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**Application for a Certificate of Environmental  
Compatibility**

**Midtown Reliability Project**

**Exhibit J-6.4**

**Newspaper Public Notice March 2024**

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Using input from midtown residents and other stakeholders, Tucson Electric Power has identified 10 draft alternative transmission line routes. TEP encourages customers and other stakeholders in the project study area to attend an upcoming open house and help shape our future energy grid.

### Public Open House

Thursday, March 28, 2024 | 6-8 p.m.  
Open house begins at 6 p.m.  
Q&A begins at 7 p.m.  
Light refreshments will be provided.

DoubleTree - Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711



[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

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Utilizando los aportes de los residentes del centro de la ciudad y otras partes interesadas, Tucson Electric Power ha identificado 10 posibles rutas alternativas para la línea de transmisión propuesta. TEP alienta a los clientes y otras partes interesadas en el área de estudio del proyecto a asistir a una próxima reunión abierta y ayudar a dar forma a nuestra futura red eléctrica. Participarán miembros del equipo bilingües y un intérprete de español. Gracias por su interés en el proyecto.

### Reunión abierta pública

Jueves, 28 de marzo de 2024  
6-8 p.m.

La reunión abierta comienza a las 6 p.m.

Las preguntas y respuestas comienzan a las 7 p.m.

Se proporcionarán refrigerios livianos.

DoubleTree - Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711



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## Hablando de Bienes Raíces



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**E**stamos en la temporada de impuestos, muchas personas y familias esperan ansiosamente sus declaraciones de impuestos. Si bien algunos pueden ver estos reembolsos como una ganancia inesperada para derrochar en vacaciones o compras, otros están pensando en hacer una medida más sustancial y financieramente más inteligente: usar sus declaraciones de impuestos para comprar una casa este año.

Algunas de las razones convincentes por las que utilizar su reembolso de impuestos para comprar una casa en el año en curso puede ser una decisión financiera acertada:

**Completar para su enganche:** Uno de los mayores obstáculos para ser propietario de una vivienda es acumular suficiente dinero para el pago inicial. Al recibir el reembolso de impuestos puede aumentar significativamente sus ahorros, brindándole un pago inicial mayor para su nueva casa. Si paga un enganche alto puede ayudar a que sus mensualidades sean más bajas y en ocasiones a mejorar la tasa de interés.

**Reducción del monto del préstamo,** si utiliza su reembolso de impuestos para aumentar su pago inicial, disminuye el monto

que necesita pedir prestado para comprar una casa. Esto ayuda en costos de intereses generales más bajos durante el tiempo de su préstamo. Además, un monto de préstamo más bajo puede hacer que sea más fácil calificar para un préstamo por primera vez.

**Generar plusvalía:** Ser propietario de una casa puede ayudarte a organizar tu futuro mejor. Cuando utilice su reembolso para comprar una propiedad, mírelo como una inversión. Con el paso del tiempo su propiedad agarrará más valor, mas si cuida de mantenerla en buenas condiciones.

**Costos estables de vivienda,** la renta puede significar aumento de un año a otro. Cuando tiene un préstamo hipotecario sus pagos son más fijos. Esto le puede permitir tener una mejor planeación en su presupuesto sin incomodar su estilo de vida.

**Beneficios en sus impuestos,** La propiedad de vivienda conlleva ventajas fiscales, incluidas deducciones por intereses hipotecarios e impuestos sobre la propiedad. Al comprar una casa, usted se ayuda a reducir su obligación tributaria, haciendo que ser propietario de una vivienda sea aún más fácil.

**Inversión para tu futuro,** comprar una casa es una inversión a largo plazo en su futuro. Proporciona una sensación de estabilidad y seguridad y puede servir como un activo valioso que puede transmitirse a las generaciones futuras.

Sin embargo, es importante informarse para tomar la decisión de utilizar el reembolso de tus impuestos para comprar una casa con cuidadosa consideración y tomar una buena decisión.

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-6.5**

#### **Posted Signs for Open House 3**

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## Public Open House

**A stronger, smarter grid**

**Midtown Reliability Project**

**Please join us**

**Thursday, February 8, 2024 | 6-8 p.m.**

**Complimentary refreshments will  
be provided.**

**Hotel DoubleTree**

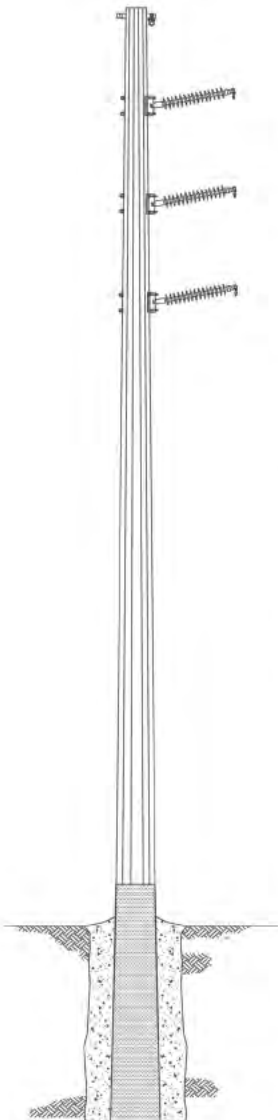
**by Hilton Tucson – Reid Park**

**445 S. Alvernon Way**

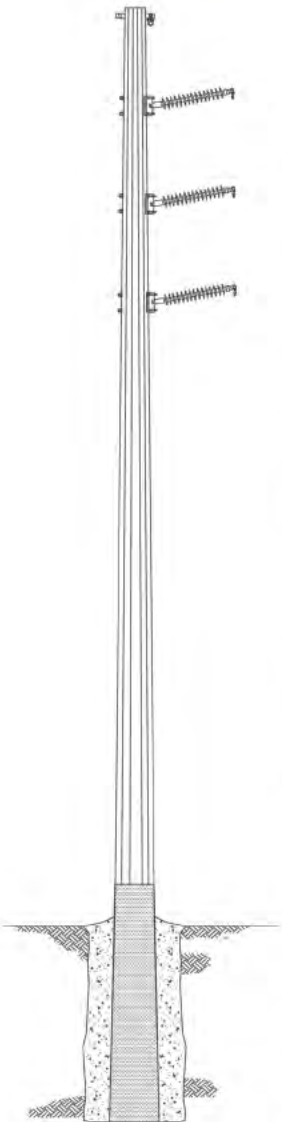
**Tucson, AZ 85711**

**More information**

**[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)**



## Aviso de Reunión Abierta Pública



**Una red más sólida e inteligente**  
**Proyecto de Confiabilidad del Centro**  
**de la Ciudad**

**Acompáñenos**

**Jueves, 8 de febrero de 2024**  
**de 6 a 8 p.m.**

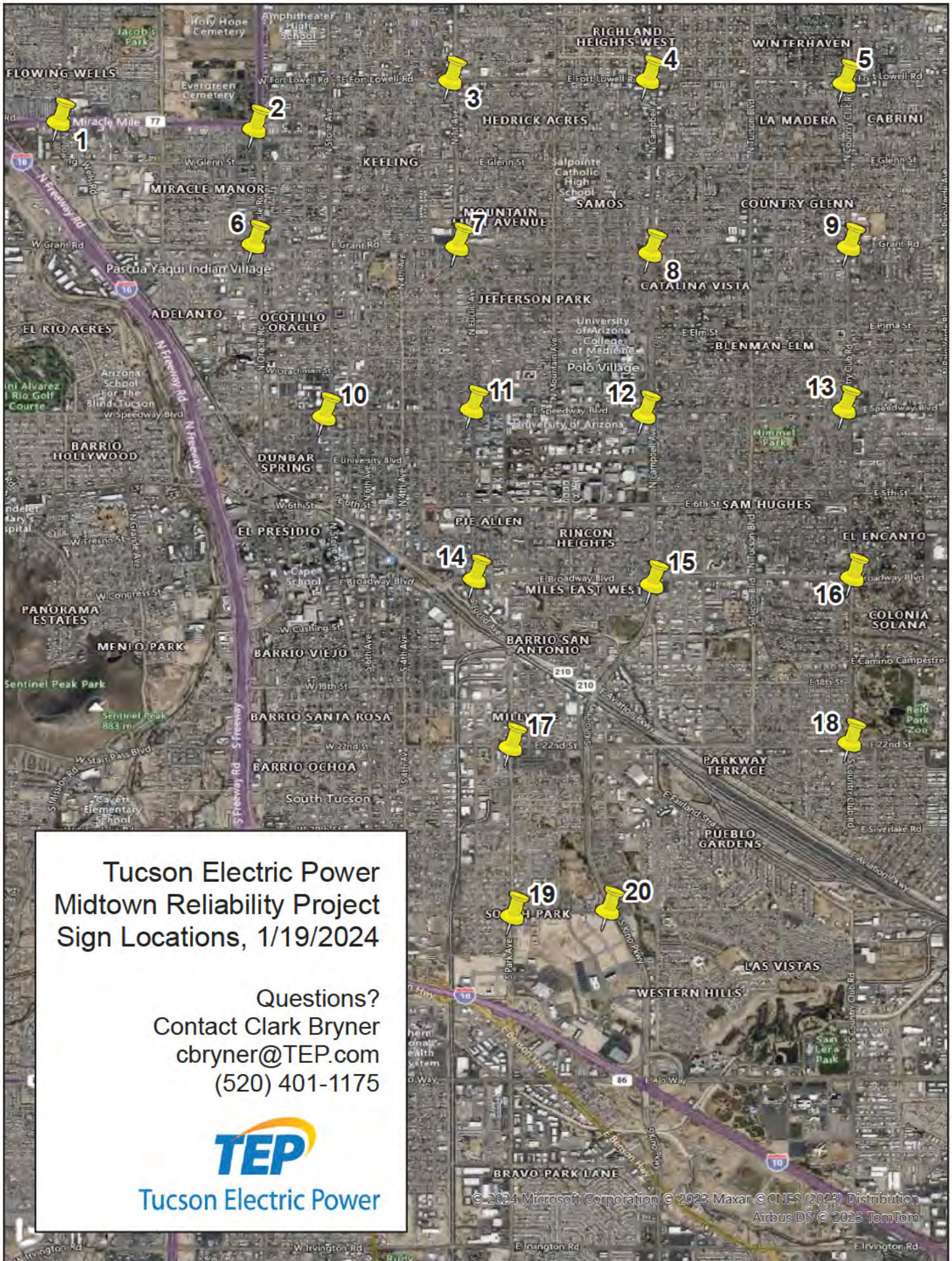
**Refrescos de cortesía será servido**

**Hotel DoubleTree**  
**by Hilton Tucson – Reid Park**  
**445 S. Alvernon Way**  
**Tucson, AZ 85711**

**Más information**

**[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)**





**Tucson Electric Power  
Midtown Reliability Project  
Sign Locations, 1/19/2024**

Questions?  
Contact Clark Bryner  
cbryner@TEP.com  
(520) 401-1175



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Airbus DS © 2023 TomTom

Midtown Reliability Project



### Aviso de Reunión Abierta Pública


**Una red más sólida e inteligente**  
Proyecto de Confiabilidad del Centro  
de la Ciudad  
Acompáñenos  
Jueves, 8 de febrero de 2024  
de 6 a 8 p.m.  
Refrescos de cortesía será servido

Hotel DoubleTree  
by Hilton Tucson – Reid Park  
445 S. Alvernon Way  
Tucson, AZ 85711

**Más information**  
[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)





Midtown Reliability Project   
Tucson Electric Power

**Public Open House**

**A stronger, smarter grid**  
Midtown Reliability Project  
Please join us  
Thursday, February 8, 2024 | 6-8 p.m.  
Complimentary refreshments will  
be provided.

Hotel DoubleTree  
by Hilton Tucson – Reid Park  
445 S. Alvernon Way  
Tucson, AZ 85711

**More information**  
[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)



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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-6.6**

#### **Posted Signs for Open House 4**

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**Public Open House**

**Midtown Reliability  
Project**

**Thurs., March 28, 2024  
6-8 p.m.**

**Refreshments provided**

**DoubleTree - Reid Park  
445 S. Alvernon Way  
Tucson, AZ 85711**

**[tep.com/midtown](http://tep.com/midtown)**



**Reunión Abierta Pública**

**Proyecto de  
Confiabilidad del  
Centro de la Ciudad**

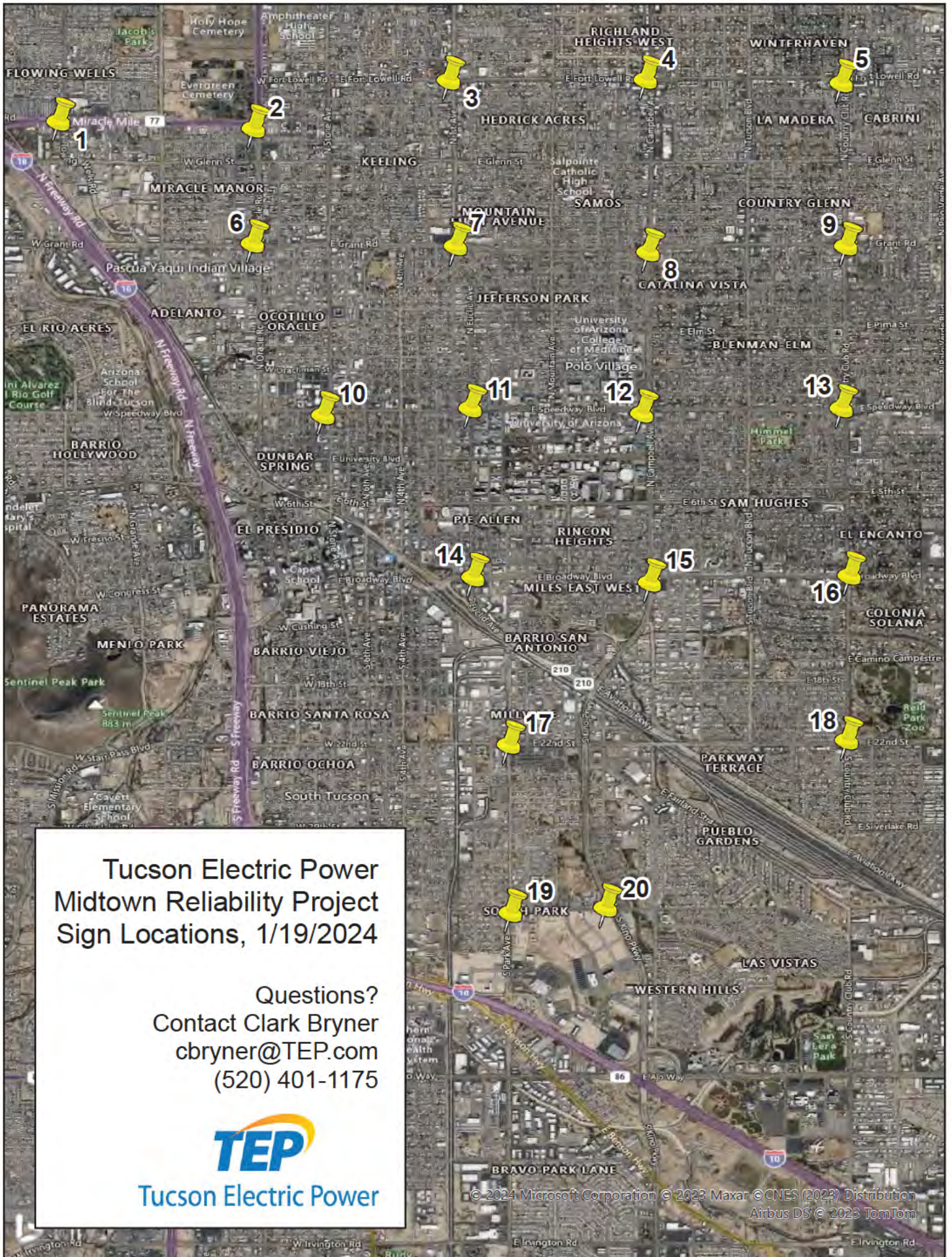
**Jueves, 28 de marzo de 2024  
6-8 p.m.**

**Refrescos será servido**

**DoubleTree - Reid Park  
445 S. Alvernon Way  
Tucson, AZ 85711**

**[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)**





**Tucson Electric Power  
Midtown Reliability Project  
Sign Locations, 1/19/2024**

Questions?  
Contact Clark Bryner  
cbryner@TEP.com  
(520) 401-1175



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**Public Open House**  
**Midtown Reliability**  
**Project**

Thurs., March 28, 2024  
6-8 p.m.

Refreshments provided

DoubleTree - Reid Park  
445 S. Alvernon Way  
Tucson, AZ 85711

[tep.com/midtown](http://tep.com/midtown)



RIGHT LANE



1900 E Broadway Blvd  
Tucson AZ 85719

N 32.221260°, W 110.943760°

WED | 06 MAR 2024 | 11:19AM



El evento es gratuito y abierto al público.  
**Proyecto de Confiabilidad del Centro de la Ciudad**  
 Jueves, 28 de marzo de 2024  
 9-4 a.m.  
 Refrescos para servicio  
 Douglas - Reid Park  
 885 S. Alameda Way  
 Tucson, AZ 85711  
 TEP

3101-3111 E Grant Rd  
 Tucson AZ 85716

N 32.250505°, W 110.926653°

WED | 06 MAR 2024 | 12:47PM

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# **Application for a Certificate of Environmental Compatibility**

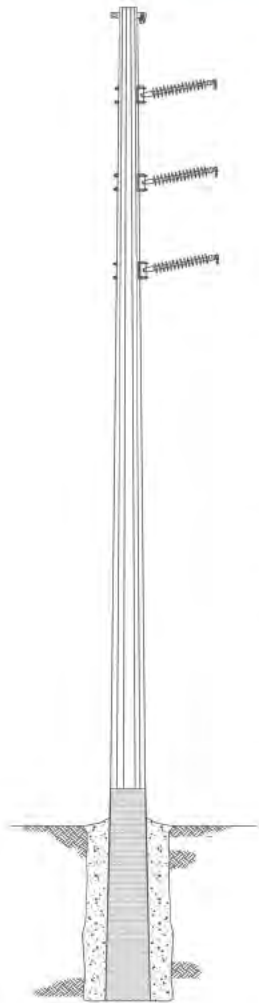
## **Midtown Reliability Project**

### **Exhibit J-6.7**

#### **Flyers Placed for Open House 3**

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## Public Open House Aviso de Reunión Abierta Pública



### **A stronger, smarter grid**

Midtown Reliability Project

Please join us

Thursday, February 8, 2024 | 6-8 p.m.

Complimentary refreshments will be provided.

### **Una red más sólida e inteligente**

Proyecto de Confiabilidad del Centro de la Ciudad

Acompañenos

Jueves, 8 de febrero de 2024 | de 6 a 8 p.m.

Refrescos de cortesía será servido.

Hotel DoubleTree by Hilton Tucson – Reid Park


445 S. Alvernon Way

Tucson, AZ 85711

More information / más información:

[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)



**Midtown Reliability Project** 


**Public Open House**  
**Aviso de Reunión Abierta Pública**


**A stronger, smarter grid**  
Midtown Reliability Project  
Please join us  
Thursday, February 8, 2024  
Complimentary refreshments will be provided.

**Una red más sólida e inteligente**  
Proyecto de Confiabilidad del Centro de la Ciudad  
Acompáñenos  
Jueves, 8 de febrero de 2024 | de 6 a 8 p.m.  
Refrescos de cortesía será servido.

Hotel DoubleTree by Hilton Tucson – Reid Park  
445 S. Alvernon Way  
Tucson, AZ 85711

More information / más información:  
[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)



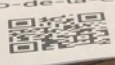
**Midtown Reliability Project** 


**Aviso de Reunión Abierta Pública**

**Una red más sólida e inteligente**  
Proyecto de Confiabilidad del Centro de la Ciudad  
Acompáñenos  
Jueves, 8 de febrero de 2024  
Refrescos de cortesía será servido.

Hotel DoubleTree by Hilton Tucson – Reid Park  
445 S. Alvernon Way  
Tucson, AZ 85711

**Más información**  
[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)




 **CITY OF TUCSON**

Mayor and Council  
Ordinances and Resolutions

**BLONDIES**  
640 N STONE AVE

**DJ YOURS TRULY**  
\$10 ENTRY

**SPECIAL GUEST**  
MAYE LEVY

MARCH

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Since 1989  
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U.S. Patent Apply Online

ENGINEERS	Intern
	Civil
	Electrical/Computer
	Mechanical/Chemical
	Nuclear
	Materials/Welding

**Trans**  
**Retreat**

RSVP Now!

3-6pm

Location: LGBTQ+ Resource Center (Room 404, Student Union)

**with guest teacher Jacoby Ballard**  
Social Justice Educator  
Yoga Teacher  
Author of *A Queer Dharma: Yoga and Meditation for Liberation*

**\$2000 Scholarships**  
for students from **any major!**

**Eligibility Criteria**

- Undergrad student
- Minimum GPA 3.0
- Must be degree-seeking
- Declare minor in Sustainable Mineral Resources at [mining.arizona.edu/undergraduate\\_minor](http://mining.arizona.edu/undergraduate_minor)

**Application Materials**

- Brief form found
- 300-word essay w/ interest in and sustainability in mineral resources.

**Application Deadline**  
March 17, 2024

**Apply today!**  
[mining.arizona.edu/](http://mining.arizona.edu/)

**Midtown Reliability Project**  
TEP  
Tucson Electric Power

**Public Open House**

**A stronger, smarter grid**  
Midtown Reliability Project  
Please join us  
Thursday, February 8, 2024 | 6-8 p.m.  
Complimentary refreshments will be provided.

**Hotel DoubleTree**  
by Hilton Tucson – Reid Park  
445 S. Alvernon Way  
Tucson, AZ 85711

**More information**  
[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

**Curious about faith?**  
Join a series of group conversations that help explore the Christian faith in an open, friendly environment.

Wednesday 6:00pm - 7:00pm  
Drew & Emma Hosted  
Room 1449-205

**UNIVERSITY OF ARIZONA WORKSHOP**  
RELATIONSHIP SKILLS FOR LIFE, LOVE AND WORK  
FOR TEENS 12-18  
FREE SNACKS AND PRIZES

**UP FOR OUR WORKSHOP**  
February 6, 2024 - March 29, 2024

**QUESTIONS?**  
Email: [workshop@ces.arizona.edu](mailto:workshop@ces.arizona.edu)  
Phone: 520-924-2121

**Want to...**

Are you pre-memorable?  
We're seeking individuals to complete...

**WHY WORK WITH US?**

- Work in a safe environment
- Inclusive company culture
- Gain valuable experience
- Enjoy the great outdoors
- Build lifelong friendships

**HAVE QUESTIONS?**  
Join us for our **SUMMER CAMP STAFF AND OPTIONAL GUESTS**  
12pm - 1:30pm  
Angel's Place  
1400 E Broadway  
Tucson, AZ

**Experience Tucson's Great Outdoors**  
**255NORTH**

**PRIMA FOUNDATION**

**JOB FAIR**

Join us for Primavera's First Job Fair...  
Open Positions:

- Resource Center
- Safety & Program Assistant
- Resource Specialist
- Agile Rehabilitation Assessment Specialist
- Program Assistant
- Resource Specialist
- Rural Resource Specialist

**SUSANUS**  
Premium Turkey, Chicken, Beef, Pork, Ham, Corned Beef and Cold Turkey

Jan. 15th, 10am-10pm  
1111 S. Wilson Road

**VOICE LESSONS**  
For Ages 7+ and All Skills Levels  
with Alexander Lionheart

AVAILABLE MONDAY - WEDNESDAY  
THURSDAY, AND FRIDAY AFTERNOONS

• \$40/HOUR FOR ONE LESSON (INDIVIDUAL)  
• \$30/HOUR FOR TWO LESSONS (DUO)  
• \$10/HOUR FOR FIVE LESSONS (GROUP)

**UNIVERSITY OF ARIZONA WORKSHOP**  
RELATIONSHIP SKILLS FOR LIFE, LOVE AND WORK  
FOR TEENS 12-18  
FREE SNACKS AND PRIZES

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Phone: 520-924-2121

**EXPLORE OPTIONS FOR HOUSING**  
DON'T MISS THE OPEN HOUSE  
Wednesday, February 7th | 9am - 11am

## Public Open House Fliers - February 2024 Open House

Location	Address	Date Posted
Ward 6	3202 E 1st St, Tucson, AZ 85716	1/24/2024
Himmel Park Library	1035 N Treat Ave, Tucson, AZ 85716	1/24/2024
U of A Student Union	1303 E University Blvd, Tucson, AZ 85719	1/24/2024
Ward 1	940 W Alameda St, Tucson, AZ 85745	1/24/2024
City Hall 1st Floor	255 W Alameda St, Tucson, AZ 85701	1/24/2024
City Hall 9th Floor (Mayor's Office)	255 W Alameda St, Tucson, AZ 85701	1/24/2024
Armory Park Center	220 S 5th Ave, Tucson, AZ 85701	1/24/2024
Donna Liggins Center	2160 N 6th Ave, Tucson, AZ 85705	1/24/2024
PCC Downtown	1255 N Stone Ave, Tucson, AZ 85709	1/24/2024
Ward 5	4300 S Park Ave, Tucson, AZ 85714	1/24/2024
Quincie Douglas Center	1575 E 36th St, Tucson, AZ 85713	1/24/2024
Sam Lena-South Tucson Library	1607 S 6th Ave, Tucson, AZ 85713	1/24/2024

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-6.8**

#### **Flyers Placed for Open House 4**

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# Public Open House

## Aviso de Reunión Abierta Pública

Thursday, March 28, 2024 | 6-8 p.m.

Complimentary refreshments will be provided.

Jueves, 28 de marzo de 2024 | de 6 a 8 p.m.

Refrescos de cortesía será servido

Hotel DoubleTree by Hilton Tucson – Reid Park

445 S. Alvernon Way

Tucson, AZ 85711

### More information

[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

### Más información

[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)



## Public Open House Fliers - March 2024 Open House

Location	Address	Date Posted
Joel Valdez Library (Downtown)	101 N Stone Ave, Tucson, AZ 85701	3/6/2024
Ward 3	1510 E Grant Rd, Tucson, AZ 85719	3/6/2024
Ward 6	3202 E 1st St, Tucson, AZ 85716	3/6/2024
Himmel Park Library	1035 N Treat Ave, Tucson, AZ 85716	3/6/2024
U of A Student Union	1303 E University Blvd, Tucson, AZ 85719	3/6/2024
Ward 1	940 W Alameda St, Tucson, AZ 85745	3/6/2024
City Hall 1st Floor	255 W Alameda St, Tucson, AZ 85701	3/6/2024
City Hall 9th Floor (Mayor's Office)	255 W Alameda St, Tucson, AZ 85701	3/6/2024
Armory Park Center	220 S 5th Ave, Tucson, AZ 85701	3/7/2024
Donna Liggins Center	2160 N 6th Ave, Tucson, AZ 85705	3/6/2024
PCC Downtown	1255 N Stone Ave, Tucson, AZ 85709	3/6/2024
Ward 5	4300 S Park Ave, Tucson, AZ 85714	3/6/2024
Quincie Douglas Center	1575 E 36th St, Tucson, AZ 85713	3/6/2024
Sam Lena-South Tucson Library	1607 S 6th Ave, Tucson, AZ 85713	3/6/2024

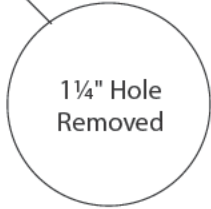
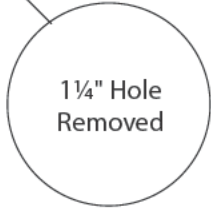
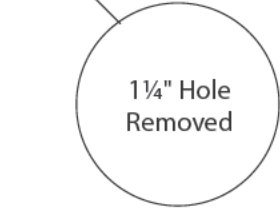
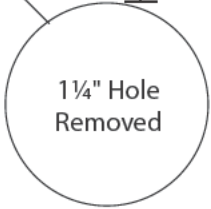
# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-6.9**

#### **Doorhangers Placed for Open House 4**

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### Midtown Reliability Project

With input from midtown residents and others, Tucson Electric Power has identified potential route segments for a new transmission line in midtown Tucson. After detailed analysis, TEP determined new facilities cannot be safely constructed in some alleyways where facilities are currently installed. These potential routes were moved to adjacent streets including East 7<sup>th</sup>, East Adams and East Lester. If you have questions about this change, please contact us at [midtownreliability@tep.com](mailto:midtownreliability@tep.com) or 833-523-0887.

Learn more at [tep.com/midtown](http://tep.com/midtown).



TEP identificó recientemente East 7<sup>th</sup> Street, East Adams Street y East Lester Street como posibles rutas de líneas de transmisión. Si tienes preguntas, contáctenos en [midtownreliability@tep.com](mailto:midtownreliability@tep.com) o al 833-523-0887.

Más información: [tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad).



CUT LINE



### Midtown Reliability Project

With input from midtown residents and others, Tucson Electric Power has identified potential route segments for a new transmission line in midtown Tucson. After detailed analysis, TEP determined new facilities cannot be safely constructed in some alleyways where facilities are currently installed. These potential routes were moved to adjacent streets including East 7<sup>th</sup>, East Adams and East Lester. If you have questions about this change, please contact us at [midtownreliability@tep.com](mailto:midtownreliability@tep.com) or 833-523-0887.

Learn more at [tep.com/midtown](http://tep.com/midtown).



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Más información: [tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad).



CUT LINE



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Learn more at [tep.com/midtown](http://tep.com/midtown).



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Más información: [tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad).



CUT LINE



### Midtown Reliability Project

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Learn more at [tep.com/midtown](http://tep.com/midtown).



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Más información: [tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad).





# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-6.10**

#### **Email Blasts for Open Houses 2, 3, 4**

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## Bryner, Clark

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**From:** midtownreliability  
**Sent:** Monday, November 6, 2023 12:51 PM  
**Subject:** TEP - Midtown Reliability Project Update

*You are receiving this email because you requested to receive updates about the [Midtown Reliability Project](#). If you would like to be removed from the project email list, please let us know.*

Tucson Electric Power is continuing efforts to build a stronger, smarter grid to support our community's growth through the Midtown Reliability Project. TEP is in the first phase of a detailed planning and siting process to identify potential routes for a new 138-kV transmission line that will serve central Tucson and provide reliability benefits to an even larger area of town.

Currently, TEP is identifying and evaluating "opportunities and constraints." Opportunities are defined as areas where it might make sense to locate a new transmission line. Constraints are defined as areas that present challenges to constructing and maintaining a new transmission line. An interactive map illustrating both can be viewed on the project webpage at [tep.com/midtown](http://tep.com/midtown). Upon detailed review, TEP will determine if it is feasible to construct and operate a transmission line within these areas of opportunity. If so, a preliminary segment could be identified in that area. These preliminary segments will be further refined into potential transmission line routes during later phases of the planning and siting process. Residents and other stakeholders will have multiple opportunities to review and provide comment throughout this process.

A newsletter with the latest project updates is being mailed this month to about 100,000 stakeholders. A digital copy of the newsletter is also available on the project website.

You are invited to an open house where you can ask questions and provide feedback on opportunities and constraints.

Midtown Reliability Project – Open House  
Thursday, Nov. 16, 2023

Doubletree – Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

Open House – 6-8 p.m.  
Presentation – 7 p.m.

Should you have any questions or comments, please send an email to [midtownreliability@tep.com](mailto:midtownreliability@tep.com) or call our project information line at 1-833-523-0887.

We appreciate your engagement in this important energy project.

**Clark Bryner, AICP**  
**Principal Program Manager, Transmission Line Siting**  
*Tucson Electric Power/UNS Electric Inc.*

4350 E. Irvington Rd.  
Mailstop CB200  
P.O. Box 711 Tucson, AZ 85702

## Bryner, Clark

---

**From:** midtownreliability  
**Sent:** Monday, January 29, 2024 8:57 AM  
**Subject:** TEP - Midtown Reliability Project Update

Tucson Electric Power is continuing efforts to reinforce the local energy grid that supports electric reliability for nearly 37,000 households and more than 6,800 businesses in the heart of Tucson. Our Midtown Reliability Project is in the third phase of a detailed planning and siting process to identify potential routes for a new 138-kV overhead transmission line that will serve central Tucson.

Most recently, TEP conducted a Suitability Assessment to narrow a list of more than 460 potential route segments. The assessment considered multiple criteria deemed important by area residents and stakeholders and other factors required by law. As a result, TEP narrowed the list of potential route segments under consideration to about 125 refined segments. An interactive map illustrating route segments still under consideration and those eliminated can be viewed on the project webpage at [tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project).

During the next phase of the siting process, TEP will conduct another, even more detailed analysis to identify a preferred route, and possibly alternative routes. Feedback from residents and other stakeholders continues to be important in guiding the outcome of the siting process.

A newsletter with the latest project updates has been mailed to about 100,000 stakeholders. A digital copy of the newsletter is also available on the project webpage.

You are invited to an open house where you can ask questions and provide feedback on the refined segments.

Midtown Reliability Project – Open House  
Thursday, Feb. 8, 2024

Doubletree – Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

Open House – 6-8 p.m.  
Presentation – 7 p.m.

Should you have any questions or comments, please send an email to [midtownreliability@tep.com](mailto:midtownreliability@tep.com) or call our project information line at 1-833-523-0887.

We appreciate your engagement in this important energy project.

**Clark Bryner**  
*Tucson Electric Power - Midtown Reliability Project Team*

4350 E. Irvington Rd.  
Mailstop CB200  
P.O. Box 711 Tucson, AZ 85702  
Phone: 1-833-523-0887  
E-mail: [midtownreliability@tep.com](mailto:midtownreliability@tep.com)  
Webpage: [www.tep.com/midtown](http://www.tep.com/midtown)

## Bryner, Clark

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**From:** midtownreliability  
**Sent:** Tuesday, March 12, 2024 12:10 PM  
**Subject:** TEP - Midtown Reliability Project Update March 2024

Tucson Electric Power is continuing efforts to reinforce the local energy grid that supports electric reliability for nearly 37,000 households and more than 6,800 businesses in the heart of Tucson. Our Midtown Reliability Project is in the final phase of a detailed planning and siting process to identify potential routes for a new 138-kV overhead transmission line that will serve central Tucson.

Most recently, TEP conducted a comprehensive compatibility analysis that considered multiple criteria, including some required by law and others deemed important by area residents and other stakeholders. As a result, 10 potential route alternatives were identified. An interactive map illustrating route alternatives still under consideration and those eliminated can be viewed on the project webpage at [tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project).

TEP has not yet identified a preferred route and is seeking public input on the proposed alternative route segments. The final route is subject to approval by the Arizona Power Plant and Transmission Line Siting Committee and the Arizona Corporation Commission.

A newsletter with the latest project updates has been mailed to about 100,000 stakeholders. A [digital copy of the newsletter is also available on the project webpage](#).

You are invited to an open house where you can ask questions and provide feedback on the route alternatives.

Midtown Reliability Project – Open House  
Thursday, Mar. 28, 2024

Doubletree – Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

Open House – 6-8 p.m.  
Presentation – 7 p.m.

Should you have any questions or comments, please send an email to [midtownreliability@tep.com](mailto:midtownreliability@tep.com) or leave a voicemail at 1-833-523-0887.

We appreciate your engagement in this important energy project.

**Clark Bryner**  
*Tucson Electric Power - Midtown Reliability Project Team*

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Webpage: [www.tep.com/midtown](http://www.tep.com/midtown)

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-7**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

**Exhibit J-7.1**

**Newsletter #1**

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## Tucson Electric Power

Midtown Reliability Project  
P.O. Box 711  
Mail Stop CB200  
Tucson, AZ 85701-0711

## Energy Grid Update Midtown Reliability Project

September 2023



### TEP Begins New Review for Urgently Needed Upgrades in Central Tucson

Tucson Electric Power (TEP) is helping Tucson thrive by building a stronger, smarter grid that supports our community's growth, facilitates additional use of clean energy resources and improves reliability during extreme weather conditions.

The TEP Midtown Reliability Project will support these efforts by reinforcing systems that ensure electric reliability in the heart of Tucson, giving midtown residents the same reliability benefits that residents of other areas already enjoy as the result of comparable improvements.

#### Project Need

The project will replace older, lower-voltage equipment that cannot keep pace with the increasing energy use in central Tucson, an area that includes historic neighborhoods, popular business districts and the University of Arizona campus. Peak power demand in the area has nearly reached the capacity of the older equipment, reducing electric reliability and leading to longer power outages on some circuits.

Components include:

- A new transmission line and substation that connect midtown neighborhoods to TEP's modern 138-kilovolt (kV) system, more than tripling electric capacity in the area.
- Significant investments in distribution systems that link customers' homes and

businesses to the local energy grid.

- Retirement and removal of old equipment, including eight substations and 19 miles of power lines throughout central Tucson, helping keep power bills lower.

Because these upgrades are urgently needed to maintain reliable service, TEP plans to complete construction of the transmission line and substation by the summer of 2027.

TEP's 46-kV system was designed to serve the energy needs of homes and businesses built in the mid to late 20th century. While many of those buildings remain the same, particularly in central Tucson, their energy use has escalated significantly with a growing population, the use of air conditioning rather than evaporative cooling and greatly expanded use of electronic devices.

Some transformers providing service in central Tucson are more than 50 years old, while other elements are even older. Upgrades are critical because some of this equipment is rated as being in 'poor' or 'very poor' condition, creating a greater risk of outages. Simply replacing that equipment would be expensive and ineffective, and would not address the need for additional capacity.

#### Current Status

In July 2023, TEP defined the Midtown Reliability Project study area boundaries as just north of Fort Lowell Road on the north, just west of Interstate 10 and South Fourth Avenue on the west, just south of East 36th Street on the south and just east of Country Club Road on the east. Please see the map shown inside.

Specific route segments for the proposed transmission line have not been developed at this time.

TEP has begun a new review of all potential routes for the line, including those previously excluded from consideration as part of the Kino-DeMoss Petrie (DMPI) Transmission Line Project.

#### Help Guide Central Tucson's Energy Future

Although Arizona law defines the criteria that must be considered when evaluating potential transmission line routes, TEP also wants to hear about other issues and concerns from customers and other stakeholders. TEP will use all these criteria to compare potential transmission line routes and assess their compatibility with the environment and the preferences expressed by stakeholders.

What criteria are most important to you? Please let us know by participating in a brief online survey available on our project webpage.

### Midtown Reliability Project

#### Please Join Us Public Open House

Thursday, Sept. 21 | 6-8 p.m.  
DoubleTree by Hilton Hotel Tucson - Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)



#### Greater capacity for growing energy needs

Planned transmission facilities in the Midtown Reliability Project will provide more than three times the capacity of today's nearly overloaded systems - enough to meet central Tucson's day-to-day energy needs for a lifetime.

## Midtown Reliability Project

### Benefits

The Midtown Reliability Project will close a gap in our local energy grid's transmission network. Benefits include:

Shorter, less frequent power outages. The project will complete a 138-kV "loop" around central Tucson allowing TEP to supply energy from more than one direction to substations that support service to residents, business owners, community organizations, service providers and other customers in central Tucson.

Greater capacity for growing energy needs. New 138-kV transmission facilities will provide more than three times the capacity of the current system, enough to meet our community's day-to-day energy needs for a lifetime.

Aging 4-kV facilities will be replaced with new 13.8-kV distribution lines, poles, transformers and switching – improvements that depend upon the construction of new 138-kV transmission facilities.

More customer-owned solar and storage. Transmission and distribution improvements will allow customers in the area to continue adding rooftop solar panels, private battery storage systems and electric vehicles. Currently, some central Tucson neighborhoods are nearing capacity for solar interconnections.

Comparable cost, greater efficiency. Completion of the new, higher-capacity transmission line and associated improvements would allow TEP to retire up to eight 46-kV substations and associated facilities within 10 years, avoiding approximately \$42 million in replacement costs for facilities in need of replacement today. Additional 46-kV facilities could be retired in the near future, avoiding significant additional replacement costs and impacts.

Improved service citywide. The Midtown Reliability Project will reduce the strain on TEP's remaining 46-kV system, helping to avoid overloads in other parts of town.

Support for economic growth and a healthy community. Additional energy capacity will support anticipated increases in job and population density that the City expects. The project will also upgrade service to the University of Arizona, Tucson's largest employer, and Banner - University Medical Center's Tucson campus and emergency room, each of which provides services and benefits for our entire community and supports a growing economy.

### Learn More

Please visit our project web page at [tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project) for more information including:



- A detailed, interactive map
- Design options for the transmission line, including the potential use of shorter poles in some areas
- Details about why interconnecting 138-kV substations to remote energy resources is crucial for reliable service
- Required regulatory and zoning approvals
- Details about the proposed Vine Substation

### Public Participation

Please come to our open house on September 21 and participate in the survey described in this newsletter. TEP is also reaching out to all individual neighborhoods within the study area for input.

Residents, property owners, businesses and others also can ask questions and submit general comments about the project by:

- Filling out an online comment form on the project webpage
- Sending email comments to [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- Calling 1-833-523-0887 and leaving a voicemail message
- Mailing a letter with comments to:  
TEP Midtown Reliability  
P.O. Box 711  
Mail Stop CB200  
Tucson, AZ 85701-0711

## Midtown Reliability Project



El Proyecto Midtown Reliability de Tucson Electric Power fortalecerá los sistemas que garantizan la fiabilidad eléctrica en el centro de Tucson, proporcionando a los residentes del área central de la ciudad los mismos beneficios de fiabilidad que ya disfrutan los residentes de otras áreas. Estas mejoras incluyen una nueva línea de transmisión, una nueva subestación e inversiones significativas en sistemas de distribución que vinculan los hogares y las empresas de los clientes con nuestra red energética local. TEP anima a los clientes y a otras partes interesadas en el área de estudio del proyecto a asistir a la jornada de puertas abiertas y a participar en la encuesta descrita en este boletín informativo. Visite el sitio web del Proyecto para ver un mapa interactivo y más información. Si tiene preguntas, llámenos al 1-833-523-0887. Gracias por su interés en el proyecto.

**TEP comienza una nueva revisión para actualizaciones que se necesitan de manera urgente en el centro de Tucson**

Tucson Electric Power (TEP) ayudará a Tucson a progresar mediante el desarrollo de una red más sólida e inteligente que respaldará el crecimiento de nuestra comunidad, facilitará el uso adicional de recursos de energía limpia y mantendrá la fiabilidad en condiciones climáticas extremas.

**El Proyecto de Confiabilidad del Centro de la Ciudad** de TEP respaldará estas iniciativas reforzando los sistemas que garantizan la fiabilidad eléctrica en el centro de Tucson, lo que proporcionará a los residentes del área central de la ciudad los mismos beneficios de fiabilidad que ya tienen los residentes de otras áreas.

El proyecto reemplazará los equipos más antiguos y de menor voltaje que no pueden satisfacer el creciente uso de energía en el centro de Tucson, un área que incluye vecindarios históricos, distritos comerciales populares y el campus de la Universidad de Arizona. La demanda de energía en hora pico en el área casi alcanza la capacidad de esos equipos más antiguos, lo que reduce la fiabilidad eléctrica y provoca cortes de energía más prolongados en algunos circuitos.

Los componentes incluyen:

- Una nueva línea de transmisión y una subestación que conectan los vecindarios del centro de la ciudad con nuestro moderno sistema de 138 kilovoltios (KV), lo que triplica la capacidad eléctrica en el área.
- Inversiones significativas en sistemas de distribución que

conectan a los clientes con nuestra red de energía local.

- Retiro de hasta ocho subestaciones antiguas y otros equipos en vecindarios en todo el centro de Tucson, lo que ayuda a que nuestro servicio siga siendo asequible.

**Necesidad**  
 El sistema de 46 kV de TEP fue diseñado para satisfacer las necesidades energéticas de los hogares y negocios construidos a mediados y finales del siglo XX. Si bien muchos de esos edificios siguen en pie, especialmente en el centro de Tucson, su consumo energético ha aumentado significativamente.

La demanda de energía en hora pico continúa aumentando en el centro de Tucson y en toda nuestra comunidad. Las demandas en nuestra red de energía local han aumentado debido al crecimiento de la población, el uso de aire acondicionado en lugar de la refrigeración por evaporación y el amplio uso de dispositivos electrónicos.

Algunos transformadores que prestan servicio en el centro de Tucson tienen más de 50 años y otros elementos de nuestra red en el área son aún más antiguos. Es esencial contar con nuevos equipos, ya que los residentes dependen actualmente de equipos clasificados como "deficientes" o "muy deficientes", lo que crea un mayor riesgo de baja tensión y cortes. Reemplazar esos equipos sería costoso e ineficaz, ya que no abordaría la necesidad de capacidad adicional en el área.

**Estado actual**  
 En julio de 2023, TEP definió los límites del área de estudio del Proyecto de Confiabilidad del Centro de la Ciudad: justo al norte de Fort Lowell Road en el norte, justo al oeste de la Interestatal 10 y South Fourth Avenue en el oeste, justo al sur de East 36th Street en el sur y justo al este de Country Club Road en el este. Consulte el mapa adjunto.

En este momento, no se han desarrollado los segmentos de ruta específicos para la línea de transmisión propuesta.

TEP ha comenzado una nueva revisión de todas las posibles rutas para la línea, incluidas aquellas que no se tuvieron en cuenta previamente para el proyecto de la línea de transmisión Kino-DeMoss Petrie (DMP).

**Guía de ayuda sobre el futuro energético del centro de Tucson**  
 Si bien la ley de Arizona define los criterios que TEP debe considerar al evaluar las posibles rutas de la línea de transmisión, también queremos conocer otros problemas e inquietudes que los clientes y otras partes interesadas crean importantes. TEP utilizará todos estos criterios para comparar las posibles rutas de la línea de transmisión y evaluar su compatibilidad con el medioambiente y las preferencias expresadas por las partes interesadas.

¿Qué criterios son los más importantes para usted? Para informarnos sus opiniones, complete una breve encuesta en línea disponible en nuestra página web del proyecto en [tep.com/midtown](http://tep.com/midtown).

**Acompañenos**  
**Reunión abierta**

Jueves, 21 de septiembre | De 6 a 8 p. m.  
 DoubleTree by Hilton Hotel Tucson - Reid Park  
 445 S Alvernon Way  
 Tucson, AZ 85711

[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad/](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad/)



**Mayor capacidad para**  
**satisfacer las crecientes**  
**necesidades energéticas**

Las instalaciones de transmisión planificadas proporcionarán más del triple de capacidad que los sistemas actuales que están casi sobrecargados, lo suficiente para satisfacer las necesidades energéticas diarias de Tucson para siempre.

El Proyecto de Confiabilidad del Centro de la Ciudad proporcionará una actualización oportuna y rentable a estos sistemas más antiguos, lo que nos ayuda a mantener un servicio asequible y fiable para todos los clientes de TEP.

**Beneficios**

El Proyecto de Confiabilidad del Centro de la Ciudad cerrará una brecha en la red de transmisión de nuestra red de energía local. Los beneficios incluyen lo siguiente:

- Cortes de energía más breves y menos frecuentes.**
  - El proyecto completará un "lazo" de 138 kV alrededor del centro de Tucson, lo que reforzará la fiabilidad eléctrica en el área. Los cortes de energía serían menos frecuentes y más breves porque TEP podría suministrar energía desde más de una dirección a las subestaciones que respaldan el servicio a residentes, propietarios de negocios, organizaciones comunitarias, proveedores de servicios y otros clientes en el centro de Tucson.

**Mayor capacidad para satisfacer las crecientes necesidades energéticas**

- Las nuevas instalaciones de transmisión de 138 kV proporcionarán más del triple de capacidad que el sistema actual, lo suficiente para satisfacer las necesidades energéticas diarias de nuestra comunidad para siempre.
- Por instalaciones antiguas de 4 kV se reemplazarán por nuevos postes, transformadores, tablero de distribución y líneas de distribución de 13.8 kV, lo que ayudará a TEP a satisfacer mejor las cambiantes necesidades energéticas.

**Más sistemas de energía propios del cliente.**

- Las mejoras en la transmisión y distribución permitirán a los clientes del área seguir incorporando paneles solares en los techos, sistemas privados de almacenamiento de baterías y vehículos eléctricos. En la actualidad, algunos vecindarios del centro de Tucson están a punto de alcanzar la capacidad de interconexiones de energía solar.

**Costo comparable, mayor eficiencia**

La finalización de la nueva línea de transmisión de mayor capacidad y las mejoras asociadas permitirían a TEP retirar hasta ocho subestaciones de 46 kV e instalaciones asociadas en un plazo de 10 años, evitando aproximadamente \$42 millones en costos de reemplazo para instalaciones que hoy necesitan ser reemplazadas. Se podrían retirar instalaciones adicionales de 46 kV en

un futuro próximo, evitando estos importantes costos adicionales de reemplazo.

**Servicio mejorado en toda la ciudad**

- El Proyecto de Confiabilidad del Centro de la Ciudad reducirá la carga en el sistema de 46 kV restante de TEP. Esto ayuda a evitar condiciones de sobrecarga en otras partes de la ciudad.

**Apoyo para el crecimiento económico y la salud de la comunidad**

- El proyecto mejorará el servicio brindado a la Universidad de Arizona, el empleador más grande de Tucson, y al campus y sala de emergencias de Banner - University Medical Center de Tucson, cada uno de los cuales brinda servicios y beneficios a toda nuestra comunidad e impulsa el crecimiento de la economía.
- Se necesita capacidad de energía adicional en el centro de Tucson para respaldar los aumentos previstos de densidad laboral y de población descritos en los planes municipales locales de crecimiento.

**Participación pública**

TEP anima a los clientes y a otras partes interesadas en el área de estudio a asistir a la reunión abierta y a participar en la encuesta que se proporciona en este boletín informativo. También nos estaremos comunicando individualmente con todos los vecindarios del área de estudio para obtener información.

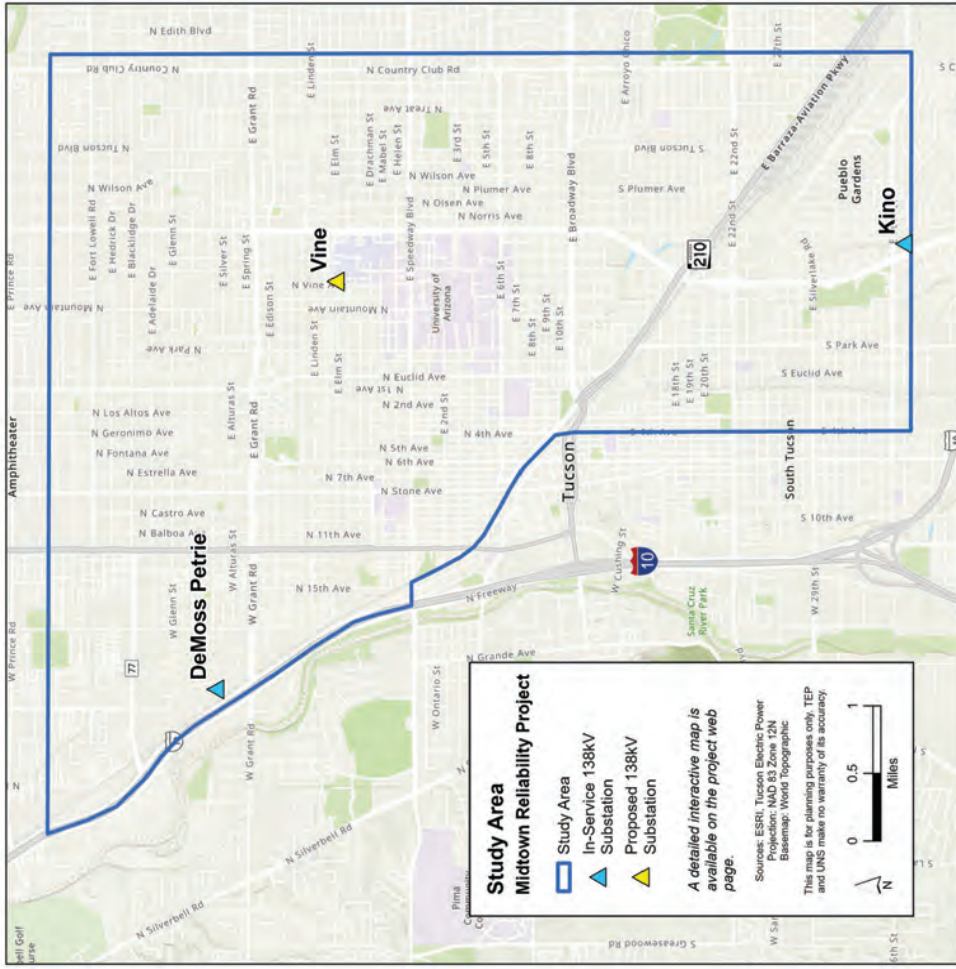
Los residentes, los propietarios, las empresas y otras personas también pueden hacer preguntas y enviar comentarios generales sobre el proyecto: [tep.com/midtown](http://tep.com/midtown) para obtener más información



Visite nuestra página web del proyecto en [tep.com/midtown](http://tep.com/midtown) para obtener más información, incluyendo:

- Un mapa detallado e interactivo.
- Opciones de diseño para la línea de transmisión, incluido el posible uso de postes más bajos en algunas áreas.
- Detalles sobre por qué la interconexión de las subestaciones de 138-kV con recursos de energía remotos es fundamental para un servicio fiable.
- Aprobaciones reglamentarias y de zonificación requeridas.
- Detalles sobre la subestación Vine propuesta.

En la página web del proyecto, se ofrece un mapa interactivo detallado.



# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

**Exhibit J-7.2**

**Newsletter #2**

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**Stakeholders Asked to Help Identify Project 'Opportunities and Constraints'**

Tucson Electric Power (TEP) is seeking feedback from residents, businesses and other stakeholders to help identify potential locations for new transmission facilities needed to maintain reliable service in central Tucson.

TEP also looks for "constraints," or areas that present natural, manufactured, regulatory or political challenges to constructing and maintaining a transmission line. For example, the City of Tucson's determination that, with some exceptions, new utilities must be installed underground in Gateway Corridors has created a constraint along North Campbell Avenue and South Kino Parkway. High-density development, like that at the University of Arizona main campus or downtown Tucson, are examples as well.

The opportunities and constraints that TEP has identified are shown on a map in this newsletter. TEP is now asking stakeholders within the study area to tell us about others.

"Input from people who know the study area best will be extremely helpful in identifying potential routes that are most compatible with the community," Bryner said.

**Recent Public Outreach**

- Sent newsletter inviting more than 100,000 stakeholders to a September open house. Successful outcome with about 125 in attendance.
- TEP invited representatives from active associations in each of the study area's 62 neighborhoods to participate in a Neighborhood Advisory Group meeting in October. TEP also offered to attend individual association meetings to answer questions about the project. Several meetings were scheduled.
- Field visits in the study area will continue throughout the siting process to maintain familiarity with neighborhoods, streets, and existing land uses.

**Project Need and Benefits**

Peak energy demand continues to increase in central Tucson and throughout our community. Some transformers and other equipment providing service are 50 years old or more. Residents currently depend on equipment rated as being in 'poor' or 'very poor' condition, creating a greater risk of low voltage and outages. For more details about the project need and benefits, please visit our project website.

**Project Need and Benefits**

Peak energy demand continues to increase in central Tucson and throughout our community. Some transformers and other equipment providing service are 50 years old or more. Residents currently depend on equipment rated as being in 'poor' or 'very poor' condition, creating a greater risk of low voltage and outages. For more details about the project need and benefits, please visit our project website.

**Midtown Reliability Project**



**Please Join Us**

We're working to identify areas in central Tucson that are most compatible with new, urgently needed transmission facilities.

**Public Open House**

Thursday, November 16, 2023 | 6-8 p.m.  
 Open house begins at 6 p.m.  
 Presentation begins at 7 p.m.  
 DoubleTree - Reid Park  
 445 S Alvernon Way  
 Tucson, AZ 85711

**TEP asks Midtown residents & others for input**

Read inside and visit our website to learn how you can help shape our future energy grid.

[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)



TEP's project team will evaluate all opportunities and constraints using field visits and other measures. This information will then be developed into preliminary segments that could be combined in various ways to form potential routes.

To view a detailed interactive map of opportunities and constraints, or to provide feedback about others using our online comment form, please visit the project webpage. TEP expects to share draft preliminary segments at an open house next month.

**Survey Results**

In late August, TEP emailed a short project survey to 55,000 recipients. A link to the survey also was available on the project website through Oct. 15. Based on responses from nearly 2,800 participants:

- The project's potential impact on low income and disadvantaged communities and its cost, as recovered through electric bills, were determined to be the two most important factors of six presented.
- Taller poles with longer spans of wire between them were preferred over shorter poles with shorter spans. Use of shorter poles would require more poles to be installed.
- Poles with a 'rusted' weathering steel finish, which TEP typically uses throughout its service territory, were preferred over poles with a galvanized metallic finish.

The survey was designed to provide the project team with a closer look at the opinions and preferences of customers and other stakeholders. The survey did not ask participants about underground installation because it is not

under consideration due to significantly higher installation and maintenance costs, shorter lifespan and other factors. Participants identified additional criteria to consider including:

- Public health and safety
- Impacts to pedestrian walkways, public transit, and vehicular traffic
- Impact on property values
- Impact on future land uses
- Impact on Native lands
- Impact on water
- Radio/communications interference

This feedback will be very helpful during later phases of the planning and siting process as TEP's project team evaluates preliminary segments with these criteria and others required under Arizona law.

**Public Participation**

Please come to our open house on November 16. Stakeholders also can ask questions and submit general comments about the project by:

- Filling out an online comment form on the project webpage
- Sending email comments to [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- Calling 1-833-523-0887 and leaving a voicemail message
- Mailing a letter with comments to:

TEP Midtown Reliability  
 P.O. Box 711  
 Mail Stop CB200  
 Tucson, AZ 85701-0711



El Proyecto de Confiabilidad del Centro de la Ciudad ofrecerá un servicio más limpio y confiable a los clientes del centro de Tucson en el futuro. Tucson Electric Power (TEP) solicita su ayuda para identificar áreas en el centro de Tucson que sean más compatibles con las nuevas instalaciones de transmisión que se necesitan con urgencia. TEP también anima a los residentes y otras partes interesadas del área de estudio a asistir a la reunión abierta que se proporciona en este boletín informativo y compartir sus opiniones. Visite nuestra página web del proyecto en [tep.com/midtown](http://tep.com/midtown) para obtener más información. Si tiene preguntas, llámenos al 1-833-523-0887. Gracias por su interés en el proyecto.



**Se les pidió a las partes interesadas que ayudaran a identificar las "oportunidades y restricciones" del proyecto**

Tucson Electric Power (TEP) busca comentarios de residentes, empresas y otras partes interesadas para ayudar a identificar posibles ubicaciones para las nuevas instalaciones de transmisión necesarias para mantener un servicio confiable en el centro de Tucson.

El Proyecto de Confiabilidad del Centro de la Ciudad de TEP aumentará la capacidad de nuestra red eléctrica local, lo que brinda al centro de la ciudad el mismo nivel de servicio que los residentes de otras áreas ya disfrutan como resultado de mejoras comparables. El proyecto incluirá una nueva línea de transmisión de mayor voltaje, una nueva subestación y otras actualizaciones.

Al considerar dónde ubicar una nueva línea de transmisión, TEP busca "oportunidades" de ubicación: corredores lineales y otras características del suelo que sean adecuadas para dichas instalaciones. Las oportunidades pueden incluir carreteras importantes, ferrocarriles e infraestructura de servicios públicos existente. También consideramos el uso de suelo existente o planificado, suelo desocupado, el espacio abierto y las características lineales naturales.

"Las oportunidades sirven como un buen punto de partida. Son áreas que, a primera vista, pueden ser compatibles con una nueva línea de transmisión, pero que requieren que echemos un vistazo más de cerca para determinar si una línea podría construirse allí", dijo Clark Bryner, gerente principal del programa de TEP para el emplazamiento de la línea de transmisión.

TEP también busca "restricciones" o áreas que presentan desafíos naturales, fabricados, regulatorios o políticos para construir o mantener una línea de transmisión. Por ejemplo, la determinación de la ciudad de Tucson de que, con algunas excepciones, se deben instalar nuevos servicios públicos subterráneos en los corredores de acceso, creó una restricción a lo largo de North Campbell Avenue y South Kino Parkway. El desarrollo de alta densidad, como el del campus principal de la Universidad de Arizona o del centro de Tucson, también son ejemplos.

Las oportunidades y limitaciones que TEP identificó se muestran en un mapa en este boletín informativo. TEP ahora pide a las partes interesadas dentro

del proyecto, visite nuestro sitio web del proyecto.

**Alcance público reciente**  
 • Se envió un boletín informativo invitando a más de 100,000 partes interesadas a una reunión abierta en septiembre. El resultado fue extenso con aproximadamente 125 asistentes.

• TEP invitó a representantes de asociaciones activas en cada uno de los 62 vecindarios del área de estudio para participar en una reunión del Grupo Asesor Comunitario en octubre. TEP también ofreció asistir a reuniones individuales de la asociación para responder preguntas sobre el proyecto. Se programaron varias reuniones.

• Las visitas de campo en el área de estudio continuarán durante todo el proceso de ubicación para mantenerse familiarizado con los vecindarios, las calles y los usos existentes del suelo.

**Necesidad y beneficios del proyecto**

La demanda de energía en hora pico continúa aumentando en el centro de Tucson y en toda nuestra comunidad. Algunos transformadores y otros equipos que proporcionan servicio tienen 50 años o más. Los residentes dependen actualmente de equipos clasificados como "deficientes" o "muy deficientes", lo que crea un mayor riesgo de baja tensión y cortes. Para obtener más detalles sobre la necesidad y los beneficios del proyecto, visite nuestro sitio web del proyecto.

**Proyecto de Confiabilidad del Centro de la Ciudad**



**TEP pide aportes a los residentes del centro de la ciudad y a otras personas**

Lea adentro y visite nuestro sitio web para saber cómo puede ayudar a dar forma a nuestra red eléctrica futura.

[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)



**Acompañenos**  
 Estamos trabajando para identificar áreas en el centro de Tucson que sean más compatibles con las nuevas instalaciones de transmisión que se necesitan con urgencia.

**La reunión abierta comienza**  
 Thursday, Noviembre 16, 2023 | 6-8 p. m.  
 La reunión abierta comienza a las 6:00 p. m. La presentación comienza a las 7:00 p. m.  
 DoubleTree - Reid Park  
 445 S Alvernon Way  
 Tucson, AZ 85711

del área del estudio que nos cuenten sobre otras oportunidades y limitaciones.

"La opinión de las personas que mejor conocen el área de estudio será extremadamente útil para identificar posibles rutas que sean más compatibles con la comunidad", dijo Bryner.

El equipo del proyecto de TEP evaluará todas las oportunidades y limitaciones mediante visitas de campo y otras medidas. Esta información luego se desarrollará en segmentos preliminares que podrían combinarse de varias maneras para formar rutas potenciales.

Para ver un mapa interactivo detallado de oportunidades y restricciones o para proporcionar comentarios sobre otras mediante nuestro formulario de comentarios en línea, visite la página web del proyecto. TEP espera compartir un borrador de segmentos preliminares en una reunión abierta el próximo mes.

#### Resultados de la encuesta

A fines de agosto, TEP envió por correo electrónico una breve encuesta de proyecto a 55,000 destinatarios. También hubo un enlace a la encuesta disponible en el sitio web del proyecto hasta el 15 de octubre. En función de las respuestas de casi 2,800 participantes:

- Se determinó que el impacto potencial del proyecto en las comunidades de bajos ingresos y desfavorecidas y su costo, recuperado a través de las facturas de electricidad, son los dos factores más importantes de los seis presentados.
- Se preferían postes más altos con tramos de cable más largos entre ellos en lugar de postes más cortos con tramos más cortos. El uso de postes más cortos requeriría la instalación de más postes.
- Se prefirieron los postes con un acabado de acero 'oxidado' resistente a la intemperie, que TEP utiliza normalmente en todo su territorio de servicio, en lugar de los postes con un acabado metálico galvanizado.

La encuesta se diseñó para proporcionar al equipo del proyecto una mirada más detallada a las opiniones y preferencias de los clientes y otras partes interesadas. La encuesta no preguntó a los participantes sobre la instalación subterránea porque no se está considerando debido a costos de instalación y mantenimiento significativamente más altos, vida útil más corta y otros factores. Los participantes identificaron criterios adicionales a considerar, incluidos los siguientes:

- Salud y seguridad públicas
- Impactos en pasos peatonales, transporte público y tráfico vehicular
- Impacto en los valores de la propiedad
- Impacto en usos futuros del suelo
- Impacto en las tierras nativas
- Impacto en el agua
- Interferencia de radio/comunicaciones

Estos comentarios serán muy útiles durante las fases posteriores del proceso de planificación y ubicación, ya que el equipo de proyectos de TEP evalúa los segmentos preliminares con estos criterios y otros requeridos por la ley de Arizona.

#### Participación pública

Venga a nuestra reunión abierta el 16 de noviembre. Las partes interesadas también pueden hacer preguntas y enviar comentarios generales sobre el proyecto de la siguiente manera:

- al completar un formulario de comentarios en línea en la página web del proyecto;
- al enviar comentarios por correo electrónico a [midtownreliability@tep.com](mailto:midtownreliability@tep.com);
- al llamar al 1-833-523-0887 y dejar un mensaje de correo de voz; o
- al enviar una carta por correo postal a la siguiente dirección:

TEP Midtown Reliability  
 P.O. Box 711  
 Mail Stop CB200 Tucson, AZ 85701-0711



# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

**Exhibit J-7.3**

**Newsletter #3**

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## Tucson Electric Power

Midtown Reliability Project  
P.O. Box 711  
Mail Stop CB200  
Tucson, AZ 85701-0711

## Energy Grid Update Midtown Reliability Project

January 2024



### TEP Narrows List of Potential Route Segments, Seeks Comment Before Route Development

Using input from midtown residents and other stakeholders, Tucson Electric Power has identified more than 100 segments that could be combined to form potential routes for a new transmission line to serve midtown Tucson.

TEP's Midtown Reliability Project will reinforce the local energy grid that supports electric reliability for nearly 37,000 households and more than 6,800 businesses in the heart of Tucson.

The project will include a new higher-voltage overhead transmission line, a new substation and other upgrades to replace eight aging substations, sub-transmission lines and other lower-voltage equipment that can't keep pace with increasing energy use.

TEP will continue to seek public input before recommending routes for the project. Any final route, as well as the project itself, is subject to approval by the Arizona Power Plant and Transmission Line Siting Committee and the Arizona Corporation Commission.

To help identify a path for the line, TEP completed a comprehensive suitability assessment of more than 460 potential route segments in the project study area. The

assessment considered multiple criteria, including some required by law and others deemed important by area residents and other stakeholders, including residential land use, proximity to historic properties and impact on low-income residents. As a result of the assessment, more than 300 segments were removed from consideration.

TEP will perform additional analysis on remaining segments to determine which are most compatible for use in potential routes to link key energy hubs in Tucson. See page 3 for a map of segments that remain under consideration and those eliminated during the suitability assessment. An interactive map is available on the project website at [tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project).

"Now, we're asking residents and other stakeholders for additional feedback on specific segments that remain under consideration," said Clark Bryner, TEP's Manager for Transmission Line Siting.

**Identifying Suitable Options**  
The new transmission line must interconnect two existing substations and a planned substation. Last year, TEP considered stakeholder input and other factors to identify hundreds of preliminary segments that could be

#### Recent Public Outreach

- Mailed newsletter inviting more than 100,000 stakeholders to attend November open house, to provide comments and to visit the project webpage. About 90 people attended the open house.
- About 20 neighborhoods within the study area are represented in the project's Neighborhood Advisory Group. Some segments remain under consideration as a result of group member input. All neighborhood associations in the study area's 62 neighborhoods are invited to participate.
- TEP representatives have attended 9 individual neighborhood association meetings to listen to concerns and answer questions about the project.
- TEP field visits in the study area continue.

#### Open House FAQs

Questions submitted by the public at recent open houses and TEP's responses are available on our project webpage at [tep.com/midtown](http://tep.com/midtown).

## Midtown Reliability Project



You can help shape our future energy grid. Please read inside, visit our website or join our open house to learn how.

#### Public Open House

Thursday, February 8, 2024 | 6-8 p.m.  
Open house begins at 6 p.m.  
O&A begins at 7 p.m.  
Light refreshments will be provided.

DoubleTree - Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)



Lea adentro, visite nuestro sitio web o venga a nuestra reunión abierta para saber cómo puede ayudar a dar forma a nuestra red eléctrica futura.

#### Reunión abierta pública

Jueves, 8 de febrero de 2024 | 6-8 p.m.  
La reunión abierta comienza a las 6 p.m.  
Las preguntas y respuestas comienzan a las 7 p.m.  
Se proporcionarán refrigerios livianos.  
Participarán miembros del equipo bilingües y un intérprete de español.

DoubleTree - Reid Park  
445 S Alvernon Way  
Tucson, AZ 85711

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combined to form potential routes. TEP first shared the list of preliminary segments at its November open house.

"We begin identifying segments by considering the engineering feasibility. We ask from a purely engineering perspective, 'Can a line be built on this segment?' If the answer is yes, we include it in the list of preliminary segments. In this preliminary stage, we do not yet consider any environmental or land use impacts, public or stakeholder preferences, or compliance with local ordinances," Bryner said.

In November, TEP began evaluating preliminary segments using additional criteria, including impacts on biological resources, historic properties and neighborhoods and low-income and disadvantaged communities. Some criteria were informed by residents and other stakeholder preferences.

"During the next phase, known as the suitability assessment, we use geographic information system software to examine each segment multiple times based on suitability models that represent multiple perspectives. In one model, we placed greater emphasis on impact to low-income communities, based on feedback from our stakeholder survey. In another, consideration of impacts on cultural and historic properties carry more weight. We also use a model in which all criteria are weighted equally," Bryner said.

The analysis identified the most suitable segments according to each model. A few segments were identified as most suitable in every model. Segments with lower suitability scores were eliminated from consideration.

TEP then carefully reviewed the eliminated segments to determine if any were comparable in suitability with those retained by the model, and whether they should be carried forward for continued evaluation. Remaining segments were then evaluated during field visits for engineering, land use and right-of-way suitability. Today, 126 segments remain under consideration.

TEP is now asking stakeholders to provide comments about the refined segments. Based on continued evaluation and input TEP receives over the next few weeks, project planners may eliminate additional segments or consider new ones before identifying potential routes.

**TEP reduce la lista de posibles tramos y pide comentarios antes de trazar las rutas**

Utilizando los aportes de los residentes del centro de la ciudad y otras partes interesadas, Tucson Electric Power ha identificado más de 100 tramos refinados que podrían combinarse para formar rutas potenciales para una nueva línea de transmisión aérea que preste servicio al centro de la ciudad de Tucson.

El Proyecto de Confiabilidad del Centro de la Ciudad de TEP reforzará los sistemas que garantizan la confiabilidad eléctrica para casi 37,000 hogares y más de 6,800 clientes comerciales en el corazón de Tucson.

Para ayudar a determinar el trazado de la línea, TEP ha completado una evaluación integral de idoneidad en la que se han tenido en cuenta los criterios requeridos por la ley y los criterios considerados importantes por los residentes y otras partes interesadas dentro del área de estudio del proyecto. TEP está pidiendo comentarios de las partes interesadas sobre los tramos restantes. Consulte la página 3 para ver un mapa de los tramos que siguen en estudio y aquellos eliminados durante la evaluación de idoneidad. Una versión interactiva del mapa está disponible en la página web del proyecto.

Se publicará una versión en español de este boletín informativo en el sitio web del proyecto en [tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad), y puede enviarse por correo si lo solicita utilizando la información de contacto anterior. Gracias por su interés en el proyecto.



**Public Participation**

Please come to our open house on February 8. Stakeholders also can ask questions and submit comments by:

- Filling out an online comment form on the project webpage
- Sending email comments to [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- Calling 1-833-523-0887 and leaving a voicemail message
- Mailing a letter with comments to:

TEP Midtown Reliability  
P.O. Box 711  
Mail Stop CB200  
Tucson, AZ 85701-0711

**Participación pública**

Venga a nuestra reunión abierta el 8 de febrero. Participarán miembros del equipo bilingües y un intérprete de español. Las partes interesadas también pueden hacer preguntas y enviar comentarios de la siguiente manera:

- al completar un formulario de comentarios en línea en la página web del proyecto
- al enviar comentarios por correo electrónico a [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- al llamar al 1-833-523-0887 y dejar un mensaje de correo de voz
- al enviar una carta por correo postal a la siguiente dirección:

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Tucson, AZ 85701-0711

**TEP reduce la lista de posibles tramos de la ruta y pide comentarios antes del desarrollo de la ruta**

Utilizando los aportes de los residentes del centro de la ciudad y otras partes interesadas, Tucson Electric Power ha identificado más de 100 tramos que podrían combinarse para formar posibles rutas para una nueva línea de transmisión que preste servicio al centro de la ciudad de Tucson.

El Proyecto de Confiabilidad del Centro de la Ciudad de TEP reforzará la red de energía local que garantiza la confiabilidad eléctrica para casi 37,000 hogares y más de 6,800 negocios en el corazón de Tucson.

evaluación integral de idoneidad de más de 460 posibles tramos de ruta en el área de estudio del proyecto. La evaluación consideró múltiples criterios, incluidos algunos requeridos por la ley y otros considerados importantes por los residentes del área y otras partes interesadas, incluido el uso de la tierra residencial, la proximidad a propiedades históricas y el impacto en los residentes de bajos ingresos. Como resultado de la evaluación, se eliminaron de consideración más de 300 tramos.

**Proyecto de Confiabilidad del Centro de la Ciudad**



Lea adentro, visite nuestro sitio web o venga a nuestra reunión abierta para saber cómo puede ayudar a dar forma a nuestra red eléctrica futura.

**Reunión abierta pública**

Jueves, 8 de febrero de 2024 | 6-8 p. m.  
 La reunión abierta comienza a las 6 p.m.  
 Se proporcionarán refrigerios livianos.  
 Participarán miembros del equipo bilingües y un intérprete de español.

DoubleTree - Reid Park  
 445 S Alvernon Way  
 Tucson, AZ 85711

[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)



**Alcance público reciente**

- Boletín informativo enviado por correo que invita a más de 100,000 partes interesadas a asistir a la jornada de puertas abiertas de noviembre, a proporcionar comentarios y a visitar la página web del proyecto. Alrededor de 90 personas asistieron a la jornada de puertas abiertas.

- Aproximadamente 20 vecindarios dentro del área del estudio están representados en el grupo asesor vecinal del proyecto. Algunos tramos siguen siendo considerados como resultado de la aportación de los miembros del grupo. Se invita a participar a todas las asociaciones de vecindarios de los 62 vecindarios del área del estudio.

- Los representantes de TEP han asistido a 9 reuniones individuales de asociaciones de vecindarios para escuchar inquietudes y responder preguntas sobre el proyecto.
- Las visitas de campo del TEP en el área del estudio continúan.

Preguntas frecuentes sobre la jornada de puertas abiertas

Las preguntas enviadas por el público en las recientes jornadas de puertas abiertas y las respuestas de TEP se publicarán en nuestra página web del proyecto en [tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)

"Ahora, estamos pidiendo a los residentes y otras partes interesadas comentarios adicionales sobre tramos específicos que siguen siendo considerados", dijo Clark Bryner, gerente de TEP para línea de transmisión.

**Identificación de opciones**

La nueva línea de transmisión debe interconectar dos subestaciones existentes y una subestación planificada. El año pasado, TEP consideró los aportes de las partes interesadas y otros factores para identificar cientos de tramos que podrían combinarse para formar posibles rutas. TEP compartió por primera vez la lista de tramos preliminares en su jornada de puertas abiertas de noviembre.

"Comenzamos a identificar tramos considerando la viabilidad de la ingeniería. Desde una perspectiva puramente de ingeniería, preguntamos: "¿Se puede construir una línea en este tramo?" Si la respuesta es afirmativa, la incluimos en la lista de tramos preliminares. En esta etapa preliminar, aún no consideramos ningún impacto medioambiental o de uso de la tierra, preferencias públicas o de las partes interesadas, ni el cumplimiento de las ordenanzas locales", dijo Bryner.

En noviembre, TEP comenzó a evaluar tramos preliminares utilizando criterios adicionales, incluidos impactos en recursos biológicos, propiedades y vecindarios históricos y comunidades de bajos ingresos y desfavorecidas. Algunos criterios fueron informados por los residentes y otras preferencias de las partes interesadas.

"Durante la siguiente fase, conocida como evaluación de idoneidad, utilizamos software de sistema de información geográfica para examinar cada tramo varias veces en función de modelos de idoneidad que representan múltiples perspectivas. En un modelo, ponemos mayor énfasis en el impacto en las comunidades de bajos ingresos, basándonos en los comentarios de nuestra encuesta a las partes interesadas. En otra, la consideración de los impactos en las propiedades culturales e históricas tiene más peso. También utilizamos un modelo en el que todos los criterios se ponderan por igual", dijo Bryner.

El análisis identificó los tramos más adecuados de acuerdo con cada modelo. Se identificaron algunos

tramos como los más adecuados en cada modelo. Los tramos con puntuaciones de idoneidad más bajas se eliminaron de la consideración.

A continuación, TEP revisó cuidadosamente los tramos eliminados para determinar si alguno era comparable en idoneidad con los retenidos por el modelo, y si debían llevarse a cabo para una evaluación continua. Los tramos restantes se evaluaron durante las visitas de campo para ingeniería, uso del suelo e idoneidad del derecho de paso. En la actualidad, se siguen considerando 126 tramos.

TEP ahora pide a las partes interesadas que proporcionen comentarios sobre los tramos refinados. Basándose en la evaluación continua y en la aportación que TEP recibe en las próximas semanas, los planificadores de proyectos pueden eliminar tramos adicionales o considerar nuevos antes de identificar posibles rutas.

**Participación pública**

Venga a nuestra reunión abierta el 8 de febrero. Participarán miembros del equipo bilingües y un intérprete de español. Las partes interesadas también pueden hacer preguntas y enviar comentarios de la siguiente manera:

- al completar un formulario de comentarios en línea en la página web del proyecto
- al enviar comentarios por correo electrónico a [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- al llamar al 1-833-523-0987 y dejar un mensaje de correo de voz
- al enviar una carta por correo postal a la siguiente dirección:

TEP Midtown Reliability  
 P.O. Box 711  
 Mail Stop CB200  
 Tucson, AZ 85701-0711





# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

**Exhibit J-7.4**

**Newsletter #4**

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## TEP Identifies List of 10 Potential Alternative Route Segments

Using input from midtown residents and other stakeholders, Tucson Electric Power has identified 10 potential route segments for a new transmission line in midtown Tucson.

The Midtown Reliability Project will strengthen the local energy grid that provides service every day to nearly 37,000 households and more than 6,800 businesses in central Tucson while also supporting greater reliability throughout TEP's system. The project will include a new high-voltage overhead transmission line, a new substation and other upgrades to replace eight aging substations and other lower-voltage equipment that can't support customers' growing energy needs.

removed from consideration.

"We've examined each of the remaining alternative routes multiple times from multiple perspectives over the last several months. Based on our analysis, these routes are most compatible with the surrounding area," said Clark Bryner, TEP's Manager for Transmission Line Siting. "Each alternative route segment offers advantages and disadvantages, so we're very interested to hear thoughts from residents and other stakeholders. The input will help us to identify a preferred route."

### Midtown Reliability Project

You can help shape our future energy grid. Please read inside, visit our website or join our open house to learn how.

#### Public Open House

Thursday, March 28, 2024 | 6-8 p.m.  
 Open house begins at 6 p.m.  
 O&A begins at 7 p.m.  
 Light refreshments will be provided.

DoubleTree - Reid Park  
 445 S Alvernon Way  
 Tucson, AZ 85711

[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)



Lea adentro, visite nuestro sitio web o venga a nuestra reunión abierta para saber cómo puede ayudar a dar forma a nuestra red eléctrica futura.

#### Reunión abierta pública

Jueves, 28 de marzo de 2024 | 6-8 p.m.  
 La reunión abierta comienza a las 6 p.m.  
 Las preguntas y respuestas comienzan a las 7 p.m.  
 Se proporcionarán refrigerios livianos.  
 Participarán miembros del equipo bilingües y un intérprete de español.

DoubleTree - Reid Park  
 445 S Alvernon Way  
 Tucson, AZ 85711

[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)



- Compatibility Analysis**  
 These criteria were used to identify 10 alternative route segments most compatible with a new transmission line:
- Impact on low-income and disadvantaged communities
  - Cost of transmission line construction, including relocation or undergrounding of distribution lines
  - Sensitive plant and wildlife species and habitat within the transmission line corridor
  - Proximity to residential properties
  - Proximity to historic properties and districts
  - Impact on views
  - Impact on the total environment
  - Noise
  - Communication signal interference
  - Existing development plans
  - Engineering feasibility and challenges
  - Right-of-way acquisition
  - Compliance with applicable ordinances, master plans and regulations
  - Health and safety
  - Transit impacts (pedestrian, public transit and traffic)
  - Use of existing utility corridors
  - Impact on Native lands
  - Public/stakeholder feedback

TEP identified four alternative route segments between the DeMoss-Petrie and proposed Vine substations, and six alternative route segments between the Kino and Vine substations; together, these can be combined into 24 potential routes for the completed transmission line. Detailed descriptions of each alternative route segment and an interactive map are posted on the project website at [tep.com/midtown](http://tep.com/midtown).

"To complete the transmission line, we'll need to identify one route between DeMoss-Petrie and Vine, and one route between Kino and Vine. Some route segments overlap, but any combination of these route segments is feasible," Bryner said.

Detailed alternative route descriptions on the website will include:

- Route length
- Areas where existing lower-voltage overhead distribution and telecommunication lines could be moved underground
- Low-income areas, residential areas and historic districts in which the route is located
- Nearby areas with preservation overlay zones and neighborhood plans

Once new transmission facilities are built and lower-voltage facilities are removed, the Midtown Reliability Project will result in overall fewer substations and fewer overhead lines than today. Based on requests from stakeholders, TEP is also considering use of several design elements including an anti-graffiti finish on poles, thinner and shorter poles, painted poles, and right-of-way enhancements.

**Public Participation**

Please come to our open house on March 28. Stakeholders also can ask questions and submit comments by:

- Filling out an online comment form on the project webpage
- Sending email comments to [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- Calling 1-833-523-0887 and leaving a voicemail message
- Mailing a letter with comments to:

TEP Midtown Reliability  
P.O. Box 711  
Mail Stop CB200  
Tucson, AZ 85701-0711

**TEP reduce la lista de posibles rutas**

El Proyecto de Confiabilidad del Centro de la Ciudad de la TEP reforzará los sistemas que garantizan la confiabilidad eléctrica para casi 37,000 hogares y más de 6,800 clientes comerciales en el corazón de Tucson.

Utilizando los aportes de los residentes del centro de la ciudad y partes interesadas, Tucson Electric Power ha identificado 10 posibles rutas alternativas para una nueva línea de transmisión aérea que preste servicio al centro de la ciudad de Tucson. TEP está pidiendo comentarios de las partes interesadas sobre las rutas alternativas. Un mapa interactivo está disponible en la página web del proyecto.

TEP alienta a los clientes y otras partes interesadas en el área de estudio del proyecto a asistir a una próxima reunión abierta y ayudar a dar forma a nuestra futura red eléctrica. Participarán miembros del equipo bilingües y un intérprete de español.

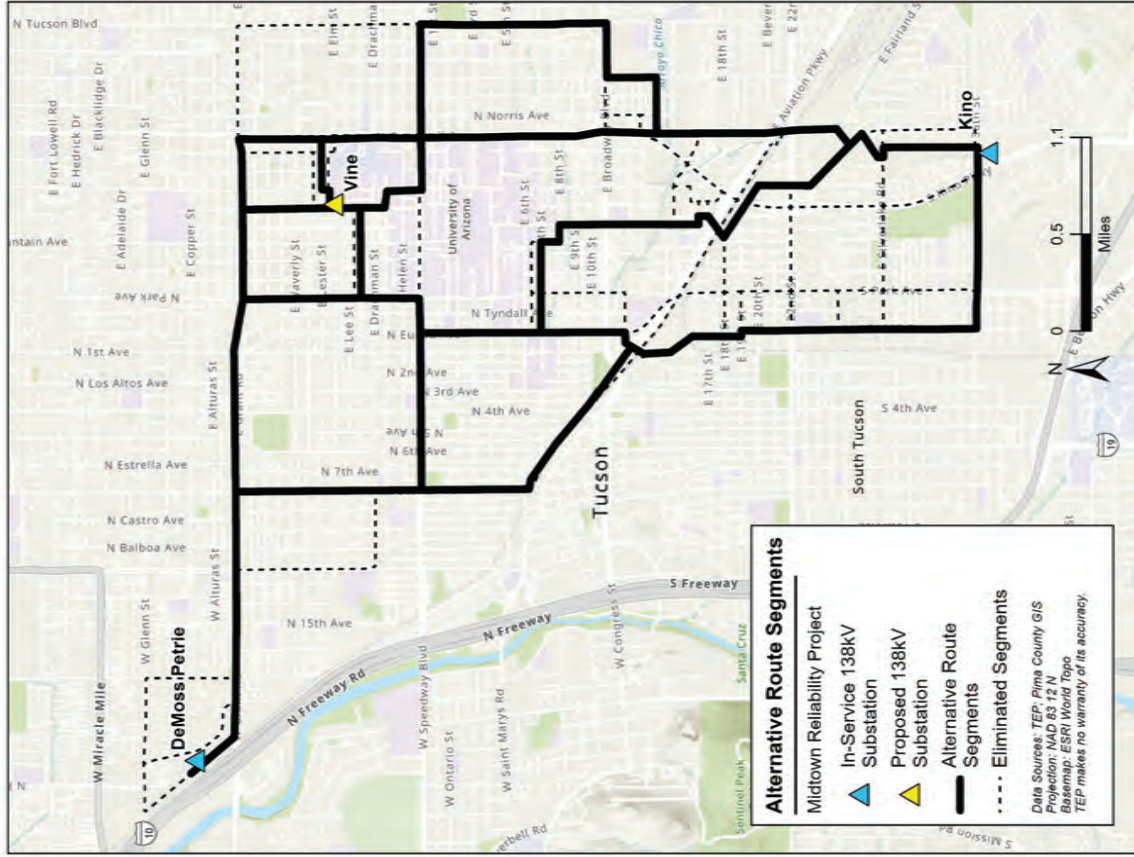
Se publicará una versión en español de este boletín informativo en el sitio web del proyecto en [tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad), y puede enviarse por correo si lo solicita utilizando la información de contacto anterior. Gracias por su interés en el proyecto.

**Participación Pública**

Venga a nuestra reunión abierta el 28 de marzo. Participarán miembros del equipo bilingües y un intérprete de español. Las partes interesadas también pueden hacer preguntas y enviar comentarios de la siguiente manera:

- al completar un formulario de comentarios en línea en la página web del proyecto
- al enviar comentarios por correo electrónico a [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- al llamar al 1-833-523-0887 y dejar un mensaje de correo de voz
- al enviar una carta por correo postal a la siguiente dirección:

TEP Midtown Reliability  
P.O. Box 711  
Mail Stop CB200  
Tucson, AZ 85701-0711



**TEP elabora una lista de 10 posibles tramos de ruta alternativos**

Utilizando la opinión de los residentes del centro de la ciudad y demás partes interesadas, Tucson Electric Power (TEP) identificó más de 10 posibles tramos de ruta para una nueva línea de transmisión en el centro de la ciudad de Tucson.

El Proyecto de Confiabilidad del Centro de la Ciudad reforzará la red de energía local que presta servicio todos los días a unos 37,000 hogares y a más de 6,800 empresas en el centro de Tucson y, a su vez, favorecerá una mayor confiabilidad de todo el sistema de TEP. El proyecto incluirá una nueva línea de transmisión aérea de mayor voltaje, una nueva subestación y otras actualizaciones para reemplazar ocho subestaciones antiguas y otros equipos de menor voltaje que no pueden satisfacer las crecientes necesidades energéticas de los clientes.

Lea adentro, visite nuestro sitio web o venga a nuestra reunión abierta para saber cómo puede ayudar a dar forma a nuestra red eléctrica futura.

**Reunión abierta pública**

Jueves, 28 de marzo de 2024 | 6-8 p.m.  
 La reunión abierta comienza a las 6 p.m.  
 Las preguntas y respuestas comienzan a las 7 p.m.  
 Se proporcionarán refrigerios livianos.  
 Participarán miembros del equipo bilingües y un intérprete de español.

DoubleTree - Reid Park  
 445 S Alvernon Way  
 Tucson, AZ 85711

[tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad](http://tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad)



Los tramos de ruta alternativos se identificaron mediante un análisis de compatibilidad integral en el que se consideraron múltiples criterios, incluidos algunos exigidos por ley y otros que los residentes de la zona y demás partes interesadas consideran importantes. Cientos de posibles tramos de ruta quedaron excluidos de consideración.

El trazado de la ruta definitiva está sujeto a la aprobación de Arizona Power Plant, Transmission Line Siting Committee y Arizona Corporation Commission.

- Análisis de compatibilidad**
- A continuación, se mencionan los criterios que se utilizaron para identificar los 10 tramos de ruta alternativos más compatibles con una nueva línea de transmisión:
  - Impacto en comunidad de bajos ingresos y desfavorecidas.
  - Costo de construcción de la línea de transmisión, incluido el traslado o soterramiento de las líneas de distribución.
  - Hábitat y especies de plantas y vida silvestre sensibles dentro del corredor de la línea de transmisión.
  - Proximidad a propiedades residenciales.
  - Proximidad a propiedades y distritos históricos.
  - Impacto en las vistas.
  - Impacto en todo el entorno.
  - Ruido.
  - Interferencia en señales de comunicación.
  - Planos de desarrollo existentes.
  - Viabilidad y desafíos técnicos.
  - Adquisición de la servidumbre de paso.
  - Cumplimiento de ordenanzas, planes maestros y normativas aplicables.
  - Salud y seguridad.
  - Impactos en el tránsito (pasos peatonales, transporte público y tráfico).
  - Uso de corredores de servicios públicos existentes.
  - Opinión de la ciudadanía/de las partes interesadas.

partes interesadas. Su opinión nos ayudará a identificar una ruta preferida”.

TEP identificó cuatro tramos de ruta alternativos entre las subestaciones DeMoss-Petrie y Vine propuestas, y seis tramos de ruta alternativos entre las subestaciones Kino y Vine; juntos, pueden combinarse en 24 posibles rutas para completar la línea de transmisión. En el sitio web del proyecto tep.com/midtown están publicadas las descripciones detalladas de cada tramo de ruta alternativo y un mapa interactivo.

“Para completar la línea de transmisión, tendremos que identificar una ruta entre DeMoss-Petrie y Vine, y una ruta entre Kino y Vine. Algunos tramos de ruta se solapan, pero cualquier combinación de estos tramos de ruta es viable”, comentó Bryner.

En el sitio web se incluirán descripciones detalladas de las rutas alternativas con la siguiente información:

- Longitud de la ruta.
- Zonas en las que las líneas existentes de telecomunicaciones y las líneas aéreas de distribución de menor voltaje podrían trasladarse bajo tierra.
- Zonas de bajos ingresos, zonas residenciales y distritos históricos en los que se encuentra la ruta.
- Zonas cercanas que incluyen zonas de superposición de preservación y planos de vecindarios.

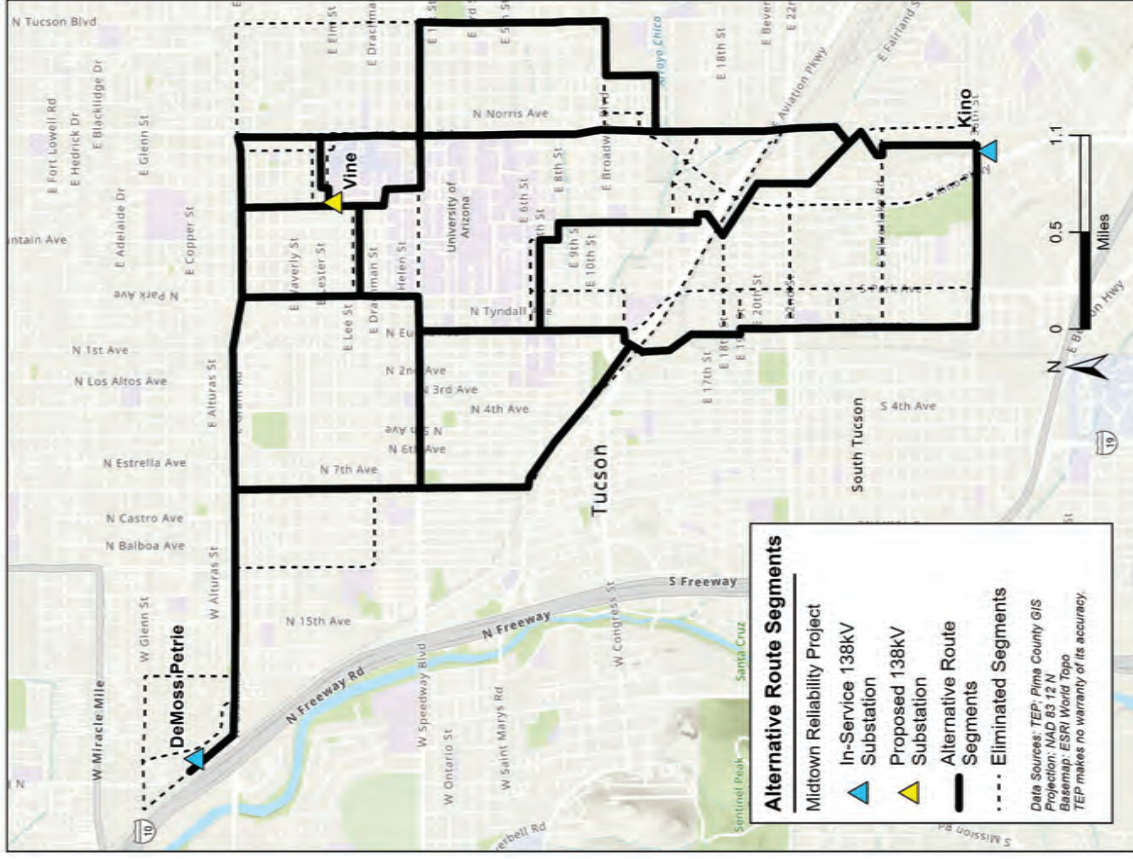
Una vez que se construyan nuevas instalaciones de transmisión y se eliminen las instalaciones de menor voltaje, el Proyecto Midtown Reliability supondrá en conjunto menos subestaciones y menos líneas aéreas que en la actualidad. A petición de las partes interesadas, TEP también está analizando la posibilidad de utilizar varios elementos de diseño, como un acabado antigrafitis en postes, postes más delgados y más cortos, postes pintados y mejoras en la servidumbre de paso.

**Participación pública**

Venga a nuestra reunión abierta el 28 de marzo. Participarán miembros del equipo bilingüe y un intérprete de español. Las partes interesadas también pueden hacer preguntas y enviar comentarios de la siguiente manera:

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 P.O. Box 711  
 Mail Stop CB200  
 Tucson, AZ 85701-0711



# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.1**

#### **Open House #1 Boards**

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## Midtown Reliability Project

Meeting everyday energy needs in the heart of Tucson for a lifetime



Tucson Electric Power



### SHORTER, LESS FREQUENT OUTAGES

- 36,936 households
  - 62 neighborhoods
  - 6,834 businesses
- All will benefit from a new 138-kilovolt (kV) "loop" around central Tucson supplying energy from more than one direction.

### ENERGY FOR A GENERATION OF TUCSONANS

The project would provide over 3x the capacity of the current systems



### 212% increase

In Tucson's peak energy demand since 1975

### STRONG, HEALTHY COMMUNITY

Supports growing economy, population



Improves reliability in extreme weather

Provides midtown residents with same reliability benefits enjoyed in other areas



100,000+ newsletters  
55,000+ emails

Sent to midtown homes, businesses and others about the project

### COST SAVINGS, GREATER EFFICIENCY



### 19 miles

46-kV lines removed, avoiding need to install 138-kV scale poles

### 8 46-kV substations retired

### \$52 million

saved over 15 years by avoiding replacement of older equipment



### 268 miles

4-kV distribution circuits upgraded to 14-kV with new poles, wires, switchgear and more

### \$52 million investment

- 7-8 miles of new 138-kV lines in our local energy grid
- A new 138-kV substation

## Midtown Reliability Project



# Welcome

## Please Sign In

# Bienvenidos

(Hablamos Español)

## Por Favor Regístrese

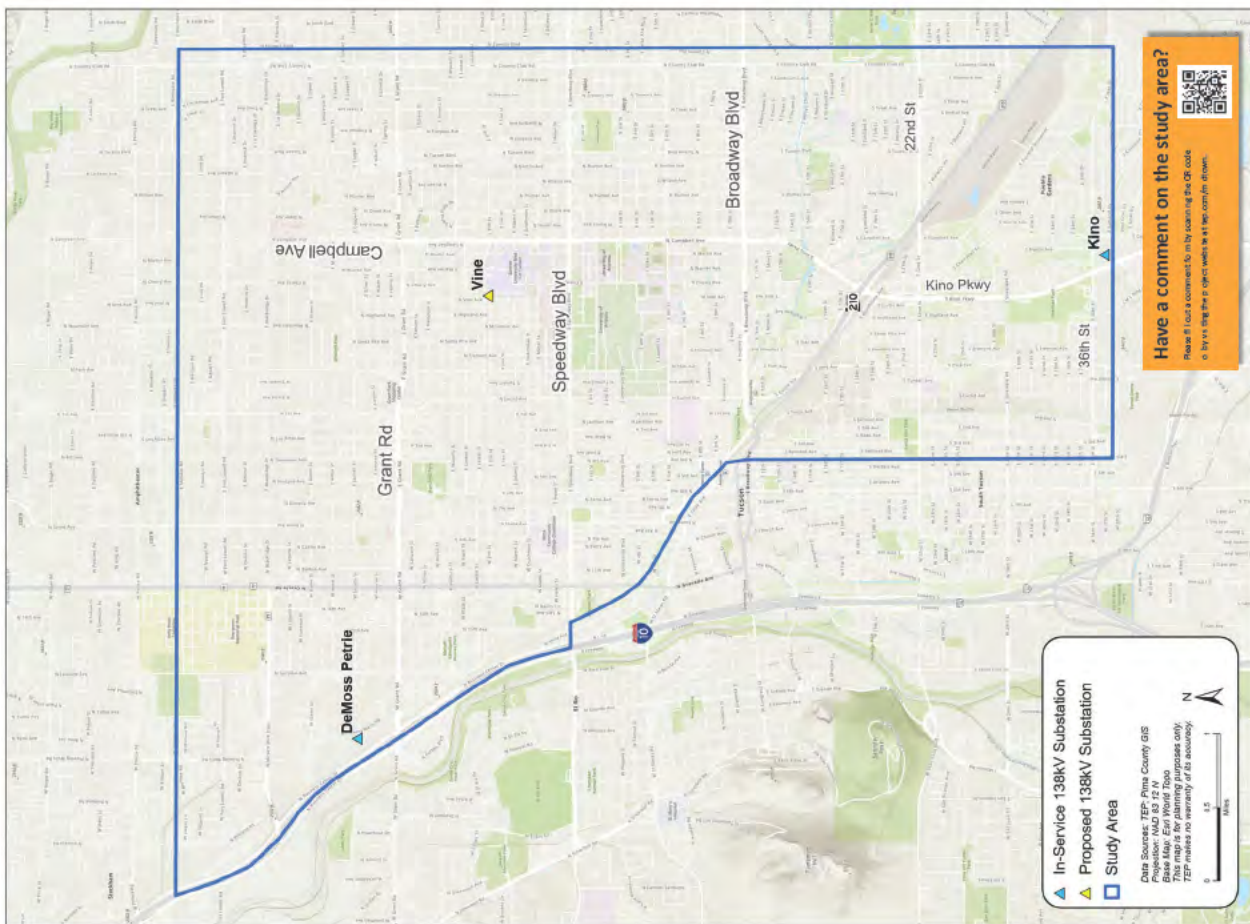
Presentation Schedule (Salons D & E)

6:15 pm - 7:15 pm

For more information - Para más información:

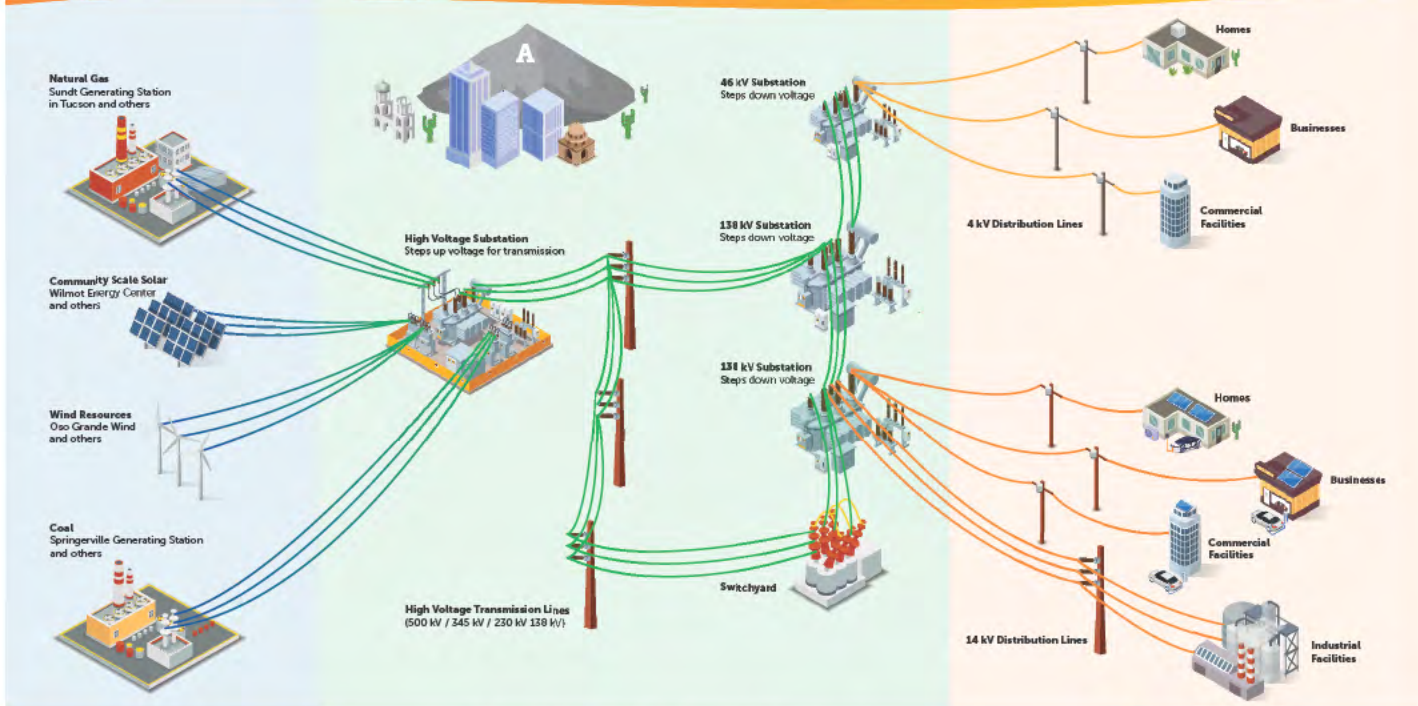


Learn more at [tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)



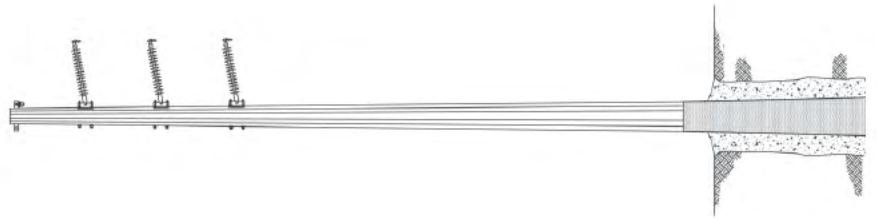
# Our Energy Grid

## How we deliver electric service to you



## Transmission Line Characteristics

- Single-circuit 138-kV transmission line
- Tubular, weathering steel monopoles
- Typical structure heights of around 75 feet
- Around 600-foot span between poles
- Non-specular, aluminum conductor wire



A typical weathering steel monopole supporting a 138 kilovolt transmission line

## Vine Substation

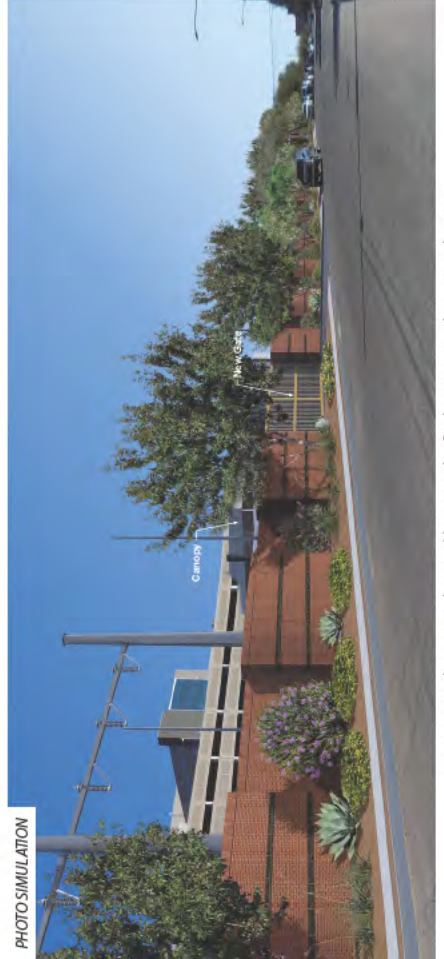
- Gas Insulated Substation (GIS)
- Located on a 1.6-acre site
- The substation will contain:
  - Three - 75 MVA transformers
  - Switchgear
  - Static Masts
  - Structural Canopy
- 12-foot decorative masonry block wall
- Perimeter landscaping



EXISTING CONDITION



PHOTO SIMULATION



Transmission line is not depicted because the final route is not known at this time.

## Midtown Reliability Project Fewer Power Lines, Better Service



Tucson Electric Power

### Aging Assets in Project Study Area



On average, major 46-kV substation equipment is 47 years old.  
Some equipment is in 'poor' or 'very poor' condition.

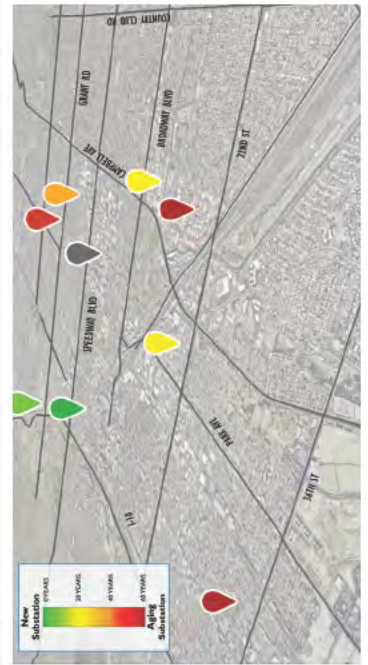


On average, 46-kV power poles in the study area are 61 years old.  
Some equipment is in 'poor' or 'very poor' condition.  
More than 430 poles need to be replaced within 15 years at a cost of \$11 million.

It would cost \$41 million to replace this equipment over the next 5 years.

### Options

	Maintain existing 46-kV System	Upgrade to new 138-kV System
<b>Built for:</b>	Late 20th Century	21st Century
<b>Substations:</b>	<ul style="list-style-type: none"> <li>8 46-kV substations</li> <li>Cost: \$41 million</li> <li>Additional substations may be required</li> </ul>	<ul style="list-style-type: none"> <li>1,138-kV substation added</li> <li>8 46 kV substations removed</li> <li>Cost: \$34 million</li> </ul>
<b>Power lines:</b>	<ul style="list-style-type: none"> <li>19 miles of 46-kV lines</li> <li>Poles in poor condition replaced with larger metal poles (similar to 138-kV poles)</li> <li>Cost: \$11 million</li> </ul>	<ul style="list-style-type: none"> <li>7-8 miles 138-kV lines added</li> <li>19 miles 46-kV power lines removed</li> <li>Cost: \$18 million</li> </ul>
<b>Added Capacity:</b>	None	3X
<b>Total:</b>	\$52 million investment in 46 kV system	\$52 million investment in new 138-kV facilities



## Midtown Reliability Project



## UPGRADING THE DISTRIBUTION SYSTEM

Providing additional capacity and improving reliability of service in support of growth, electrical vehicle charging and rooftop solar installations.



### SYSTEM UPGRADES INCLUDE:

- Convert distribution circuits from 4-kV to 13.8-kV
- Replace transformers
- Replace conductors (wires), where merited
- Replace poles, where needed

Why won't TEP install this transmission line underground?



**COST**

- Underground transmission lines cost significantly more to build and maintain.
  - The difference escalates with voltage. Higher voltages = higher underground costs.
  - 5-10x more expensive – or more. Costs vary for each project.
- Higher costs lead to higher electric rates.
- Arizona Corporation Commission has not allowed rate recovery of unnecessary costs.
- Voters rejected proposal to pay for underground construction in a new franchise agreement.
- Stakeholders can create improvement district to fund undergrounding in their area.



**EFFICIENCY, CONSISTENCY**

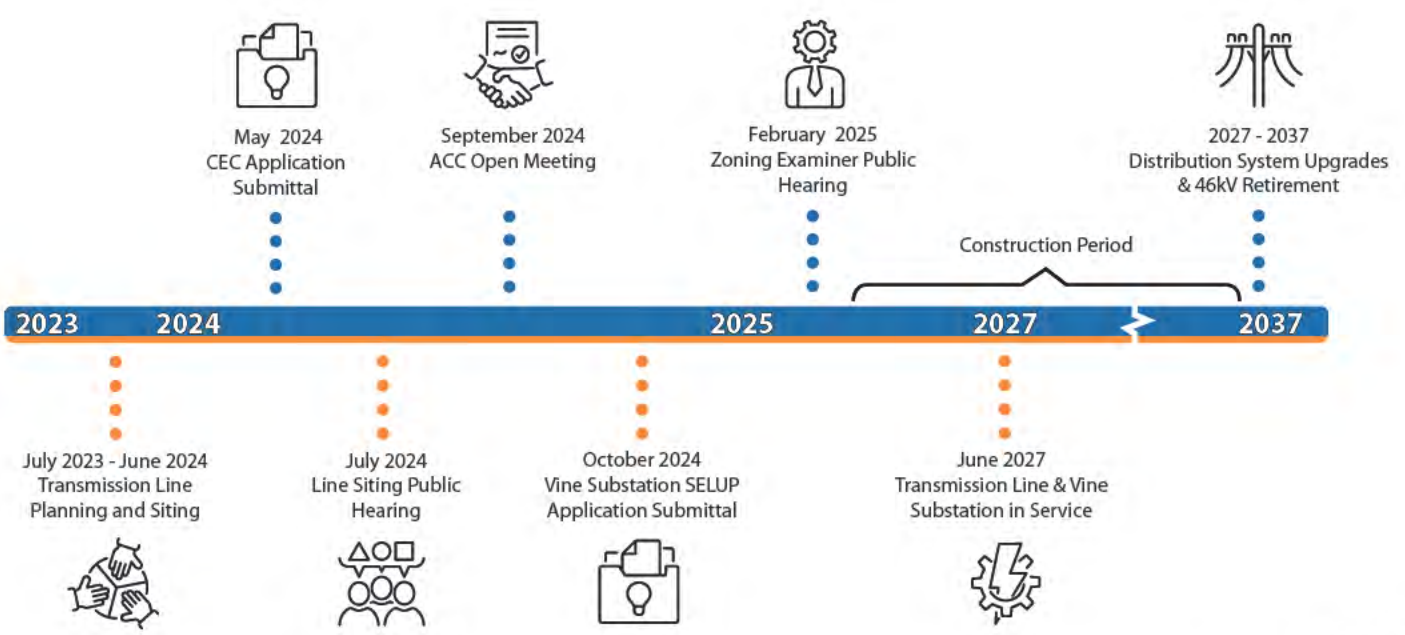
- No engineering or safety justification.
- Every other TEP transmission line is installed overhead.
- Majority of transmission lines in the United States are installed overhead.
- Underground construction disturbs more land, existing facilities and archaeological resources.



**RELIABILITY**

- Comparable to overhead construction, with higher maintenance costs.
- Fewer outages but longer repair times.
- Life expectancy of underground equipment is lower.
- 138-kV transmission poles withstand extreme weather, traffic impacts.

Midtown Reliability Project



## PLANNING AND SITING PROCESS



## Want to influence how transmission line routes are evaluated?

In your opinion, which criteria are most important in considering the route of the proposed transmission line for the Midtown Reliability Project?

Historic properties and neighborhoods adjacent to the transmission line.	
Sensitive plant and wildlife species and/or habitat within the transmission line corridor.	
Cost of transmission line construction, which will be recovered through electric bills.	
Impact on low-income and/or disadvantaged communities.	
Residential properties adjacent to transmission lines.	
Impact on views near transmission lines.	

In addition to the criteria listed above, TEP will consider additional factors when evaluating potential transmission line routes, as prescribed by Arizona State Law (A.R.S. 40-360.06).

- Public and stakeholder input
- Existing development plans
- Engineering feasibility and challenges
- Potential public recreational uses
- Noise emission levels
- Total environment
- Interference with communication signals

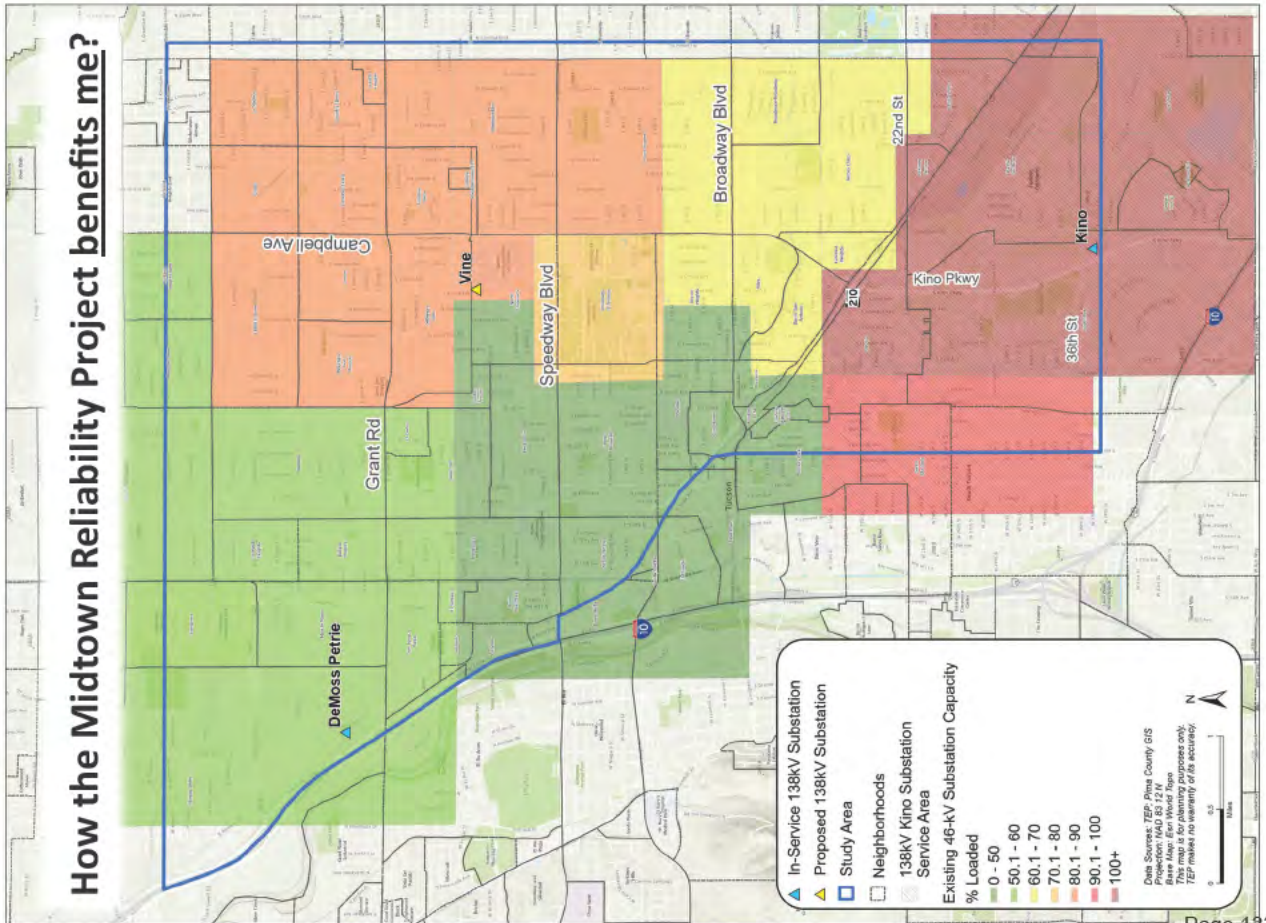
Provide your thoughts by taking a quick survey.



Please complete the survey by scanning the QR code or by visiting the project website at [tep.com/midtown](http://tep.com/midtown).

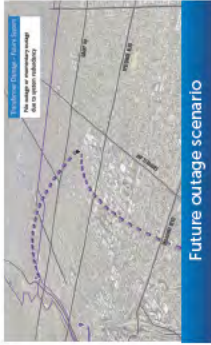


## How the Midtown Reliability Project benefits me?

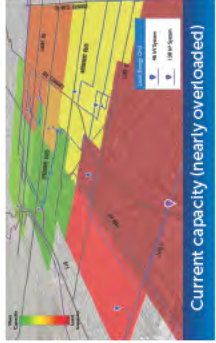


# Midtown Reliability Project Benefits

Fewer, shorter power outages



Greater capacity for growing energy needs



More customer-owned solar, storage and EVs



Removal of aging substations, power lines



Improved service citywide



Support for economic growth and a healthy community



Learn more about these benefits at:  
[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

## Want to influence how transmission line routes are evaluated?

In your opinion, which criteria are most important in considering the route of the proposed transmission line for the Midtown Reliability Project?

Historic properties and neighborhoods adjacent to the transmission line.	★★★★★
Sensitive plant and wildlife species and/or habitat within the transmission line corridor.	
Cost of transmission line construction, which will be recovered through electric bills.	
Impact on low-income and/or disadvantaged communities.	★
Residential properties adjacent to transmission lines.	★★★★★
Impact on views near transmission lines.	★

(Please star in the box next to the criteria you feel is most important to consider.)

In addition to the criteria listed above, TEP will consider additional factors when evaluating potential transmission line routes, as prescribed by Arizona State Law (A.R.S. 40-360.06 ).

- Public and stakeholder input
- Existing development plans
- Engineering feasibility and challenges
- Potential public recreational uses
- Noise emission levels
- Total environment
- Interference with communication signals

Provide your thoughts by taking a quick survey.



Please complete the survey by scanning the QR code or by visiting the project website at [tep.com/midtown](http://tep.com/midtown).

## INTERACTIVE MAP STATION



## Provide your Spatial Comments

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.2**

#### **Open House #1 Infographic**

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# Midtown Reliability Project



Meeting everyday energy needs in the heart of Tucson for a lifetime

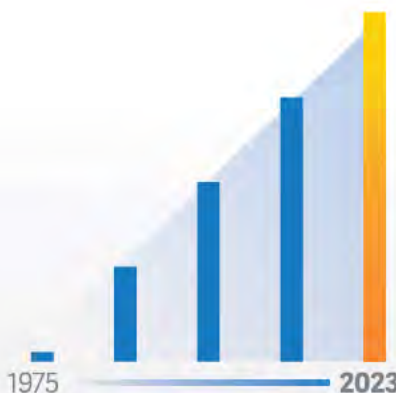
## SHORTER, LESS FREQUENT OUTAGES



- 36,936 households
- 62 neighborhoods
- 6,834 businesses

All will benefit from a new 138-kilovolt (kV) "loop" around central Tucson supplying energy from more than one direction.

## ENERGY FOR A GENERATION OF TUCSONANS



212%

**INCREASE** IN TUCSON'S PEAK ENERGY DEMAND SINCE 1975

THE PROJECT WOULD PROVIDE OVER

**3x** THE CAPACITY OF CURRENT SYSTEMS

## COST SAVINGS, GREATER EFFICIENCY



268 MILES

**4-KV DISTRIBUTION CIRCUITS UPGRADED** TO 14-KV WITH NEW POLES, WIRES, SWITCHGEAR & MORE

19

**MILES OF 46-KV LINES REMOVED**

8

**46-KV SUBSTATIONS RETIRED**

\$52M

**SAVED OVER 15 YEARS** BY AVOIDING REPLACEMENT OF OLDER EQUIPMENT

\$52M

**INVESTMENT** IN OUR LOCAL ENERGY GRID

- A new 138-kV substation
- 7-8 miles of new 138-kV lines

## READY FOR THE FUTURE

- More customer-owned rooftop solar, home battery storage, electric vehicles
- Reduced strain on our local grid, improved service citywide
- Improved reliability in extreme weather



## REACHING OUT FOR CUSTOMER FEEDBACK

100,000+ newsletters • 55,000 emails

sent to midtown homes, businesses and other stakeholders.

[www.tep.com/midtown](http://www.tep.com/midtown)



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**Application for a Certificate of Environmental  
Compatibility**

**Midtown Reliability Project**

**Exhibit J-8.3**

**Open House #1 Presentation**

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Midtown Reliability Project **TEP**

Project Information Open House

# WELCOME

Presentation(s) - 6:15 p.m., 7:15 p.m.\*  
\* (time permitting)

1

Midtown Reliability Project **TEP**

**Future Opportunities to Participate**

- Nov. 16 – Public Open House
- Feb. 2024\* – Public Open House
- Apr. 2024\* – Public Open House
- July 2024\* – Line Siting Hearing
- Q3 2024\* – ACC Open Meeting
- Neighborhood Advisory Group
- Neighborhood Listening Session


\* Target schedule, subject to change

2

Midtown Reliability Project **TEP**

**How to Comment**

- Mail a comment form or a letter to:  
P.O. Box 711  
ATTN: Midtown Reliability  
Mail Stop CB200  
Tucson, AZ 85701-0711
- Complete online comment form
- Visit webpage tep.com/midtown
- Send comments to midtownreliability@tep.com
- Complete Project Criteria Survey
- Call 1-833-523-0887 and leave a voicemail message




Online Comment Form

3

Project Overview **TEP**

**Components of the Midtown Reliability Project**

- Vine Substation
- 138 kilovolt (kV) Transmission Line
- Distribution System Upgrades
- Retirement of Aging Assets



4

Vine Substation **TEP**

- 1.6 acre site at Vine Avenue between Lee Street & Chauncey Lane
- Gas Insulated Substation (GIS)





5

138 kV Transmission Line **TEP**

**Transmission Line Specifications**


- Single circuit 138kV
- Tubular steel monopole structures (weathering steel is standard)
- Typical structure heights ~75 feet
- Span length of ~600 feet (distance between poles)
- Aluminum conductor, with a non-specular finish ~1 inch in diameter


Project Criteria Survey

6

## Distribution System Upgrades




- Convert 4 kV distribution circuits to 13.8 kV circuits
- Replace and upgrade service transformers
- Replace existing poles, where merited




Existing 4kV distribution on residential street at 4th St. and 9th Ave.

7

## Retirement of Aging Assets

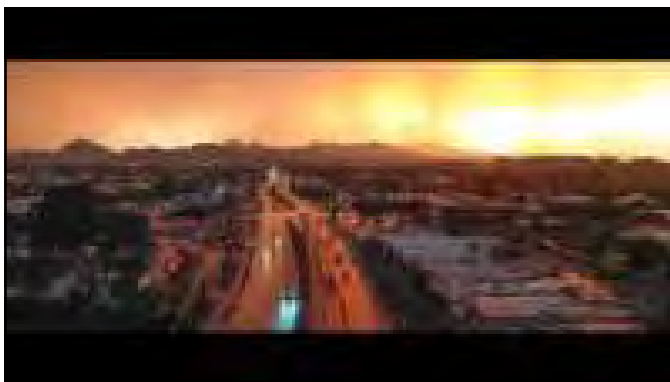


- Replace aging wood distribution poles and transformers
- Remove up to eight 46 kV Substations
- Remove approximately 19 miles of 46 kV sub-transmission lines




Existing area 46kV system.

8



9

## Questions and Comments




**PLEASE DO:**

- Respect all people who are present.
- Be ready with a concise question/comment.
- Use a respectful tone and language.
- Be respectful of others while they speak.

10

## Questions and Comments



**Written Question Forms**


- Fill out and hold form up

**Verbal Questions/Comments**

- Raise hand until called upon

11


## Midtown Reliability Project



**Future Opportunities to Participate**

- Nov. 16 – Public Open House
- Feb. 2024\* – Public Open House
- Apr. 2024\* – Public Open House
- July 2024\* – Line Siting Hearing
- Q3 2024\* – ACC Open Meeting
- Neighborhood Advisory Group
- Neighborhood Listening Session

**Please Comment**



Online Comment Form

\* Target schedule, subject to change

12

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.4**

#### **Open House #1 FAQs**

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## Tucson Electric Power

### Midtown Reliability Project

Stakeholder FAQs Submitted at Sept. 21, 2023 Open House

## Reliability and Energy Use

**1. You said there is heavy damage to the lines in monsoon season – will the steel poles lower the damage and length of outages?**

Yes, the steel 138-kilovolt (kV) poles proposed for use in this project will help maintain reliability. They are well equipped to withstand extreme weather and other conditions. Anecdotally speaking, no steel 138-kV poles have been felled by storms, traffic collisions or other emergencies in the last 10 years. Many of the more than 200 poles damaged this summer by storms were wooden 46 kV poles.

**2. You said demand is increasing. How much of that increased midtown demand is due to residential use verses UofA or Banner Hospital demand increasing? It's just odd that per capita water use in Tucson is not increasing but electricity is? Why?**

Tucson's peak energy needs have more than tripled since 1975, and TEP customers set new energy demand records in both 2020 and 2021. Although TEP [offers a variety of energy efficiency programs](#) for both residential and commercial customers, and despite a significant increase in the number of customers who installed their own rooftop solar systems, peak energy demand has continued to increase due to a growing population, the replacement of swamp coolers with air conditioning systems, greater use of electronics and other factors.

This mirrors national trends. For example, according to the [U.S. Energy Information Administration](#), the percentage of homes with central air conditioning in the United States more than doubled to 64 percent in 2015 from 27 percent in 1980.

Based on a review of energy usage in zip codes that encompass the project study area, the number of residential customers increased by about 7 percent from 2007 to 2020. During this time, the energy delivered by TEP to residential customers increased by more than 11 percent.

**3. Why did you let your 46kV system become so poor to very poor?**

TEP continually inspects and performs maintenance on equipment for both safety and reliability reasons. However, all systems and equipment have a finite if indefinite useful life. At least some of this 46-kV equipment would have been retired and replaced by 138-kV equipment already if our previous 138-kV upgrade project wasn't delayed. We believe upgrading to a 138-kV system, instead of like-for-like replacements of 46-kV equipment, is the best, most cost-effective solution for meeting customers' current and long-term energy needs.

**4. So the equipment was good and then it went down to poor or very poor in three years?**

TEP first proposed 138-kV upgrades for central Tucson in 2019. At that time, our 46-kV system was already in need of replacement. Please see question 3. Although TEP continually inspects and repairs systems to maintain safe operations, the delay in our previous upgrade project provided more time for our 46-kV system to degrade.

As we did then, we believe upgrading to a higher-capacity system with similar costs provides greater reliability and long-term value for our community.

**5. Why so many outages – inadequate preparation – metal poles?**

TEP has provided top-tier service to customers over the last 10 years, [ranking among the most reliable electric service providers in the country](#). Many of the outages experienced by customers this summer involved wooden 46-kV poles damaged by storms. Please see question 1.

**6. What are your plans for new energy systems – modern and environmentally friendly?**

About 27 percent of the energy serving customers in 2022 was generated by wind and solar resources, including large, efficient community-scale systems and the customer-owned systems we support every day. We're working to add more renewable systems to our energy portfolio while pursuing a goal to reduce carbon emissions 80 percent by 2035. For more information about our Integrated Resource Plan (IRP), which describes how we plan to provide service over the next 15 years, please visit [tep.com/2023-irp](http://tep.com/2023-irp).

**7. Will this reliability project assist with bringing renewable energy from the edge of town to the center of town?**

New transmission facilities will provide TEP with a more reliable system for transmission of energy from our increasingly cleaner generating resources into central Tucson. The related distribution system upgrades will also provide greater capacity, supporting customers' efforts to add more rooftop solar panels, private battery storage systems and electric vehicles.

**8. TEP/UNS's parent Fortis, Inc. is primarily a transmission corporation. TEP represents 95% of Fortis' fossil fuel generation. TEP wishes to transition to all renewables by 2030. How does TEP plan to replace generating capacity without homeowners buying solar panels and storage batteries? Is TEP not causing higher frequency of power shortages? There simply isn't enough solar or windmills commercially?**

TEP is working to add more renewable systems to our energy portfolio while pursuing a goal to reduce carbon emissions 80 percent by 2035. Please see question 6.

About 45,000 homes and businesses – approximately 10 percent of our customers – have their own rooftop systems. TEP had a record year in 2022, interconnecting with more than 7,500 customers who installed their own systems. However, fewer than 1,000 customers have installed their own battery systems. We expect customers will continue to explore the benefits of investing in their own energy systems. However, this project is designed to support safe reliable service for all customers.

Please see questions 5-7.

**9. It appears that TEP could reduce the load on the inner-city grid by working with the City and County on power agreement (i.e. the UA Power Agreement) that stress the use of green energy. This might preclude the need for the "Reliability Project". What is TEP doing to move forward on these important agreements?**

We're proud to work with the City of Tucson to help it achieve its clean energy goals while we work toward providing cleaner, less carbon-intensive energy for our entire community. TEP provides service to the city at more than 2,000 locations ranging from office buildings to water wells, adding complexity that would need to be addressed in any such agreement.

Robust transmission and distribution facilities, however, are still required to serve the 36,936 residents, 6,834 business customers and other customers within the project study area, where not all customers can afford to invest in their own energy systems. Clean energy supply agreements would not reduce our need for the Midtown Reliability Project.

**10. Why ask City for money? Regulated by State AZ PUC, get state and federal money for renewable resources.**

Proposition 412 offered an opportunity for all TEP customers in the City of Tucson to fund underground construction of a portion of this project, but voters rejected the proposal in May 2023. Since investments in our local energy grid can impact customer bills, we look for reliable, cost-effective options.

## Underground Installation

**11. Why doesn't Univ of AZ and Banner Medical cover part of the underground installation cost? They are the biggest users of power by far.**

Tucson's peak energy needs have more than tripled since 1975, and customers throughout TEP's service territory set new peak energy demand records in both 2020 and 2021. This is true for both residential and commercial customers.

Six of the eight 46-kV substations that will be replaced by the Midtown Reliability Project do not serve the University of Arizona or Banner Medical, yet they face overload conditions and reliability concerns due to higher energy demands and aging equipment in need of replacement. Please see question 2.

- 12. TEP just received an 11.5% rate increase. Undergrounding would be a minor percent of this rate increase over the life of the project: ~2/100<sup>th</sup>. Why not recover the undergrounding cost in this manner? ACC policy can be changed to allow this. If not, then Banner and University, the major increased power users, should pay for the undergrounding.**

Please see questions 2 and 11. It costs much more to build a transmission line underground, and doing so also increases maintenance costs. Because our costs are passed along to customers, TEP avoids unnecessary expenditures to help keep our rates as affordable as possible.

Additionally, in October 2023, the Arizona Corporation Commission approved a policy statement instructing regulated utilities like TEP to avoid underground installation. A portion of the statement says:

*"As a general matter, utilities under the Commissions jurisdiction should avoid incurring these higher costs unless underground installation of a transmission line is necessary for reliability or safety purposes or to satisfy other prudent operational needs."*

- 13. Currently, 138kV poles and lines run the perimeter of the city. You are now suggesting to run them through the center of the city, ignoring undergrounding and the UofA area plan that calls for that. How do you justify that? Why not move the substation to a more industrial area, then run distribution lines, which could be undergrounded at lower cost into the neighborhoods? Although there is not yet a route, if the substation remains in the same spot, then conceivably, there will be lines right next to residences. What about the rights of those property owners?**

The location for the proposed Vine Substation was selected for several reasons. It's efficiently located in the middle of the area where it will serve customers. Although finding a suitable parcel of adequate size in the area was a challenge, this site is large enough to accommodate the substation.

Moving the substation further away from the area would require longer transmission lines, decreasing efficiency and increasing the size of the study area. Distribution lines can't provide adequate capacity to meet customers' energy needs.

Our outreach efforts are intended to find the most suitable locations for these facilities, including the lines that interconnect with the substation. We'll continue working to minimize impacts to area residents, who will be served by these new facilities.

- 14. The establishment of the "Gateway" status along Kino/Campbell was largely for the benefit of the University and its S. Kino developments. Have you asked them to subsidize undergrounding along with Banner? They appear to be the biggest beneficiaries of the project. Have you considered the value of increasing public ill-will towards TEP over this project?**

Please see questions 2, 11 and 12. The project is designed to improve transmission and distribution facilities that serve customers throughout the entire study area, including nearly 37,000 residential customers in more than 60 midtown Tucson neighborhoods. Our goal is to provide all customers within the study area with more reliable service while considering potential cost impacts and other factors.

- 15. Cost to underground is \$90M vs \$52M to overhead. TEP's 2022 profit was \$217 million, representing an 8% increase from 2021. TEP could pay for the additional \$38 million simply by not increasing profit for the next 2 years. Why is TEP not willing to do this? Seems like corporate greed.**

Underground installation would add an estimated \$80 million to the project cost.

TEP's returns are considerably lower than the level of investment needed to support safe, reliable service and our ongoing transition to cleaner, less carbon intensive resources. For example, the 250-megawatt Oso Grande Wind Farm that started producing clean energy for customers in 2021 cost approximately \$370 million.

We anticipate investments of more than \$3 billion from 2023 through 2028. The capital required for those improvements would not be available to us if we did not seek recovery of and return on those investments.

Because our costs are passed along to customers, TEP avoids unnecessary expenditures to help keep rates as affordable as possible. Underground installation would add significant and unnecessary additional cost that would be passed along to customers for aesthetics – not safety or reliability reasons.

These additional and unnecessary costs would be magnified as underground installation was considered for other transmission line projects. TEP, which anticipates the Midtown Reliability Project transmission line will stretch 7-8 miles, has about 500 miles of transmission lines in and around the metropolitan area alone.

Please see question 12.

**16. Will you consider underground only in dense areas – for example, Broadway to Vine only?**

Please see question 12. We are not considering underground installation due to significantly higher installation and maintenance costs, shorter lifespan and other factors.

**17. Why no underground? Cost is negligible 2/100<sup>th</sup> of the most current rate increase .20 per month. Does corporation commission live near the lines?**

Please see question 12.

**18. How does TEP justify above ground lines after proposing going underground along Sam Hughes? For Proposition 412, hasn't the genie already been let out of the bottle?**

Please see questions 10 and 16.

**19. How can you call undergrounding unnecessary when the city's rules call for undergrounding?**

While the City of Tucson has determined that – with some exceptions – new utilities must be installed underground in Gateway Corridors, such restrictions do not apply outside of these corridors.

These new facilities are urgently needed to maintain reliable service for customers. We continue with our efforts to find the most promising route options, which may include overhead construction outside of Gateway Corridors.

**20. Banner and the University of Arizona are major power users. Why are they not asked to pay for their fair share in undergrounding?**

Please see question 11. The rates paid by commercial and residential customers alike are based on the cost of providing service to them, which includes investment in equipment and energy systems that provide service to those customers every day.

**21. We have been hearing about the needs of TEP to move more energy through the city for three years. The undergrounding committee and our lawyer have been discussing the need to underground for all of this time. Why didn't you bring your lawyers to discuss why you think you can circumvent the rules of the City of Tucson?**

This project is designed to serve the energy needs of residents and commercial customers throughout central Tucson. This is an important discussion and we want to provide all stakeholders with opportunities to understand the need for this very important project. That's why we've invited more than 100,000 stakeholders to our open houses and invited more than 55,000 stakeholders to participate in a project survey. We also continue working closely with the city to ensure we adhere to all City of Tucson zoning requirements.

**22. Is TEP willing to negotiate with stakeholders to come up with a better proposal to pay to underground the lines?**



TEP would be willing to work with property owners to create an improvement district to fund underground installation. Arizona state law (ARS 48-620) provides for the creation of an underground utility improvement district that can allow nearby property owners to pay the additional cost of installing facilities below ground. While such districts have been used to fund the underground installation of distribution lines, the extremely high cost of installing higher-voltage lines below ground makes this option less realistic for transmission line projects.

**23. How deep and how much per mile would it cost to put 138kV line underground?**

Cost will vary depending on the route, which has not been determined. Please see question 12 for additional cost information. The depth of the cables can vary widely. Arizona has adopted National Electric Safety Code standards that require underground facilities to be installed at a depth that ensure public safety. Designers must also consider how depth can impact operation of the line, which is susceptible to malfunction or damage due to heat buildup. Existing underground utilities, natural or cultural resources and other factors can affect the depth and configuration of underground lines.

**24. Since California and Colorado have been able to have underground transmission lines, why are these lines not going to be underground?**

Please see question 12. With rare exceptions, these underground installation initiatives involve lower-voltage distribution lines, not transmission lines. In some cases, the need for wildfire risk mitigation has been cited as justification for incurring the high cost of undergrounding transmission lines. That would not apply to lines developed in urban areas, such as the Midtown Reliability Project.

## Poles

**25. In November when you share potential routes, please include how many poles on routes will be removed and how many added. Thank you.**

In November, TEP will share preliminary segments. Preliminary segments are not routes, but simply rough alignments to consider where construction of a transmission line may be possible. Although we will strive to provide as much information as possible, it is difficult to provide a specific number of poles without a final design, which cannot be completed until a route has been determined.

**26. What will be done to prevent vandalism such as gunfire and drones? Also, the risk of helicopters falling near Banner. Will there be larger poles adjacent to the substations?**

Please see question 1. The majority of the 138-kV poles are about 75 feet tall. The exact height of each one will depend on its location and if it is required to bear heavier equipment or greater line tension. We will continue to coordinate with local officials about any safety concerns.

**27. What is the height of the poles recently erected along Grant Road between Country Club and Swan?**

Those poles stand approximately 70-80 feet tall. Although they support a 46-kV line, they are comparable to those that will be used for the 138-kV Midtown Reliability Project.

Examples of recent 138-kV installations include:

1. 22<sup>nd</sup> Street between Alvernon and Kolb
2. 36<sup>th</sup> Street between Park and Kino Parkway
3. Kolb Road between Escalante and Valencia

## Location

**28. I am concerned that this new project will run through the middle of Jefferson Park neighborhood to get to the new Vine substation. That seems inappropriate for a residential neighborhood. What will the route be and what will it look like along that route and what health impacts?**

We appreciate hearing those concerns. TEP has no routes at this point. That's why we restarted our outreach and evaluation process - to find potential routes that are most suitable for the surrounding area.

We understand that some customers have concerns about the proximity of electrical equipment to their homes and the production of electric and magnetic fields (EMFs). But research has not found reason for such concern.

For more than 30 years, scientists and researchers from universities, national laboratories, health agencies, the World Health Organization and other groups have conducted research activities into possible health effects of EMFs. According to this large body of peer-reviewed research, there are no confirmed health risks caused by exposure to low-level EMFs. The National Cancer Institute states “Extremely low-frequency EMFs include power lines, electrical wiring, and electrical appliances such as shavers, hair dryers, and electric blankets.”

More information, please visit [tep.com/electric-and-magnetic-fields](http://tep.com/electric-and-magnetic-fields).

**29. There was mention of no tall poles on scenic entryways in Tucson. Does that mean there will be no poles run down Campbell Ave to the University area?**

TEP has no routes at this time. Please see question 28.

**30. So now I am confused. If you aren't allowed to run down Campbell by city ordinance, then how are you getting lines from south to north portions? Is the ordinance for scenic corridors pushing lines into less arterial routes?**

Please see questions 19 and 28.

**31. Is TEP ready for the lawsuits which most likely will be brought by homes which will lose value if above ground are put up through historic neighborhoods?**

We do not expect that this project will negatively impact property values. TEP's lines are located above ground throughout the study area and the entire city, and that reality is already priced into local home values, which have risen significantly in recent years. We also believe this project will help preserve property values by relieving electric reliability risks and supporting additional investments in rooftop solar arrays, battery storage systems and electric vehicles.

**32. Is the line changing where it will run? It was proposed originally run north on Kino/Campbell. If so, do we get a say in the route? When you take out poles and old substations will they fully get removed? A lot of times shorter poles are left behind when new poles are installed.**

Please see questions 19 and 28. Once the project is completed, we anticipate removing 19 miles of 46-kV lines and retiring 8 46-kV substations. Some poles could remain in place if they house telecommunications equipment as required by federal law or other equipment.

**33. Can we be assured that the transmission lines will not be going down residential streets and instead using main business thoroughfares?**

When considering where to locate a new transmission line, TEP looks for siting “opportunities” – linear corridors and other land features that are suitable for such facilities. Opportunities may include major roads, railroads, and existing utility infrastructure. We also consider existing or planned land use, vacant land, open space and natural linear features.

TEP also looks for “constraints,” or areas that present natural, manufactured, regulatory or political challenges to constructing and maintaining a transmission line.

Our current outreach efforts are centered around finding such opportunities and constraints.

**34. Will lines be guaranteed to run down main arterial roads and not quiet, historic neighborhood streets (such as Linden St.)? How often do outages in midtown actually happen? Is there truly zero chance of undergrounding through historic neighborhoods?**

Please see question 33. Regarding outages, the frequency of outages will depend on individual customer location and other factors. Please see question 5. Regarding the potential for underground installation, please see question 12.

**35. Can you commit to whatever route is taken that it includes “no residential streets only major arterial roads”?**

Please see question 33.

## Health, Appearance and Property Value

- 36. Are you asking for our opinions to appease us – how open are you to really consider the people who will be impacted? Do any of you live in this area? Anyone care about health, aesthetics and health impact on us and the decrease in property values? Our TEP bill for our XXX sq. foot home was 300-400 per month this summer in Sam Hugues. Concern about money? You have 15-20 people staff, food, drinks – here to convince us of the positives? Concern for costs? Negatives of this project? We only have heard the positives.**

We very much value the input and opinions of residents and other stakeholders throughout the study area. We are working to provide the most reliable service possible to all of our customers, especially considering recent severe weather and higher temperatures.

Please see questions 28 and 31.

You can read about some of the concerns our customers have in this document. We encourage you and others to continue sharing your thoughts about the project – positive or otherwise.

- 37. Is TEP considering the costs of the loss of aesthetics and beauty in central Tucson when you when you talk about costs to you and the community? Your profit 2022: 217 million.**

Please see questions 15, 31 and 36.

- 38. How much compensation will be provided to homeowners whose home value will be negatively impacted by above ground transmission lines?**

Please see question 31.

- 39. How can I protect myself and family from the EMFs that are emitted from my new smart meter and the likes in my house?**

Please see question 28.

- 40. G<sup>3</sup> or G cube gas is hundreds of times more safe than SF6. Why not use nitrogen, carbon dioxide or G<sup>3</sup> instead of SF6?**

Sulfur hexafluoride is a heavy, inert, nontoxic and incombustible gas with excellent electric insulating and arc-quenching capacity. It has been used extensively by electric utilities in electrical transmission systems and electrical distributing devices. Although SF6 is a potent greenhouse gas, it is used in an enclosed system that prevents the gas' escape into the atmosphere.

At this time, no reliable, commercially viable alternatives are available for high-voltage operations. Oil-filled circuit breakers are no longer an option because they are no longer manufactured. Studies suggest vacuum interrupters are not well-suited to higher voltages. Alternative gases are being studied. TEP currently is participating in a technical working group evaluating alternatives to SF6.

## Substation

- 41. For a different location for the Vine substation, why not use the abandoned theater at Grant and Campbell? The theater can be torn down with no loss sense it hasn't been used for years.**

Banner University Medical Center has purchased this parcel and has plans for development on the site. Additionally, this location is further from the center of the area that will be served by the substation, decreasing efficiency while potentially increasing impacts. Please see Question 13.

- 42. Vine substation within historic neighborhood. Why was that site chosen initially within and close to homes? SF gas not safe near homes. The vine substation is to be upgraded so why not move it?**

Please see questions 13 and 40.

- 43. Have you considered moving the Vine substation to a different location?**

Please see questions 13 and 41.

## Miscellaneous

**44. What was TEP's profits for last 4 fiscal years?**

Please see question 15.

**45. We recognize the need for upgrades, we want it done in a way that enhances, not diminishes our neighborhood. We pay a lot of money for TEP services. How can you work with us for a win/win?**

We are working very hard to communicate with stakeholders and identify areas in central Tucson that are most compatible with these urgently needed facilities. Please see question 21 for details about our outreach efforts.

In addition to crucial reliability benefits, this project will result in the removal of 19 miles of 46-kV transmission lines and 8 46-kV substations. In doing so, we avoid the need to replace 46-kV poles in poor condition with larger metal poles similar in size to 138-kV poles. Fewer power poles overall will be needed throughout the area as a result of this project.

**46. Part of our bill covers maintenance, replacement and repairs. Why hasn't the older substations? Doesn't AZ Corporation Commission require maintenance?**

We continually inspect and maintain our 46-kV facilities to provide safe, reliable service. However, several systems now require replacement due to the age of the equipment and higher energy demand. Please see question 3.

**47. Do any of your administration live along the possible above ground lines?**

Approximately 1,300 full-time TEP employees live and work in this project study area and throughout the greater metropolitan area, including areas with overhead transmission and distribution lines.

**48. What is the minimum right of way to put these very tall poles for the 138kV line?**

TEP plans to use road right-of-way for placement of most poles.

**49. Exactly what is the procedure for this to move forward? In other words, what role does the City play? What about the ACC?**

Under state law, TEP must secure a Certificate of Environmental Compatibility (CEC) approved by the Arizona Corporation Commission before it can build the proposed transmission line along an approved route.

TEP must secure a Special Exception Land Use Permit from the City of Tucson before construction of the substation can begin. TEP's previous application for this permit was denied in May 2021 by the city's Zoning Examiner, who determined it could not be issued until the transmission line route is known. TEP will seek approval of this permit once a route has been approved.

Information about these required approvals is available on our project webpage.

**50. Does any other city or part of the city have this system? If so, where?**

TEP customers are served by approximately 500 miles of 138-kV transmission lines throughout the metropolitan area. Please see question 27.

**51. How much money is this going to cost? And where are you getting the money from? I think it is going to be wonderful. Thank you for your budget plan for our home. It is just right for me.**

Although the exact cost of the new transmission line and substation cannot be calculated until a final route has been determined, we estimate it will cost approximately \$52 million to build a 7-8 mile overhead line and substation.

**52. The Palo Verde Neighborhood does not benefit from this substation but we are in the study area. Why? If we don't get direct benefit, we shouldn't bear the cost.**

Thank you for your interest in the project. The Palo Verde Neighborhood is partially located within the eastern boundary of the study area. The higher capacity of new 138-kV systems and reduced strain on remaining 46-kV

systems would help improve reliability for your neighborhood and many other neighborhoods beyond the study area that are still served by the 46-kV system.

**53. What is TEP's commitment to the quality of life in Tucson? What are you actually doing and where are you investing your time and money?**

We anticipate investments of more than \$3 billion from 2023 through 2028 in our local energy grid and systems that serve our customers. Please see question 15.

TEP's dedication to service extends beyond providing safe, reliable energy service to more than 445,000 customers over a 1,155 square mile service area. TEP's financial, in-kind and volunteer contributions have significant, measurable impact in our community. TEP is among our community's leading philanthropic funders with \$1.44 million in donations and nearly 13,000 volunteer hours donated by employees in 2022.

Our contributions are funded with company resources, not with customers' rates. We focus our philanthropic investments in four specific areas: community vitality, environmental stewardship, education and racial and social equity. For more information, please visit [tep.com/investing-in-our-community](http://tep.com/investing-in-our-community).

**54. Can you provide examples from some of your and your company's other utility companies that have done this? Show us what quality finished products look like.**

Please see questions 27 and 50.

**55. What area will be next after this midtown improvement and how does that plan impact this decision?**

TEP works continually to maintain and improve our local energy grid. Please see questions 50 and 53.

**56. What options are you considering seriously? My experience is with corporations that you are thinking about options. We'd like to know what they are.**

Our evaluation of potential routes for this project has been conducted transparently and updates are shared as they occur. We believe upgrading to a higher-capacity system for the midtown area will provide greater reliability and long-term value for our community. Our current outreach efforts are focused on finding areas in central Tucson that are most compatible with these new, urgently needed transmission facilities. Please see question 33.

**57. Why are we doing this again for the same project? We went through this whole process over the last few years, including route choices. Clearly, no one cares and the idea is to start again to avoid paying any attention to previous public input. This does not suggest that the current process is honest.**

We very much value the feedback we've received over the last four years from residents and other stakeholders. We are conducting a second round of outreach to ensure we receive updated information from stakeholders, as the need for the project remains. Please see questions 4 and 10.

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.5**

#### **Open House #2 Boards**

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## Midtown Reliability Project

Meeting everyday energy needs in the heart of Tucson for a lifetime



Tucson Electric Power



### SHORTER, LESS FREQUENT OUTAGES

- 36,936 households
  - 62 neighborhoods
  - 6,834 businesses
- All will benefit from a new 138-kilovolt (kV) "loop" around central Tucson supplying energy from more than one direction.

### ENERGY FOR A GENERATION OF TUCSONANS

The project would provide over 3x the capacity of the current systems



**212% increase**  
In Tucson's peak energy demand since 1975

**STRONG, HEALTHY COMMUNITY**  
Supports growing economy, population



Improves reliability in extreme weather  
Provides midtown residents with same reliability benefits enjoyed in other areas



**100,000+ newsletters**  
**55,000+ emails**  
Sent to midtown homes, businesses and others about the project

### COST SAVINGS, GREATER EFFICIENCY



**19 miles**  
46-kV lines removed, avoiding need to install 138-kV scale poles

**8 46-kV substations retired**

**\$52 million**

saved over 15 years by avoiding replacement of older equipment



**268 miles**  
4-kV distribution circuits upgraded to 14-kV with new poles, wires, switchgear and more

**\$52 million investment**

- 7-8 miles of new 138-kV lines in our local energy grid
- A new 138-kV substation



Learn more at [tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

## Midtown Reliability Project



# Welcome

## Please Sign In

# Bienvenidos

(Hablamos Español)

## Por Favor Regístrese

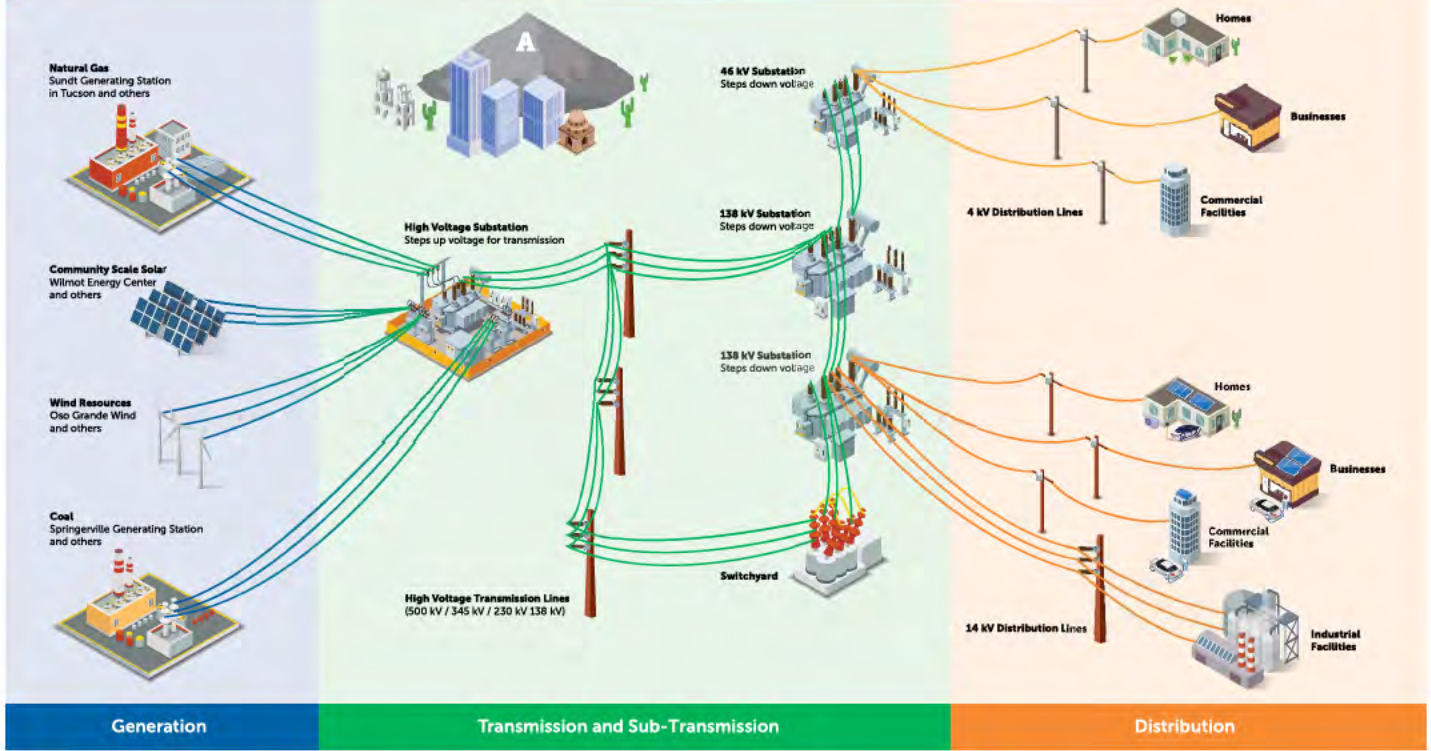
Presentation Schedule (Salons E, F, G & H)  
7:00 pm

For more information - Para más información:



# Our Energy Grid

## How we deliver electric service to you



Generation

Transmission and Sub-Transmission

Distribution

- Perimeter landscaping



EXISTING CONDITION

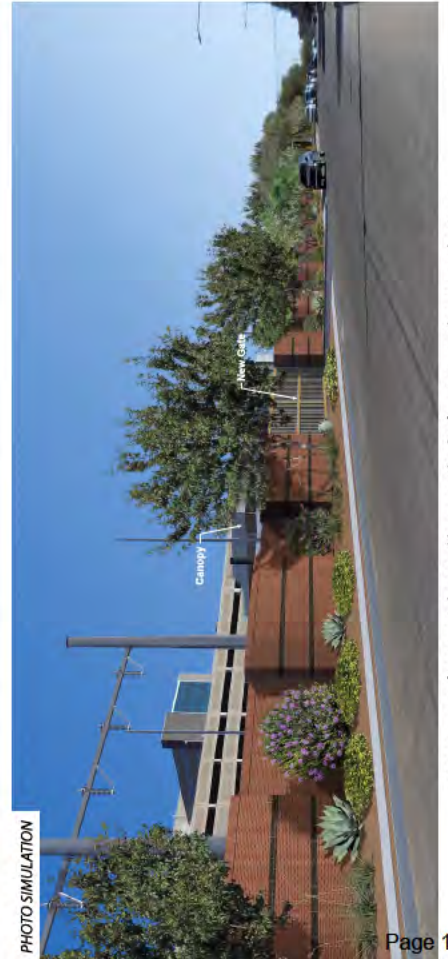


PHOTO SIMULATION

Transmission line is not depicted because the final route is not known at this time.

# Midtown Reliability Project

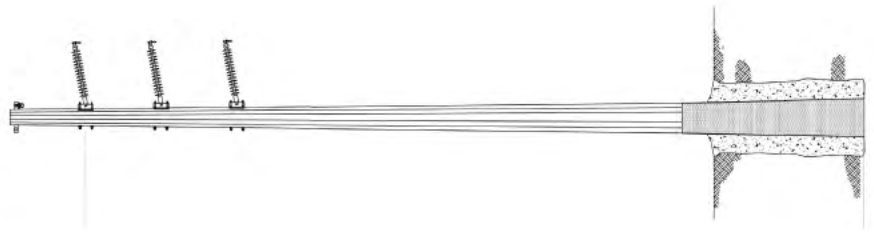


## Transmission Line Characteristics

- Single-circuit 138-kV transmission line
- Tubular, weathering steel monopoles
- Typical structure heights of around 75 feet
- Around 600-foot span between poles
- Non-specular, aluminum conductor wire



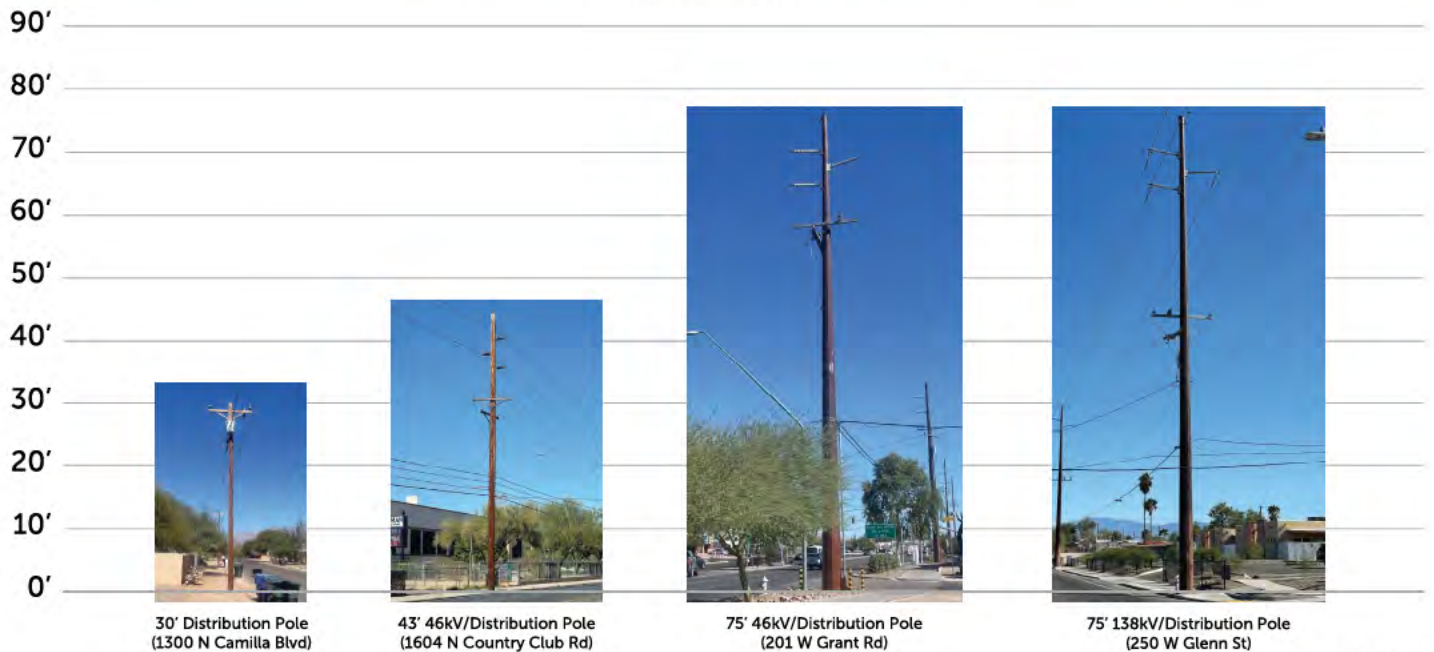
A typical weathering steel monopole supporting a 138 kilovolt transmission line



# Midtown Reliability Project



## Pole Comparison



## Midtown Reliability Project Fewer Power Lines, Better Service



Tucson Electric Power

### Aging Assets in Project Study Area



On average, major 46-kV substation equipment is **47 years old**.  
Some equipment is in 'poor' or 'very poor' condition.

It would cost **\$41 million** to replace this equipment over the next 5 years.

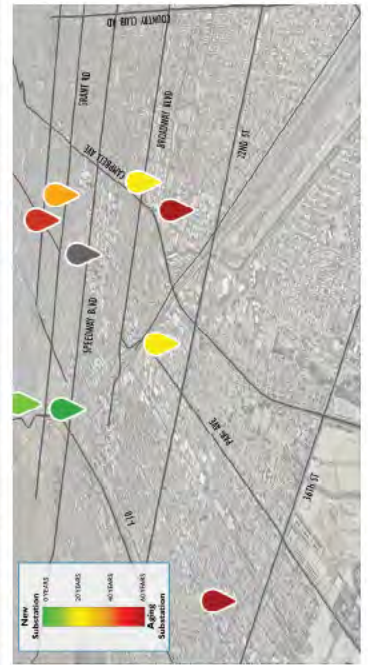


On average, 46-kV power poles in the study area are **61 years old**.  
Some equipment is in 'poor' or 'very poor' condition.

More than **430 poles** need to be replaced within 15 years at a cost of **\$11 million**.

### Options

	Maintain existing 46-kV System	Upgrade to new 138-kV System
<b>Built for:</b>	Late 20th Century	21st Century
<b>Substations:</b>	<ul style="list-style-type: none"> <li>8 46-kV substations</li> <li>Cost: \$41 million</li> <li>Additional substations may be required</li> </ul>	<ul style="list-style-type: none"> <li>1 138-kV substation added</li> <li>8 46 kV substations removed</li> <li>Cost: \$34 million</li> </ul>
<b>Power lines:</b>	<ul style="list-style-type: none"> <li>19 miles of 46-kV lines</li> <li>Poles in poor condition replaced with larger metal poles (similar to 138-kV poles)</li> <li>Cost: \$11 million</li> </ul>	<ul style="list-style-type: none"> <li>7-8 miles 138-kV lines added</li> <li>19 miles 46-kV power lines removed</li> <li>Cost: \$18 million</li> </ul>
<b>Added Capacity:</b>	None	3X
<b>Total:</b>	\$52 million investment in 46 kV system	\$52 million investment in new 138-kV facilities



## Midtown Reliability Project



## UPGRADING THE DISTRIBUTION SYSTEM

Providing additional capacity and improving reliability of service in support of growth, electrical vehicle charging and rooftop solar installations.



**SYSTEM UPGRADES INCLUDE:**  
 Convert distribution circuits from 4-kV to 13.8-kV  
 Replace transformers  
 Replace conductors (wires), where merited  
 Replace poles, where needed

## Why won't TEP install this transmission line underground?



### COST

- Underground transmission lines cost significantly more to build and maintain.
  - The difference escalates with voltage. Higher voltages = higher underground costs.
  - 5-10x more expensive – or more. Costs vary for each project.
- Higher costs lead to higher electric rates.
- In October 2023, the Arizona Corporation Commission approved a policy statement instructing regulated utilities like TEP to avoid underground installation. A portion of the statement says: *“As a general matter, utilities under the Commissions jurisdiction should avoid incurring these higher costs unless underground installation of a transmission line is necessary for reliability or safety purposes or to satisfy other prudent operational needs.”*
- Voters rejected proposal to pay for underground construction in a new franchise agreement.
- Stakeholders can create improvement district to fund undergrounding in their area.



### EFFICIENCY, CONSISTENCY

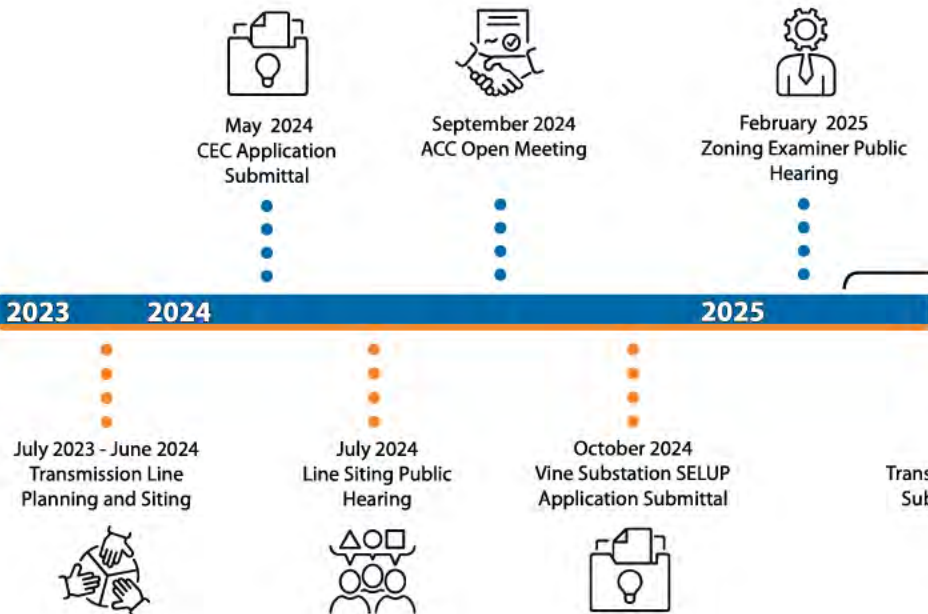
- No engineering or safety justification.
- Every other TEP transmission line is installed overhead.
- Majority of transmission lines in the United States are installed overhead.
- Underground construction disturbs more land, existing facilities and archaeological resources.



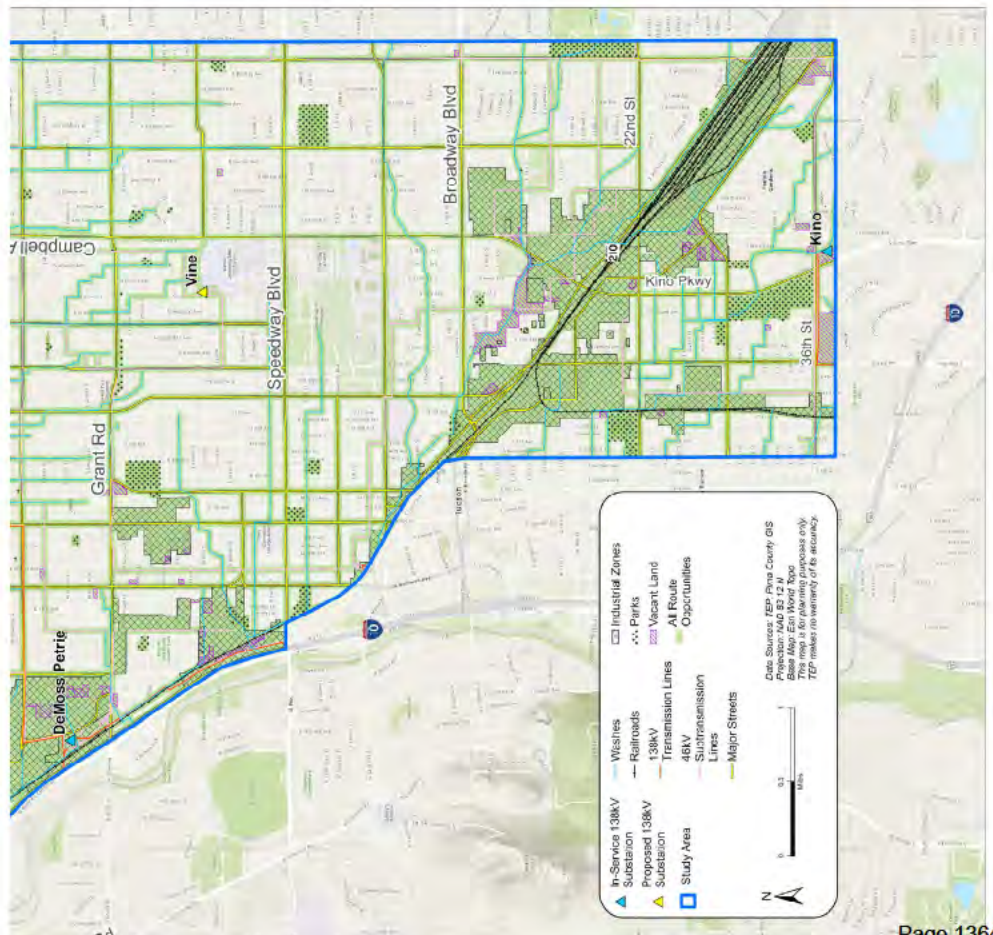
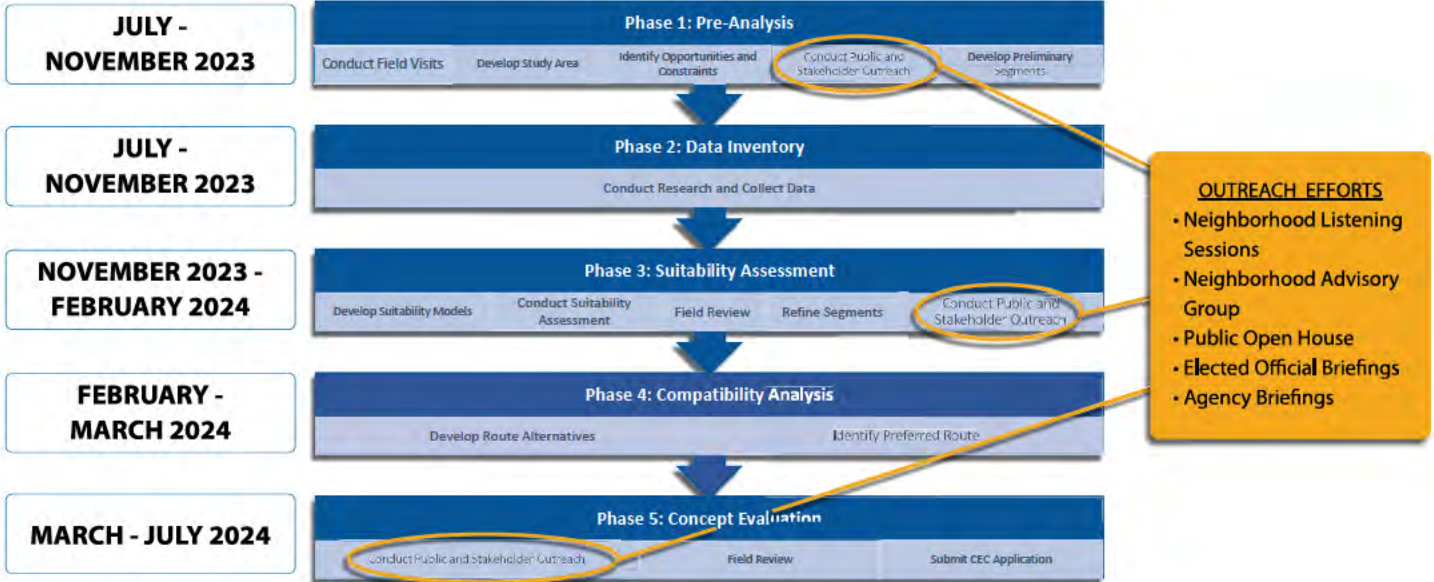
### RELIABILITY

- Comparable to overhead construction, with higher maintenance costs.
- Fewer outages but longer repair times.
- Life expectancy of underground equipment is lower.
- 138-kV transmission poles withstand extreme weather, traffic impacts.

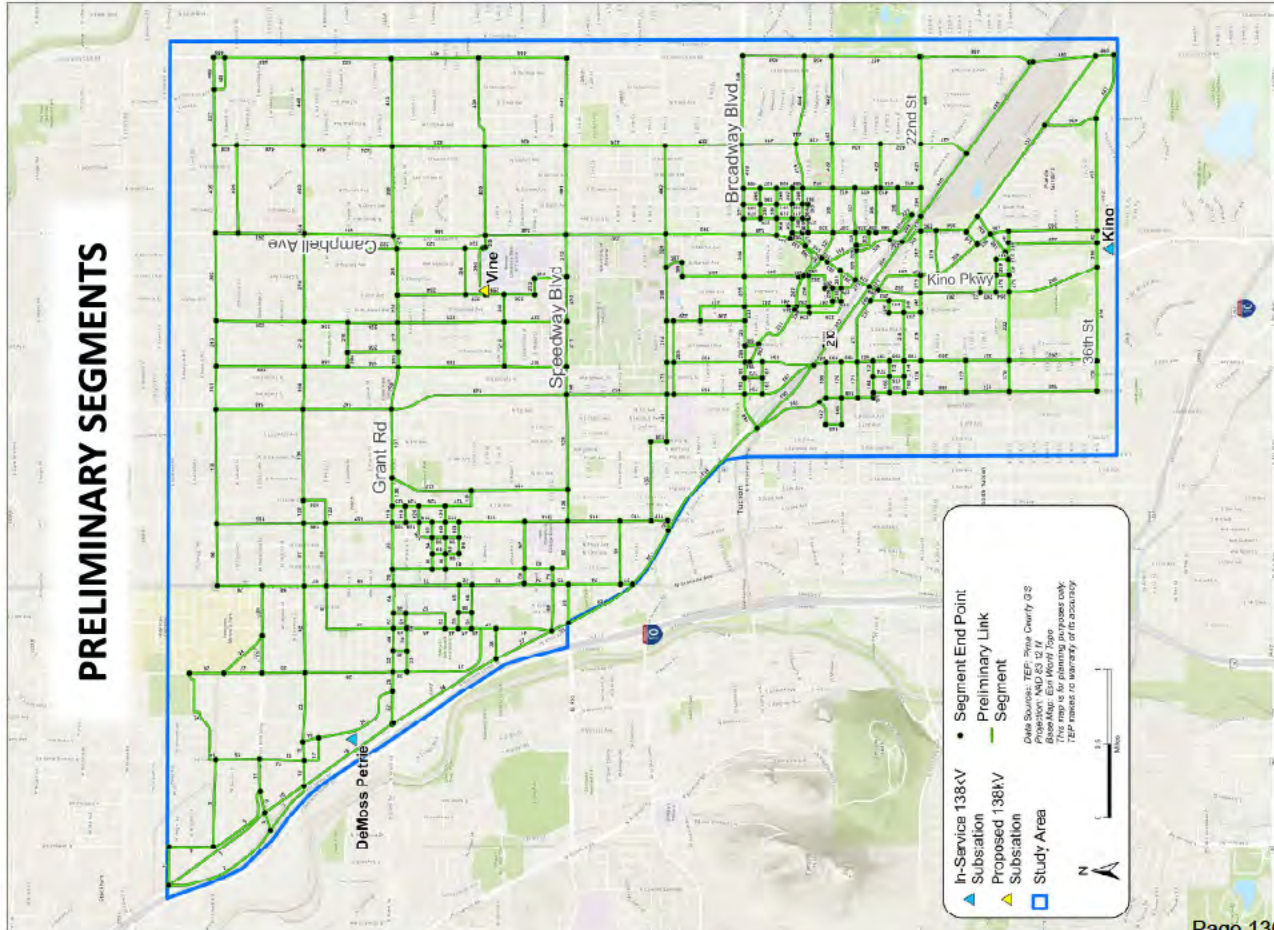
# Midtown Reliability Project



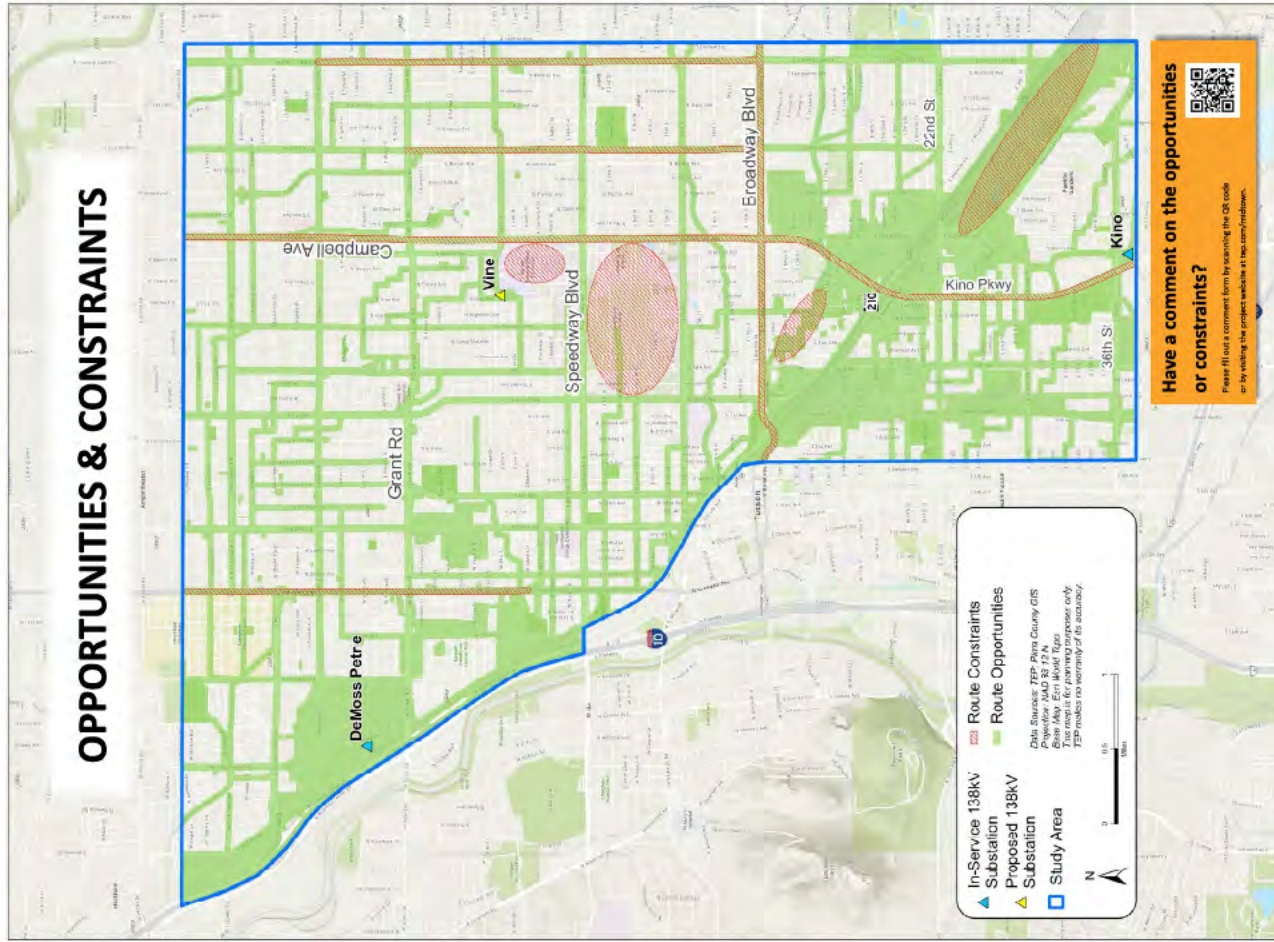
## PLANNING AND SITING PROCESS



### PRELIMINARY SEGMENTS



### OPPORTUNITIES & CONSTRAINTS



**Have a comment on the opportunities or constraints?**

Project ID: [\[Link\]](#)

or by visiting the project website at [tep.com/relia](#).

## Project Evaluation Criteria

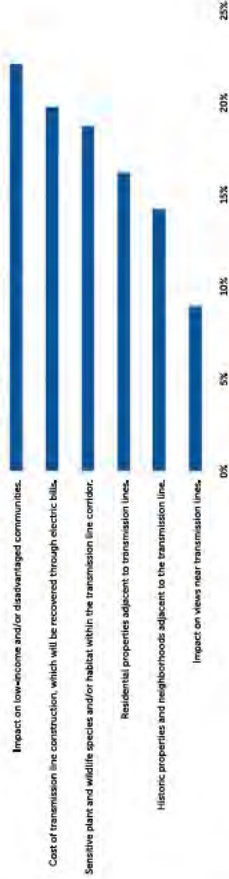
- |  |  |  |   |
|--|--|--|---|
|  | Impact on low-income and/or disadvantaged communities  |  | Impact on the total environment                                     |
|  | Cost of transmission line construction, including relocation/undergrounding of distribution lines, which will be recovered through electric bills. |  | Noise emission levels and interference with communication signals   |
|  | Sensitive plant and wildlife species and/or habitat within the transmission line corridor.   |  | Existing development plans  |
|  | Residential properties adjacent to transmission lines.   |  | Engineering feasibility and challenges                              |
|  | Historic properties adjacent to the transmission line.   |  | Compliance with applicable ordinances, master plans and regulations |
|  | Impact on views near transmission lines.   |  | Health and safety impacts   |
|  |  |  | Transit Impacts (Pedestrian, Public Transit, Traffic)               |
|  |  |  | Use of existing utility corridors                                   |
|  |  |  | Impact on native lands  |

## Project Criteria Survey Results

August 31— October 15, 2023  
2,792 Participants

In your opinion, which criteria are most important in considering the route of the proposed transmission line for the Midtown Reliability Project? Select up to TWO (2).

### Most Important Criteria to Consider

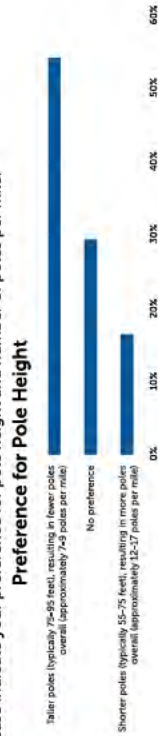


If there are other criteria you would like TEP to consider, please share your suggestion(s) in the box below:

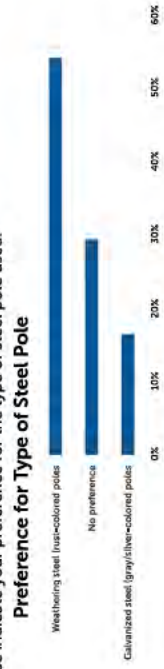
- Health and Safety
- Reliability and Maintenance
- Transit Impacts – Pedestrian, Public Transit, and Traffic
- Use of Existing Utility Corridors
- Avoidance of Gateway Corridors
- Impact on Future Land Uses
- Impact on Native Lands
- Impact on Water
- Length of the Project
- Overall Environmental Impact
- RF/Communications Interference



Please indicate your preference for pole height and number of poles per mile:

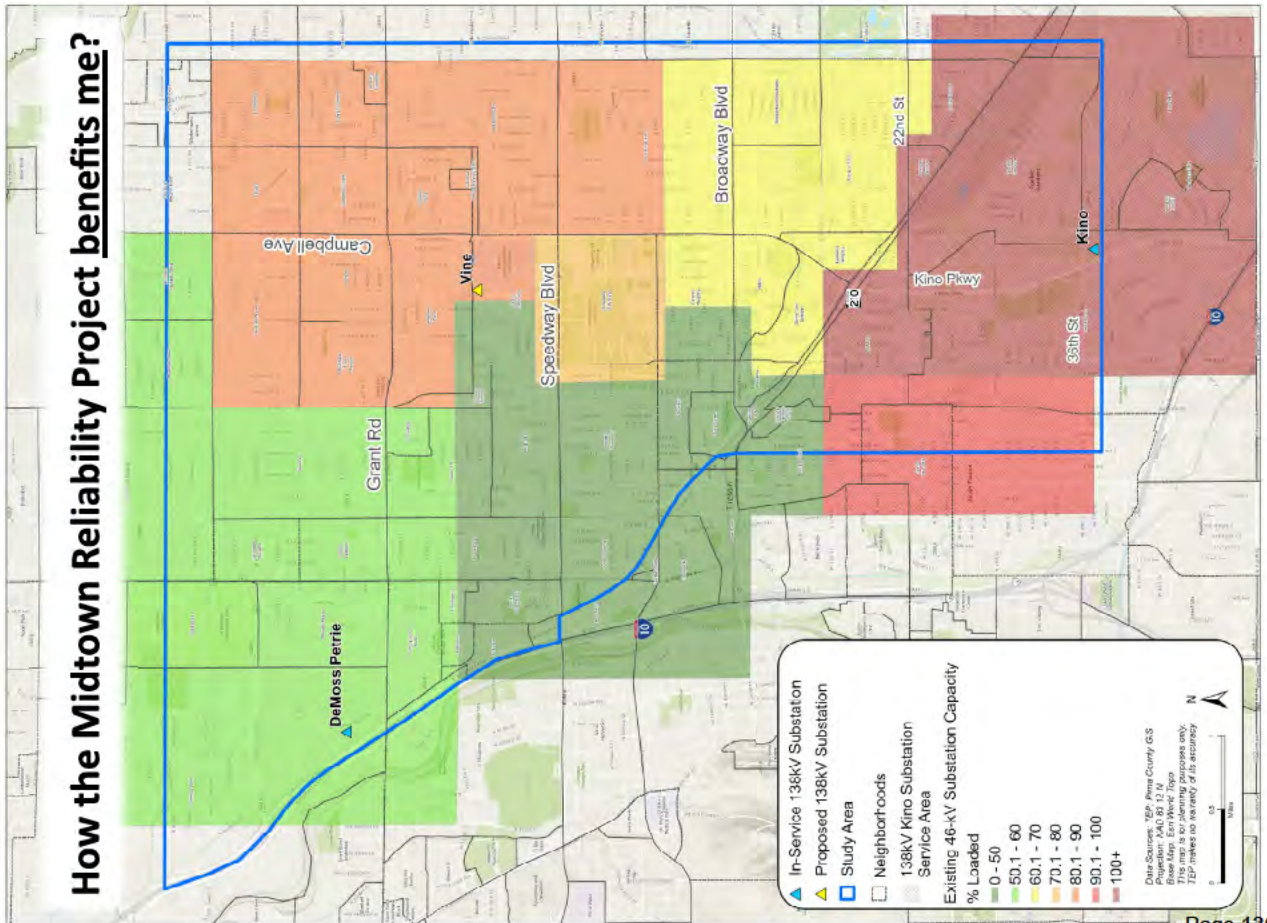


Please indicate your preference for the type of steel pole used:





## How the Midtown Reliability Project benefits me?

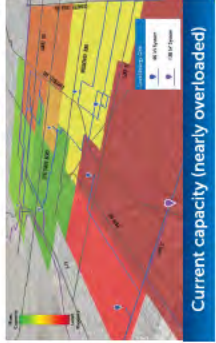


# Midtown Reliability Project Benefits

Fewer, shorter power outages



Greater capacity for growing energy needs



More customer-owned solar, storage and EVs



Removal of aging substations, power lines



Improved service citywide



Support for economic growth and a healthy community



Learn more about these benefits at:  
[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

# INTERACTIVE MAP STATION



**Provide your Spatial  
Comments**

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.6**

#### **Open House #2 Presentation**

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Midtown Reliability Project **TEP**

Project Information Open House

# WELCOME

Presentation - 7:00 p.m.

1

Midtown Reliability Project **TEP**

**Future Opportunities to Participate**

- Feb. 2024\* – Public Open House
- Apr. 2024\* – Public Open House
- July 2024\* – Line Siting Hearing
- Q3 2024\* – ACC Open Meeting
- Neighborhood Advisory Group
- Neighborhood Listening Session

\* Target schedule, subject to change

2

Midtown Reliability Project **TEP**

**How to Comment**

- Mail a comment form or a letter to:  
P.O. Box 711  
AT&T Midtown Reliability  
Mail Stop CB200  
Tucson, AZ 85701-0711
- Complete online comment form
- Visit webpage [tep.com/midtown](http://tep.com/midtown)
- Send comments to [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- Call 1-833-523-0887 and leave a voicemail message




Online Comment Form

3

Project Overview **TEP**

Components of the Midtown Reliability Project

- Vine Substation




4

Project Overview **TEP**

Components of the Midtown Reliability Project

- Vine Substation
- 138 kilovolt (kV) Transmission Line




5

Project Overview **TEP**

Components of the Midtown Reliability Project

- Vine Substation
- 138 kilovolt (kV) Transmission Line
- Distribution System Upgrades



6

## Project Overview

**Components of the Midtown Reliability Project**

- Vine Substation
- 138 kilovolt (kV) Transmission Line
- Distribution System Upgrades
- Retirement of Aging Assets

**Project Overview**

- Proposed 138kV Substation
- Existing 138kV Substation
- Existing 69kV Substation
- Existing 138kV Transmission Line
- Existing 69kV Substation Line
- Existing 69kV Substation Area

7

## Summary of Project Benefits

- Improved electric reliability
- Greater capacity for customer-owned energy systems
- Comparable cost, greater efficiency
- Improved service citywide
- Support for economic growth and a healthy community

8

## Planning and Siting Process and Timeline

Phase	Duration	Key Activities
Phase 1: Pre-Analysis	July – November 2023	Develop Vision, Conduct Preliminary Studies, Identify Potential Sites, Develop Preliminary Plans
Phase 2: Data Inventory	July – November 2023	Conduct Research, and Collect Data
Phase 3: Suitability Assessment	November 2023 – February 2024	Develop Suitability Criteria, Conduct Suitability Assessment, Identify Potential Sites, Develop Preliminary Plans
Phase 4: Compatibility Analysis	February – March 2024	Develop Compatibility Criteria, Conduct Compatibility Analysis, Identify Potential Sites, Develop Preliminary Plans
Phase 5: Concept Evaluation	March – July 2024	Develop Final Concept, Conduct Final Evaluation, Identify Potential Sites, Develop Preliminary Plans

9

**Opportunities**

Project Webpage

10

**Constraints**

Project Webpage

11

**Preliminary Segments**

Project Webpage

12

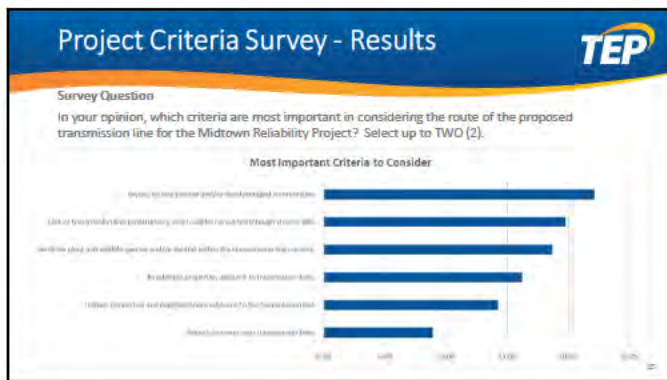


13

### Project Criteria Survey - Results

- Open Aug 31 through Oct 15
- Sent specific link by email to ~55,000 customers in the project notification area
- Available anonymously online
- 2,792 participants
  - 2,566 from email
  - 228 from anonymous link on project webpage

14



15

### Project Criteria Survey - Results

**Survey Question**  
If there are other criteria you would like TEP to consider, please share your suggestion(s) in the box below

**Other Criteria to Consider:**

- Health and Safety
- Reliability and Maintenance
- Transit Impacts – Pedestrian, Public Transit, and Traffic
- Use of Existing Utility Corridors
- Avoidance of Gateway Corridors
- Impact on Future Land Uses
- Impact on Native Lands
- Impact on Water
- Length of the Project
- Overall Environmental Impact
- RFI/Communications Interference


16

- ### Proposed Evaluation Criteria
1. Impact on low-income and/or disadvantaged communities.
  - 2.<sup>b</sup> Cost of transmission line construction, including relocation/undergrounding of distribution lines.
  - 3.<sup>b</sup> Sensitive plant and wildlife species and/or habitat within the transmission line corridor.
  - 4.<sup>a</sup> Residential properties adjacent to transmission lines.
  - 5.<sup>ab</sup> Historic properties adjacent to transmission lines.
  - 6.<sup>ab</sup> Impact on views near transmission lines.
- <sup>a</sup> Identified, in part, through comments on past Kino-DMP Project  
<sup>b</sup> Required per ARS 40-360.06

17

- ### Proposed Evaluation Criteria (continued)
- <sup>b</sup> Impact on the total environment
  - <sup>b</sup> Noise emission levels and interference with communication signals
  - <sup>b</sup> Existing development plans
  - <sup>b</sup> Engineering feasibility and challenges
  - <sup>ab</sup> Compliance with applicable ordinances, master plans and regulations
  - <sup>a</sup> Health and safety impacts
  - Transit Impacts (Pedestrian, Public Transit, Traffic)
  - <sup>a</sup> Use of existing utility corridors
  - Impact on native lands
- <sup>a</sup> Identified, in part, through comments on past Kino-DMP Project  
<sup>b</sup> Required per ARS 40-360.06

18


**Questions and Comments** 

**PLEASE DO:**

- Respect all people who are present.
- Be ready with a concise question/comment.
- Use a respectful tone and language.
- Be respectful of others while they speak.

19

19

**Questions and Comments** 

**Written Question Forms**

- Fill out and hold form up

**Verbal Questions/Comments**

- Raise hand until called upon

20

20

**Midtown Reliability Project** 

**Future Opportunities to Participate**

- Feb. 2024\* – Public Open House
- Apr. 2024\* – Public Open House
- July 2024\* – Line Siting Hearing
- Q3 2024\* – ACC Open Meeting
- Neighborhood Advisory Group
- Neighborhood Listening Session

**Please Comment**



Online Comment Form

\* Target schedule, subject to change

21

21



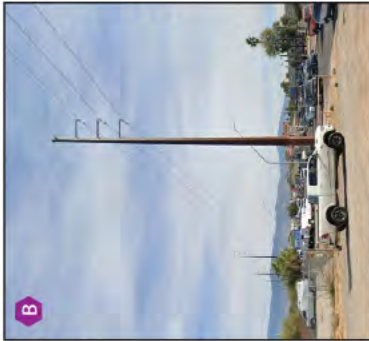
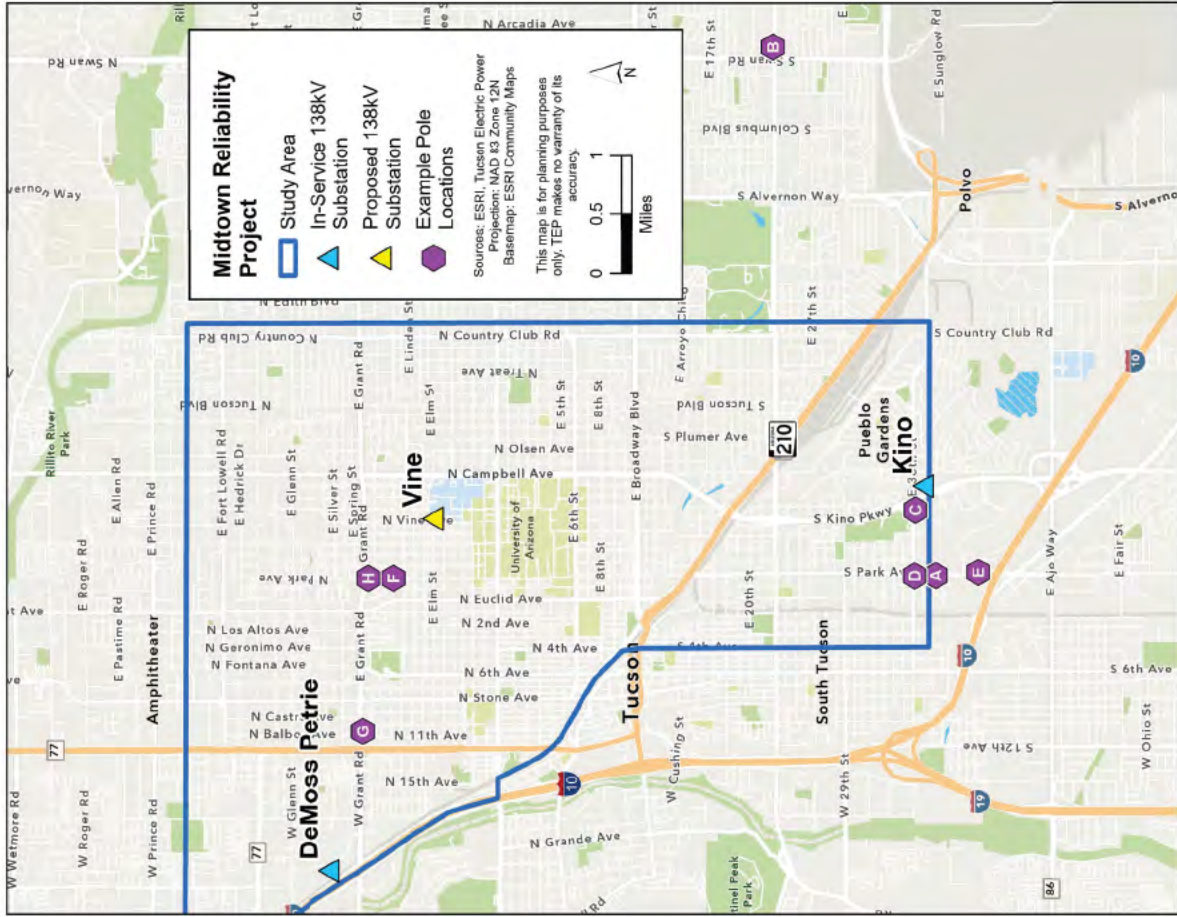
# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.7**

#### **Open House #2 Example Pole Locations Map**

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Pole ID	Type	Height
A	138-kV Tangent Structure	68 Feet
B	138-kV Tangent Structure (most common)	74 Feet
C	138-kV Tangent Structure	83 Feet
D	138-kV Turning Structure	95 Feet
E	138-kV Dead End Structure	120 Feet
F	46-kV Tangent Structure	61 Feet
G	46-kV Tangent Structure	78 Feet
H	46-kV Tangent Structure	82 Feet

Note: All poles have weathering steel finish.  
 \*With distribution & communication.  
 Under federal law, TEP must provide telecommunications companies access to poles.



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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.8**

#### **Open House #2 FAQs**

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## Tucson Electric Power

### Midtown Reliability Project

Responses to Stakeholder Questions Submitted at November 2023 Open House

#### Underground Costs

- 1. You refer to “aging assets” – some infrastructure less than 60 years old. You also refer to a 200% increase in demand over 40 years. Why has TEP not addressed this 10 or 20 years ago when costs were much lower? Do you think that the lack of innovation with regard to putting transmission lines underground is in large part due to corporate resistance to moving to completely underground electric infrastructure?**

TEP has upgraded many elements of our local energy grid over the past 10 to 20 years at a pace designed to maintain reliability and control costs while preparing for future needs. The success of these efforts is reflected in our ranking in the top quartile of all electric utilities across the country for service reliability, with metrics that reflect 99.99 percent reliability. The transmission line upgrade included in this project would have been completed in 2023 but was delayed in an attempt to addressing stakeholder concerns. That delay has exacerbated the need for the upgrade to maintain system reliability in central Tucson.

Installing transmission lines underground is much more expensive than building them above ground. The cost difference varies significantly by project but increases dramatically with higher voltages, which explains why many lower voltage lines are installed underground while higher-voltage transmission lines are not.

The higher construction cost typically reflects civil engineering expenses, right-of-way acquisition, additional labor, and materials such as conduit, insulated wire and pull-boxes that are not required for overhead projects. Transmission lines conduct energy flows at higher amperages than distribution cables, generating far more excess heat that must be managed to avoid overloads. This requires the use of higher-cost conductors and other insulating infrastructure.

Underground lines also have higher maintenance costs and require more time for repairs. Underground transmission lines typically have comparable performance and shorter lifespans when compared with overhead systems.

- 2. Why not go underground and pass the costs to the consumer? You can surcharge to residents in the areas that are affected.**

TEP cannot charge different rates in different parts of town unless this were to be approved by the Arizona Corporation Commission (ACC), which we consider to be unlikely. In October 2023, the Arizona Corporation Commission approved a policy statement instructing regulated utilities like TEP to avoid underground installation. A portion of the statement says: *"As a general matter, utilities under the Commission's jurisdiction should avoid incurring these higher costs unless underground installation of a transmission line is necessary for reliability or safety purposes or to satisfy other prudent operational needs."*

TEP can work with property owners who wish to create an improvement district to fund underground installation of facilities in their area. Arizona state law (ARS 48-620) provides for the creation of an underground utility improvement district that can allow nearby property owners to pay the additional cost of installing facilities below ground. While such districts have been used to fund the underground installation of distribution lines, the extremely high cost of installing higher-voltage lines below ground makes this option less realistic for transmission line projects.

- 3. Your marketing materials state that this project will lower costs and improve efficiency. Why can't these savings be used to offset the cost of undergrounding in sensitive areas? It seems TEP wants it both ways – build lines the cheapest way possible now then benefit from efficiency savings later.**

The savings realized through cost-effective development of utility infrastructure benefit customers, not TEP, as they result in lower rates. This project will provide greater capacity and reliability at a cost comparable to simply maintaining the aging, capacity-constrained system in place now. The project will also allow us to remove eight 46-kV substations and up to 19 miles of 46-kV overhead lines.

As described on our [project webpage](#) and in other project communications, overhead installation and maintenance cost significantly less than undergrounding. Please see questions 1 and 2. Building the line underground between our Kino Substation and the proposed Vine substation would add about \$80 million to the cost of the project, currently estimated at about \$52 million for overhead installation of the entire transmission line and construction of Vine Substation.

**4. If U of A and Banner were not here, we would not be here tonight. Again, why don't they shoulder cost?**

The Midtown Reliability Project will support electric reliability throughout a study area that includes 36,936 residential customers and 6,834 business customers in 62 neighborhoods – all served by eight aging 46-kilovolt (kV) substations. Six of these eight 46-kV substations do not provide service to the University of Arizona or Banner. Another only provides partial service. They *all* face overload conditions and reliability concerns due to higher energy demands and aging equipment in need of replacement.

Ultimately, higher energy users will end up paying a larger share of project costs than other customers in the study area through higher electric bills. All customers pay rates that reflect a cost allocation approved by the Arizona Corporation Commission.

**5. U of A and Banner are the major users. Why don't they (or in case of U of A) go to state legislators for funding? There was a \$250 million surplus in state coffers.**

Please see the response to question 4.

## Substation

**6. Can we have a map of the capacity of each substation in use now that serve this area with U of A?**

Please visit our project webpage to view an interactive map, which includes a layer representing capacity constraints on our existing 46-kV system.

**7. Can we see a map that also shows the 10-year plan buildout which includes future substations and lines and loops?**

TEP's [Ten Year Plan Transmission Projects for years 2023-2032](#) includes maps that describe existing and planned transmission infrastructure.

**8. Could TEP use ~95k existing substations and upgrade existing lines to ~95k instead of jumping from 46k to 138k?**

No. Our local energy grid is designed to accommodate sub-transmission facilities at 46 kilovolts (kV) and transmission facilities at 138, 230, 345 and 500 kV. The project would replace 46-kV facilities.

A sub-transmission line and other equipment operating at 95 kV would be incompatible with our local energy grid. Any attempt to install such a system would include higher costs, lower energy capacity and significant technical challenges.

## Poles

**9. How many poles per mile? Can they be painted like the ones on Sabino Canyon Road near Udall Park?**



The number of poles required will vary depending on the final route. In an urban environment, one mile of a 138-kV overhead line might require 6 to 10 poles.

TEP no longer uses painted poles. Although poles can be painted, the paint tends to fade and crack over time, losing its aesthetic appeal. Maintaining the paint requires additional cost and effort that could otherwise be allocated to system reliability or safety concerns.

In late August, TEP invited more than 55,000 stakeholders to participate in a project survey. Based on responses from nearly 2,800 participants, most respondents prefer poles with a 'rusted' weathering steel finish, which TEP typically uses throughout its service territory, rather than poles with a galvanized metallic finish.

- 10. Was it always an option to have more small poles vs fewer larger poles? Does Banner Hospital have concerns regarding the placement of poles along the ring road and if so, is this why an additional option to run poles in the alleyway between Lester and Linden?**

TEP typically installs taller poles because they're sturdier and fewer are required, resulting in lower cost, less required maintenance, and a smaller disturbance footprint. Taller poles also lift lines above the line of sight for viewers focused on buildings, roads, natural features and other ground level sights.

The alleyway between Lester and Linden is under consideration as a preliminary segment because a 46-kV line is installed there. Segments with 46-kV lines and other major linear infrastructure are considered to be siting opportunities.

- 11. Have you looked into other ways to make the infrastructure less notable, such as using specific paint like go away green?**

Please see question 9.

## Segments

- 12. Can you show the preliminary segment and segment points on the screen? Aren't the segments the more likely route?**

During the entire planning and line siting process, TEP will evaluate hundreds of segments that could be combined in various ways to form potential routes. At this time, TEP continues to evaluate these segments, and has not identified a preferred route.

- 13. Preliminary segment – please define – as opposed to green highlighted segment without preliminary segment.**

Preliminary segments represent specific sections between points on a map that – from an engineering perspective - could support installation of a transmission line. These preliminary segments, which are identified early in the process, do not consider stakeholder preferences, local ordinances or other considerations which may result in their elimination.

The areas highlighted in green in our earlier maps were less specific, representing areas of opportunity that required further study.

## Constraints

- 14. I fully understand the U of A and Banner need for increased capacity – Kino/Campbell is a constraint route so what is the planned route? And how do you link with Vine substation?**

Please see question 4. TEP has no proposed routes at this time.

**15. When a constraint is not marked, this means, in part, the neighborhood representative and analysis by TEP. Is this correct? Are there any other factors?**

Our maps of opportunities and constraints represent areas that required further analysis. Please see question 12. TEP will consider multiple factors as it evaluates potential route segments.

**16. Does “constraints” mean off-limits?**

Not necessarily. Constraints are factors in areas or specific locations that present challenges to installation of an overhead transmission line.

**17. Is there a way to get rid of route constraints? Those constraints seem to benefit only a small percentage of people. The U of A seems to benefit the most.**

Please see question 16. TEP will review hundreds of segments throughout the process, and each could present opportunities, constraints or both at the same time.

Areas with higher building density like the University of Arizona main campus or downtown Tucson present technical challenges to building a transmission line.

## Miscellaneous

**18. What is your position on microgrids and municipal microgrids?**

The term “microgrid” is often used to describe systems that do not qualify as such. Generally speaking, microgrids replicate components of the larger electric grid at a smaller scale, making them capable of operating in isolation from the local grid. This can provide greater resiliency but at a higher cost, as the utility grid leverages economies of scale to provide service at lower rates. TEP stands ready to work with customers who wish to invest in systems that support their resiliency needs in ways that are compatible with grid reliability standards and regulatory constraints.

**19. How will the public input that is received be used? Will it really enter into the decision-making process? Will the data gathered be made public?**

Yes, public input has already expanded the criteria TEP will use to evaluate segments and potential route options. State law requires consideration of cost, impact on sensitive plant and wildlife species, existing development plans and several other factors. Additionally, TEP will consider residential properties adjacent to potential routes, health and safety, alignment with existing utility corridors and other factors as a result of input provided by residents and other stakeholders.

TEP will share all public comments received during the planning and siting process with the Arizona Power Plant and Transmission Line Siting Committee and the Arizona Corporation Commission, the regulatory entities that must review and approve a route for TEP’s transmissions before construction can begin.

**20. Has TEP looked at all flight patterns for snowbird operation at DM?**

TEP has notified Davis-Monthan officials about this project and the Irvington to East Loop Transmission Project, a 138-kV transmission line under construction and nearing completion adjacent to the base.

**21. Considering the old infrastructure will be torn down, what is the plan to ensure the communities will not be exposed to harmful/toxic chemicals during the demolition process?**

Public safety is a crucial consideration for all TEP operations. All demolition will closely adhere to all applicable laws, environmental requirements and safety procedures designed to protect the public while minimizing any inconvenience to nearby residents.

**22. How often does the 138kV system go down?**

The steel 138-kilovolt (kV) poles proposed for use in this project are strong, reliable, and capable of withstanding extreme weather and other conditions. None of TEP's steel 138-kV poles have been felled by storms, traffic collisions or other emergencies in the last 10 years. Many of the more than 200 poles damaged in summer 2023 by storms were wooden 46-kV poles.

**23. What is RFI? How are you presenting this information to the public that can be understood at any level of knowledge and language barriers? Will the public get a vote on how much they are willing to agree on price rises?**

"RFI" is an acronym for radio frequency interference, or unwanted interruption of television, radio or other telecommunication signals. TEP must consider and mitigate potential RFI conditions when evaluating potential transmission line routes. We strive to provide complete and transparent project communications. Throughout the process and as you have in this case, customers and other stakeholders should always feel free to reach out to us with their questions.

TEP does not set the rates paid by its customers. Our rates and pricing plans are based on the cost of service provided to customers. They must be reviewed and approved by the Arizona Corporation Commission in a public process that provides opportunities for public input before incorporation into customer bills.

**24. Can the neighborhood reps meeting be recorded and posted online?**

Although all neighborhoods within the study area are invited to participate in the advisory group, meetings are designed to be small in order to encourage discussion among neighborhood representatives. Some seating is available for residents to attend and observe the meeting.

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.9**

#### **Open House #3 Boards**

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**Midtown Reliability Project**  
Meeting everyday energy needs in the heart of Tucson for a lifetime



**SHORTER, LESS FREQUENT OUTAGES**

- 36,936 households
  - 62 neighborhoods
  - 6,834 businesses
- All will benefit from a new 138-kilovolt (kV) "loop" around central Tucson supplying energy from more than one direction.

**ENERGY FOR A GENERATION OF TUCSONANS**

The project would provide over 3x the capacity of the current systems



**212% increase**  
In Tucson's peak energy demand since 1975

**STRONG, HEALTHY COMMUNITY**  
Supports growing economy, population



Improves reliability in extreme weather

Provides midtown residents with same reliability benefits enjoyed in other areas



**100,000+ newsletters**  
**55,000+ emails**  
Sent to midtown homes, businesses and others about the project

**COST SAVINGS, GREATER EFFICIENCY**



**19 miles**  
46-kV lines removed

**8 46-kV substations retired**

**\$52 million**  
saved over 15 years by avoiding replacement of older equipment



**268 miles**  
4-kV distribution circuits upgraded to 14-kV with new poles, wires, switchgear and more

**\$52 million investment**  
in our local energy grid

- 7-8 miles of new 138-kV lines
- A new 138-kV substation

**Midtown Reliability Project**



**Welcome**  
Please Sign In

**Bienvenidos**  
(Hablamos Español)  
**Por Favor Regístrese**

**Presentation Schedule (Salons E, F, G & H)**  
**7:00 pm**

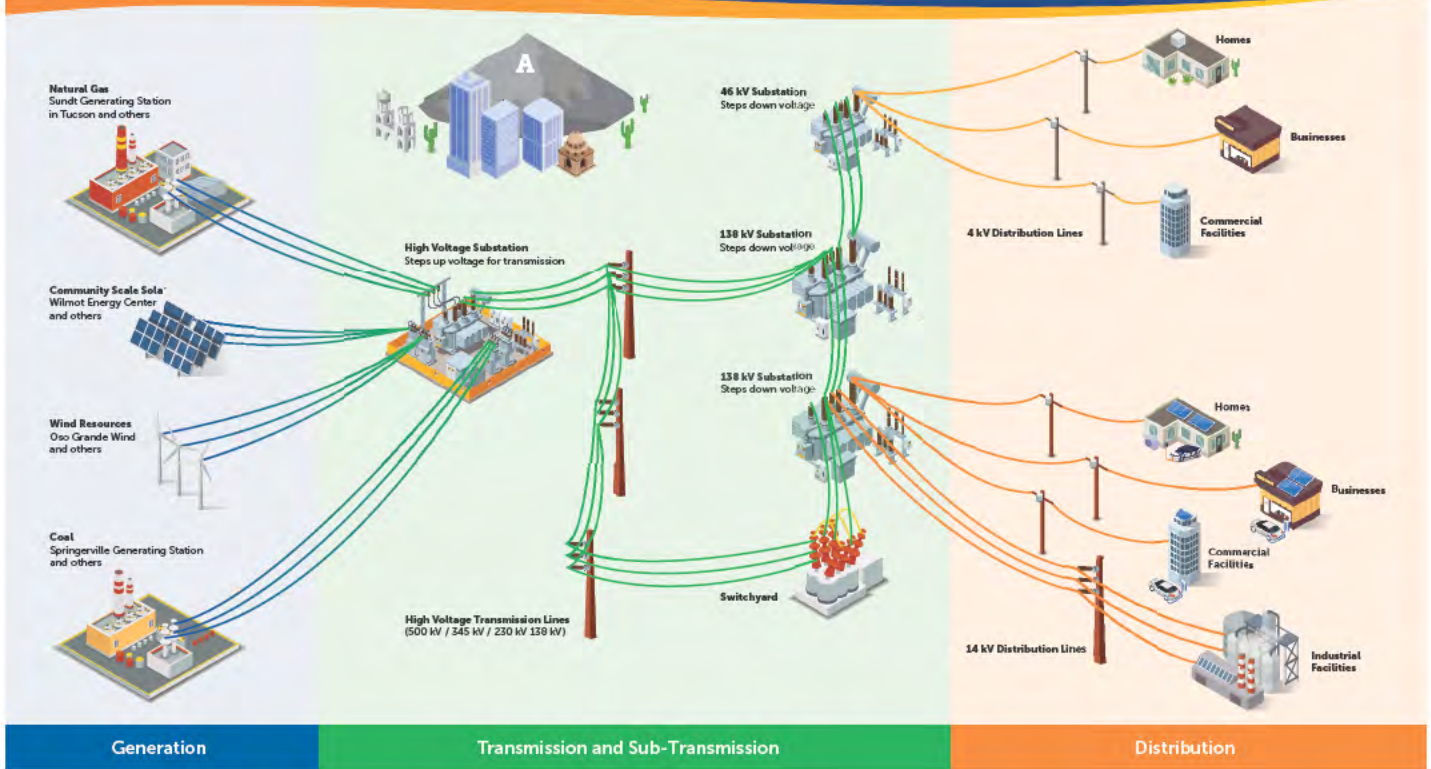
**For more information - Para más información:**



Learn more at [tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

# Our Energy Grid

## How we deliver electric service to you



Generation

Transmission and Sub-Transmission

Distribution

# Midtown Reliability Project



## Vine Substation

- Gas Insulated Substation (GIS)
- Located on a 1.6-acre site
- The substation will contain:
  - Three - 75 MVA transformers
  - Switchgear
  - Static Masts
  - Structural Canopy
- 12-foot decorative masonry block wall
- Perimeter landscaping



EXISTING CONDITION

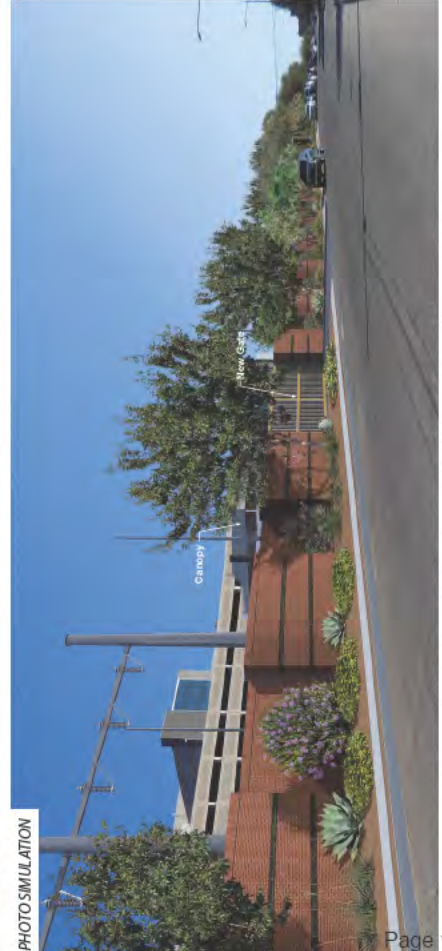


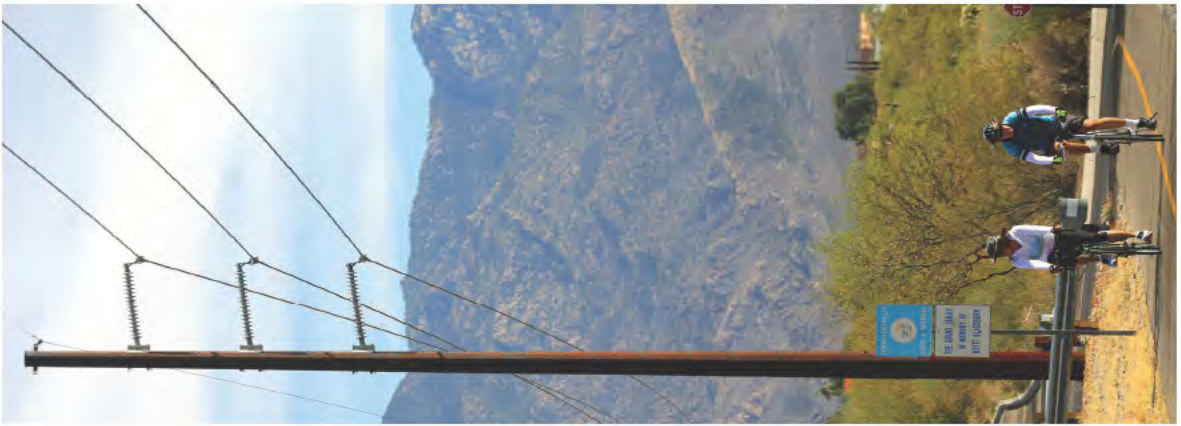
PHOTO SIMULATION

Transmission line is not depicted because the final route is not known at this time.

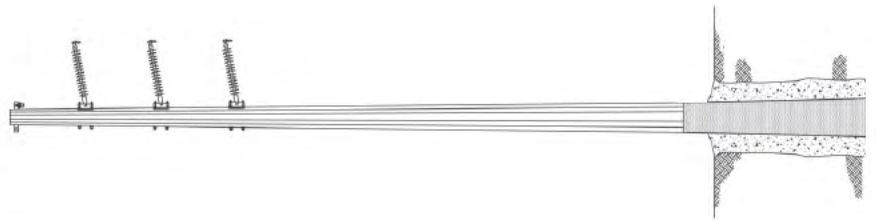


## Transmission Line Characteristics

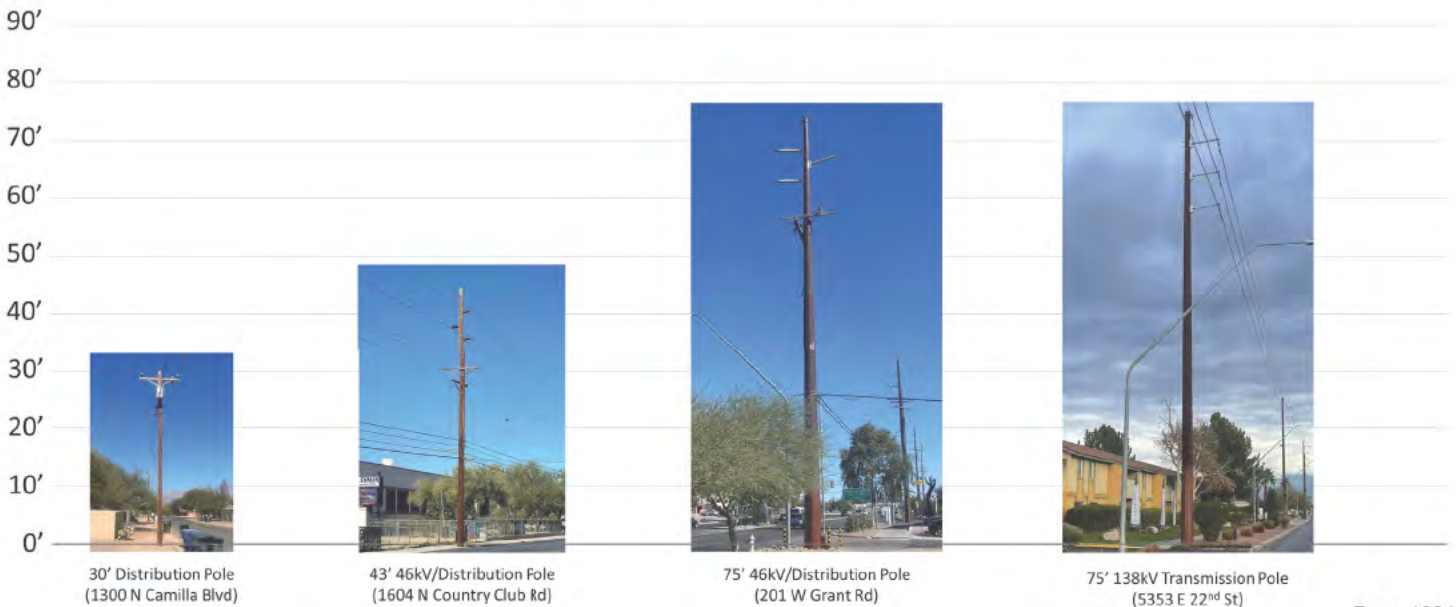
- Single-circuit 138-kV transmission line
- Tubular, weathering steel monopoles
- Typical structure heights of around 75 feet
- Around 600-foot span between poles
- Non-specular, aluminum conductor wire



A typical weathering steel monopole supporting a 138 kilovolt transmission line



## Pole Comparison



## Midtown Reliability Project Fewer Power Lines, Better Service



Tucson Electric Power

### Aging Assets in Project Study Area



On average, major 46-kV substation equipment is 47 years old.  
Some equipment is in 'poor' or 'very poor' condition.

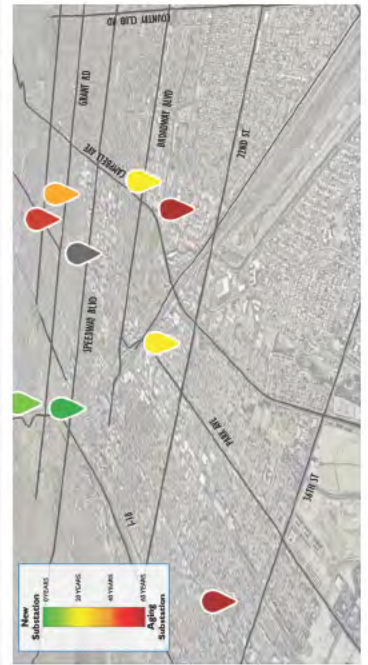


On average, 46-kV power poles in the study area are 61 years old.  
Some equipment is in 'poor' or 'very poor' condition.  
More than 430 poles need to be replaced within 15 years at a cost of \$11 million.

It would cost \$41 million to replace this equipment over the next 5 years.

### Options

	Maintain existing 46-kV System	Upgrade to new 138-kV System
<b>Built for:</b>	Late 20th Century	21st Century
<b>Substations:</b>	<ul style="list-style-type: none"> <li>8 46-kV substations</li> <li>Cost: \$41 million</li> <li>Additional substations may be required</li> </ul>	<ul style="list-style-type: none"> <li>1,138-kV substation added</li> <li>8 46 kV substations removed</li> <li>Cost: \$34 million</li> </ul>
<b>Power lines:</b>	<ul style="list-style-type: none"> <li>19 miles of 46-kV lines</li> <li>Poles in poor condition replaced with larger metal poles (similar to 138-kV poles)</li> <li>Cost: \$11 million</li> </ul>	<ul style="list-style-type: none"> <li>7-8 miles 138-kV lines added</li> <li>19 miles 46-kV power lines removed</li> <li>Cost: \$18 million</li> </ul>
<b>Added Capacity:</b>	None	3X
<b>Total:</b>	\$52 million investment in 46 kV system	\$52 million investment in new 138-kV facilities



## Midtown Reliability Project



## UPGRADING THE DISTRIBUTION SYSTEM

Providing additional capacity and improving reliability of service in support of growth, electrical vehicle charging and rooftop solar installations.



### SYSTEM UPGRADES INCLUDE:

- Convert distribution circuits from 4-kV to 13.8-kV
- Replace transformers
- Replace conductors (wires), where merited
- Replace poles, where needed

# Midtown Reliability Project



## Why won't TEP install this transmission line underground?



### COST

- Underground transmission lines cost significantly more to build and maintain.
  - The difference escalates with voltage. Higher voltages = higher underground costs.
  - 5-10x more expensive – or more. Costs vary for each project.
- Higher costs lead to higher electric rates.
- In October 2023, the Arizona Corporation Commission approved a policy statement instructing regulated utilities like TEP to avoid underground installation. A portion of the statement says: *“As a general matter, utilities under the Commissions jurisdiction should avoid incurring these higher costs unless underground installation of a transmission line is necessary for reliability or safety purposes or to satisfy other prudent operational needs.”*
- Voters rejected proposal to pay for underground construction in a new franchise agreement.
- Stakeholders can create improvement district to fund undergrounding in their area.



### EFFICIENCY, CONSISTENCY

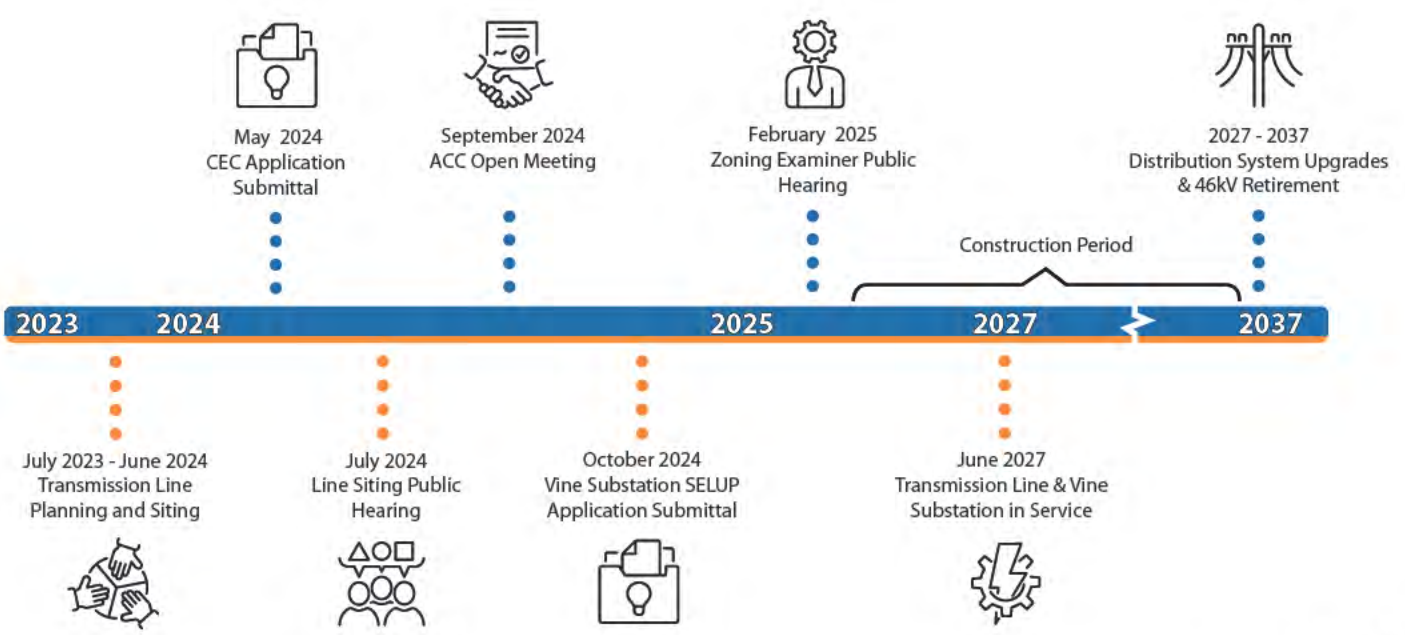
- No engineering or safety justification.
- Every other TEP transmission line is installed overhead.
- Majority of transmission lines in the United States are installed overhead.
- Underground construction disturbs more land, existing facilities and archaeological resources.



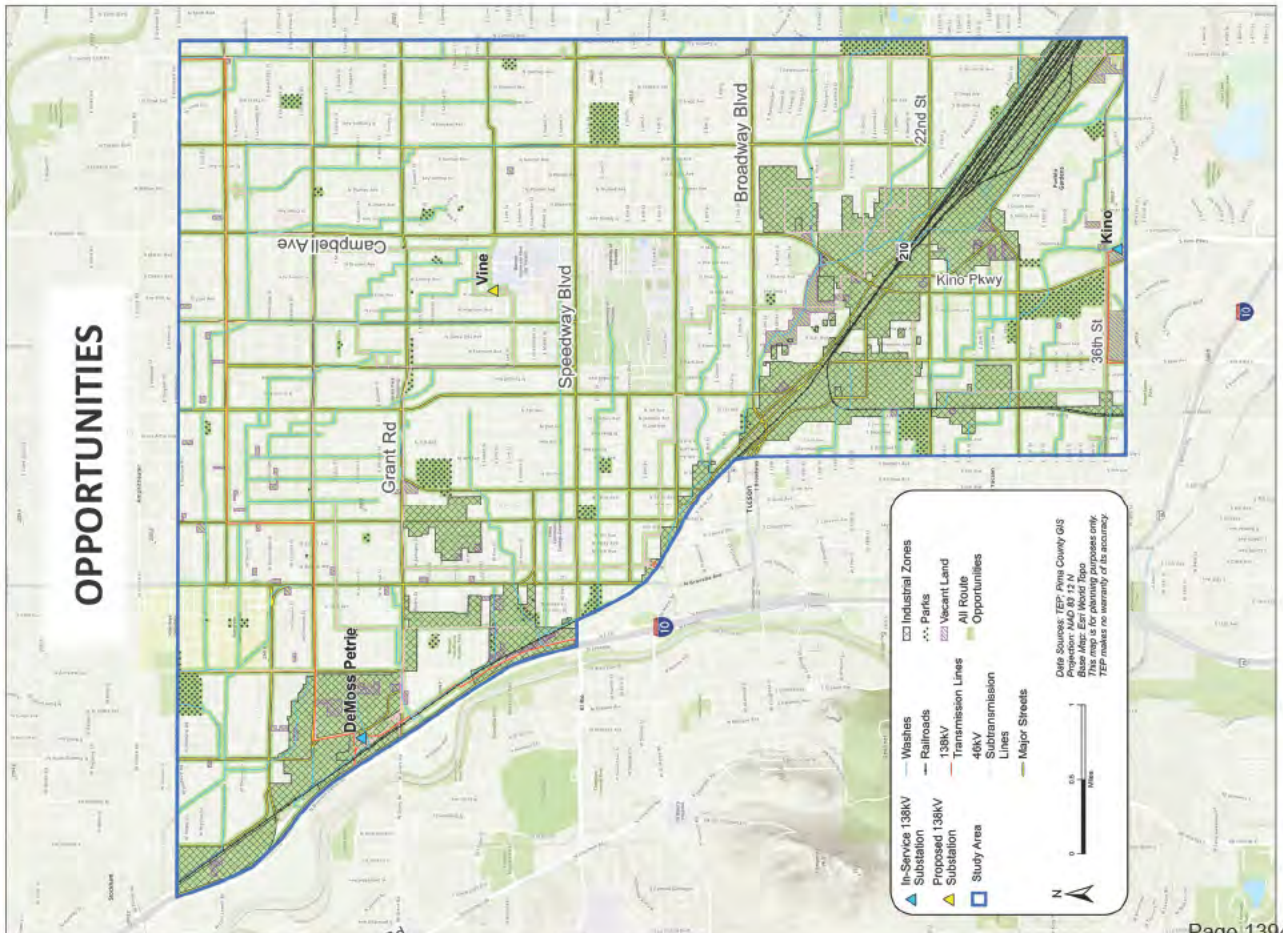
### RELIABILITY

- Comparable to overhead construction, with higher maintenance costs.
- Fewer outages but longer repair times.
- Life expectancy of underground equipment is lower.
- 138 -kV transmission poles withstand extreme weather, traffic impacts.

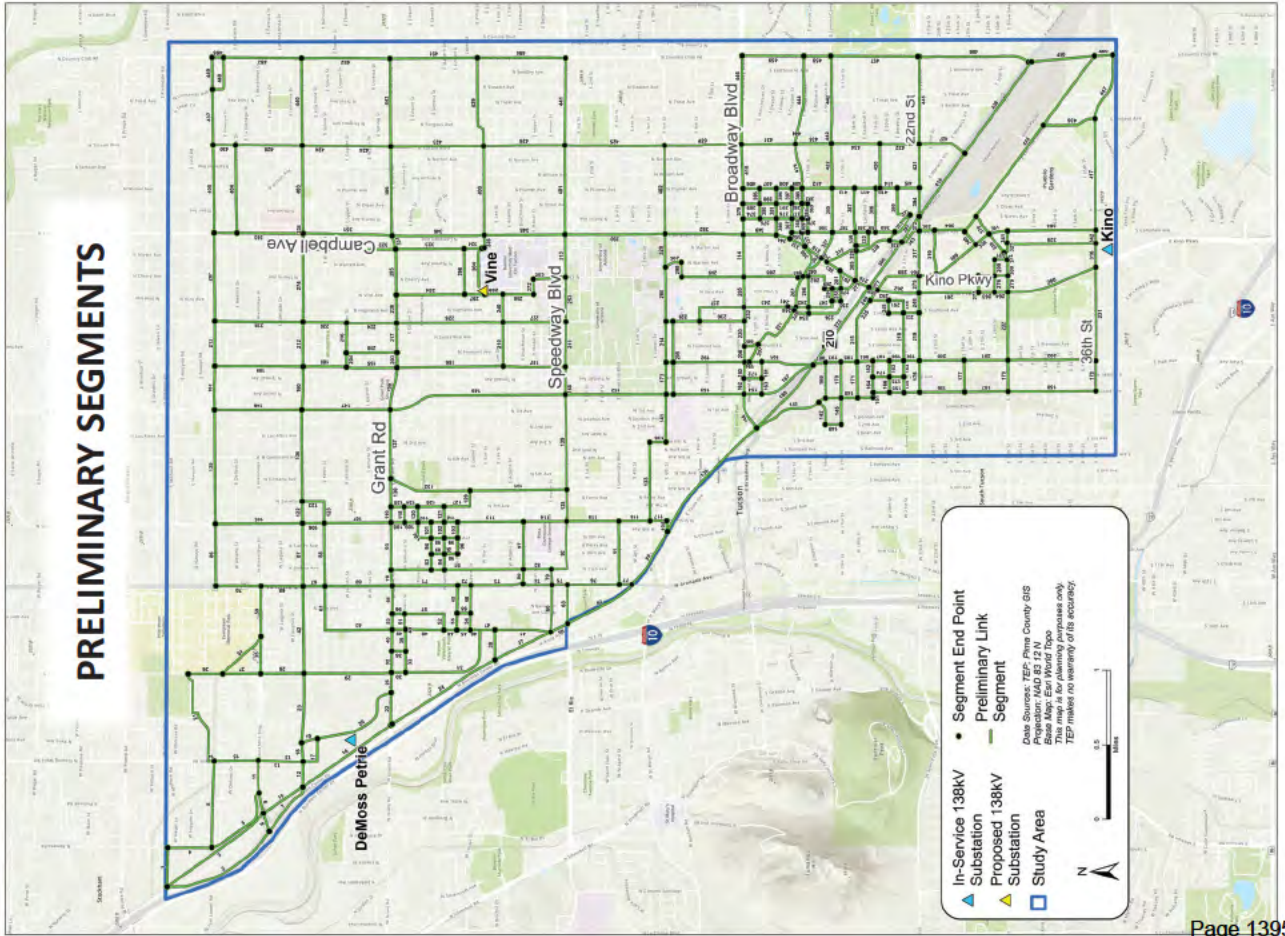
# Midtown Reliability Project



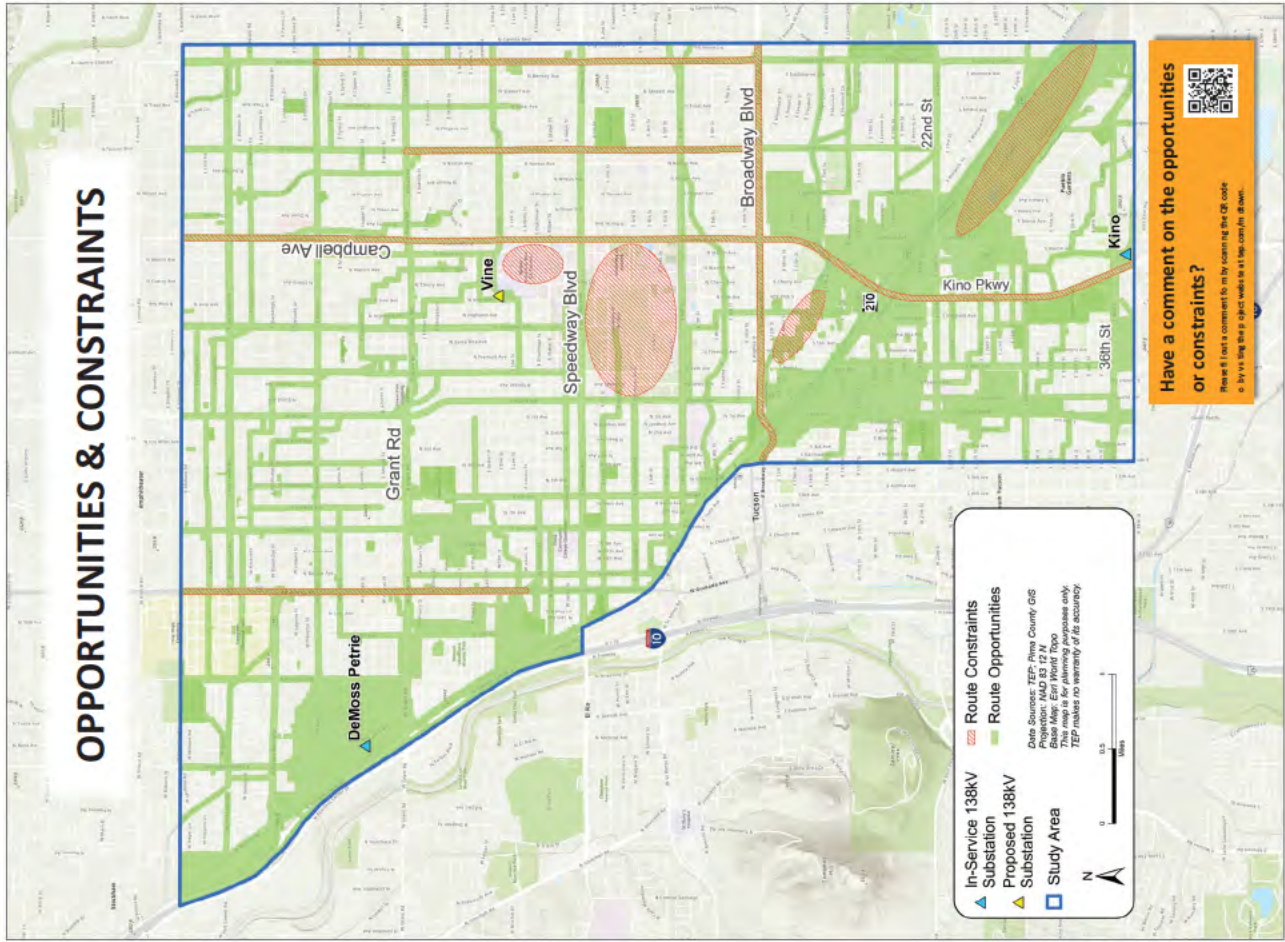
## PLANNING AND SITING PROCESS



### PRELIMINARY SEGMENTS



### OPPORTUNITIES & CONSTRAINTS



Have a comment on the opportunities or constraints?

Reach out to us with comments on the map using the QR code or by visiting <http://tep.com/ra>.

## Project Evaluation Criteria

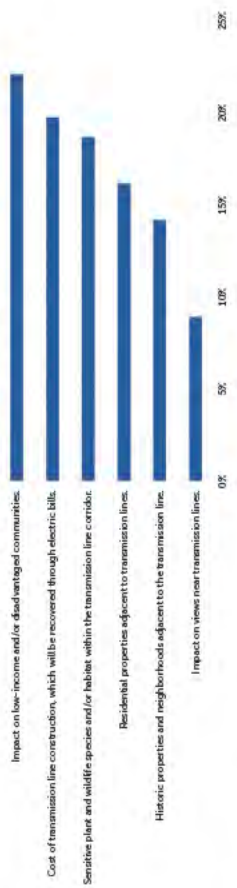
- |  |  |  |   |
|--|--|--|---|
|  | Impact on low-income and/or disadvantaged communities  |  | Impact on the total environment                                     |
|  | Cost of transmission line construction, including relocation/undergrounding of distribution lines, which will be recovered through electric bills. |  | Noise emission levels and interference with communication signals   |
|  | Existing development plans   |  | Existing development plans  |
|  | Engineering feasibility and challenges   |  | Engineering feasibility and challenges                              |
|  | Compliance with applicable ordinances, master plans and regulations  |  | Compliance with applicable ordinances, master plans and regulations |
|  | Health and safety impacts  |  | Health and safety impacts   |
|  | Transit Impacts (Pedestrian, Public Transit, Traffic)  |  | Transit Impacts (Pedestrian, Public Transit, Traffic)               |
|  | Use of existing utility corridors  |  | Use of existing utility corridors                                   |
|  | Impact on native lands   |  | Impact on native lands  |

## Project Criteria Survey Results

August 31 – October 15, 2023  
2,792 Participants

In your opinion, which criteria are most important in considering the route of the proposed transmission line for the Midtown Reliability Project? Select up to TWO (2).

### Most Important Criteria to Consider



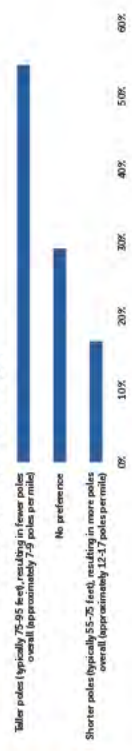
If there are other criteria you would like TEP to consider, please share your suggestion(s) in the box below:

- Health and Safety
- Reliability and Maintenance
- Transit Impacts – Pedestrian, Public Transit, and Traffic
- Use of Existing Utility Corridors
- Avoidance of Gateway Corridors
- Impact on Future Land Uses
- Impact on Native Lands
- Impact on Water
- Length of the Project
- Overall Environmental Impact
- RF/Communications Interference



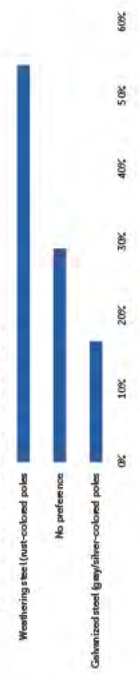
Please indicate your preference for pole height and number of poles per mile:

### Preference for Pole Height



Please indicate your preference for the type of steel pole used:

### Preference for Type of Steel Pole



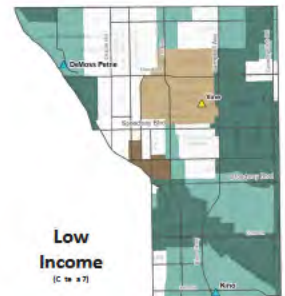
## Suitability Criteria Models

**LEGEND**

- In-Service 138kV Substation
- Proposed 138kV Substation

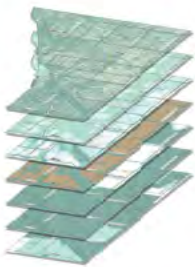
**Suitability Analysis**

- Less Suitable
- More Suitable



## Composite Suitability Models

- Criteria 1 x Weight
- Criteria 2 x Weight
- Criteria 3 x Weight
- Criteria 4 x Weight
- Criteria 5A x Weight
- Criteria 6 x Weight
- Criteria 7 x Weight



Suitability criteria models are weighted and added together to create composite models.

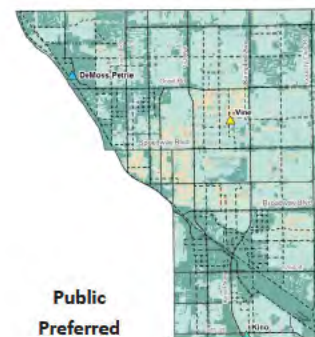
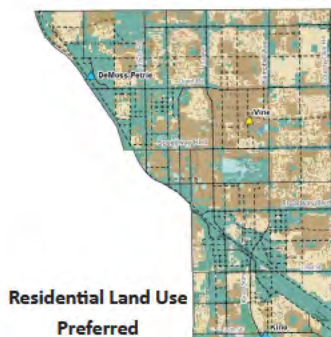
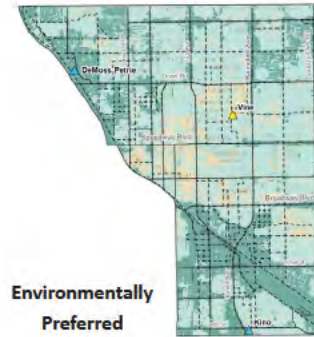


**LEGEND**

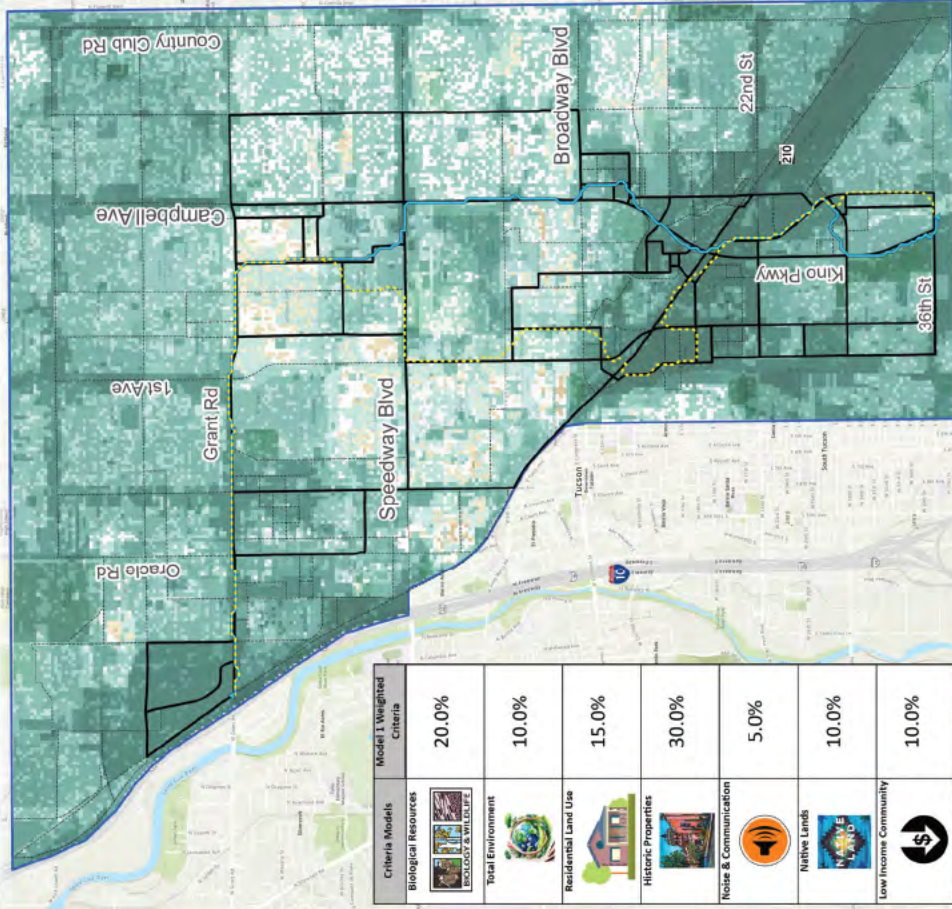
- In-Service 138kV Substation
- Proposed 138kV Substation
- Preliminary Segments

**Suitability Analysis**

- Less Suitable
- More Suitable



MODEL 1 — NEIGHBORHOOD ADVISORY GROUP



Criteria Models	Model 1 Weighted Criteria
Biological Resources	20.0%
Total Environment	10.0%
Residential Land Use	15.0%
Historic Properties	30.0%
Noise & Communication	5.0%
Native Lands	10.0%
Low Income Community	10.0%

**Model 1 Weighted Surface**

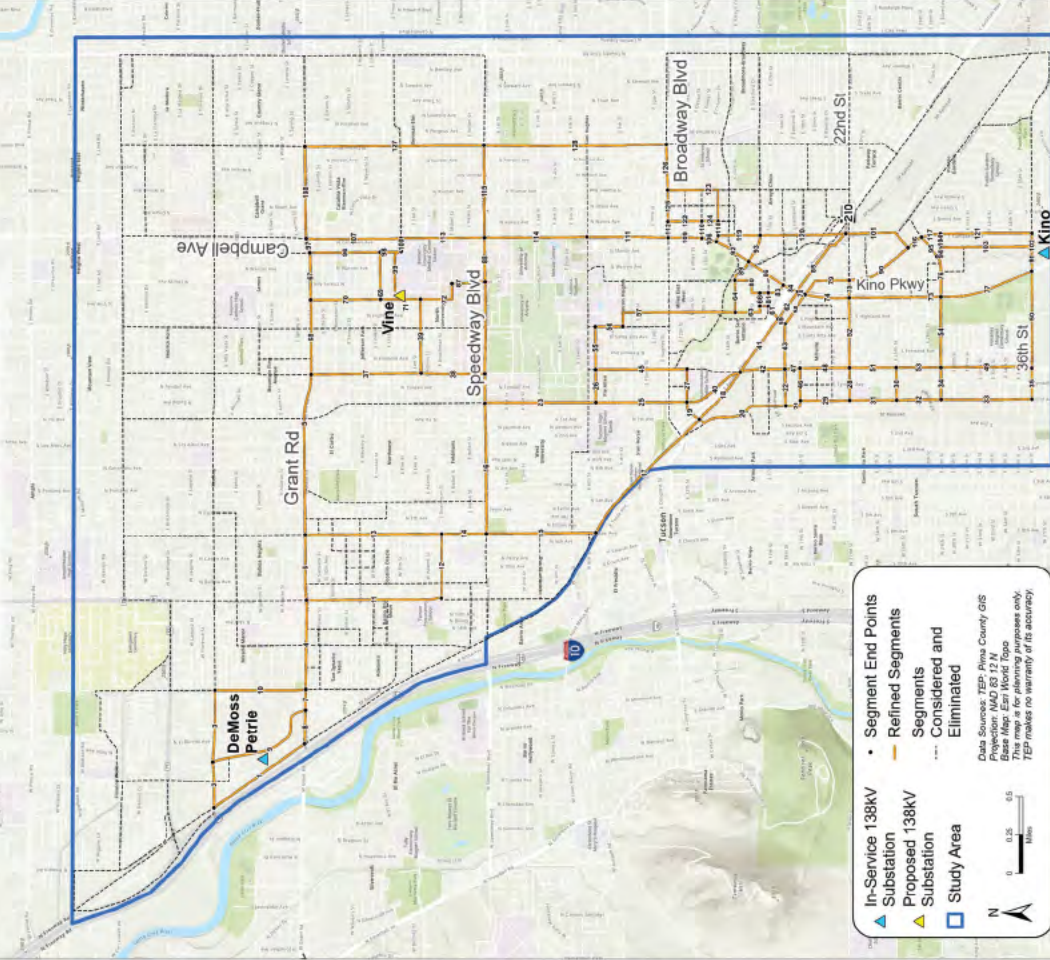
Less Suitable (lighter green) | More Suitable (darker green)

**Legend:**

- In-Service 138kV Substation (blue triangle)
- Proposed 138kV Substation (yellow triangle)
- Study Area (blue outline)
- Refined Segments (solid black line)
- Considered and Eliminated Segments (dashed black line)
- Optimal Path (solid blue line)
- All Segments (dashed blue line)
- Optimal Path Constrained Segments (dotted blue line)

**Data Sources:** TEP, Pima County GIS  
 Projection: NAD 83 12 N  
 Base Map: Esri World Topo  
 TEP makes no warranty of its accuracy.

REFINED SEGMENTS



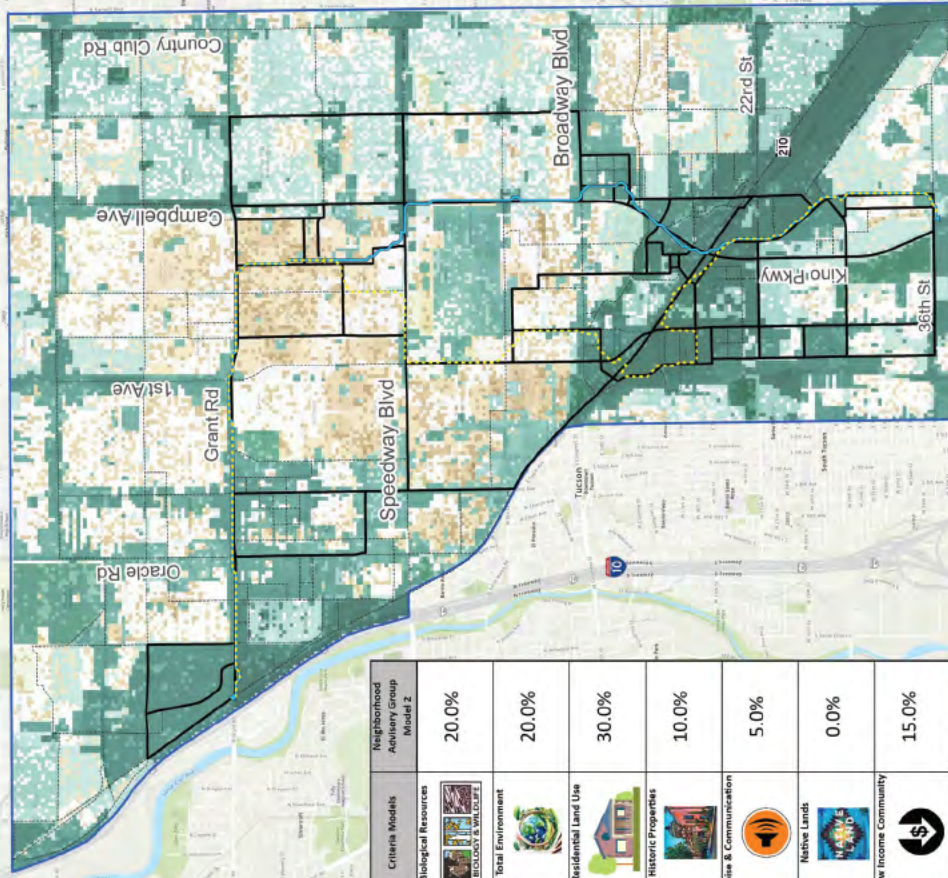
**Legend:**

- In-Service 138kV Substation (blue triangle)
- Proposed 138kV Substation (yellow triangle)
- Study Area (blue outline)
- Segment End Points (black dots)
- Refined Segments (orange line)
- Segments Considered and Eliminated (dashed orange line)

**Data Sources:** TEP, Pima County GIS  
 Projection: NAD 83 12 N  
 Base Map: Esri World Topo  
 TEP makes no warranty of its accuracy.



## MODEL 2 — NEIGHBORHOOD ADVISORY GROUP



Criteria Models	Neighborhood Advisory Group Model 2
Biological Resources	20.0%
Total Environment	20.0%
Residential Land Use	30.0%
Historic Properties	10.0%
Noise & Communication	5.0%
Native Lands	0.0%
Low Income Community	15.0%

**Model 2 Weighted Surface**

Less Suitable More Suitable

**Optimal Path**

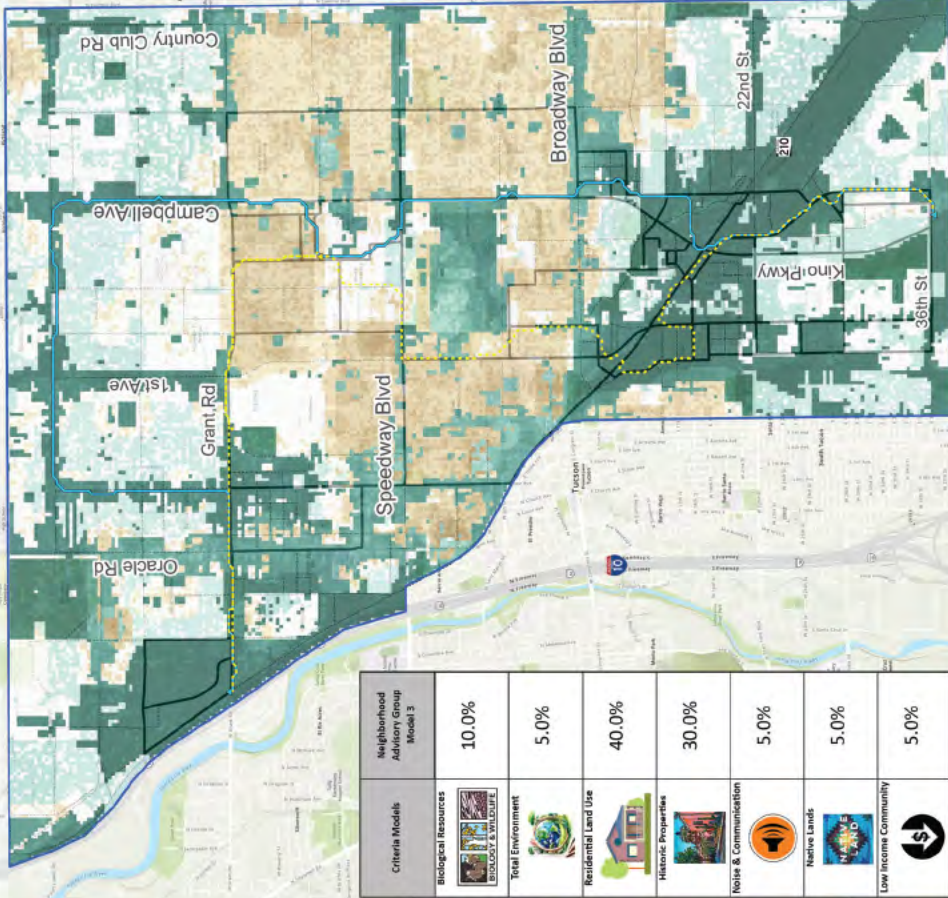
- All Segments
- Constrained Segments

**Legend**

- In-Service 138kV Substation
- Proposed 138kV Substation
- Study Area
- Refined Segments
- Considered and Eliminated Segments

Data Source: TEP, Pima County GIS  
Projection: NAD 83 12 N  
Base Map: Esri World Topo  
TEP makes no warranty of its accuracy.

## MODEL 3 — NEIGHBORHOOD ADVISORY GROUP



Criteria Models	Neighborhood Advisory Group Model 3
Biological Resources	10.0%
Total Environment	5.0%
Residential Land Use	40.0%
Historic Properties	30.0%
Noise & Communication	5.0%
Native Lands	5.0%
Low Income Community	5.0%

**Model 3 Weighted Surface**

Less Suitable More Suitable

**Optimal Path**

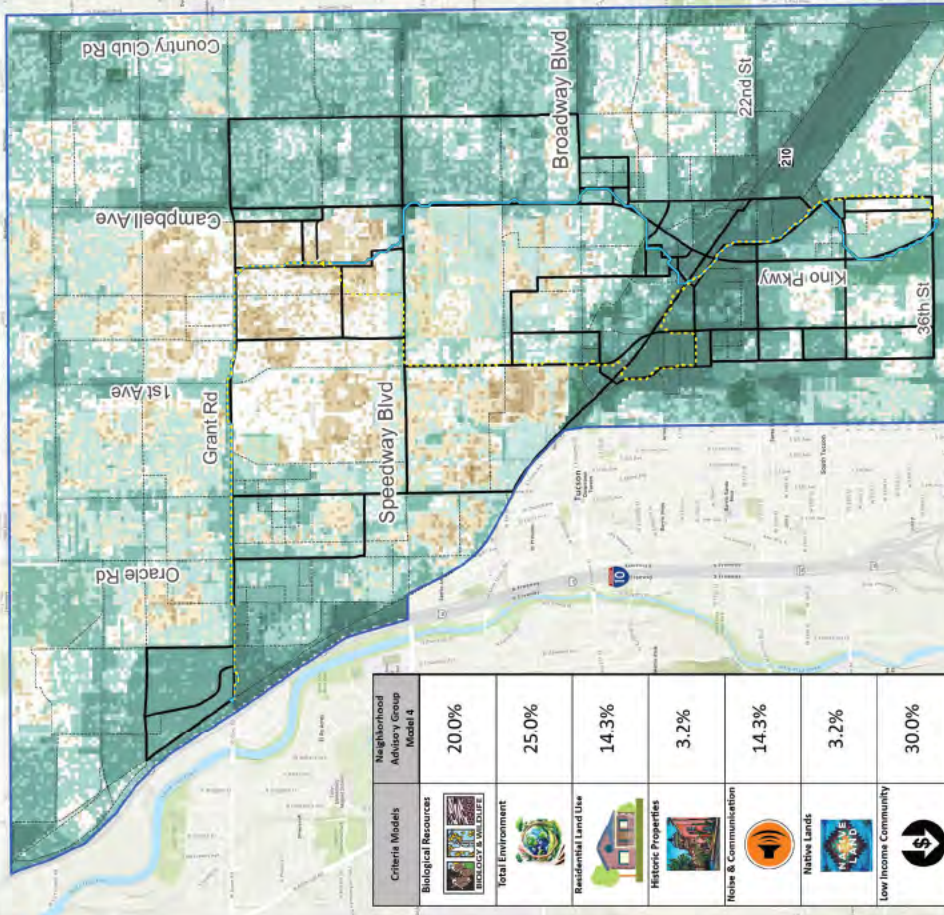
- All Segments
- Constrained Segments

**Legend**

- In-Service 138kV Substation
- Proposed 138kV Substation
- Study Area
- Refined Segments
- Considered and Eliminated Segments

Data Source: TEP, Pima County GIS  
Projection: NAD 83 12 N  
Base Map: Esri World Topo  
TEP makes no warranty of its accuracy.

## MODEL 4 — NEIGHBORHOOD ADVISORY GROUP



Criteria Models	Neighborhood Advisory Group Model 4
Biological Resources	20.0%
Total Environment	25.0%
Residential Land Use	14.3%
Historic Properties	3.2%
Noise & Communication	14.3%
Native Lands	3.2%
Low Income Community	30.0%

**Model 4 Weighted Surface**  
 Less Suitable  
 More Suitable

In-Service 138kV Substation  
 Proposed 138kV Substation  
 Study Area  
 Refined Segments  
 Considered and Eliminated Segments

Optimal Path  
 All Segments  
 Optimal Path  
 Constrained Segments

Data Sources: TEP, Pima County GIS  
 Projection: NAD 83 12 N  
 Base Map: Esri World Topographic  
 TEP makes no warranty of its accuracy.

# Midtown Reliability Project

## COMPOSITE SUITABILITY MODELS









	Balanced	Environmentally Preferred	Cultural/Historic Preferred	Residential Land Use Preferred	Public Preferred	Neighborhood Advisory Group Model 1	Neighborhood Advisory Group Model 2	Neighborhood Advisory Group Model 3	Neighborhood Advisory Group Model 4
<b>Biological Resources</b>	14.3%	20.0%	8.0%	8.3%	19.0%	20.0%	20.0%	10.0%	20.0%
<b>Total Environment</b>	14.3%	20.0%	8.0%	8.3%	9.5%	10.0%	20.0%	5.0%	25.0%
<b>Residential Land Use</b>	14.3%	10.0%	8.0%	50.0%	16.0%	15.0%	30.0%	40.0%	14.3%
<b>Historic Properties</b>	14.3%	20.0%	40.0%	8.3%	14.0%	30.0%	10.0%	30.0%	3.2%
<b>Noise &amp; Communication</b>	14.3%	10.0%	8.0%	8.3%	9.5%	5.0%	5.0%	5.0%	14.3%
<b>Native Lands</b>	14.3%	10.0%	20.0%	8.3%	10.0%	10.0%	0.0%	5.0%	3.2%
<b>Low Income Community</b>	14.3%	10.0%	8.0%	8.3%	22.0%	10.0%	15.0%	5.0%	30.0%
<b>Which model best represents your perspective?</b>									

# Midtown Reliability Project



## COMPOSITE SUITABILITY MODELS

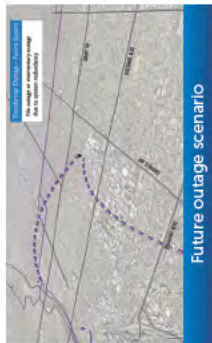
CRITERIA MODELS

	Balanced	Environmentally Preferred	Cultural/Historic Preferred	Residential Land Use Preferred	Public Preferred	Neighborhood Advisory Group Model 1	Neighborhood Advisory Group Model 2	Neighborhood Advisory Group Model 3	Neighborhood Advisory Group Model 4
Biological Resources 	14.3%	20.0%	8.0%	8.3%	19.0%	20.0%	20.0%	10.0%	20.0%
Total Environment 	14.3%	20.0%	8.0%	8.3%	9.5%	10.0%	20.0%	5.0%	25.0%
Residential Land Use 	14.3%	10.0%	8.0%	50.0%	16.0%	15.0%	30.0%	40.0%	14.3%
Historic Properties 	14.3%	20.0%	40.0%	8.3%	14.0%	30.0%	10.0%	30.0%	3.2%
Noise & Communication 	14.3%	10.0%	8.0%	8.3%	9.5%	5.0%	5.0%	5.0%	14.3%
Native Lands 	14.3%	10.0%	20.0%	8.3%	10.0%	10.0%	0.0%	5.0%	3.2%
Low Income Community 	14.3%	10.0%	8.0%	8.3%	22.0%	10.0%	15.0%	5.0%	30.0%
Which model best represents your perspective? 				★					

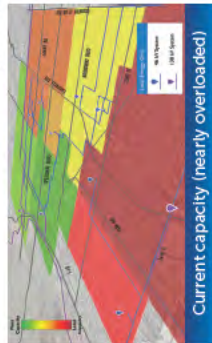
## Midtown Reliability Project Benefits



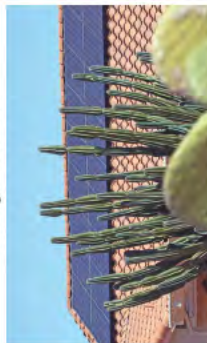
Fewer, shorter power outages



Greater capacity for growing energy needs



More customer-owned solar, storage and EVs



Removal of aging substations, power lines



Improved service citywide



Support for economic growth and a healthy community



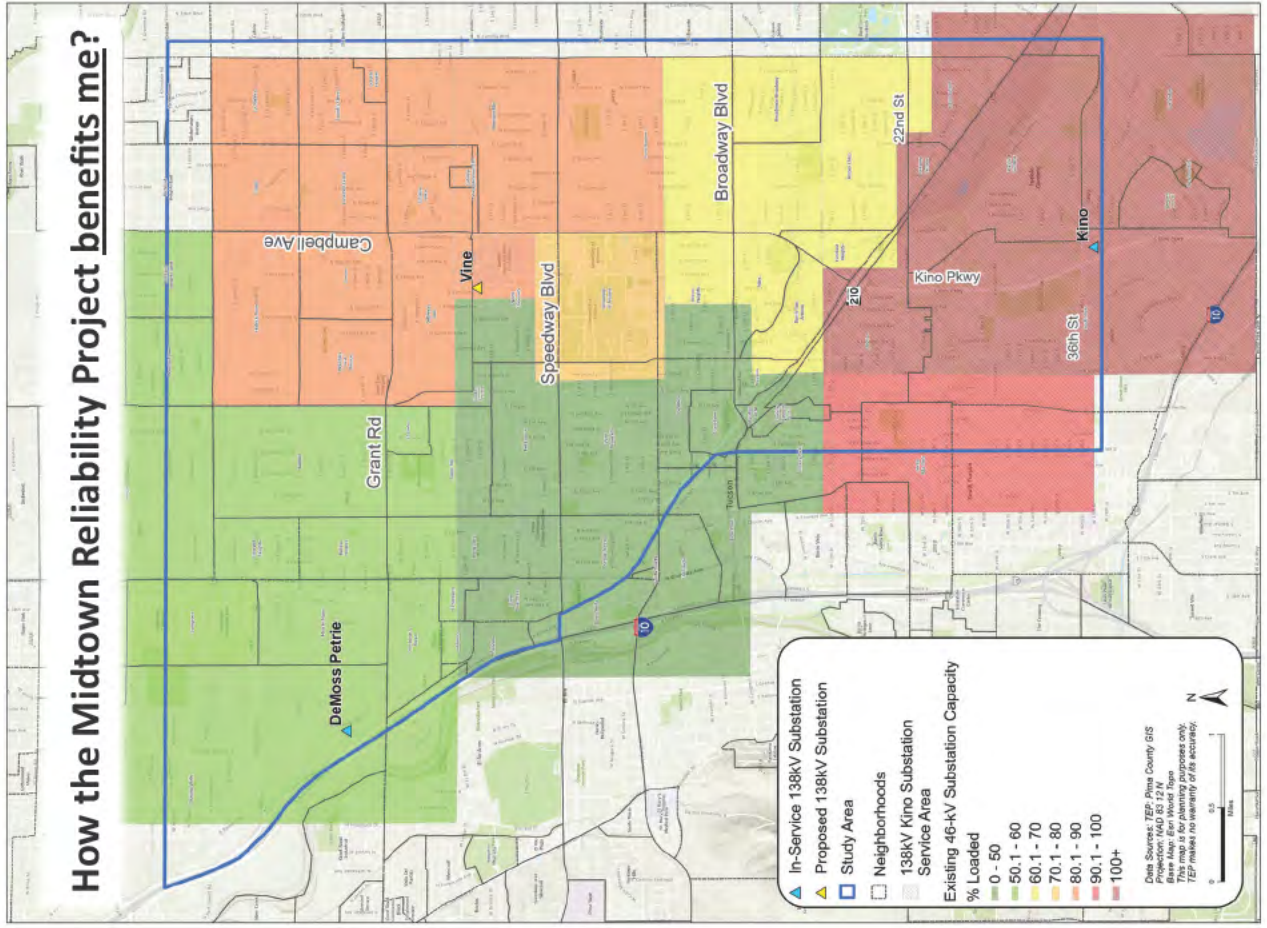
Learn more about these benefits at:  
[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

# INTERACTIVE MAP STATION



**Provide your Spatial  
Comments**

## How the Midtown Reliability Project benefits me?



# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.10**

#### **Open House #3 Presentation**

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Midtown Reliability Project **TEP**

# Project Information Open House

# WELCOME

Presentation - 7:00 p.m.

1

Project Overview **TEP**

**Project Area**

- 37,000 households
- 6,800 businesses

**Components of the Project**

- Vine Substation
- 138 kilovolt (kV) Transmission Line
- Distribution System Upgrades
- Retirement of Aging Facilities



2

Required Approvals **TEP**

**138 kV Transmission Line**

- Certificate of Environmental Compatibility (Arizona Corporation Commission)

**Vine Substation**

- Special Exception Land Use Permit (City of Tucson)

**Distribution System Upgrades & Retirement of Aging Facilities**

- No approvals, but dependent on new substation and transmission line

3

Planning and Siting Process **TEP**




**OUTREACH**

- Neighborhood Listening Sessions
- Neighborhood Advisory Group
- Public Open Houses
- Elected Official Briefings
- Agency Briefings

4

Suitability Assessment **TEP**



**Criteria Models**

- Allowing on-headers only
- No wetlands
- No wetlands
- No wetlands
- No wetlands

**Composite Models**

- No wetlands
- No wetlands
- No wetlands
- No wetlands

**Suitability Assessment**

- Highest Suitability Path
- Apply Constraints
- Visual Comparison

**Field Verification**

**Refined Segments**

5



**Refined Segments**

6



7



8



9



10



11



12





13



14

### Midtown Reliability Project

**How to Comment**

- Mail a comment form or a letter to:  
P.O. Box 711  
ATTN: Midtown Reliability  
Mail Stop CB200  
Tucson, AZ 85701-0711
- Complete online comment form
- Visit webpage [tep.com/midtown](http://tep.com/midtown)
- Send comments to [midtownreliability@tep.com](mailto:midtownreliability@tep.com)
- Call 1-833-523-0887 and leave a voicemail message



Online Comment Form

15

### Questions and Comments

**PLEASE DO:**

- Respect all people who are present.
- Be ready with a concise question/comment.
- Use a respectful tone and language.
- Be respectful of others while they speak.

16

### Questions and Comments

**Written Question Forms**

- Fill out and hold form up

**Verbal Questions/Comments**

- Raise hand until called upon

17


### Midtown Reliability Project

**Future Opportunities to Participate**

- Mar, 28 – Public Open House
- July 2024\* – Line Siting Hearing
- Q3 2024\* – ACC Open Meeting
- Neighborhood Advisory Group
- Neighborhood Listening Session

\* Target schedule, subject to change

**Please Comment**



Online Comment Form

18

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.11**

#### **Open House #3 Suitability Assessment Handout**

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Name \_\_\_\_\_

Neighborhood \_\_\_\_\_








Email \_\_\_\_\_

**Instructions:** If you don't see a composite suitability model that represents your personal preference, please let us know what would. In the last column of the table titled "My Model", add an appropriate weight as a percent of the total model that represents your values or preference, totalling 100%.

Provide this completed model worksheet to any TEP representative. TEP will create your model and identify the route of highest suitability. The results will be provided to you by email. Your model may be presented during the public open house.

### Midtown Reliability Project - Suitability Assessment

Composite Suitability Model

Criteria Models		Balanced	Environmentally Preferred	Cultural/Historic Preferred	Residential Land Use Preferred	Public Preferred	Neighborhood Advisory Group Model 1	Neighborhood Advisory Group Model 2	Neighborhood Advisory Group Model 3	Neighborhood Advisory Group Model 4	My Model
	<b>Biological Resources</b> 	14.3%	20.0%	8.0%	8.3%	19.0%	20.0%	20.0%	10.0%	20.0%	
	<b>Total Environment</b> 	14.3%	20.0%	8.0%	8.3%	9.5%	10.0%	20.0%	5.0%	25.0%	
	<b>Residential Land Use</b> 	14.3%	10.0%	8.0%	50.0%	16.0%	15.0%	30.0%	40.0%	14.3%	
	<b>Historic Properties</b> 	14.3%	20.0%	40.0%	8.3%	14.0%	30.0%	10.0%	30.0%	3.2%	
	<b>Noise &amp; Communication</b> 	14.3%	10.0%	8.0%	8.3%	9.5%	5.0%	5.0%	5.0%	14.3%	
	<b>Native Lands</b> 	14.3%	10.0%	20.0%	8.3%	10.0%	10.0%	0.0%	5.0%	3.2%	
	<b>Low Income Community</b> 	14.3%	10.0%	8.0%	8.3%	22.0%	10.0%	15.0%	5.0%	30.0%	

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**Application for a Certificate of Environmental  
Compatibility**

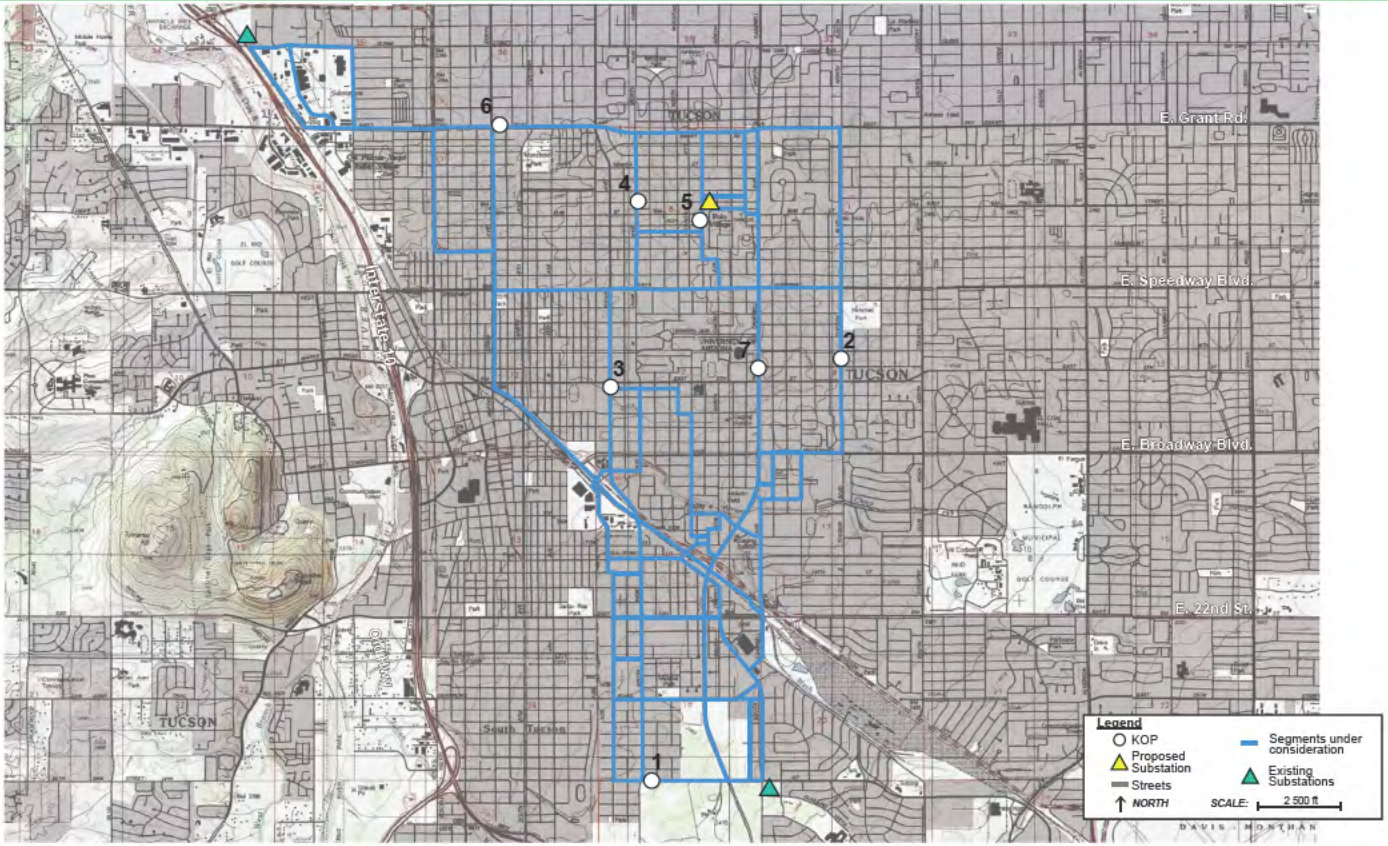
**Midtown Reliability Project**

**Exhibit J-8.12**

**Open House #3 Visual Simulations Refined Segments**

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Key Observation Points - (KOPs)

TEP - Midtown Realiability Project [Return to Map](#)

Key Observation Point (KOP) #1 - 36th Ave looking east

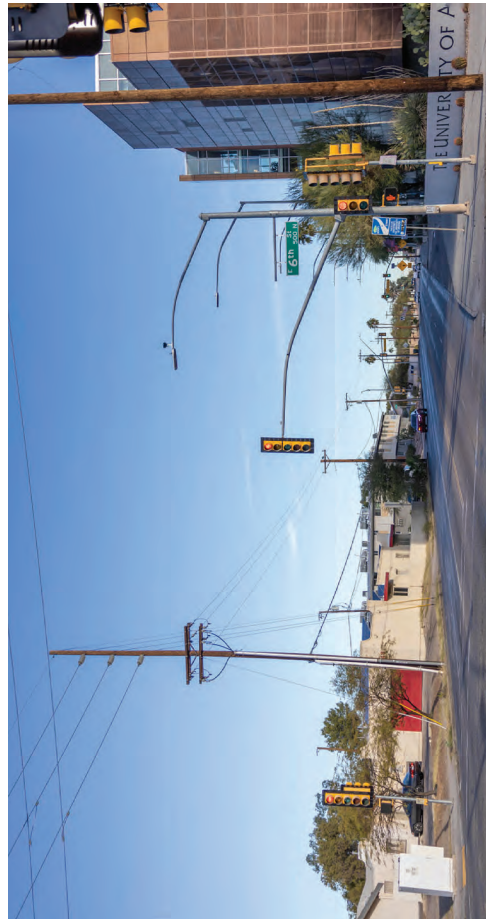


Existing Condition



Simulated Condition

Key Observation Point (KOP) #3 - Euclid Ave looking north



Existing Condition



Simulated Condition

pg 4

Key Observation Point (KOP) #2 - Tucson Blvd looking north



Existing Condition



Simulated Condition

pg 3

Key Observation Point (KOP) #5 - Vine Ave looking north



Existing Condition



Simulated Condition

Key Observation Point (KOP) #4 - Park Ave looking north



Existing Condition

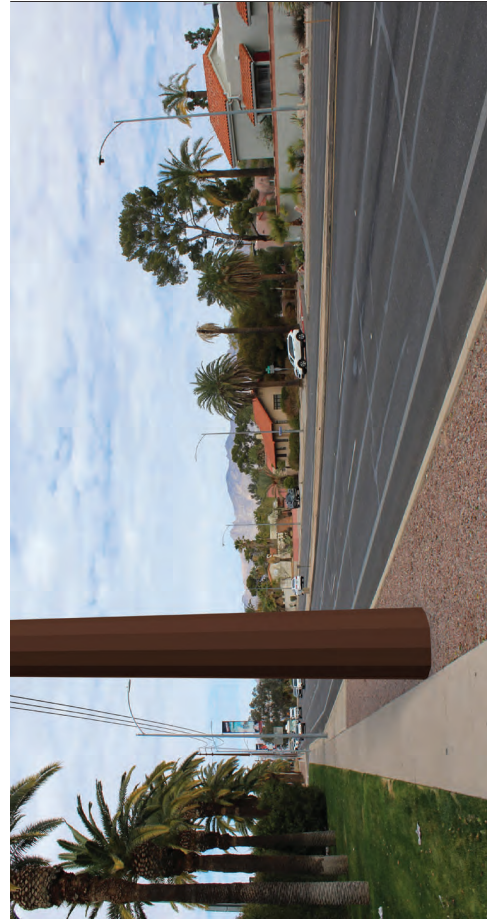


Simulated Condition

Key Observation Point (KOP) #7 - Campbell Ave looking north

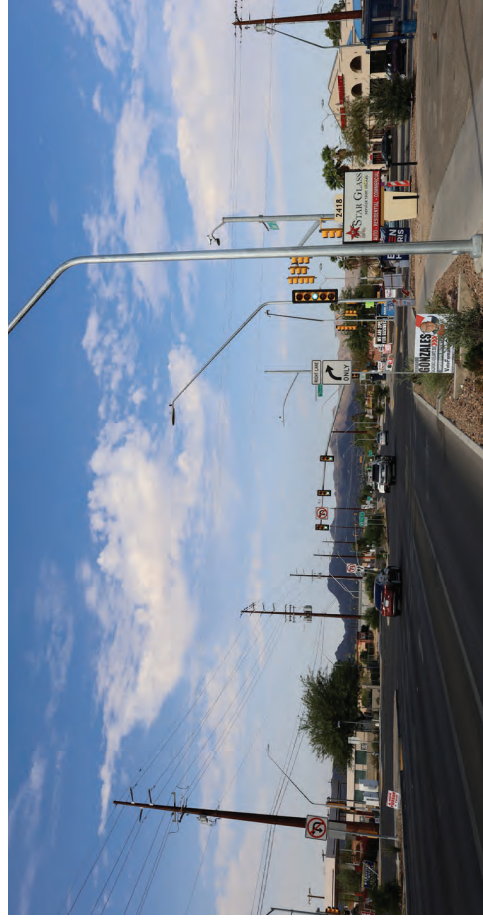


Existing Condition

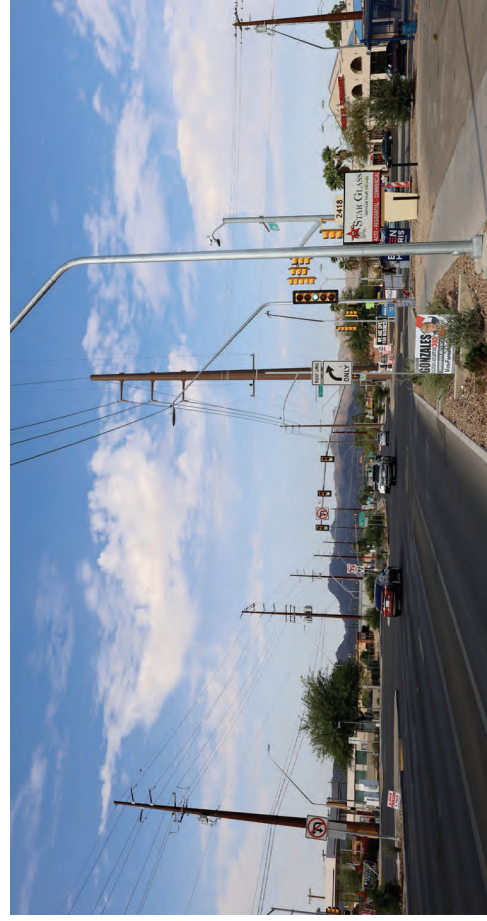


Simulated Condition

Key Observation Point (KOP) #6 - Grant Ave looking west



Existing Condition



Simulated Condition

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.13**

#### **Open House #3 FAQs**

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Tucson Electric Power  
Midtown Reliability Project

Responses to Stakeholder Questions Submitted at February 2024 Open House

1. **What is the status of the litigation involving Tucson City ordinance regarding the gateway corridor?**

TEP filed a civil action in Pima County Superior Court in November 2023 to appeal a decision by the Board of Adjustment regarding the applicability of the City's Gateway Corridor Overlay Zone ordinance. Both TEP and the City of Tucson are filing written legal arguments as part of these proceedings. A hearing is scheduled for late April.

2. **At the previous meeting the question was asked why a new proposed route in the alleyway between Lester and Linden was included. The TEP response was that the infrastructure already existed in this area. Is the plan to exchange each existing pole with a new pole (pole for pole)?**

After further review, TEP has determined that higher-voltage transmission facilities cannot be safely installed or maintained in some alleyways where lower-voltage transmission facilities are currently in place. As a result, some potential routes for the new transmission line have been relocated to adjacent streets, including East Lester Street, East Adams and East 7<sup>th</sup> Street.

3. **How much notice will residents be given prior to commencement of construction (particularly) in true residential areas such as Jefferson Park neighborhood? Will a mock-up including pole size be made available for residents to review?**

TEP will work with interested neighborhood organizations to provide timely information about construction schedules. The placement of facilities and timeline of construction will vary depending on which route is approved. Information about ongoing construction projects is also available at [tep.com/neighborhood-projects](https://tep.com/neighborhood-projects).

Please contact our project team for information about existing facilities that are similar to those TEP expects to install for this project.

4. **It appears some part of Campbell will have underground lines (near the UofA). How long is that undergrounded area and how long is the part that will not be undergrounded?**

TEP is not considering underground installation for this project due to significantly higher installation and maintenance costs, shorter lifespan and other factors. The potential routes that include portions of North Campbell Avenue presume that above-ground construction would be allowed in those areas, based either on a court's decision or a waiver that could be granted by the Tucson Mayor and Council. If such relief is unavailable, TEP would seek authority to build the line above ground along a different route.

5. **Is there any potential route to the Vine substation which would be sited on all large arterial streets, rather than on residential streets in a historic neighborhood (Jefferson Park)?**

Using an interactive map available on the project page at [tep.com/midtown](https://tep.com/midtown), you can explore how the remaining potential routes travel through or near area neighborhoods. For example, routes C, 4 and 5 do not enter the Jefferson Park neighborhood, but do travel through other area neighborhoods.

6. **What will happen to the facilities that will be retired? Sold for other development?**

Typically, TEP will make retired substation sites available for sale. Electrical equipment will be repurposed or recycled whenever possible. Some equipment, like old wooden poles in good condition, may be donated to local nonprofit organizations.

7. **Can the poles be painted or made out of a different metal that is not so obtrusive? Poles on Sunrise are much better than the rust poles in midtown.**

Possibly. Based on feedback from area residents and other stakeholders, TEP will consider painted poles, an anti-graffiti finish on poles, thinner and shorter poles, and other right-of-way enhancements for this project.

In August 2023, TEP invited more than 55,000 stakeholders to participate in a project survey. Based on responses from nearly 2,800 participants, most respondents preferred poles with a 'rusted' weathering steel finish, which TEP typically uses throughout its service territory, rather than poles with a galvanized metallic finish. Although poles can be painted, the paint tends to fade and crack over time, losing its aesthetic appeal. Maintaining the paint requires additional cost and effort that could otherwise be allocated to system reliability or safety concerns.

8. **Will there be any change to the cost of electricity for property owners (our electricity bill)? If so, what will that change be? % increase? What requirements are there for the property owners? Do any models/plans require development within private property lines?**

The rates our customers pay are based on costs to provide service, including system improvements like this project. A final project cost and any potential impact on customer bills cannot be determined until after a final route has been selected. TEP plans to build the line primarily within public right-of-way.

9. **What about the poles in backyards? I am on Euclid and I see 5 poles from my backyard. Will those be replaced?**

Since a final route has not yet been determined, TEP cannot yet identify where lower-voltage equipment might be removed to accommodate installation of higher-voltage facilities.



# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.14**

#### **Open House #4 Boards**

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## Midtown Reliability Project

Meeting everyday energy needs in the heart of Tucson for a lifetime



Tucson Electric Power



### SHORTER, LESS FREQUENT OUTAGES

- 36,936 households
  - 62 neighborhoods
  - 6,834 businesses
- All will benefit from a new 138-kilovolt (kV) "loop" around central Tucson supplying energy from more than one direction.

### ENERGY FOR A GENERATION OF TUCSONANS

The project would provide over 3x the capacity of the current systems



**212% increase**  
In Tucson's peak energy demand since 1975

### STRONG, HEALTHY COMMUNITY

Supports growing economy, population



Improves reliability in extreme weather

Provides midtown residents with same reliability benefits enjoyed in other areas



100,000+ newsletters  
55,000+ emails

Sent to midtown homes, businesses and others about the project

### COST SAVINGS, GREATER EFFICIENCY



**19 miles**  
46-kV lines removed

**8 46-kV substations retired**

**\$52 million**

saved over 15 years by avoiding replacement of older equipment



**268 miles**  
4-kV distribution circuits upgraded to 14-kV with new poles, wires, switchgear and more

**\$52 million investment**  
in our local energy grid

- 7-8 miles of new 138-kV lines
- A new 138-kV substation

## Midtown Reliability Project



# Welcome

## Please Sign In

# Bienvenidos

(Hablamos Español)

## Por Favor Regístrese

Presentation Schedule (Salons E, F, G & H)  
7:00 pm

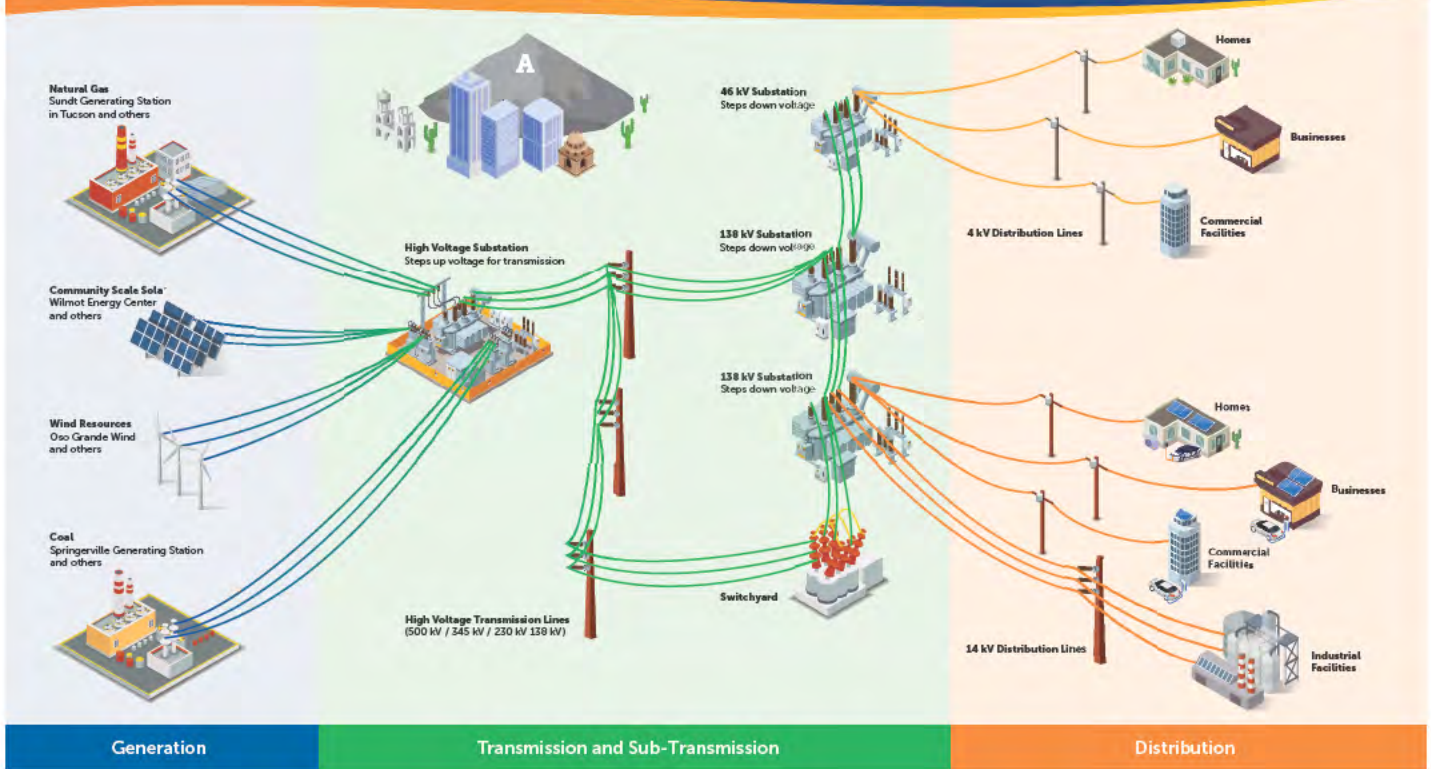
For more information - Para más información:



Learn more at [tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

# Our Energy Grid

## How we deliver electric service to you



Generation

Transmission and Sub-Transmission

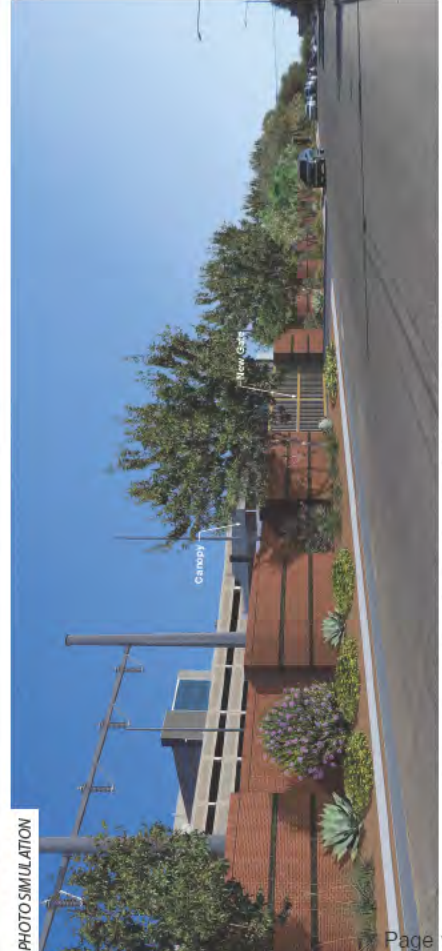
Distribution

# Midtown Reliability Project



## Vine Substation

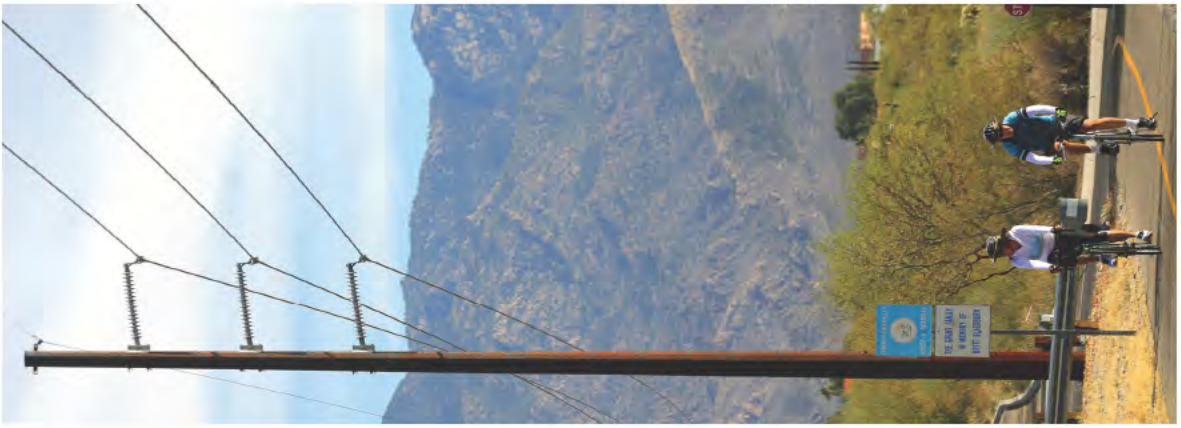
- Gas Insulated Substation (GIS)
- Located on a 1.6-acre site
- The substation will contain:
  - Three - 75 MVA transformers
  - Switchgear
  - Static Masts
  - Structural Canopy
- 12-foot decorative masonry block wall
- Perimeter landscaping



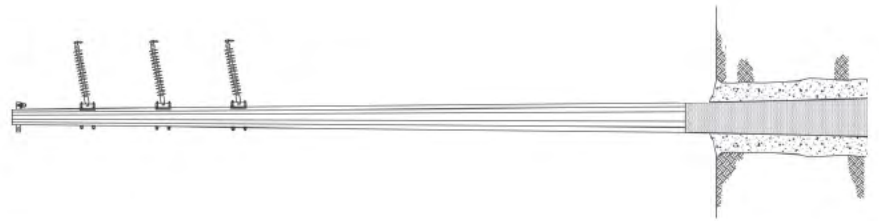
Transmission line is not depicted because the final route is not known at this time.

## Transmission Line Characteristics

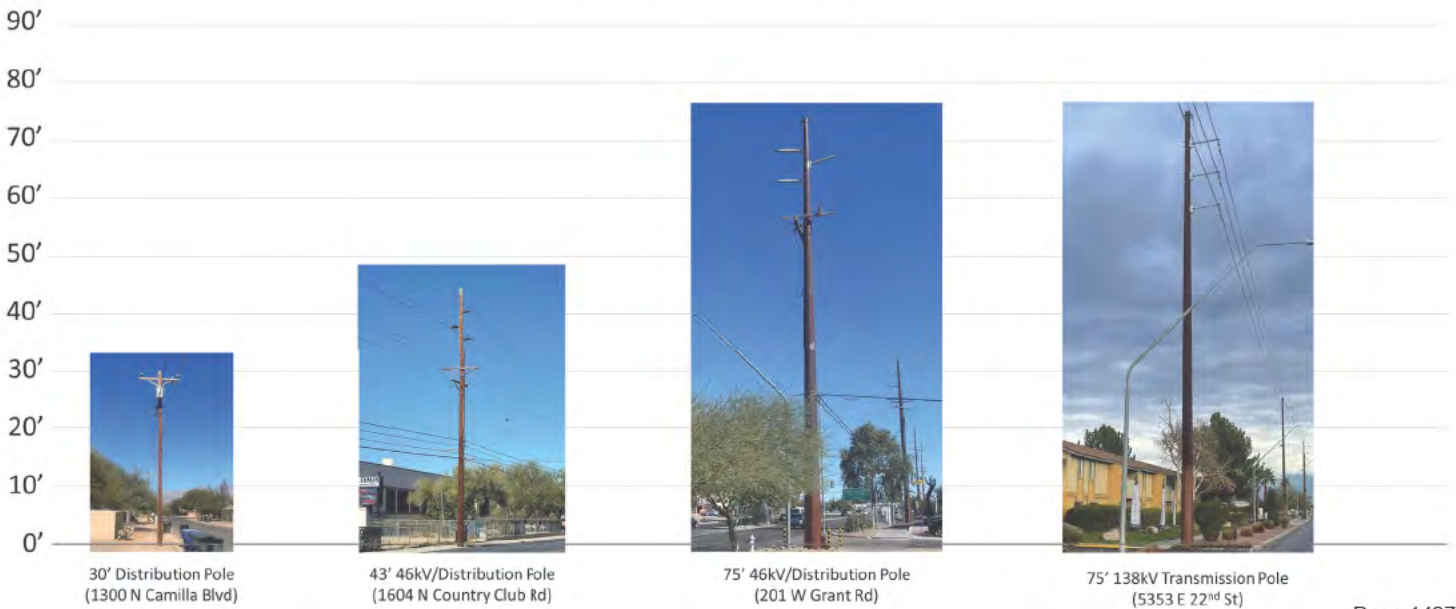
- Single-circuit 138-kV transmission line
- Tubular, weathering steel monopoles
- Typical structure heights of around 75 feet
- Around 600-foot span between poles
- Non-specular, aluminum conductor wire



A typical weathering steel monopole supporting a 138 kilovolt transmission line



## Pole Comparison



## Midtown Reliability Project Fewer Power Lines, Better Service



Tucson Electric Power

### Aging Assets in Project Study Area



On average, major 46-kV substation equipment is 47 years old.  
Some equipment is in 'poor' or 'very poor' condition.

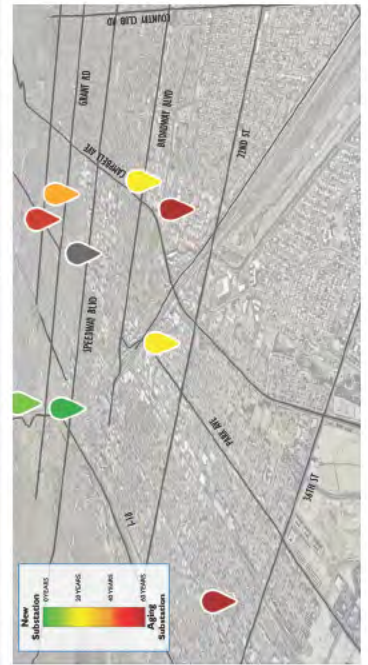


On average, 46-kV power poles in the study area are 61 years old.  
Some equipment is in 'poor' or 'very poor' condition.  
More than 430 poles need to be replaced within 15 years at a cost of \$11 million.

It would cost \$41 million to replace this equipment over the next 5 years.

### Options

	Maintain existing 46-kV System	Upgrade to new 138-kV System
<b>Built for:</b>	Late 20th Century	21st Century
<b>Substations:</b>	<ul style="list-style-type: none"> <li>8 46-kV substations</li> <li>Cost: \$41 million</li> <li>Additional substations may be required</li> </ul>	<ul style="list-style-type: none"> <li>1,138-kV substation added</li> <li>8 46 kV substations removed</li> <li>Cost: \$34 million</li> </ul>
<b>Power lines:</b>	<ul style="list-style-type: none"> <li>19 miles of 46-kV lines</li> <li>Poles in poor condition replaced with larger metal poles (similar to 138-kV poles)</li> <li>Cost: \$11 million</li> </ul>	<ul style="list-style-type: none"> <li>7-8 miles 138-kV lines added</li> <li>19 miles 46-kV power lines removed</li> <li>Cost: \$18 million</li> </ul>
<b>Added Capacity:</b>	None	3X
<b>Total:</b>	\$52 million investment in 46 kV system	\$52 million investment in new 138-kV facilities



## Midtown Reliability Project



## UPGRADING THE DISTRIBUTION SYSTEM

Providing additional capacity and improving reliability of service in support of growth, electrical vehicle charging and rooftop solar installations.



### SYSTEM UPGRADES INCLUDE:

- Convert distribution circuits from 4-kV to 13.8-kV
- Replace transformers
- Replace conductors (wires), where merited
- Replace poles, where needed

# Midtown Reliability Project

## Why won't TEP install this transmission line underground?



**COST**

- Underground transmission lines cost significantly more to build and maintain.
  - The difference escalates with voltage. Higher voltages = higher underground costs.
  - 5-10x more expensive – or more. Costs vary for each project.
- Higher costs lead to higher electric rates.
- In October 2023, the Arizona Corporation Commission approved a policy statement instructing regulated utilities like TEP to avoid underground installation. A portion of the statement says: *“As a general matter, utilities under the Commissions jurisdiction should avoid incurring these higher costs unless underground installation of a transmission line is necessary for reliability or safety purposes or to satisfy other prudent operational needs.”*
- Voters rejected proposal to pay for underground construction in a new franchise agreement.
- Stakeholders can create improvement district to fund undergrounding in their area.



**EFFICIENCY, CONSISTENCY**

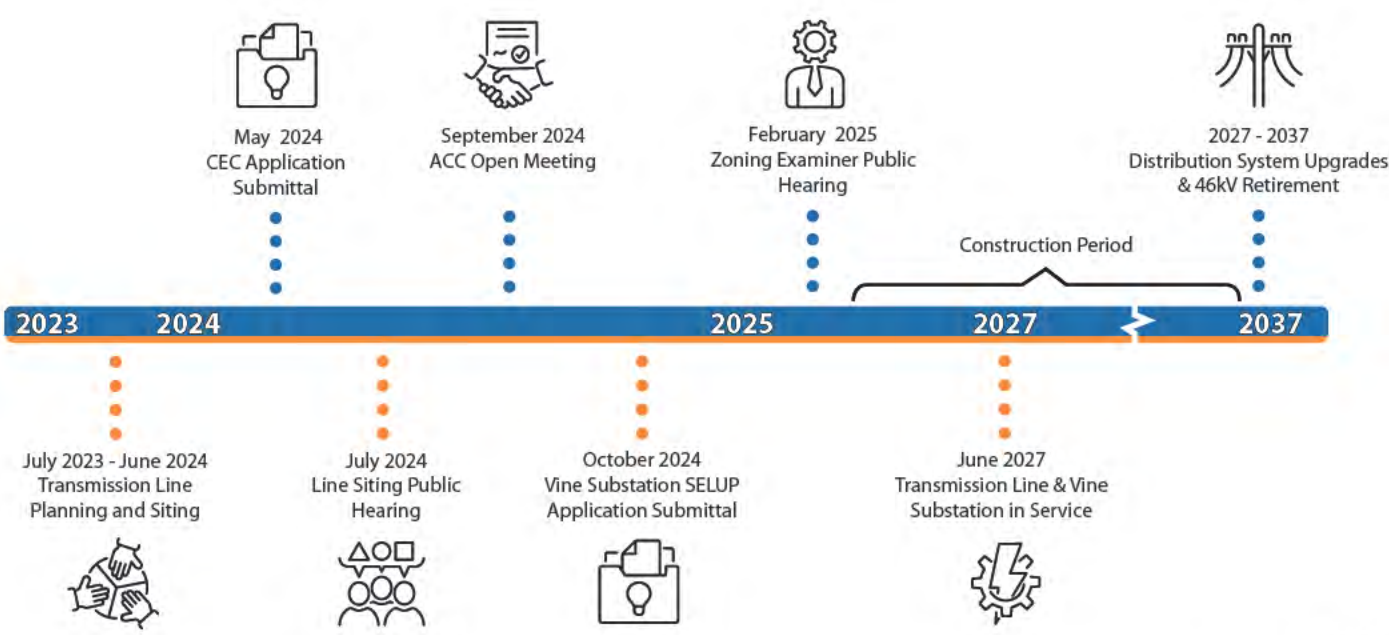
- No engineering or safety justification.
- Every other TEP transmission line is installed overhead.
- Majority of transmission lines in the United States are installed overhead.
- Underground construction disturbs more land, existing facilities and archaeological resources.



**RELIABILITY**

- Comparable to overhead construction, with higher maintenance costs.
- Fewer outages but longer repair times.
- Life expectancy of underground equipment is lower.
- 138 -kV transmission poles withstand extreme weather, traffic impacts.

# Midtown Reliability Project



## PLANNING AND SITING PROCESS



- OUTREACH EFFORTS**
- Neighborhood Listening Sessions
  - Neighborhood Advisory Group
  - Public Open House
  - Elected Official Briefings
  - Agency Briefings

To learn about the process after the CEC Application is submitted, please visit: [www.aazc.gov/aznra-power-plant/line-siting-committee](http://www.aazc.gov/aznra-power-plant/line-siting-committee)



\*Target schedule, subject to change

# Midtown Reliability Project

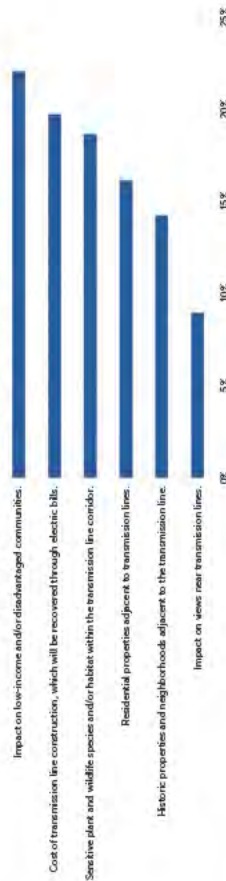
TEP  
Tucson Electric Power

## Project Criteria Survey Results

August 31 – October 15, 2023  
2,792 Participants

In your opinion, which criteria are most important in considering the route of the proposed transmission line for the Midtown Reliability Project? Select up to TWO (2).

### Most Important Criteria to Consider

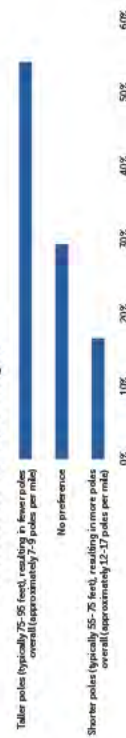


If there are other criteria you would like TEP to consider, please share your suggestion(s) in the box below:

- Health and Safety
- Reliability and Maintenance
- Transit Impacts – Pedestrian, Public Transit, and Traffic
- Use of Existing Utility Corridors
- Avoidance of Gateway Corridors
- Impact on Future Land Uses
- Impact on Native Lands
- RF/Communications Interference
- Impact on Water
- Length of the Project
- Overall Environmental Impact

Please indicate your preference for pole height and number of poles per mile:

### Preference for Pole Height



Please indicate your preference for the type of steel pole used:

### Preference for Type of Steel Pole





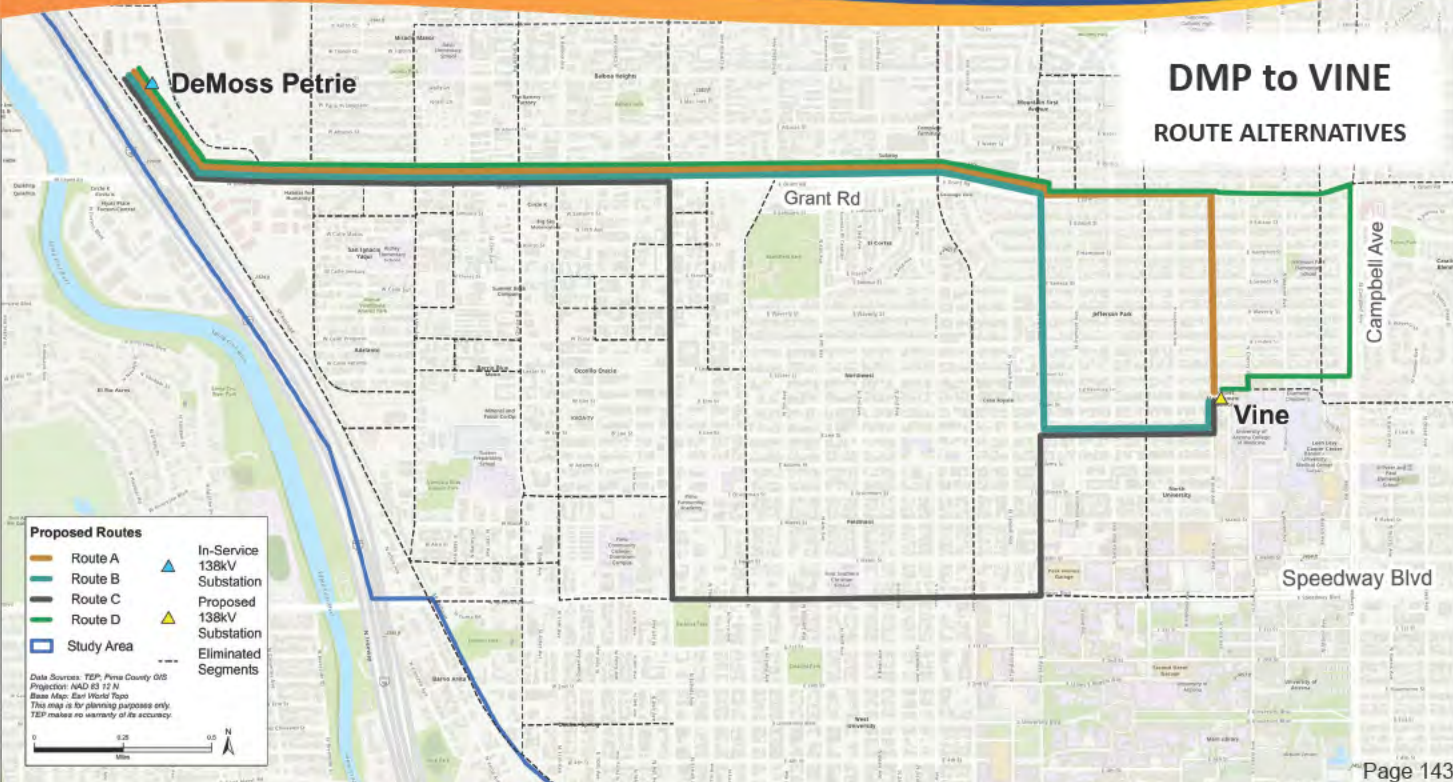
# Midtown Reliability Project

## Project Evaluation Criteria

	Impact on low-income and/or disadvantaged communities		Impact on the total environment
	Cost of transmission line construction, including relocation/undergrounding of distribution lines, which will be recovered through electric bills.		Noise emission levels and interference with communication signals
	Sensitive plant and wildlife species and/or habitat within the transmission line corridor.		Existing development plans
	Residential properties adjacent to transmission lines.		Engineering feasibility and challenges
	Historic properties adjacent to the transmission line.		Compliance with applicable ordinances, master plans and regulations
	Impact on views near transmission lines.		Health and safety impacts
			Transit Impacts (Pedestrian, Public Transit, Traffic)
			Use of existing utility corridors
			Impact on native lands

# Midtown Reliability Project

## DMP to VINE ROUTE ALTERNATIVES



# Midtown Reliability Project Benefits

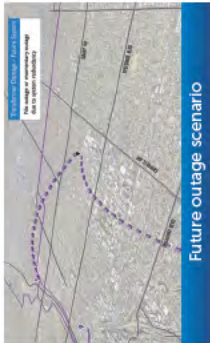


Tucson Electric Power

Fewer, shorter power outages

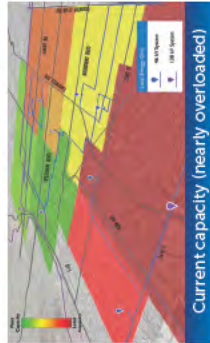


Current outage scenario



Future outage scenario

Greater capacity for growing energy needs



Current capacity (nearly overloaded)



Future capacity

More customer-owned solar, storage and EVs



Removal of aging substations, power lines



Improved service citywide



Support for economic growth and a healthy community

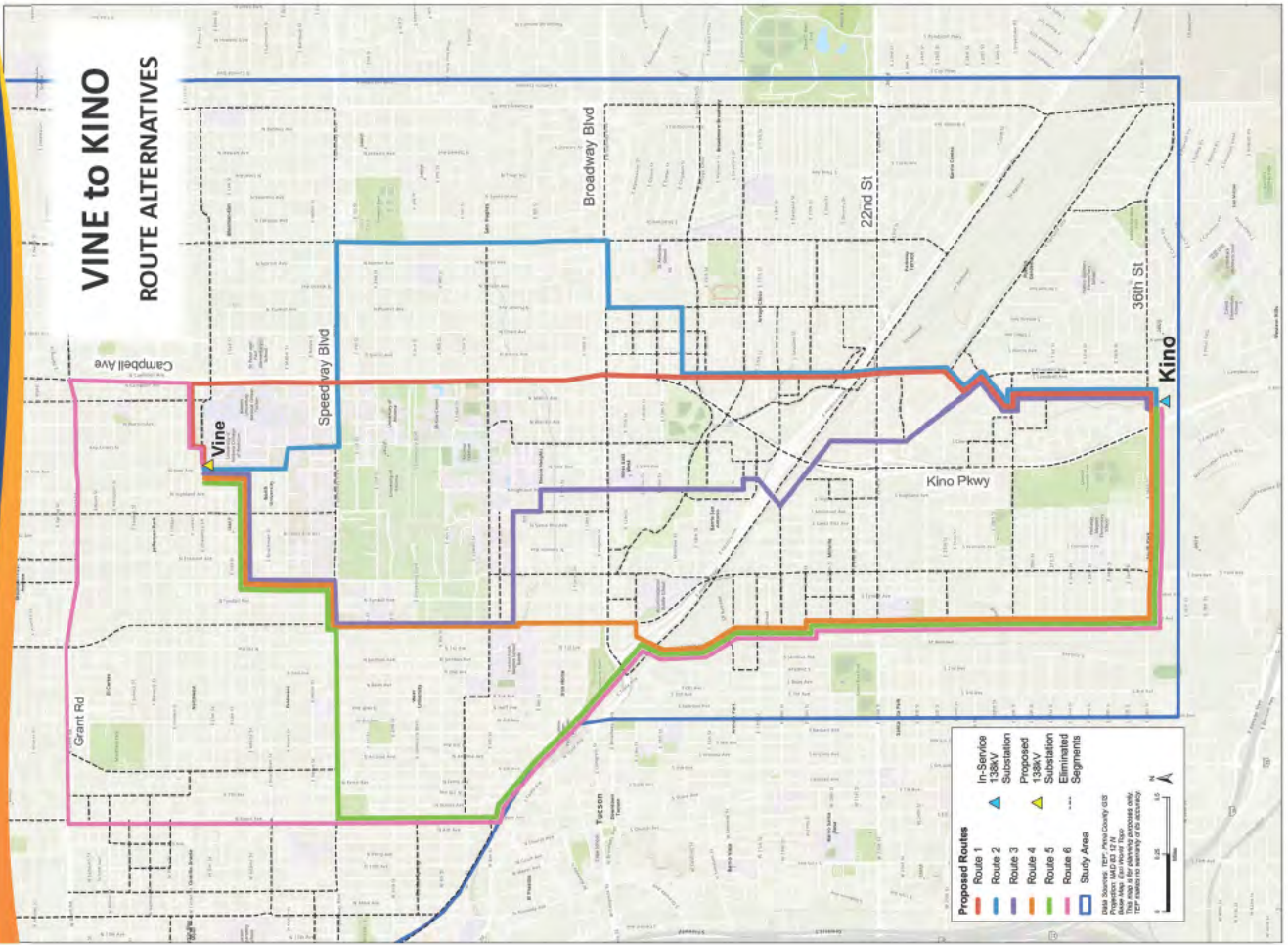


Learn more about these benefits at:  
[tep.com/midtown-reliability-project](http://tep.com/midtown-reliability-project)

# Midtown Reliability Project



## VINE to KINO ROUTE ALTERNATIVES

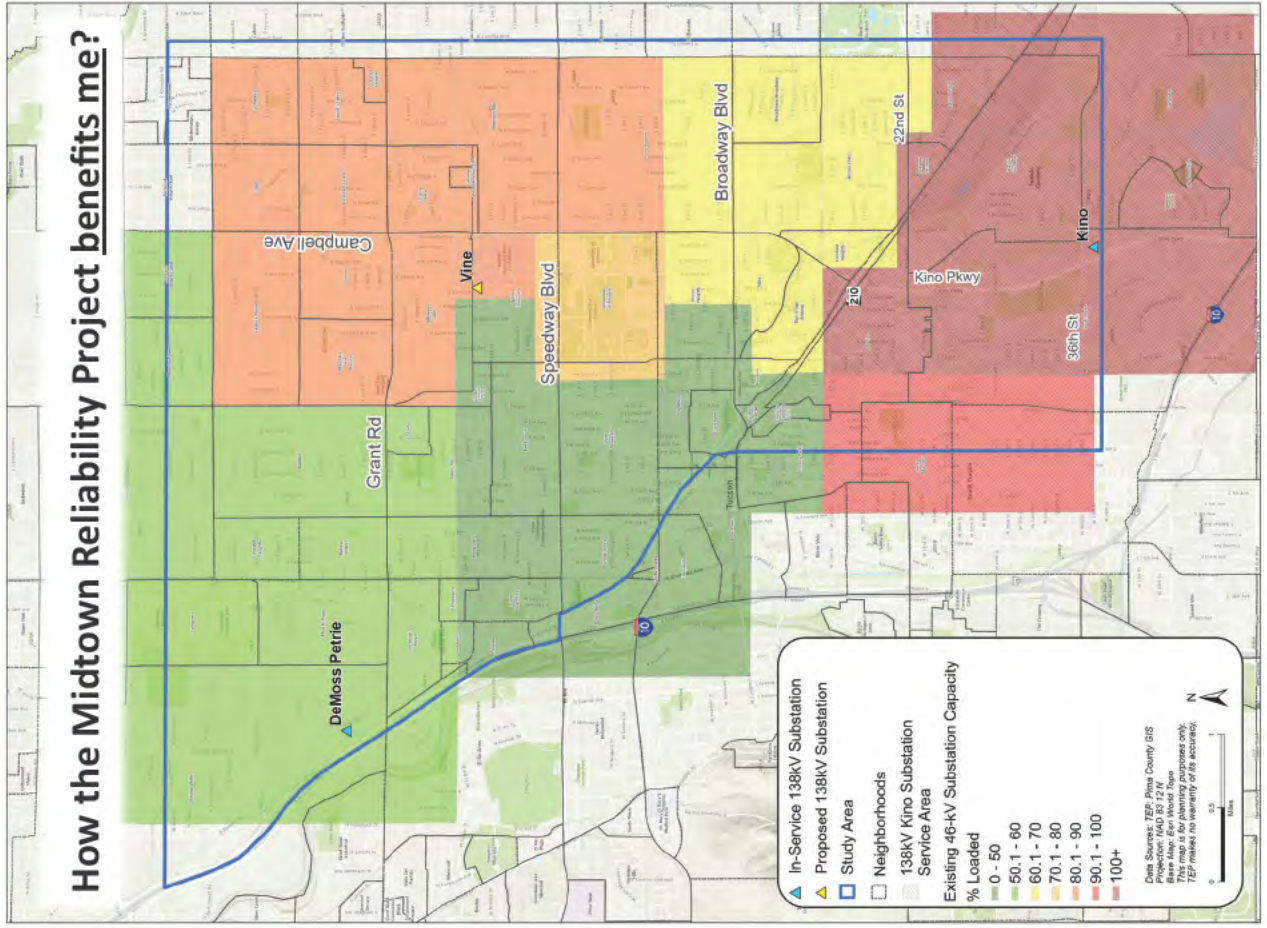


# INTERACTIVE MAP STATION



**Provide your Spatial  
Comments**

How the Midtown Reliability Project benefits me?



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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-8.15**

#### **Open House #4 Presentation**

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Midtown Reliability Project **TEP**

Project Information Open House

# WELCOME

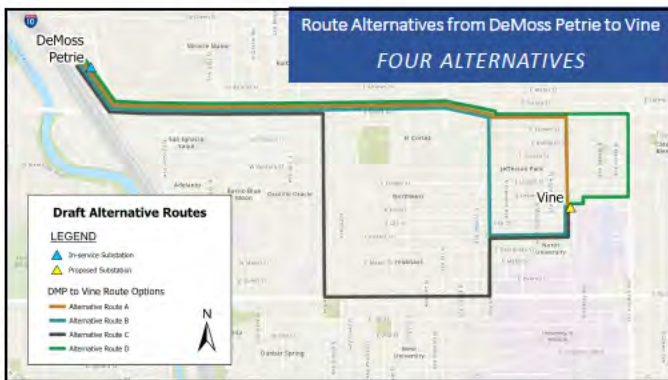
Project Video and Route Alternatives Slides will start momentarily

Formal Presentation - 7:00 p.m.

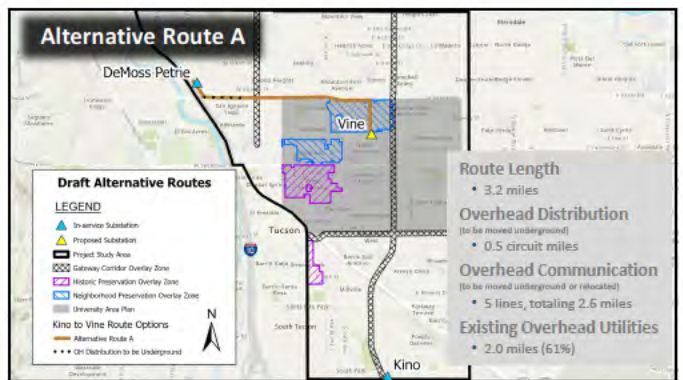
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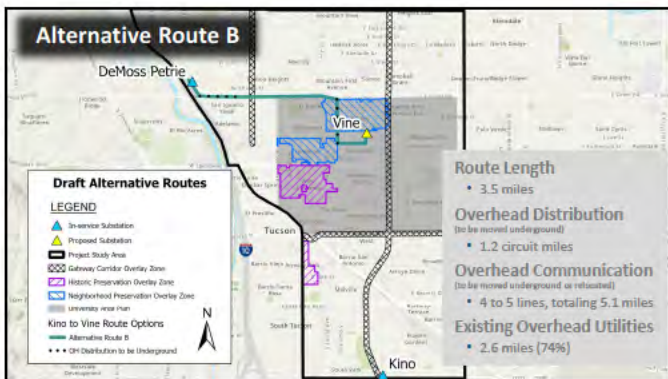
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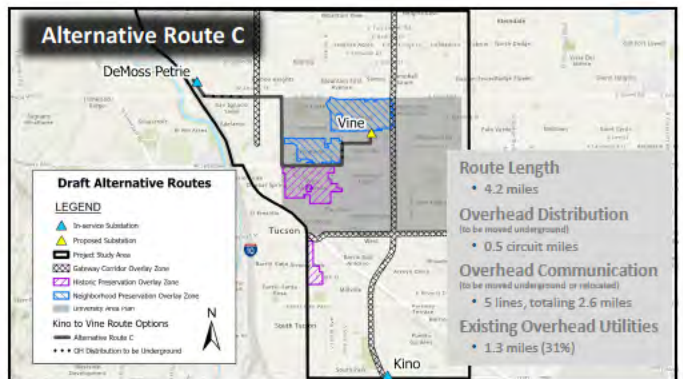
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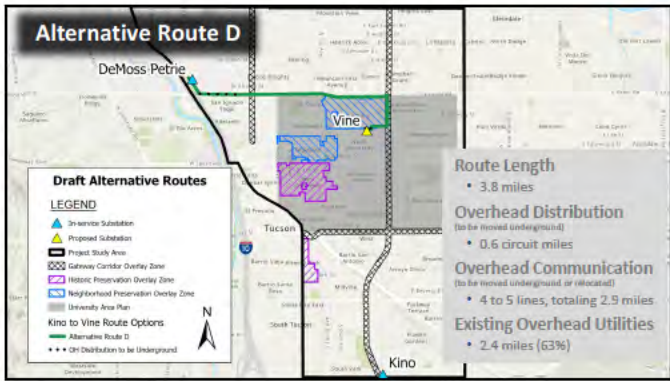
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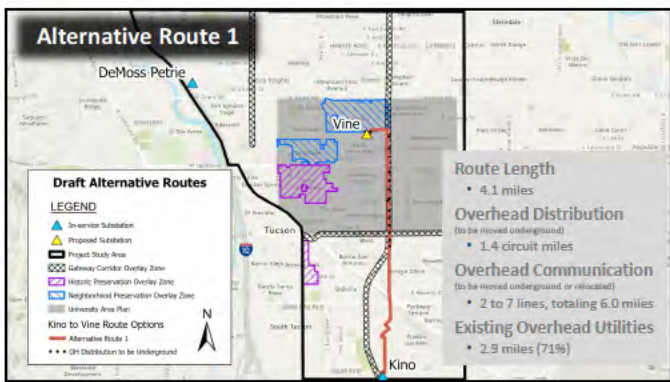
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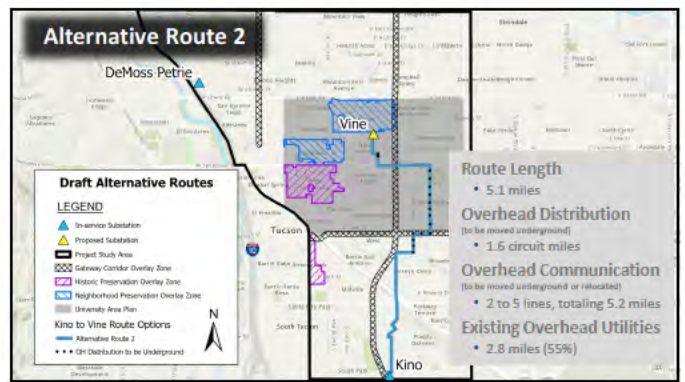
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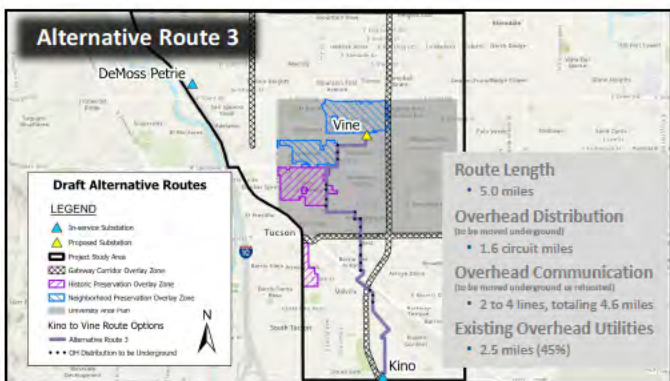
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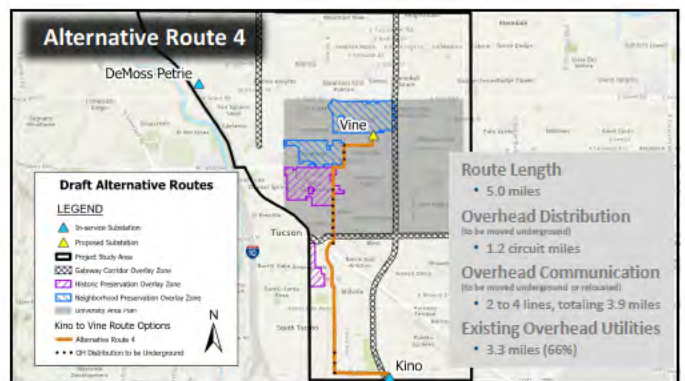
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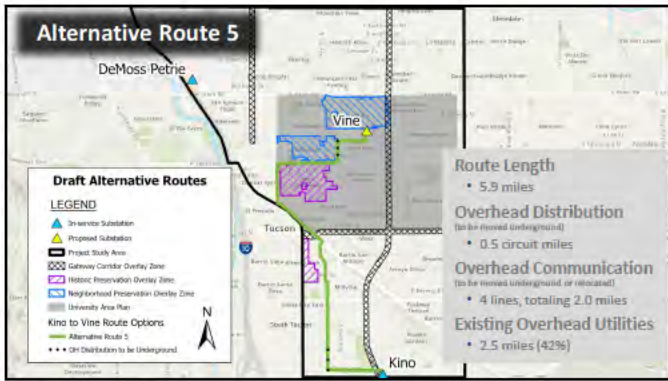


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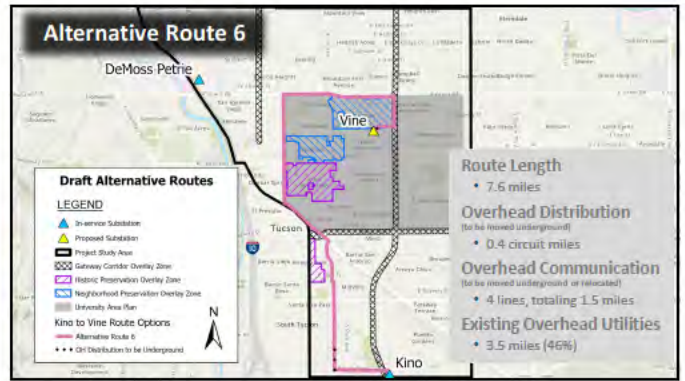


12





13



14

Midtown Reliability Project **TEP**

Project Information Open House

# WELCOME

Presentation - 7:00 p.m.

15

**THANK YOU!** **TEP**

**Neighborhood Advisory Group Members**

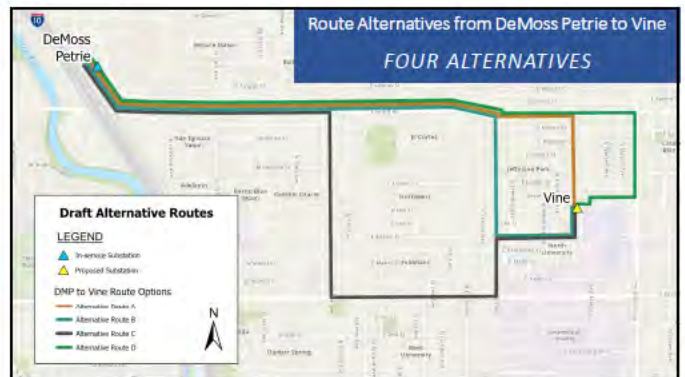
Armory Park – John Burr	Keeling – Michael DeSantis
Arroyo Chico – Andrew Christopher	Miles – Greg Clark
Blenmann Elm – Randy Hotchkins	North University – Aaron Paxton
Broadmoor/Broadway – Meredith Aronson	Palo Verde – Paula Chronister
Bronx Park – Kristina Scholz	Rinland Heights East – Jim Cummins
Catalina Vista – Hank Bogen	Rincon Heights – Stacia Reeves
Country-Glenn – Sky Dominguez	Sam Hughes – Nancy DeFeo
Dunbar Spring – Deborah Tiguel	Samos – Barbara Miller
Feldman’s – Logan Havens	South Park – Sara O’Neil
Iron Horse – Dan Dempsey	West University – Chris Gans
Jefferson Park – Colleen Nichols	

16

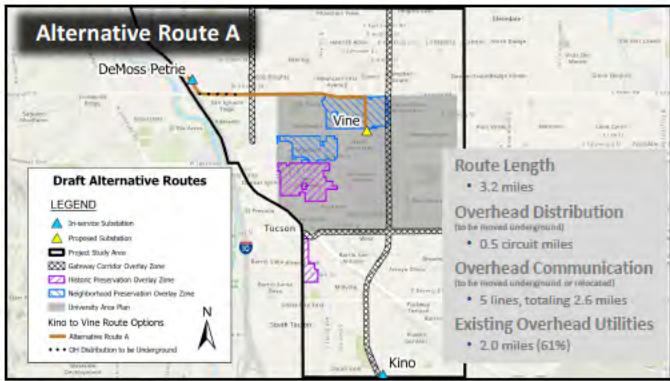
Criteria – Compatibility Analysis **TEP**

- Impact on low-income and/or disadvantaged communities
- Cost of transmission line construction, including relocation/undergrounding of distribution lines
- Sensitive plant and wildlife species and/or habitat within the transmission line corridor
- Residential properties adjacent to transmission lines
- Historic properties and districts adjacent to transmission lines
- Impact on views near transmission lines
- Impact on the total environment
- Noise
- Communication signal interference
- Existing development plans
- Engineering feasibility and challenges
- Right-of-way acquisition
- Compliance with applicable ordinances, master plans and regulations
- Health and safety impacts
- Transit Impacts (Pedestrian, Public Transit, Traffic)
- Use of existing utility corridors
- Impact on native lands
- Public/Stakeholder Feedback

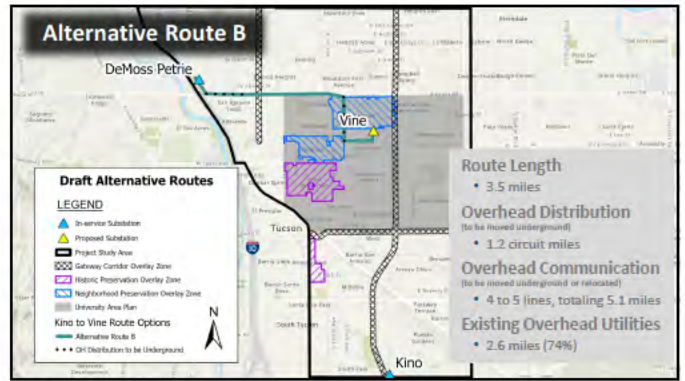
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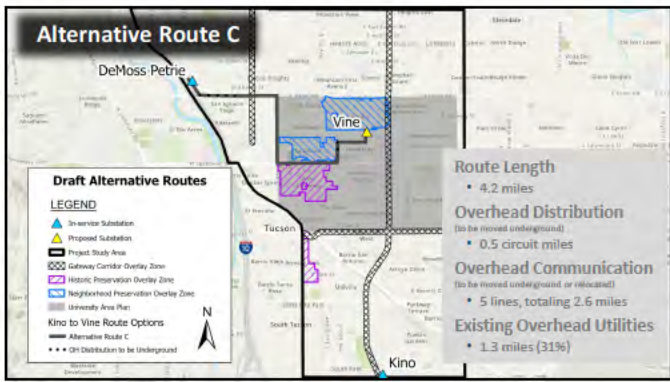
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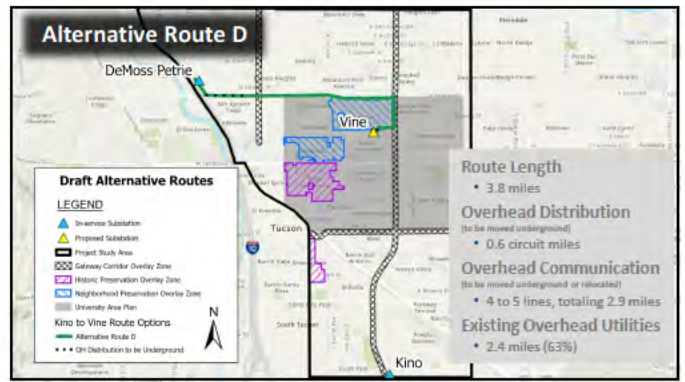
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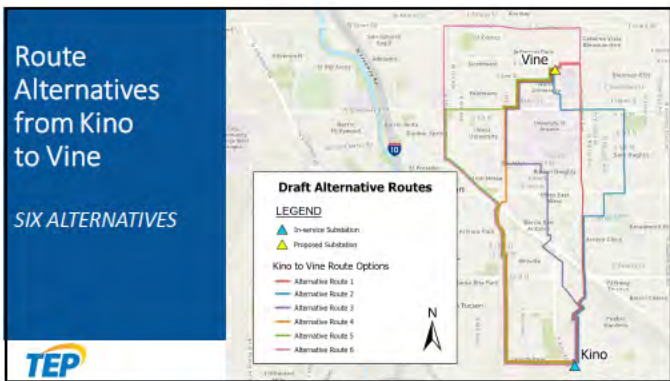
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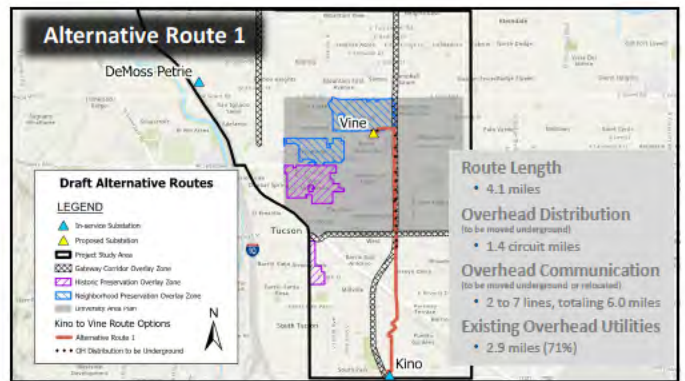
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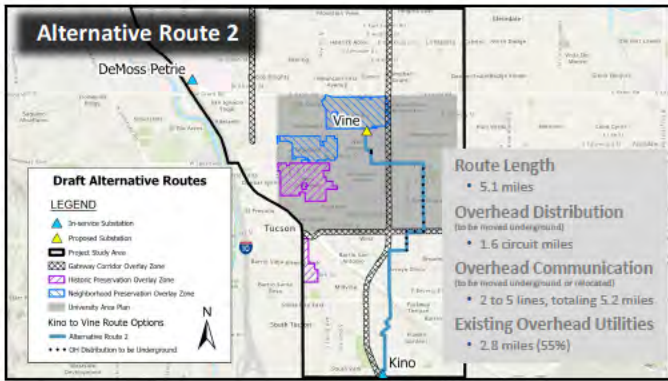
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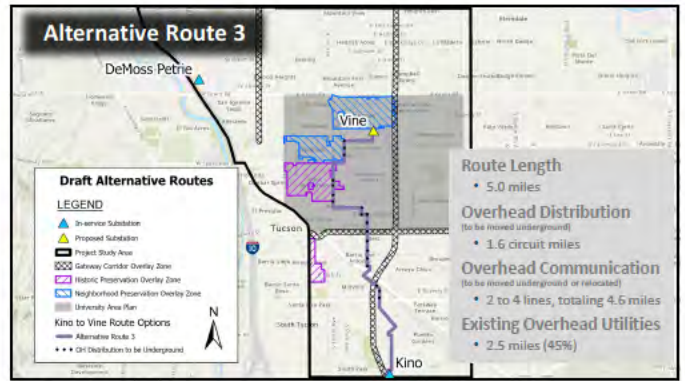
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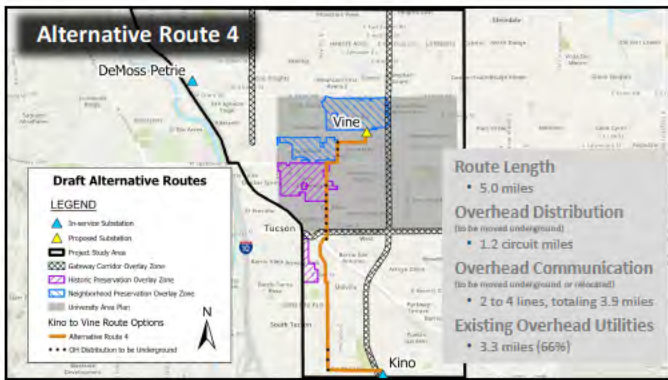
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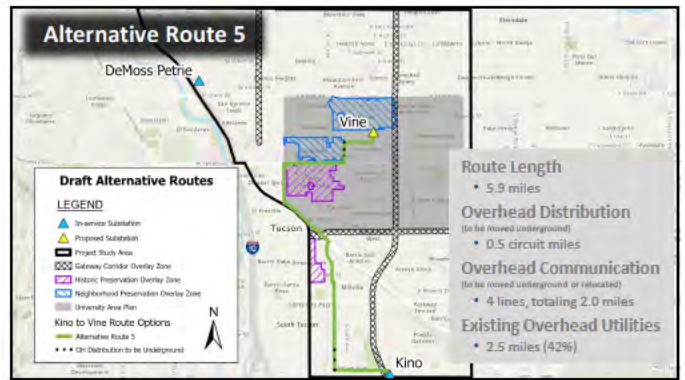
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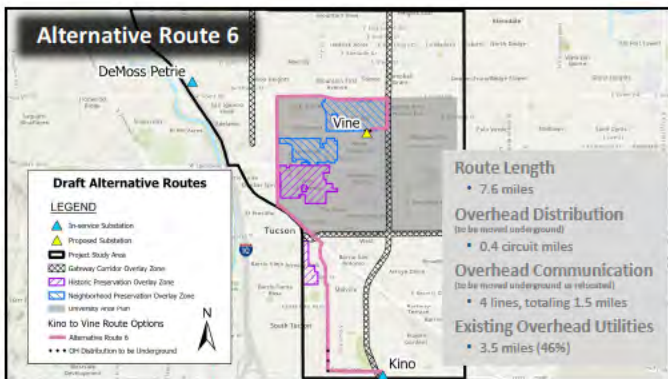
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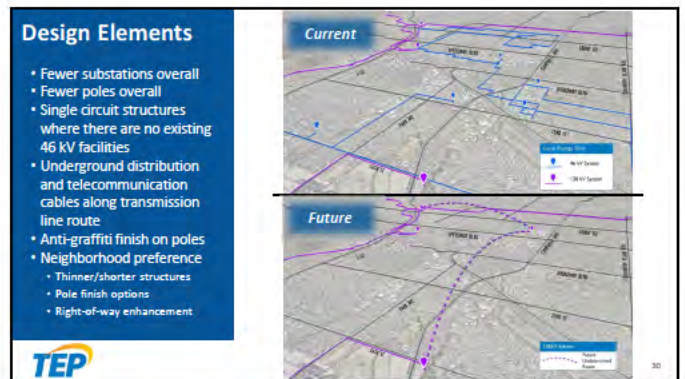
27



28



29



30

**Next Steps** 

- Identify Preferred Route Alternatives
- Submit Application for a Certificate of Environmental Compatability (CEC)
- Hearing – Arizona Power Plant and Transmission Line Siting Committee
- Decision to Approve/Deny CEC – Arizona Corporation Commission

**Continued Opportunities to Participate**

- Comments to TEP
- Comments to ACC (filed in Docket)
- Attendance at Hearing
- Public Comment at Hearing

31

31

**Midtown Reliability Project** 

**How to Comment**


- Mail a comment form or a letter to:  
P.O. Box 711  
ATTN: Midtown Reliability  
Mail Stop CB200  
Tucson, AZ 85701-0711
- Complete online comment form
- Visit webpage tep.com/midtown
- Send comments to midtownreliability@tep.com
- Call 1-833-523-0887 and leave a voicemail message



Online Comment Form

32

32


**Questions and Comments** 

**PLEASE DO:**

- Respect all people who are present.
- Be ready with a concise question/comment.
- Use a respectful tone and language.
- Be respectful of others while they speak.

33

33

**Questions and Comments** 

**Written Question Forms**

- Fill out and hold form up

**Verbal Questions/Comments**

- Raise hand until called upon

34

34

**Midtown Reliability Project** 

**Future Opportunities to Participate**

- Comments to TEP
- Comments to ACC
- July 8-19, 2024\* – Line Siting Hearing
- Q3 2024\* – ACC Open Meeting
- Neighborhood Listening Session

**Please Comment**




Online Comment Form


\* Target schedule, subject to change

35

35

**Midtown Reliability Project** 

**THANK YOU!**



36

36

**Application for a Certificate of Environmental  
Compatibility**

**Midtown Reliability Project**

**Exhibit J-8.16**

**Open House #4 Visual Simulations Alternative Routes**

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# **Midtown Reliability Project 138 kV Transmission Line Project**

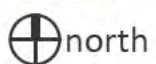
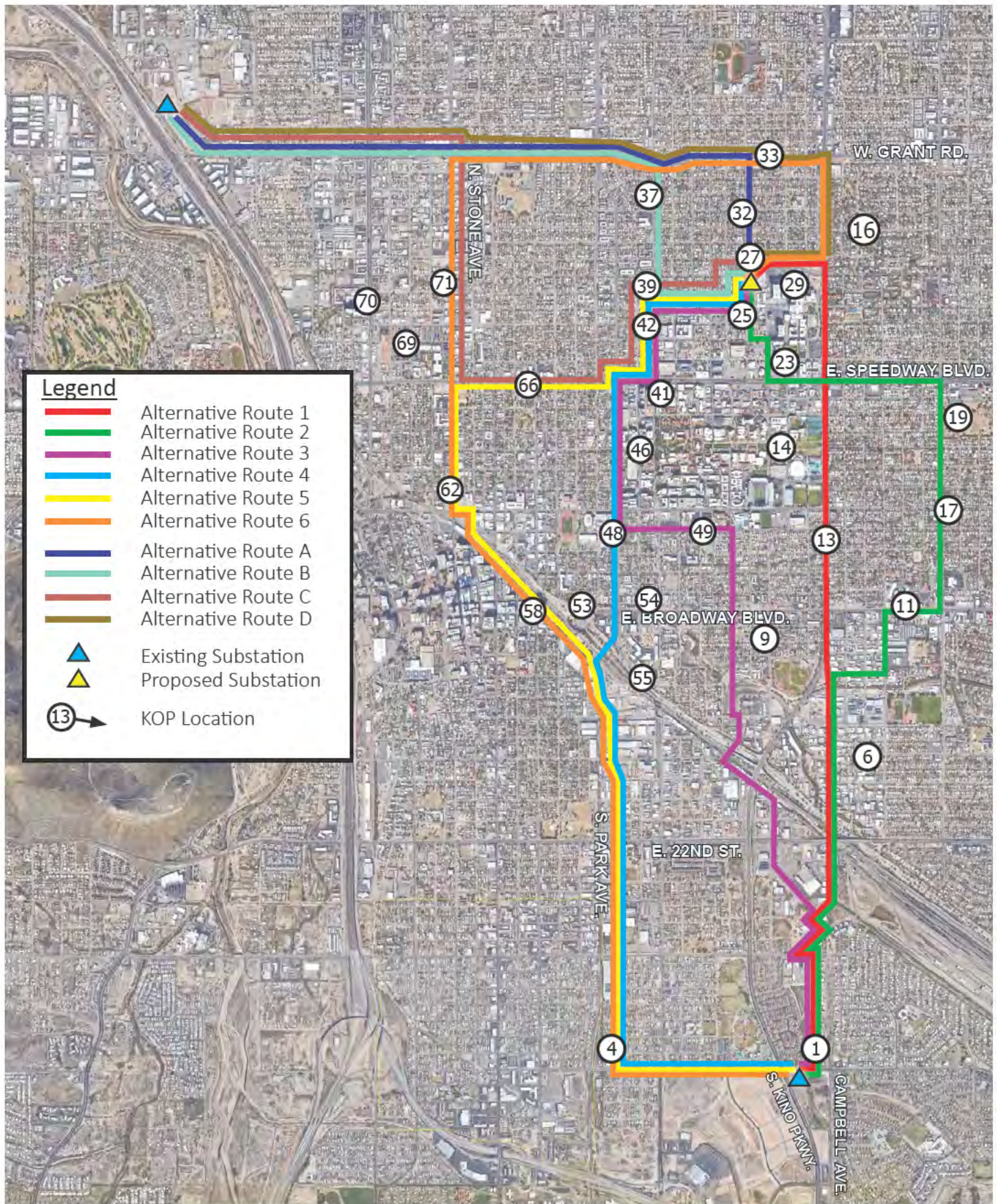
*Visual Simulation Package*

Prepared By:  
Jeremy Palmer | Sole Proprietor

March 28, 2024

# Midtown Reliability 138 kV Transmission Line Project

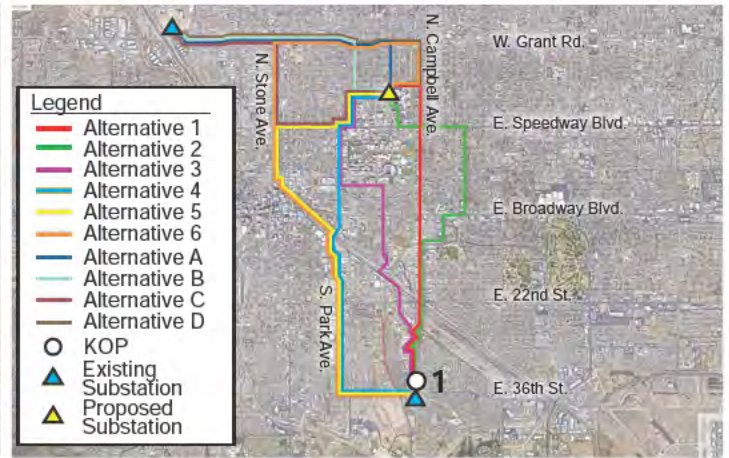
## Key Observation Point (KOP) - Key Map





# Key Observation Point (KOP) # 1

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents and church visitors
- Location: 2437 S. Martin Ave.
- Latitude: 32.193808° N; Longitude: 110.944719° W
- View Point Elevation at Eye Level: 2,486 ft.
- Looking: north
- Poles Visible: Alternative 1, 2, or 3 structures
- Image File Name: IMG\_3104.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 1:57 pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 562 feet south of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #1



Current Condition

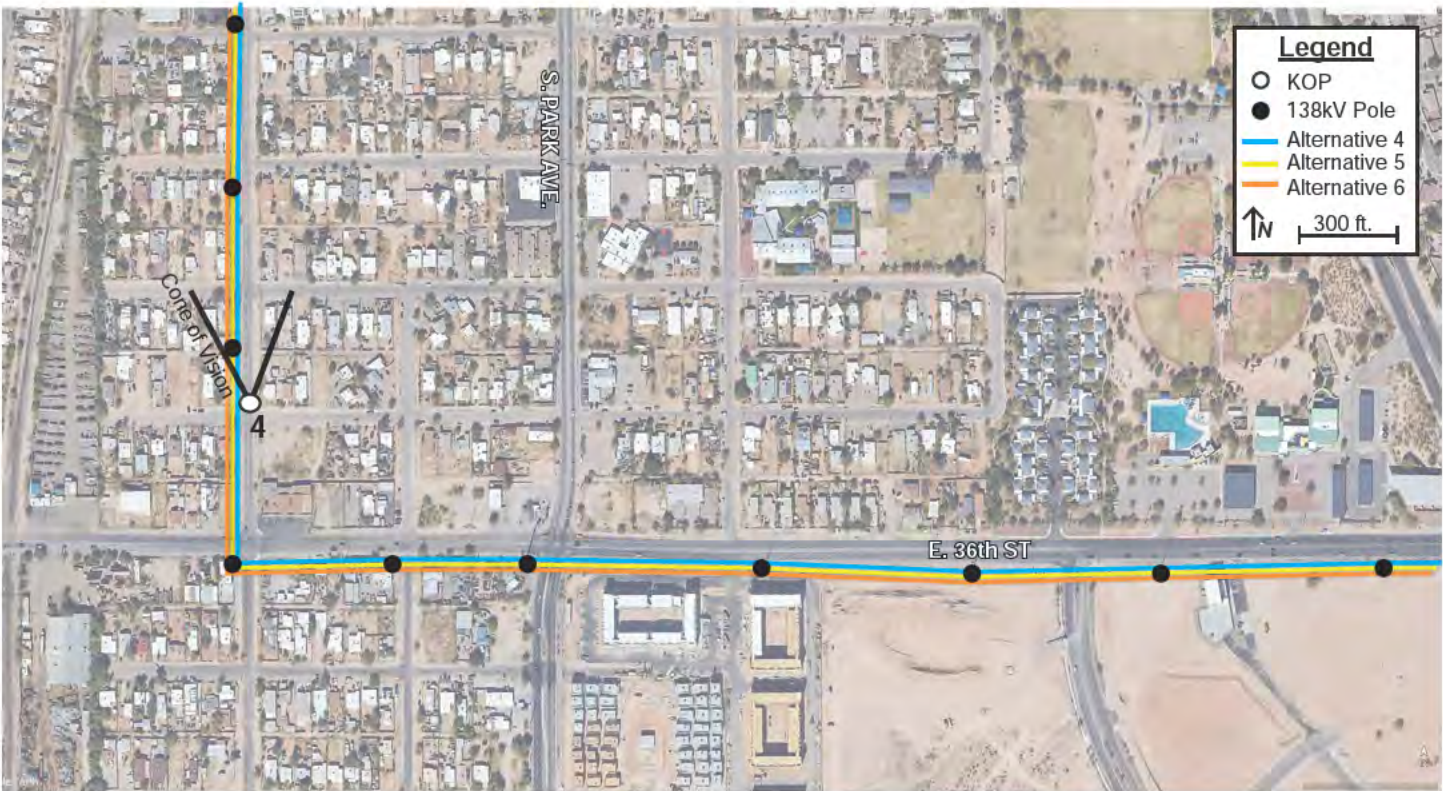
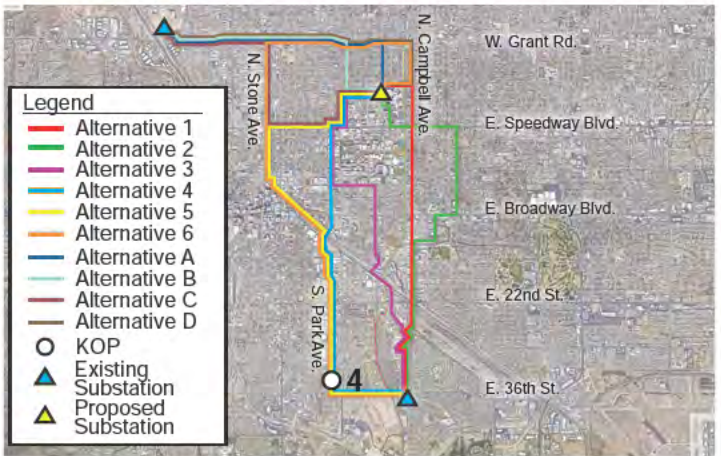


Simulated Condition

Alternative 1, 2, 3  
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# Key Observation Point (KOP) # 4

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents
- Location: 2498 S. Euclid Ave.
- Latitude: 32.193627° N; Longitude: 110.959128° W
- View Point Elevation at Eye Level: 2,455 ft.
- Looking: north
- Poles Visible: Alternative 4, 5, or 6 structures
- Image File Name: IMG\_3132.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 2:11 pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 158 feet south of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

[return to map](#)

## Key Observation Point (KOP) #4



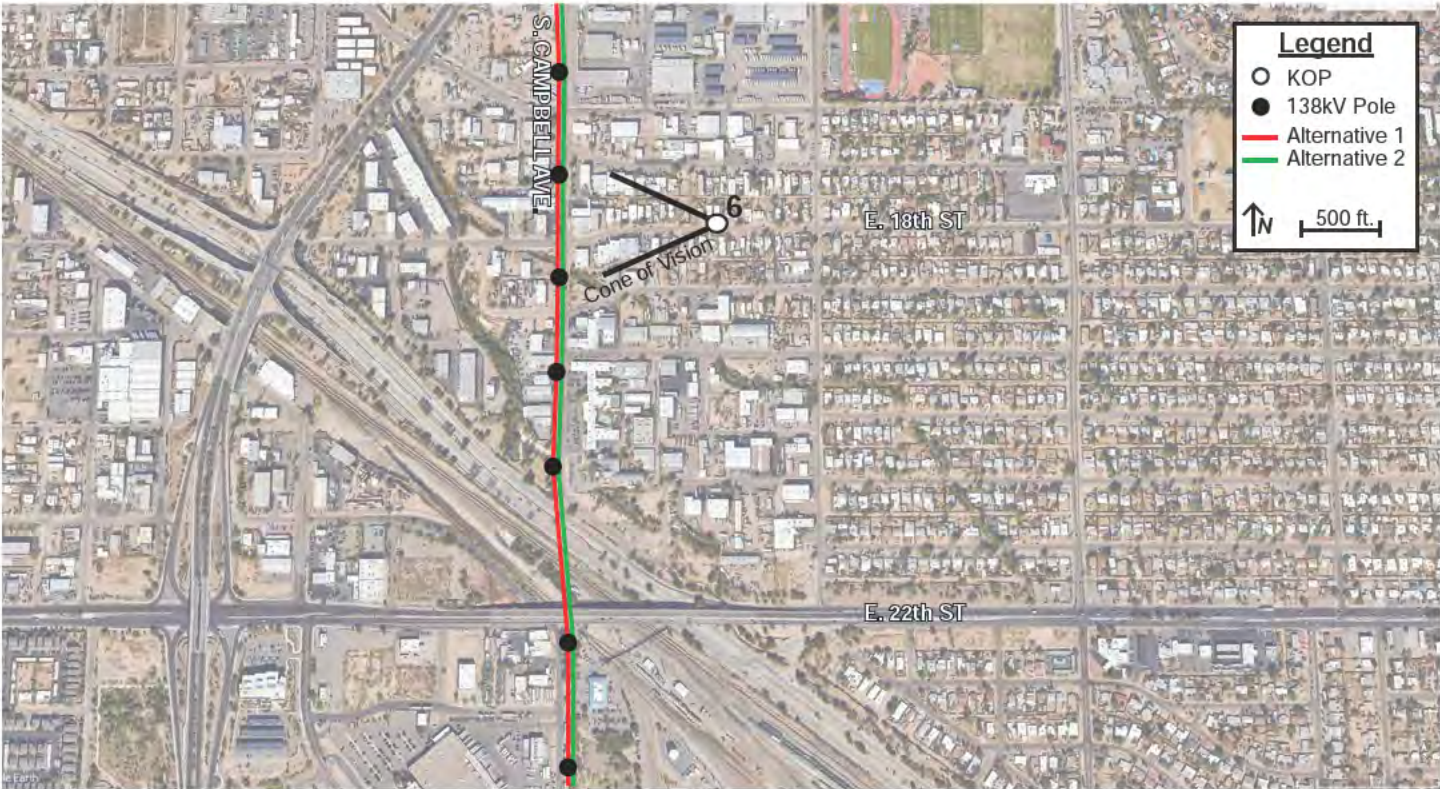
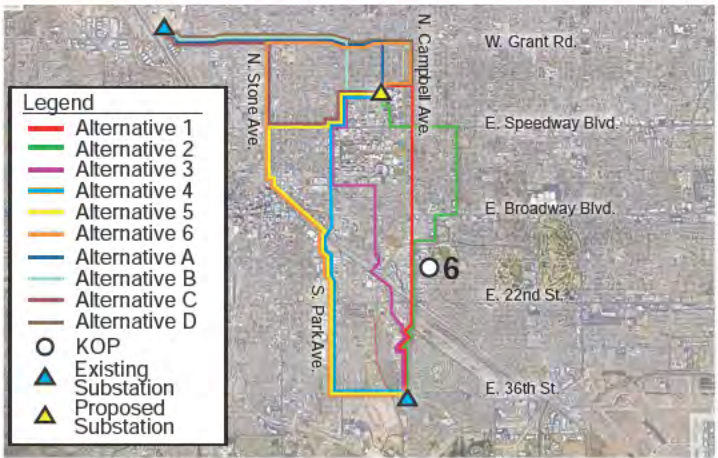
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 6

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 50mm | F-Stop: f/10 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents
- Location: 2032 E. 18th St.
- Latitude: 32.212435° N; Longitude: 110.941389° W
- View Point Elevation at Eye Level: 2,450 ft.
- Looking: west
- Poles Visible: Alternative 1, or 2 structures
- Image File Name: IMG\_3158.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 2:25 pm
- The image is based on a single photo and represent approximately 39.5 degree horizontal field of view.
- This view is approximately 780 feet east of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #6



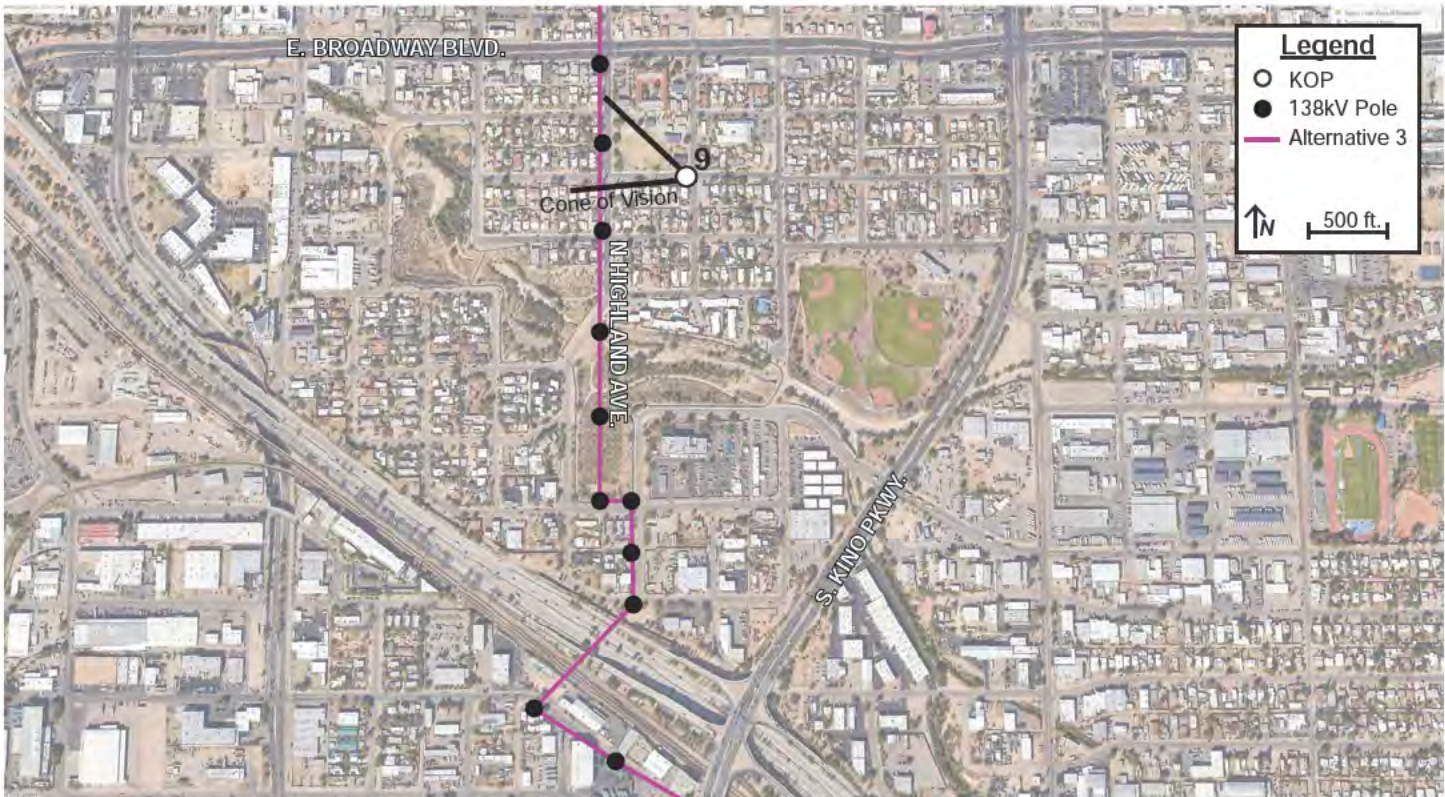
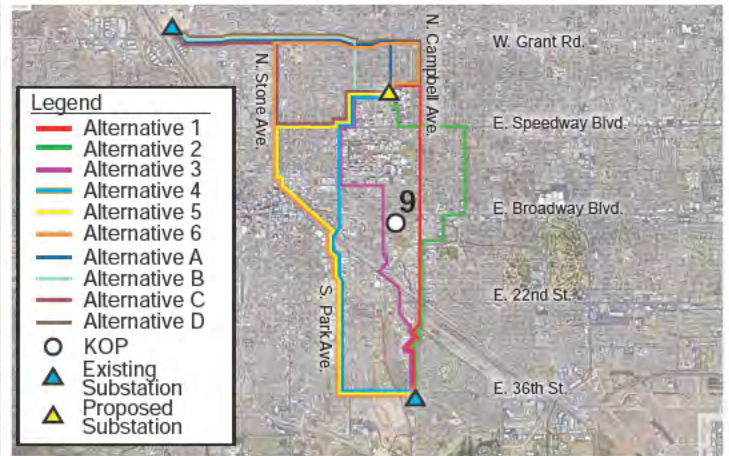
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 9

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents
- Location: 1311 E Miles St
- Latitude: 32.219487° N; Longitude: 110.949774° W
- View Point Elevation at Eye Level: 2,421 ft.
- Looking: northwest
- Poles Visible: Alternative 3 structures
- Image File Name: IMG\_3222.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 2:40 pm
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 479 feet southeast of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #9



Current Condition

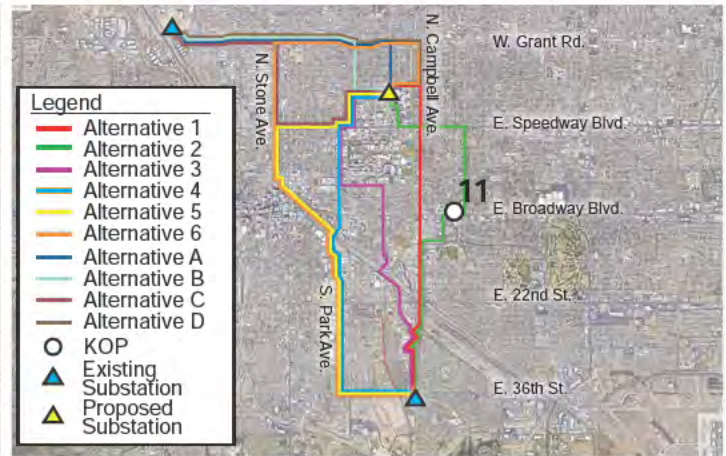


Simulated Condition



# Key Observation Point (KOP) # 11

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents and commercial traffic
- Location: 2221 E. Broadway Blvd
- Latitude: 32.221680° N; Longitude: 110.939021° W
- View Point Elevation at Eye Level: 2,458 ft.
- Looking: east
- Poles Visible: Alternative 2 structures
- Image File Name: IMG\_3245.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 2:53 pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 305 feet west of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #11



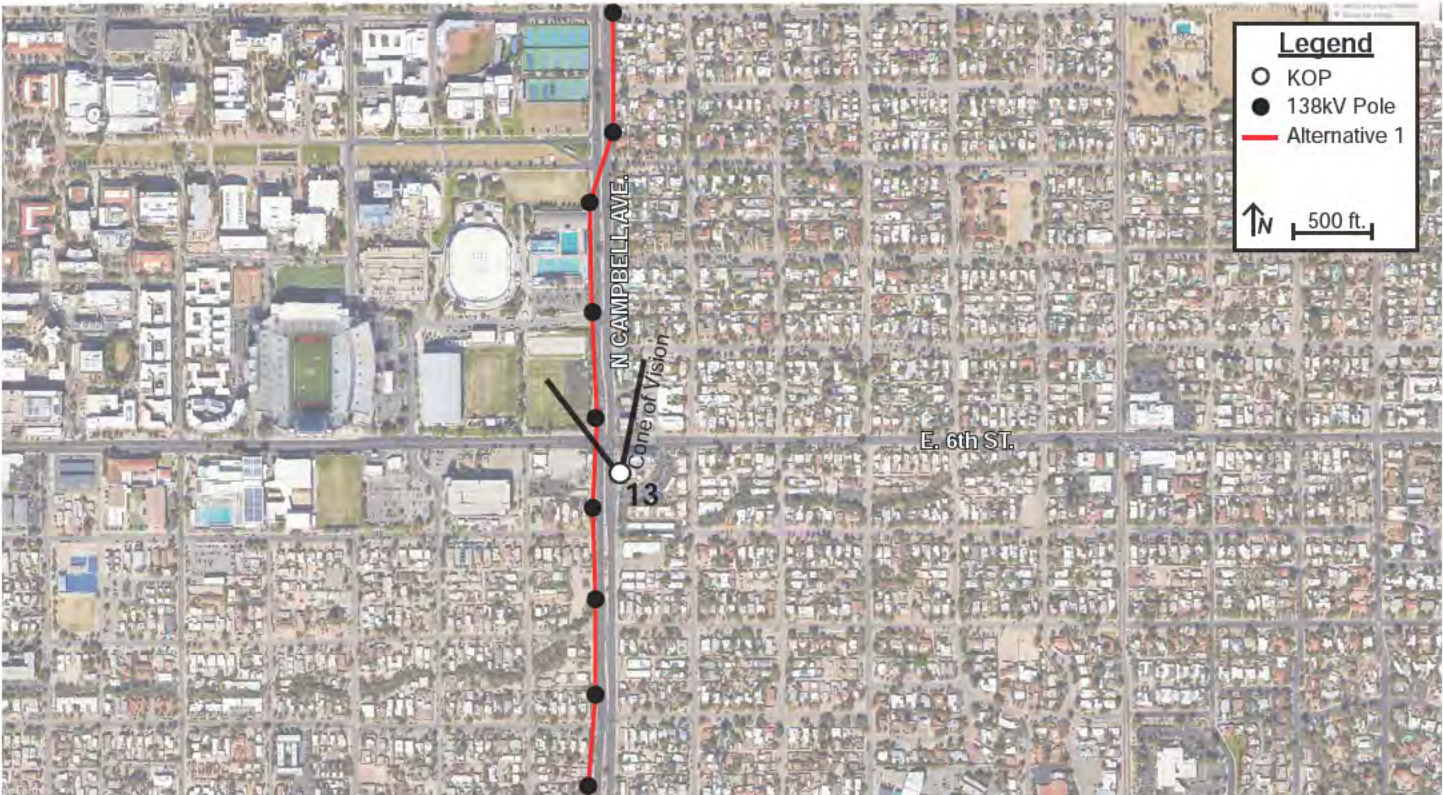
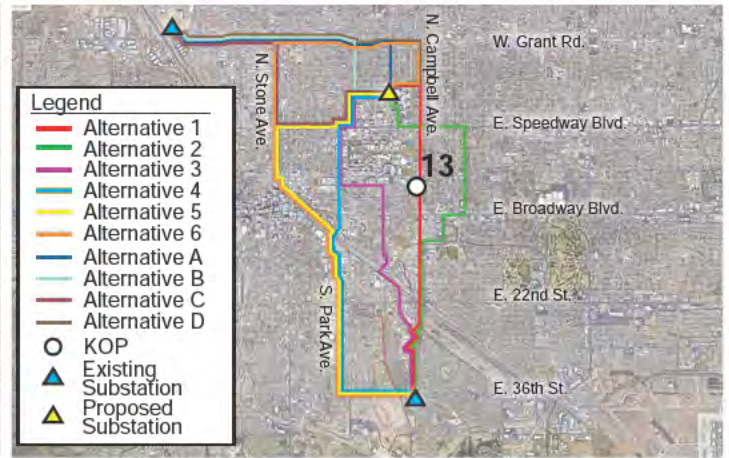
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 13

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/8 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents, student, stadium and commercial traffic
- Location: 446 N Campbell Ave.
- Latitude: 32.227523° N; Longitude: 110.943689° W
- View Point Elevation at Eye Level: 2,449 ft.
- Looking: north
- Poles Visible: Alternative 1 structures
- Image File Name: IMG\_3311.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 3:17 pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 305 feet west of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #13



Current Condition



Simulated Condition

# Key Observation Point (KOP) #13



Current Condition



Simulated Condition

# Key Observation Point (KOP) #13



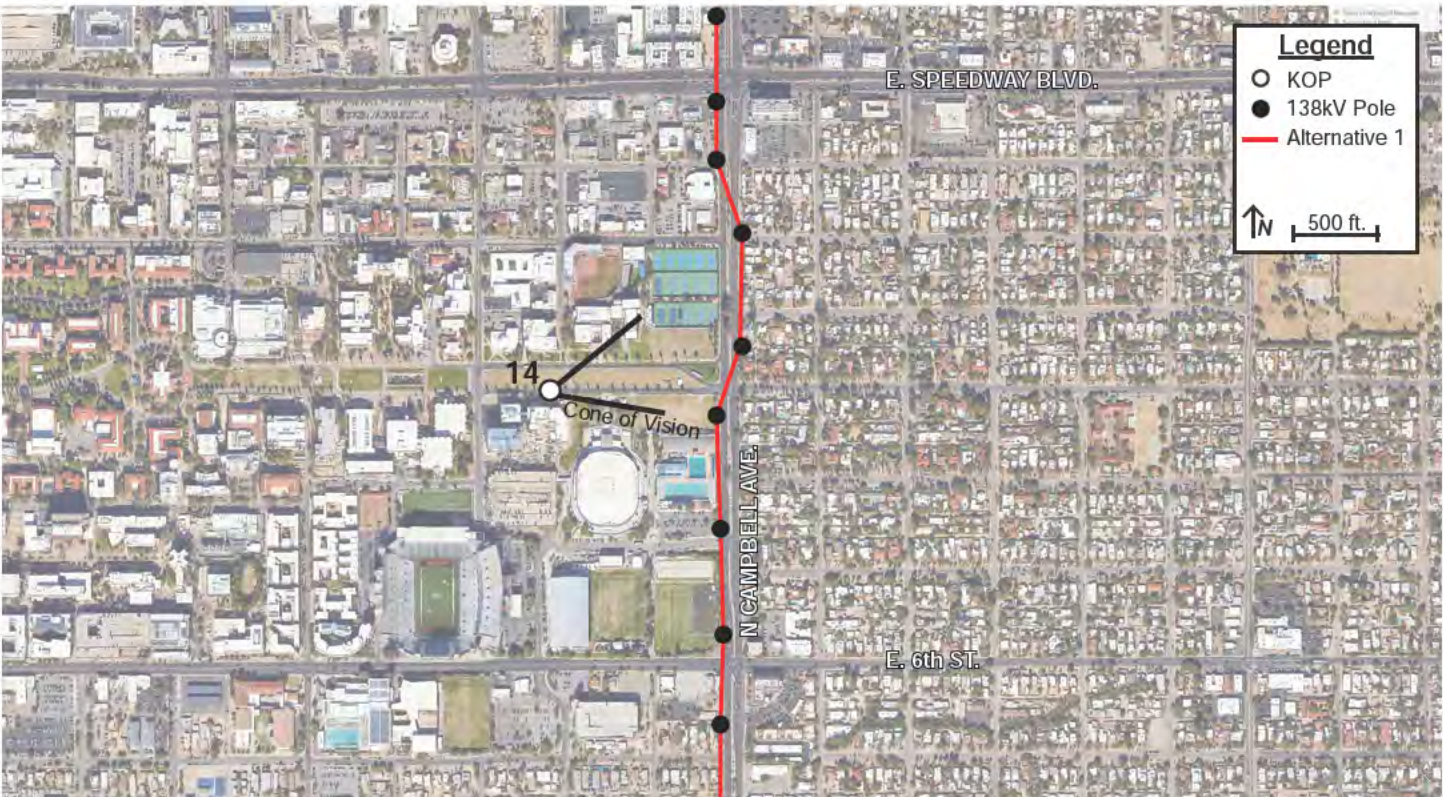
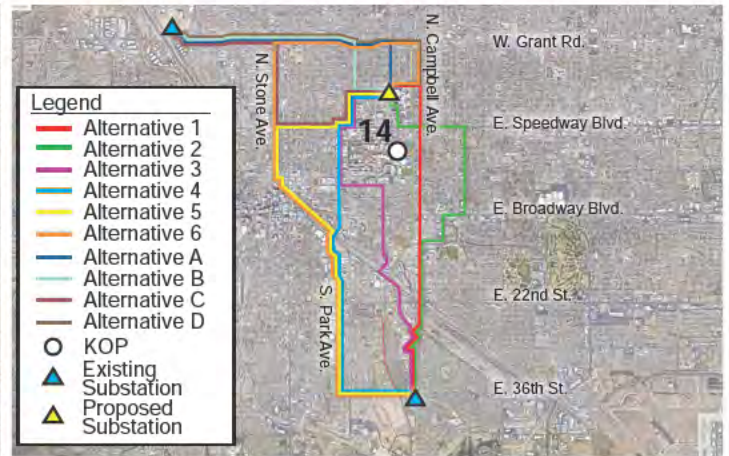
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 14

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 70mm | F-Stop: f/6.3 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: students, stadium, commercial traffic
- Location: 1630 E. University Ave.
- Latitude: 32.231731° N; Longitude: 110.947070° W
- View Point Elevation at Eye Level: 2,447 ft.
- Looking: east
- Poles Visible: Alternative 1 structures
- Image File Name: IMG\_3347.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 3:29 pm
- The image is based on a single photo and represent approximately 28.8 degree horizontal field of view.
- This view is approximately 1,057 feet west of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #14



Current Condition

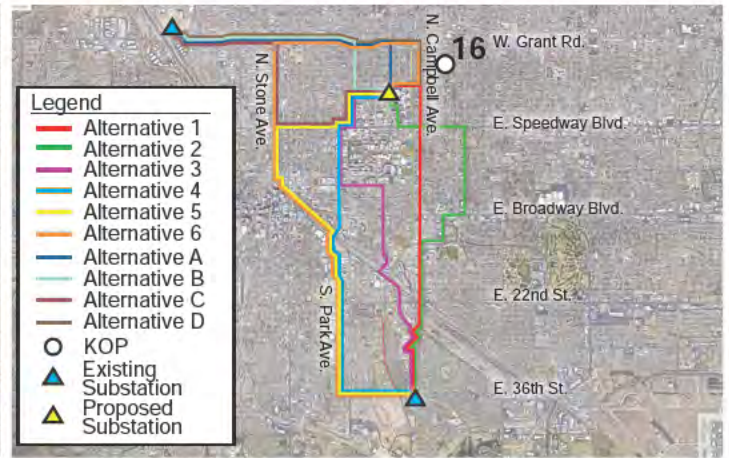


Simulated Condition



# Key Observation Point (KOP) # 16

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/8 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents
- Location: 2125 E Waverly St.
- Latitude: 32.245451° N; Longitude: 110.941625° W
- View Point Elevation at Eye Level: 2,438 ft.
- Looking: west
- Poles Visible: Alternative 6 or D structures
- Image File Name: IMG\_3340.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 4:05 pm
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 886 feet east of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #16



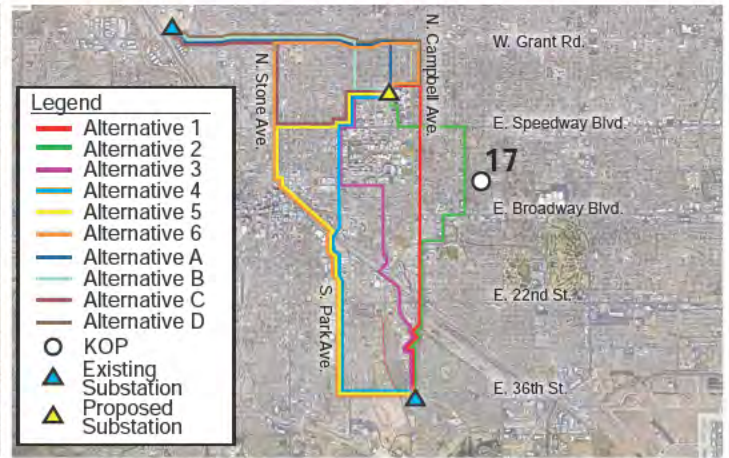
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 17

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/8 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents, student, and commercial traffic
- Location: 2530 E 6th St.
- Latitude: 32.227780° N; Longitude: 110.934457° W
- View Point Elevation at Eye Level: 2,462 ft.
- Looking: west
- Poles Visible: Alternative 2 structures
- Image File Name: IMG\_3376.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 3:42 pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 315 feet west of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #17



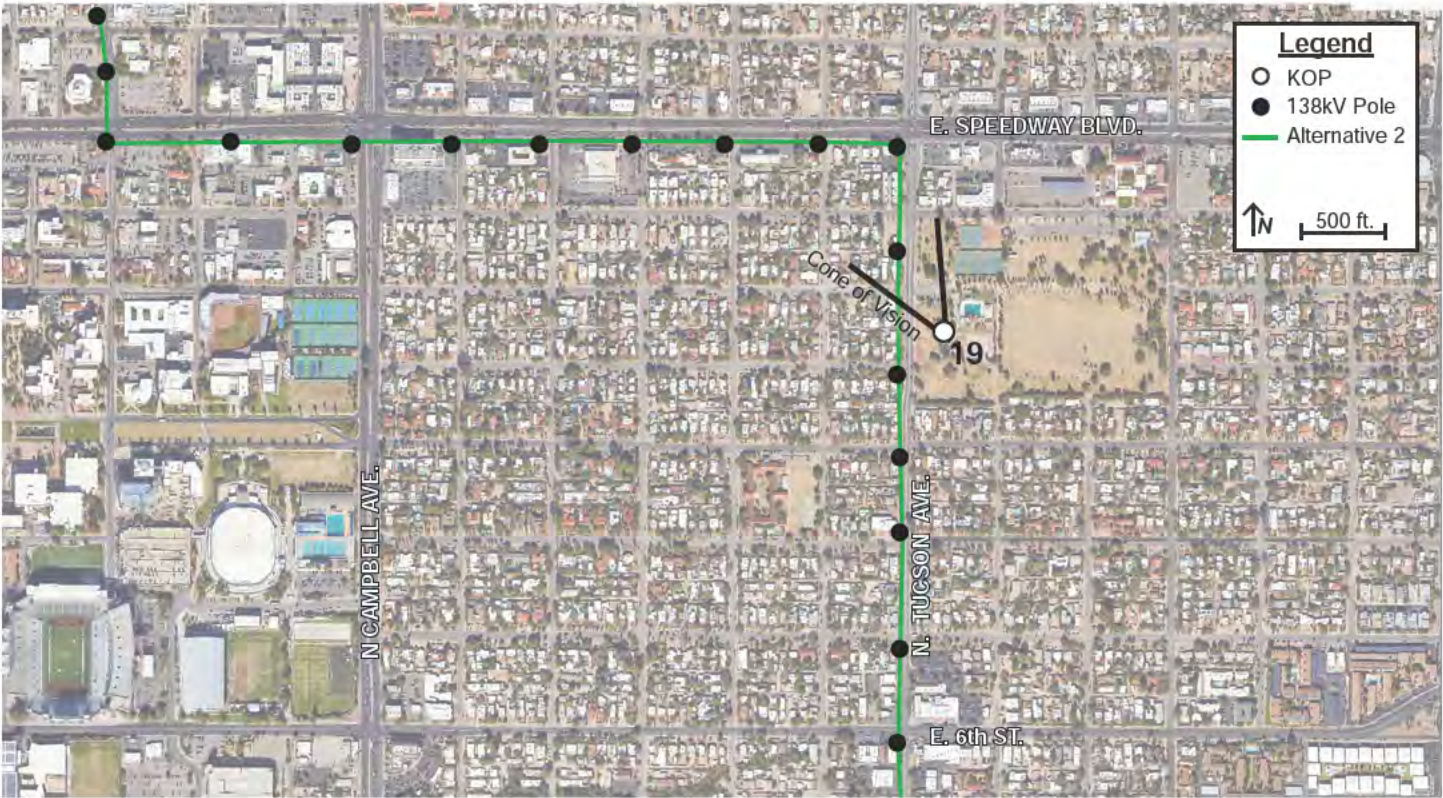
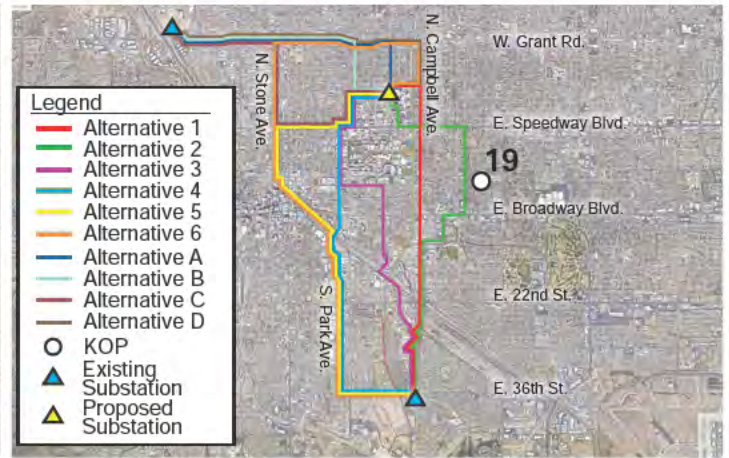
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 19

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: recreational users @ Himmel Park
- Location: Himmel Park
- Latitude: 32.233364° N; Longitude: 110.935004° W
- View Point Elevation at Eye Level: 2,469 ft.
- Looking: northwest
- Poles Visible: Alternative 2 structures
- Image File Name: IMG\_3419.JPG

### Simulation Notes

- Photo Taken: March 3rd, 2024 at 3:55 pm
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 400 feet southeast of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #19



Current Condition



Simulated Condition

# Key Observation Point (KOP) #19



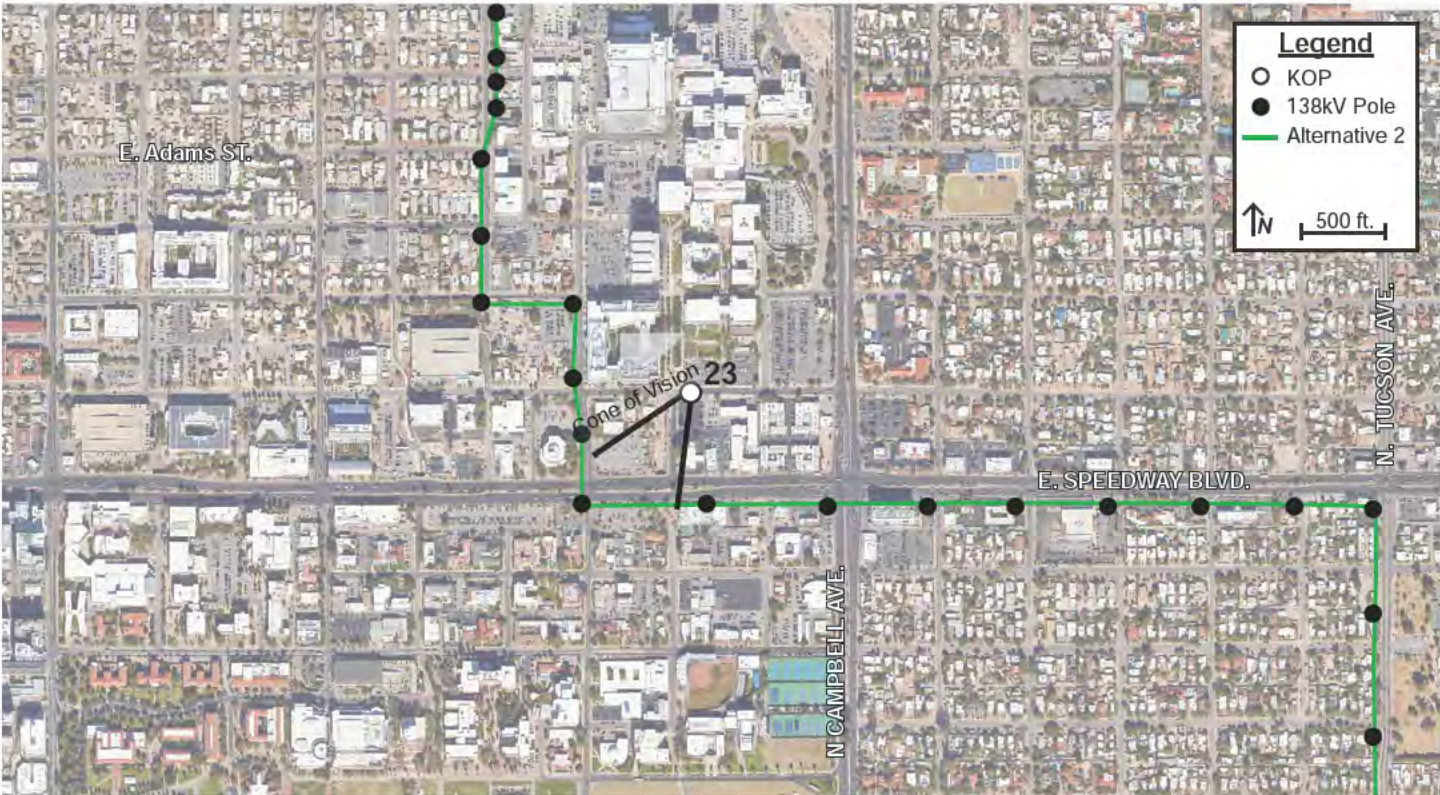
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 23

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: students and streetcar riders
- Location: Helen St. Street Car Station
- Latitude: 32.237150° N; Longitude: 110.946947° W
- View Point Elevation at Eye Level: 2,463 ft.
- Looking: southwest
- Poles Visible: Alternative 2 structures
- Image File Name: IMG\_3545.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 9:59 am
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 735 feet northeast of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.



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## Key Observation Point (KOP) #23



Current Condition



Simulated Condition

Weathered Finish  
Page 1471

# Key Observation Point (KOP) #23



Current Condition



Simulated Condition

Sage Green Finish  
Page 1472

# Key Observation Point (KOP) # 25

[return to map](#)



**Notes:**

**Camera Information**

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 50mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

**KOP**

- Representative View for: residents
- Location: 1439 E Adam St
- Latitude: 32.240687° N; Longitude: 110.950391° W
- View Point Elevation at Eye Level: 2,454 ft.
- Looking: west
- Poles Visible: Alternative 3,4,5,B,or C structures
- Image File Name: IMG\_3552.JPG

**Simulation Notes**

- Photo Taken: March 4th, 2024 at 10:05 am
- The image is based on a single photo and represent approximately 39.5 degree horizontal field of view.
- This view is approximately 287 feet east of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

[return to map](#)

## Key Observation Point (KOP) #25



Current Condition



Simulated Condition

# Key Observation Point (KOP) #25



Current Condition



Simulated Condition

# Key Observation Point (KOP) #25



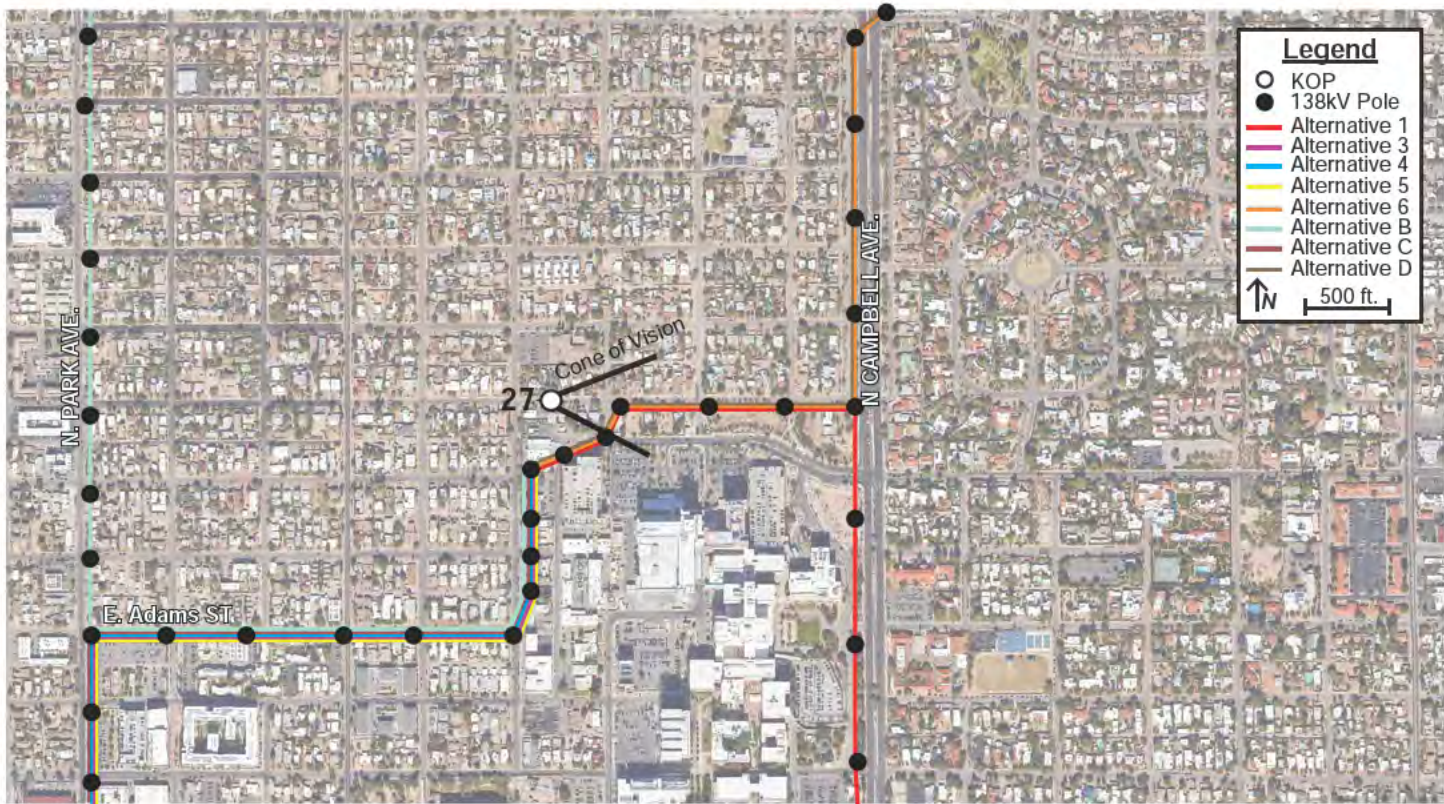
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 27

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/10 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents
- Location: 1517 E Lester St.
- Latitude: 32.243709° N; Longitude: 110.949300° W
- View Point Elevation at Eye Level: 2,423 ft.
- Looking: east
- Poles Visible: Alternative 1,6, or D structures
- Image File Name: IMG\_3566.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 10:11 am
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 348 feet west of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #27



Current Condition

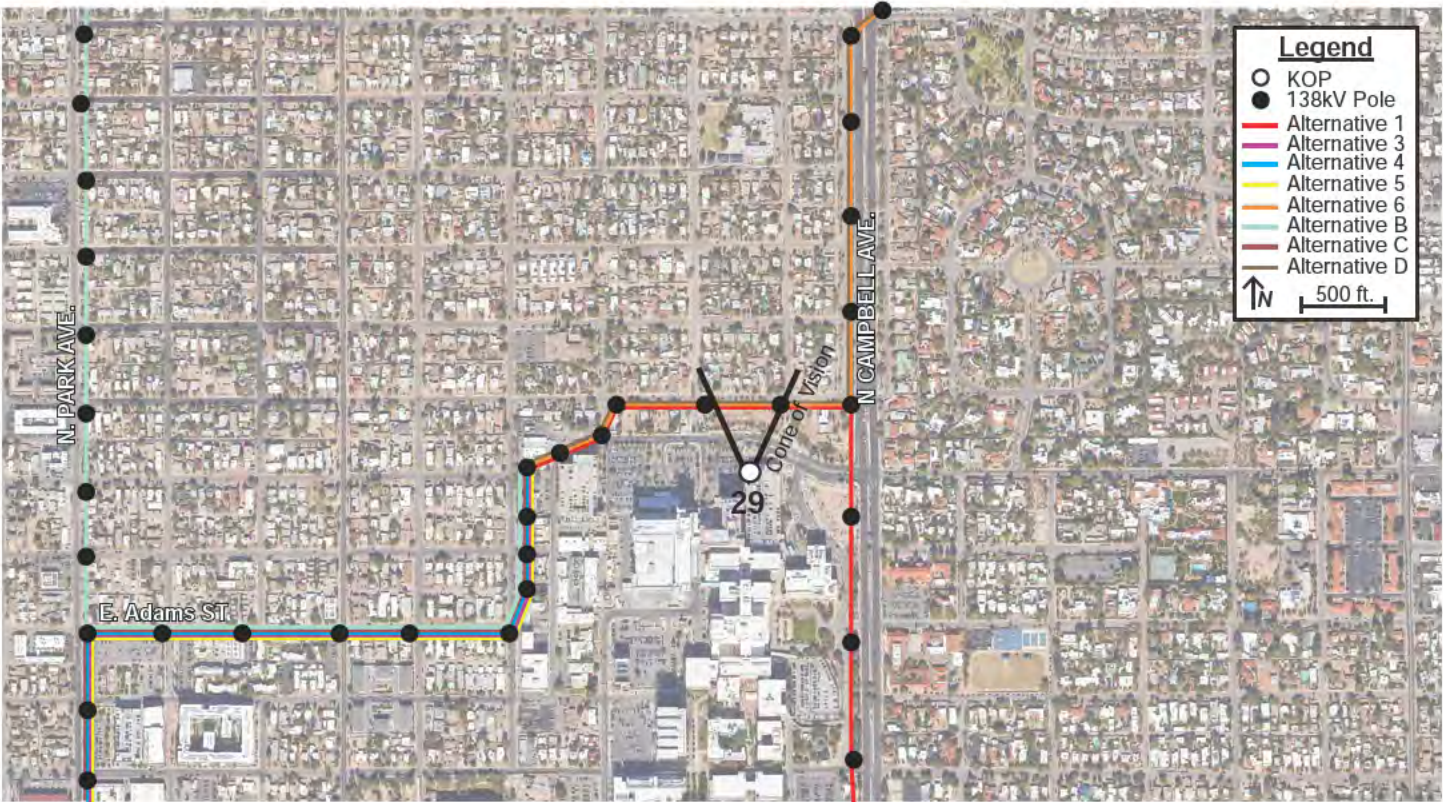
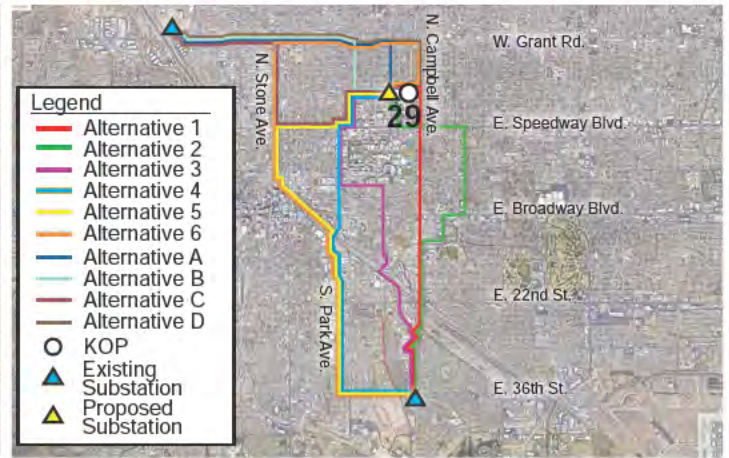


Simulated Condition



# Key Observation Point (KOP) # 29

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/8 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: Hospital visitors and staff
- Location: Elevated Hospital View
- Latitude: 32.242810° N; Longitude: 110.945952° W
- View Point Elevation at Eye Level: 2,453 ft.
- Looking: north
- Poles Visible: Alternative 1,6, or D structures
- Image File Name: IMG\_3604.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 10:19 am
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 314 feet south of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

[return to map](#)

## Key Observation Point (KOP) #29



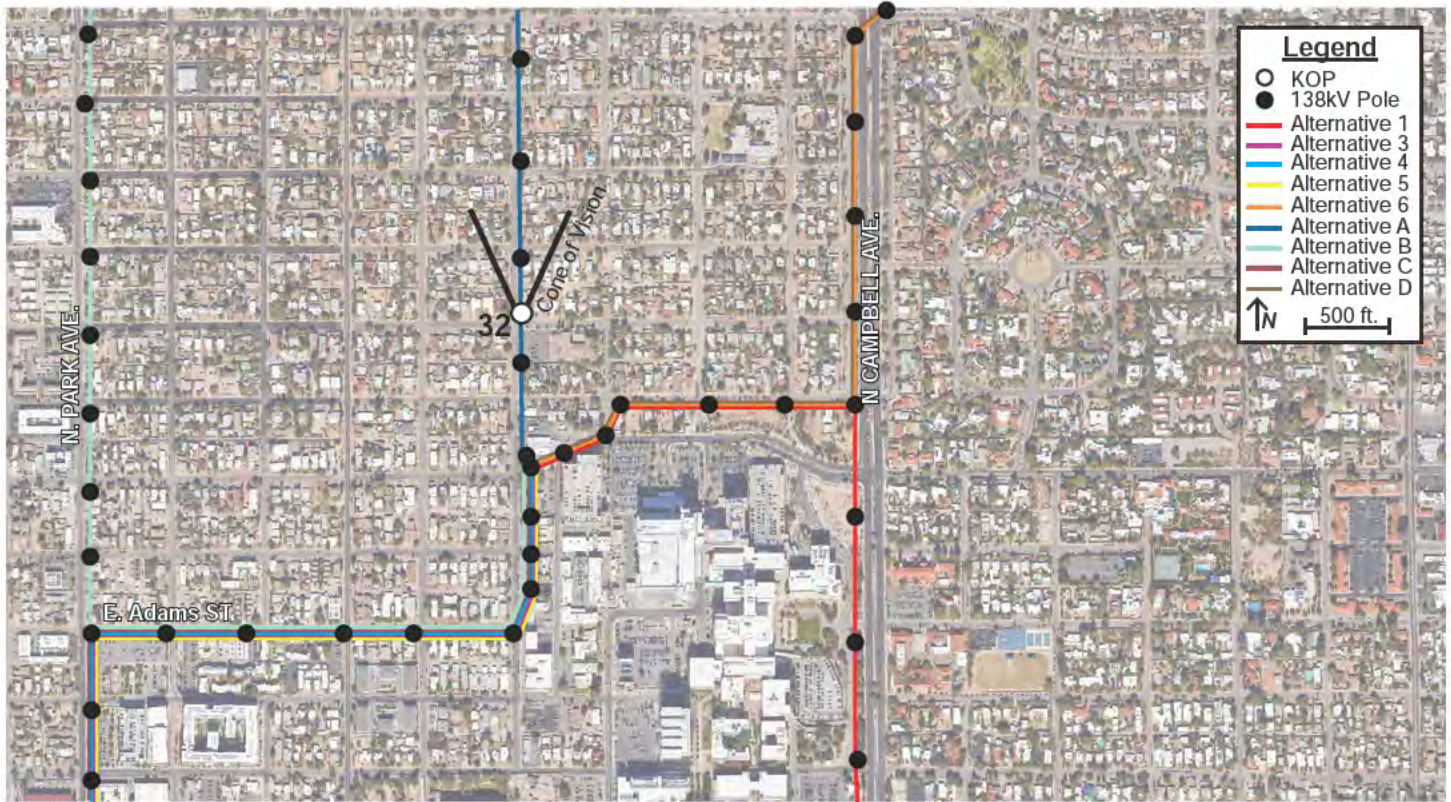
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 32

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents
- Location: 1950 Vine Ave
- Latitude: 32.244943° N; Longitude: 110.949758° W
- View Point Elevation at Eye Level: 2,431 ft.
- Looking: north
- Poles Visible: Alternative A structures
- Image File Name: IMG\_3634.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 10:30 am
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 268 feet south of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #32



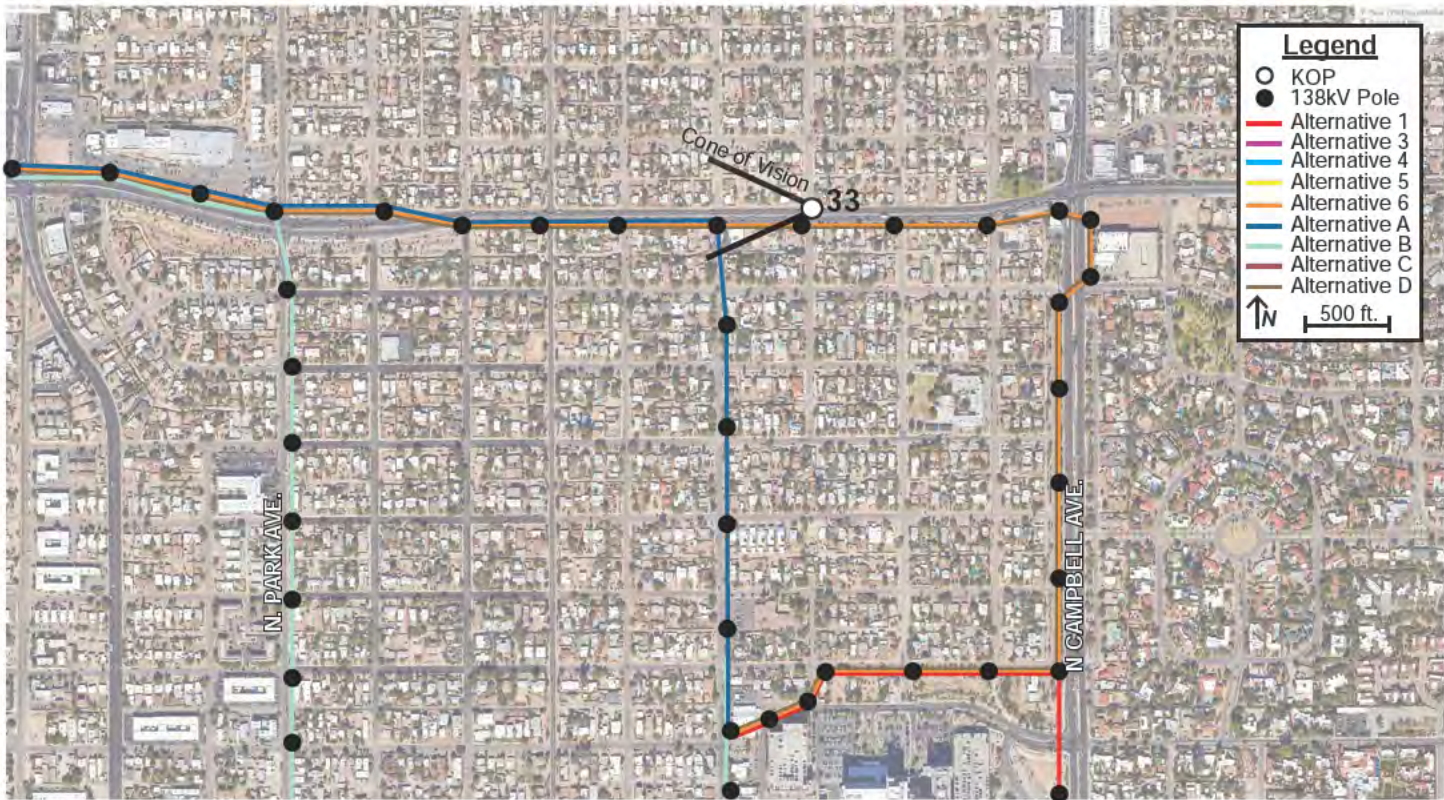
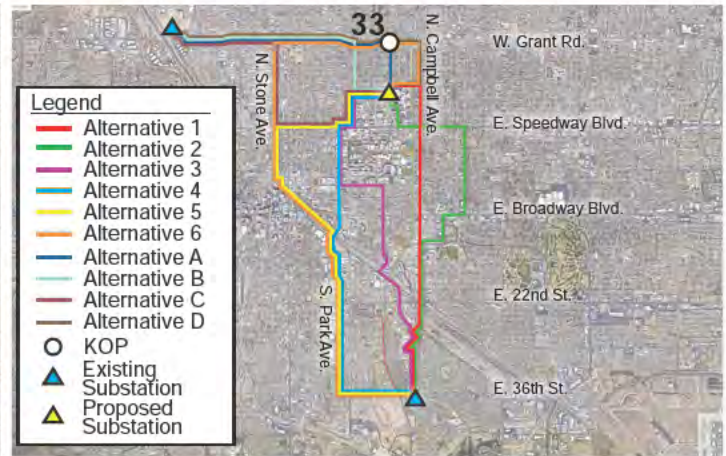
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 33

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents and commercial travelers
- Location: 1601 Grant Ave
- Latitude: 32.250078° N; Longitude: 110.948432° W
- View Point Elevation at Eye Level: 2,420 ft.
- Looking: west
- Poles Visible: Alternative 1,A,B,or D structures
- Image File Name: IMG\_3638.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 10:33 am
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 519 feet east of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #33



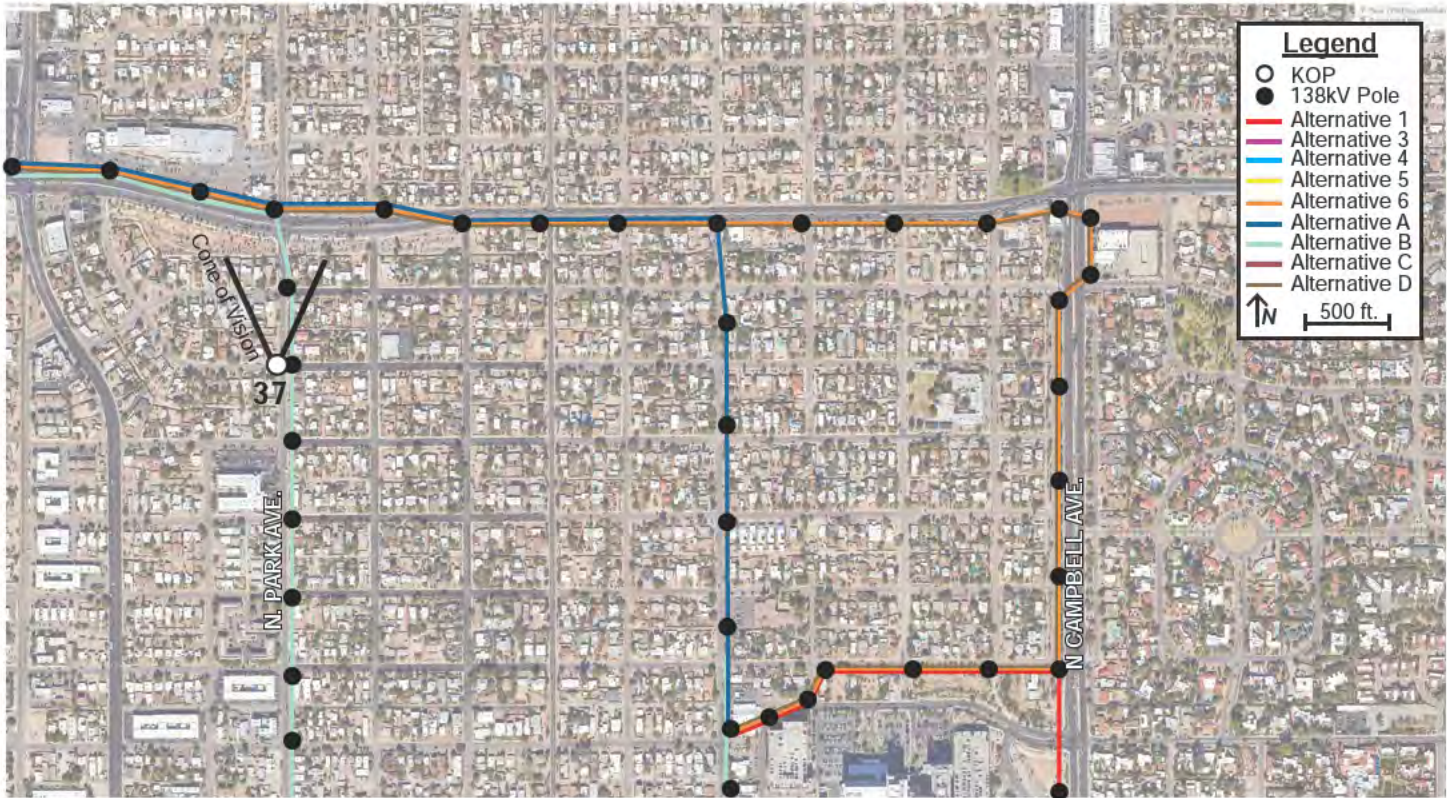
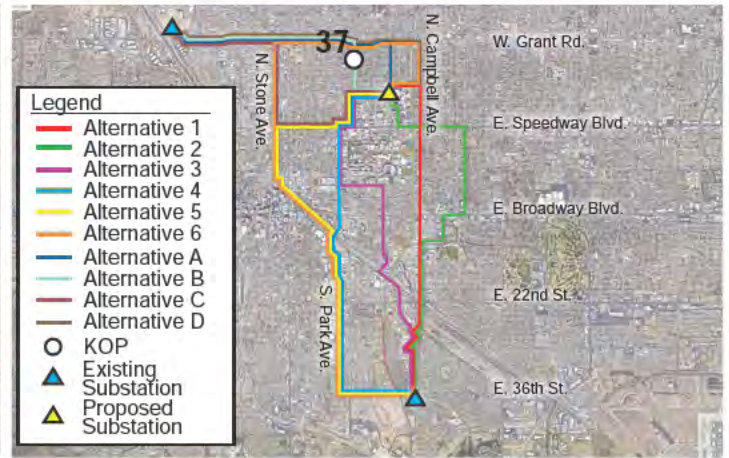
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 37

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents and commercial travelers
- Location: 2200 N Park Ave.
- Latitude: 32.247848° N; Longitude: 110.957059° W
- View Point Elevation at Eye Level: 2,430 ft.
- Looking: north
- Poles Visible: Alternative 1,A,B,or D structures
- Image File Name: IMG\_3714.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 10:52 am
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 329 feet south of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

[return to map](#)

## Key Observation Point (KOP) #37



Current Condition

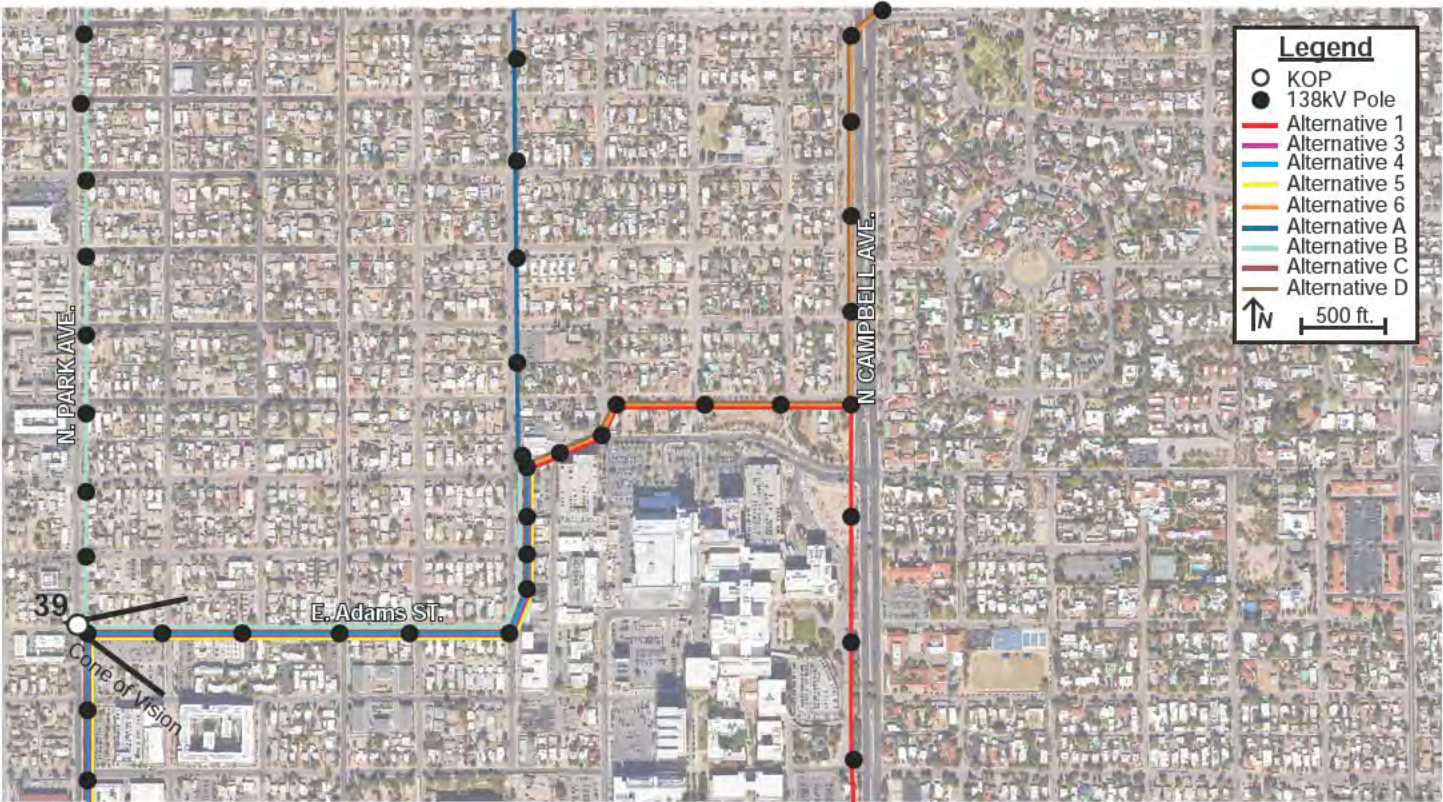
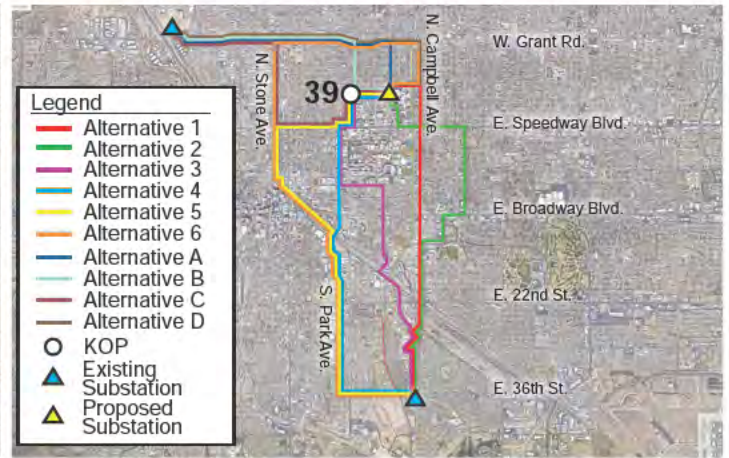


Simulated Condition



# Key Observation Point (KOP) # 39

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents
- Location: 1000 E. Adams St.
- Latitude: 32.240337° N; Longitude: 110.956882° W
- View Point Elevation at Eye Level: 2,424 ft.
- Looking: east
- Poles Visible: Alternative 3,4,5, B, or C structures
- Image File Name: IMG\_3751.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 11:03 am
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 45 feet west of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #39



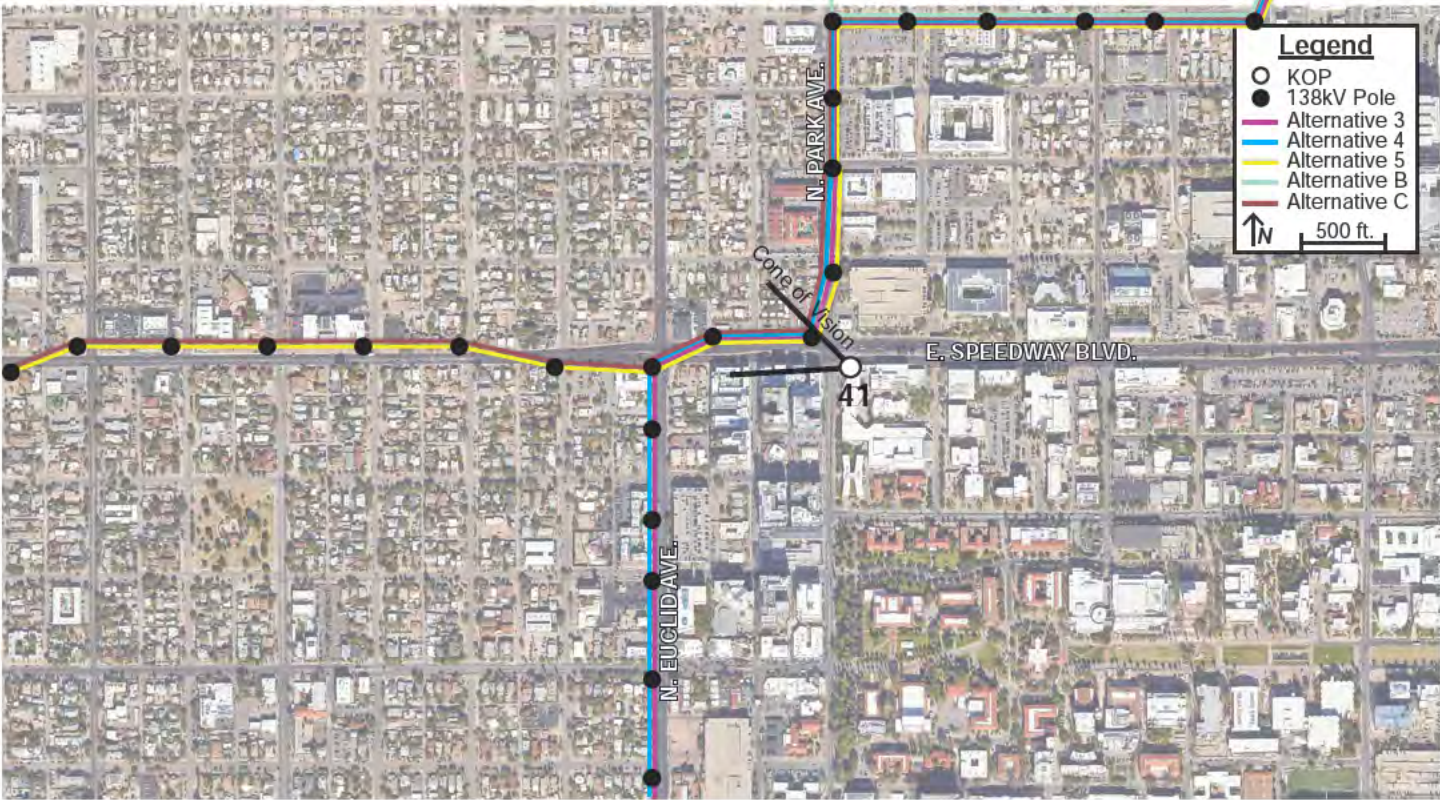
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 41

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 50mm | F-Stop: f/5 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents, students, and commercial
- Location: 1002 E Speedway Blvd.
- Latitude: 32.236257° N; Longitude: 110.956311° W
- View Point Elevation at Eye Level: 2,436 ft.
- Looking: west
- Poles Visible: Alternative 3,4,5, or C structures
- Image File Name: IMG\_2793.JPG

### Simulation Notes

- Photo Taken: December 5th, 2023 at 10:11 am
- The image is based on a single photo and represent approximately 39.5 degree horizontal field of view.
- This view is approximately 665 feet east of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #41



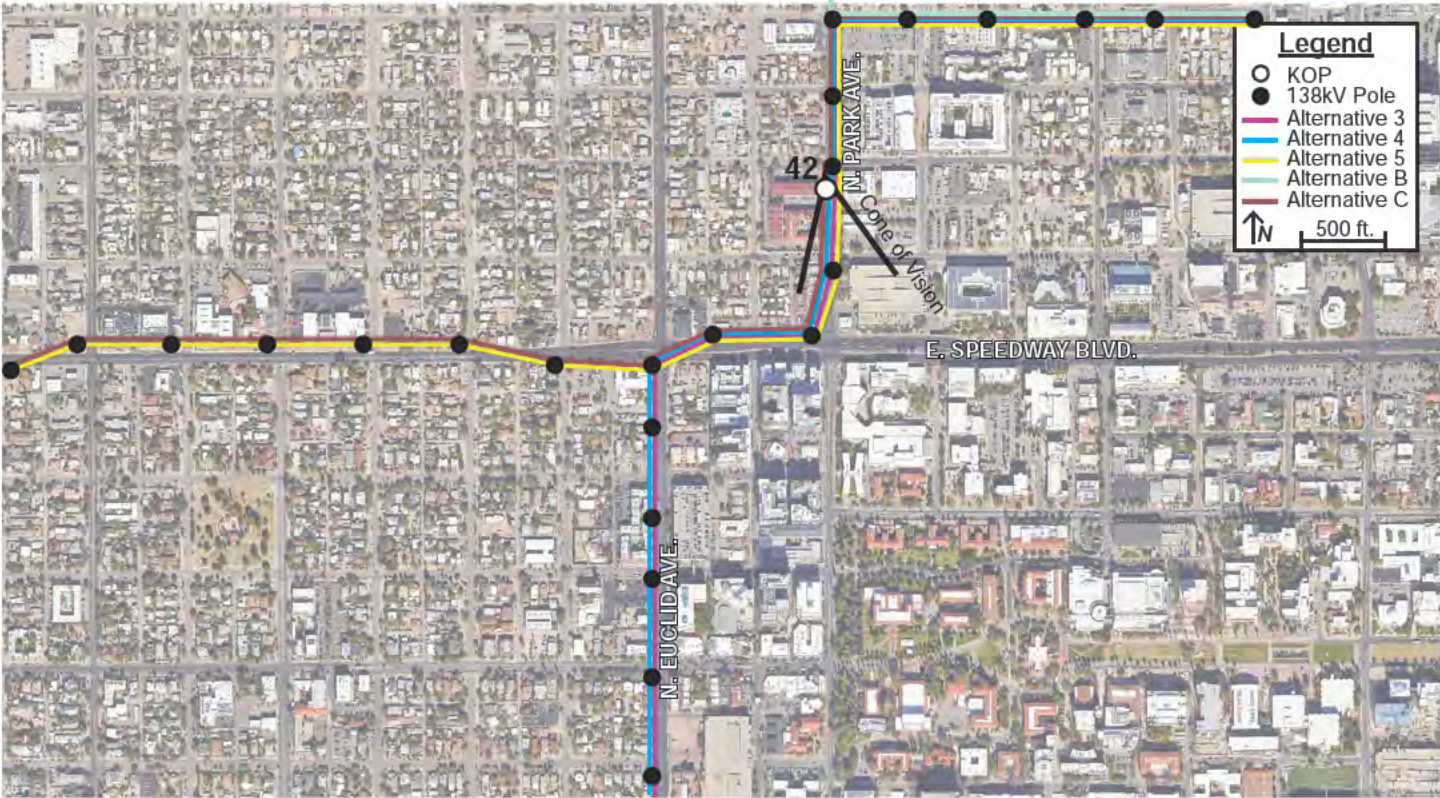
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 42

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents, students, and commercial
- Location: 1201 N Park
- Latitude: 32.238180° N; Longitude: 110.956844° W
- View Point Elevation at Eye Level: 2,429 ft.
- Looking: south
- Poles Visible: Alternative 3,4,5, or C structures
- Image File Name: IMG\_3790.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 11:18 am
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 348 feet north of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #42



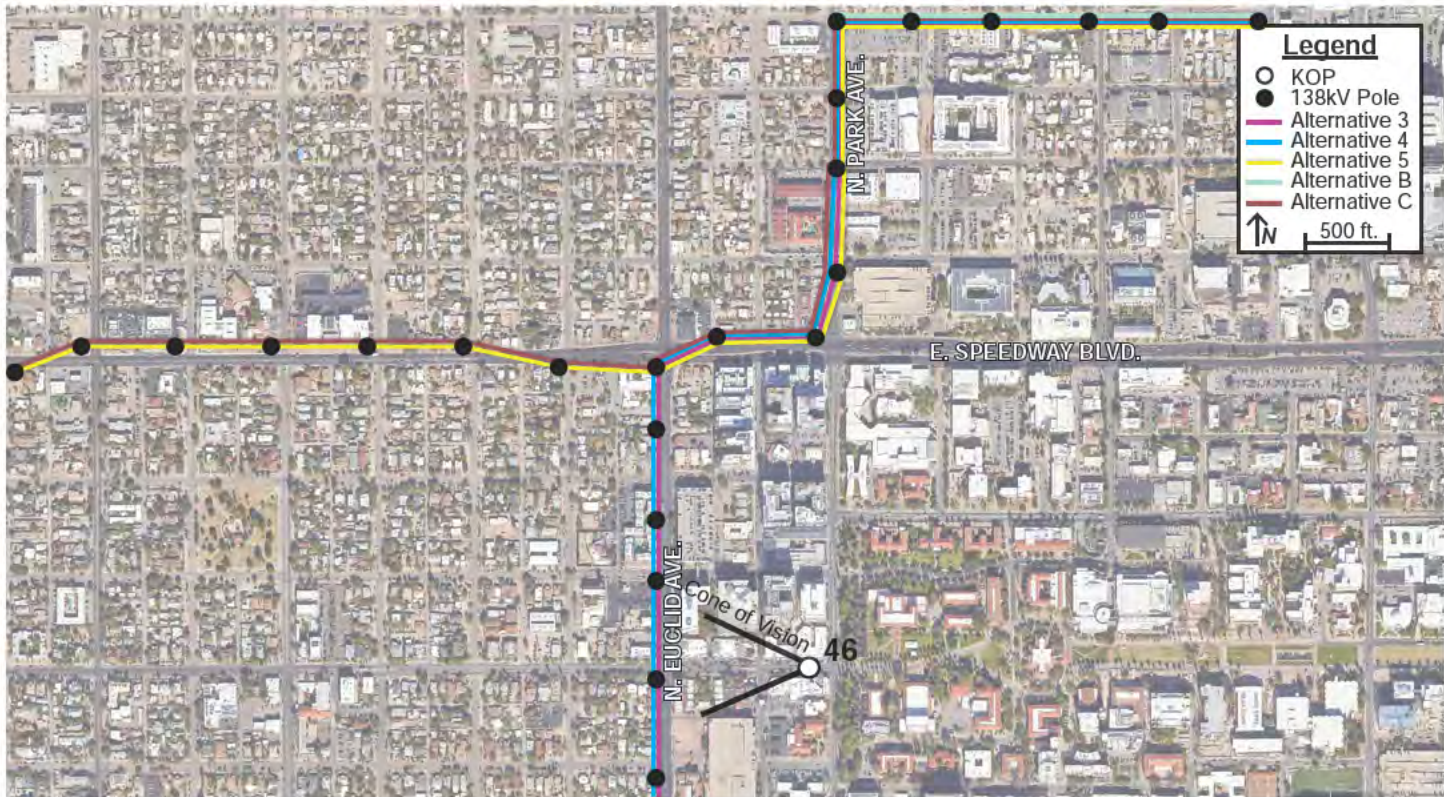
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 46

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents, students, and commercial
- Location: 982 E University
- Latitude: 32.231705° N; Longitude: 110.958282° W
- View Point Elevation at Eye Level: 2,423 ft.
- Looking: west
- Poles Visible: Alternative 3 or 4 structures
- Image File Name: IMG\_3833.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 11:49 am
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 406 feet east of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #46



Current Condition

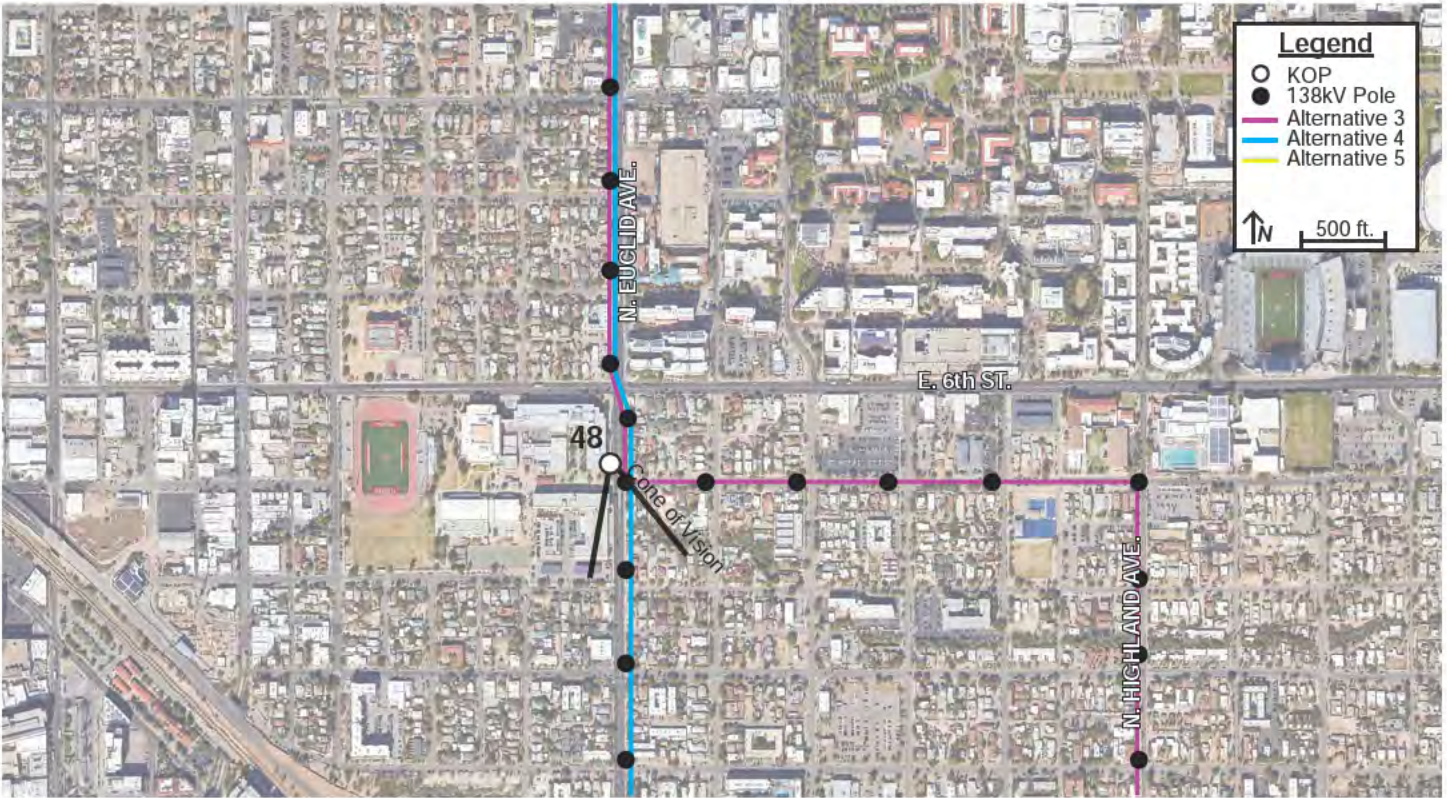
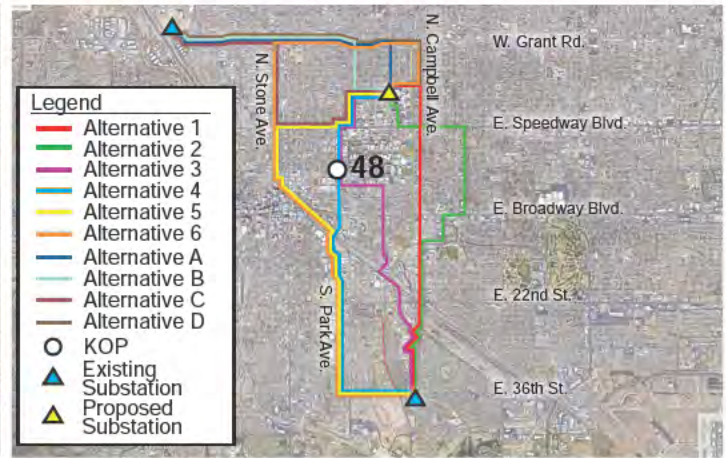


Simulated Condition



# Key Observation Point (KOP) # 48

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/10 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents, students, and commercial
- Location: 428 N Euclid
- Latitude: 32.227078° N; Longitude: 110.959520° W
- View Point Elevation at Eye Level: 2,404 ft.
- Looking: south
- Poles Visible: Alternative 3 or 4 structures
- Image File Name: IMG\_3851.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 11:59 am
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 205 feet north of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #48



Current Condition



Simulated Condition

# Key Observation Point (KOP) #48



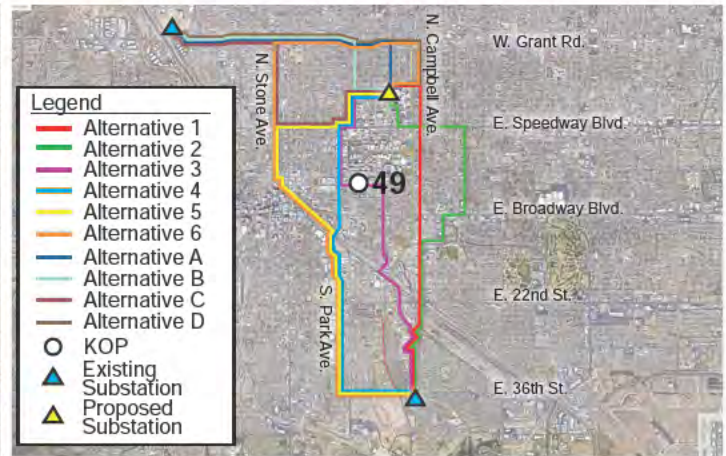
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 49

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents
- Location: 850 E 7th St.
- Latitude: 32.226415° N; Longitude: 110.957721° W
- View Point Elevation at Eye Level: 2,407 ft.
- Looking: west
- Poles Visible: Alternative 3 or 4 structures
- Image File Name: IMG\_3873.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 12:04 pm
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 112 feet east of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #49



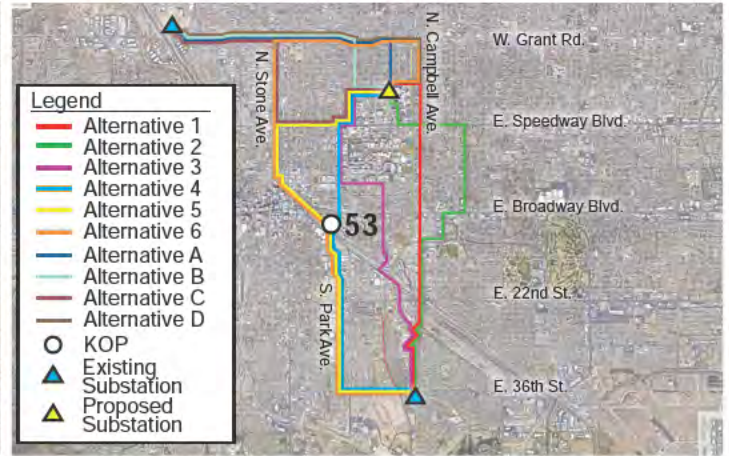
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 53

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/5.6 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: Bike path/recreational users
- Location: Snake Bridge Plaza
- Latitude: 32.221640° N; Longitude: 110.961541° W
- View Point Elevation at Eye Level: 2,410 ft.
- Looking: west
- Poles Visible: Alternative 5 structures
- Image File Name: IMG\_3905.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 12:26 pm
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 630 feet east of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

[return to map](#)

## Key Observation Point (KOP) #53



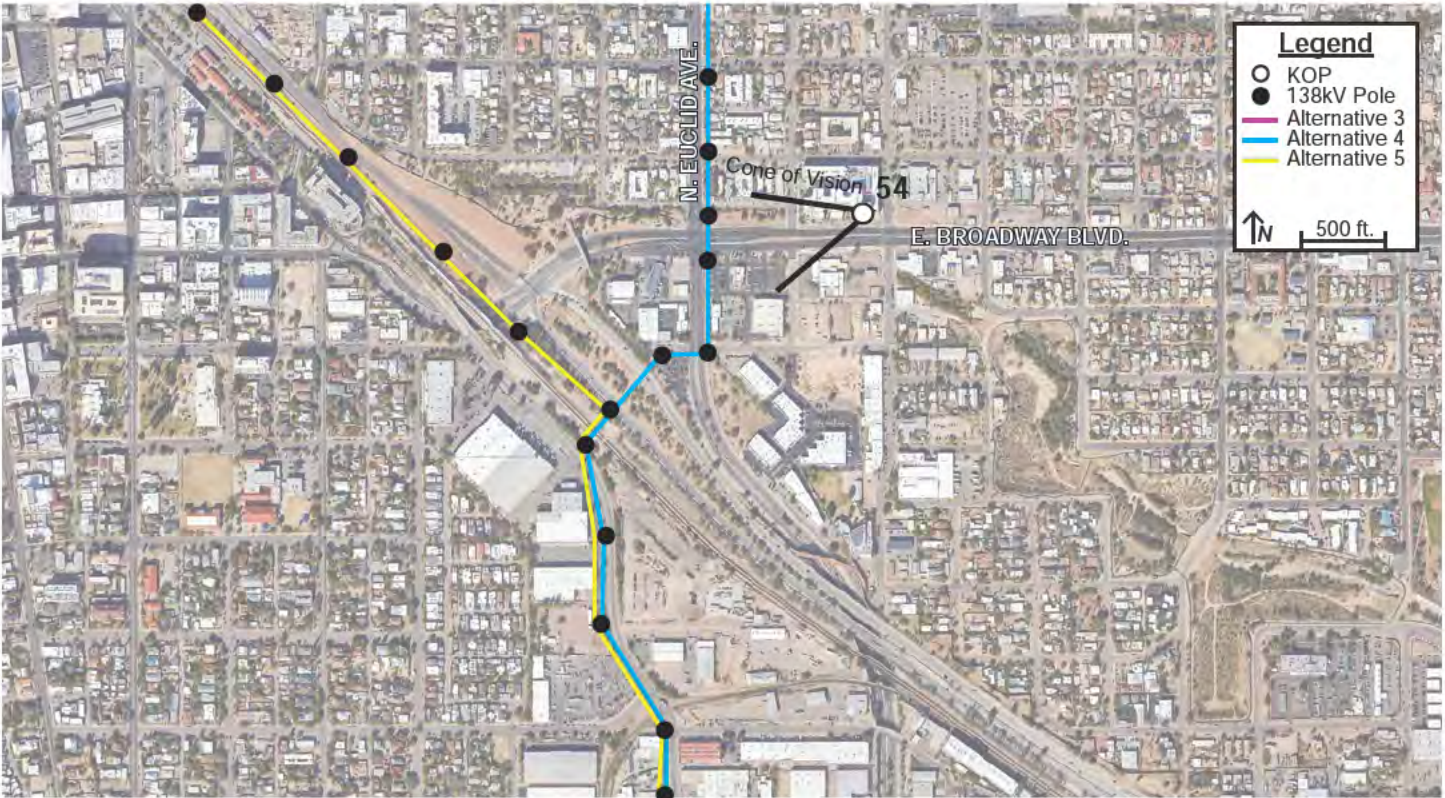
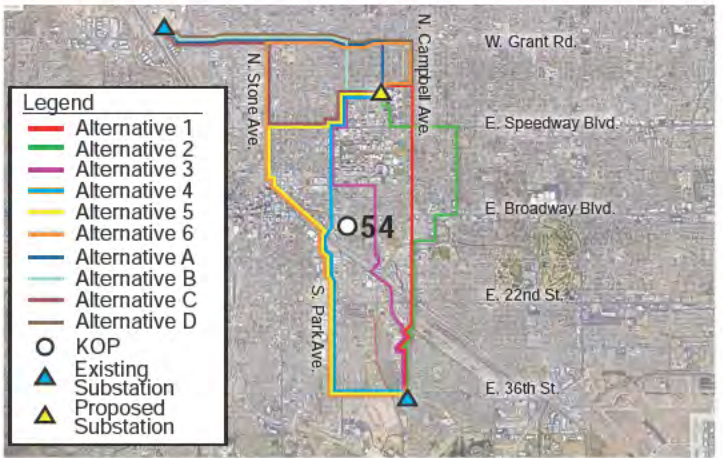
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 54

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 50mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents, commercial
- Location: 929 E Broadway Blvd
- Latitude: 32.221627° N; Longitude: 110.956885° W
- View Point Elevation at Eye Level: 2,414 ft.
- Looking: west
- Poles Visible: Alternative 4 or 5 structures
- Image File Name: IMG\_3922.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 12:59 pm
- The image is based on a single photo and represent approximately 39.5 degree horizontal field of view.
- This view is approximately 752 feet east of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.



# Key Observation Point (KOP) #54



Current Condition



Simulated Condition

[return to map](#)

## Key Observation Point (KOP) #54



Current Condition



Simulated Condition

Alternative Route 4 - Galvanized Finish  
Page 1504

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## Key Observation Point (KOP) #54



Current Condition

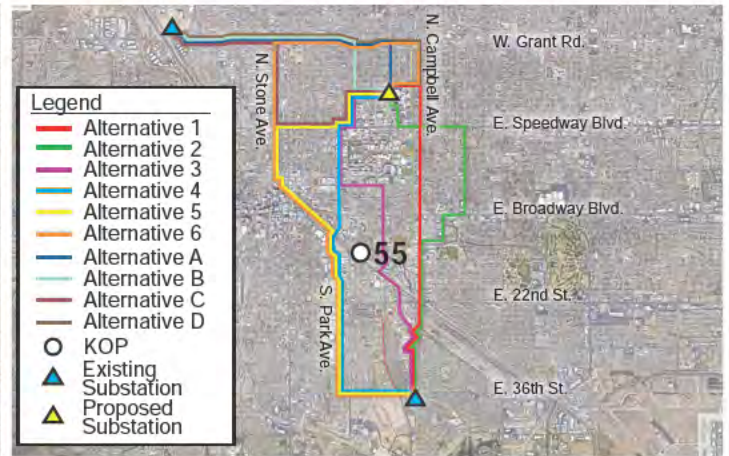


Simulated Condition

Alternative Route 5 - Weathered Finish  
Page 1505

# Key Observation Point (KOP) # 55

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/10 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: recreational users
- Location: Bike Path Bridge
- Latitude: 32.217159° N; Longitude: 110.957797° W
- View Point Elevation at Eye Level: 2,412 ft.
- Looking: northwest
- Poles Visible: Alternative 4 or 5 structures
- Image File Name: IMG\_3937.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 1:07pm
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 1161 feet southeast of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #55



Current Condition



Simulated Condition

# Key Observation Point (KOP) #55



Current Condition



Simulated Condition

# Key Observation Point (KOP) # 58

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/5.6 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: downtown
- Location: 318 Congress St.
- Latitude: 32.222190° N; Longitude: 110.966426° W
- View Point Elevation at Eye Level: 2,397ft.
- Looking: northeast
- Poles Visible: Alternative 4 or 5 structures
- Image File Name: IMG\_3972.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 1:18pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 498 feet southwest of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

# Key Observation Point (KOP) #58



Current Condition

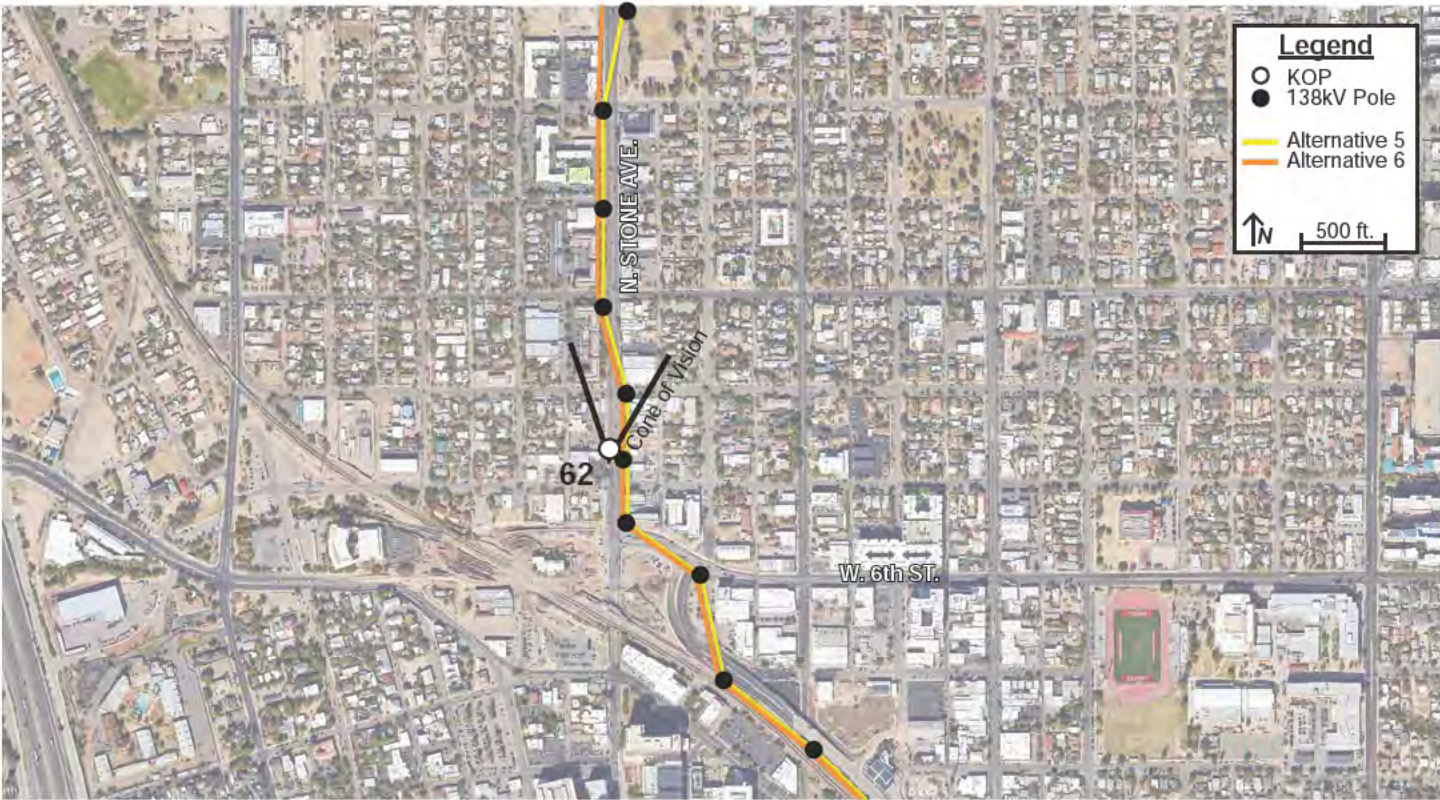
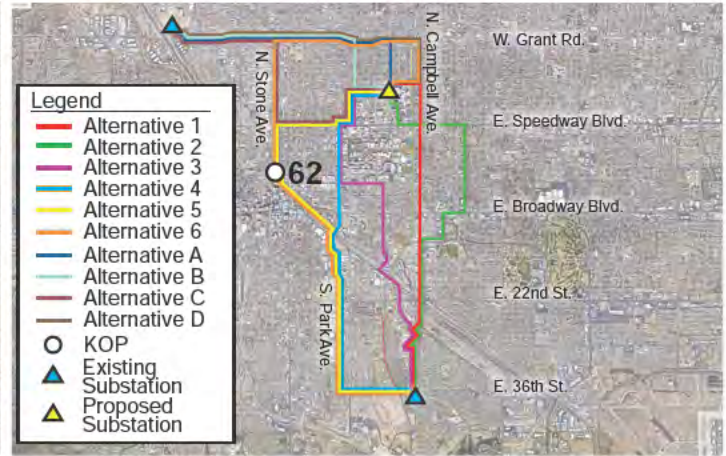


Simulated Condition



# Key Observation Point (KOP) # 62

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/10 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: commercial traffic
- Location: 642 N Stone Ave
- Latitude: 32.229329° N; Longitude: 110.971876° W
- View Point Elevation at Eye Level: 2,383ft.
- Looking: north
- Poles Visible: Alternative 5 or 6 structures
- Image File Name: IMG\_4033.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 1:39pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 308 feet south of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #62



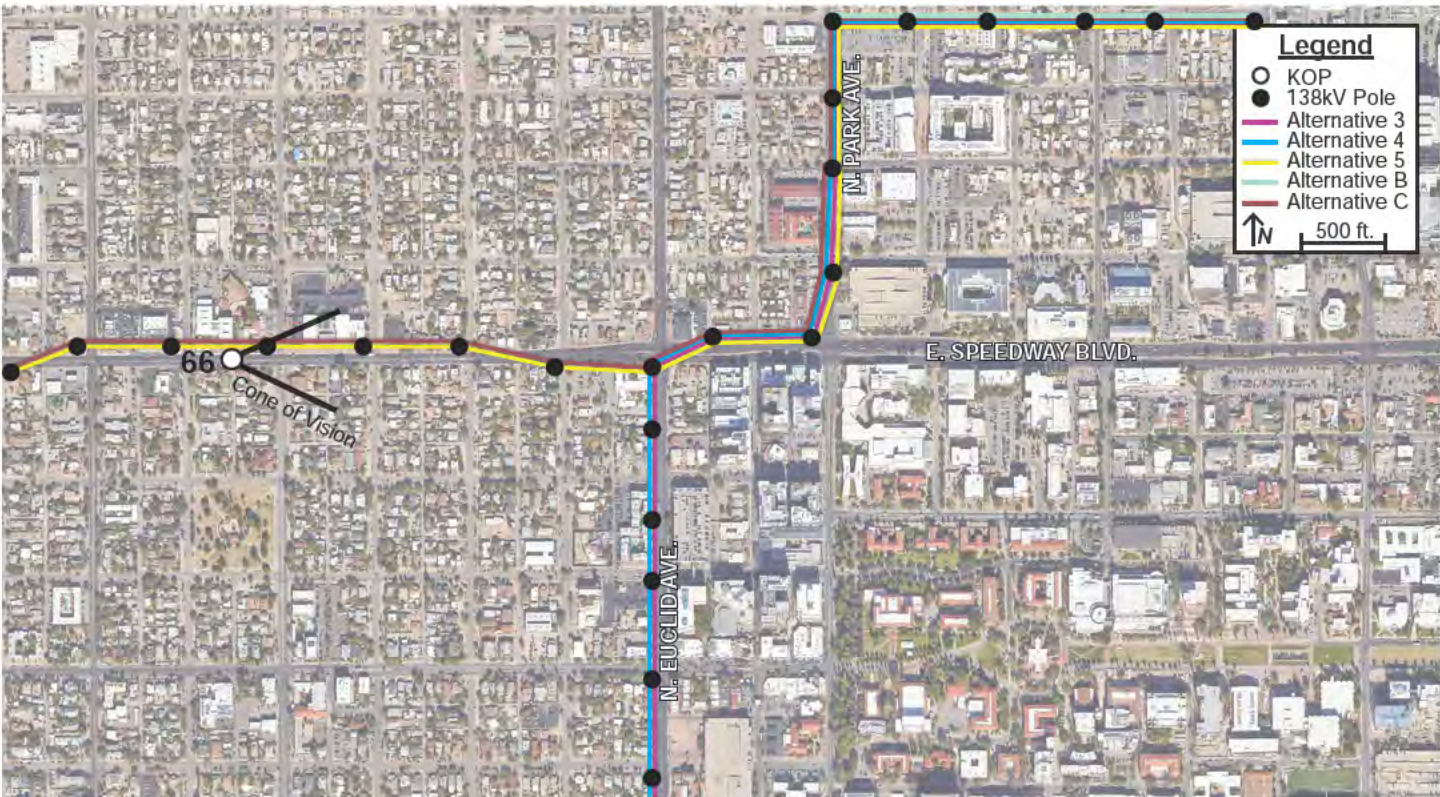
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 66

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/5.6 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents, and commercial
- Location: 203 E Speedway
- Latitude: 32.235851° N; Longitude: 110.966304° W
- View Point Elevation at Eye Level: 2,403 ft.
- Looking: east
- Poles Visible: Alternative 5 or C structures
- Image File Name: IMG\_4076.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 1:57pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 180 feet west of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

[return to map](#)

## Key Observation Point (KOP) #66



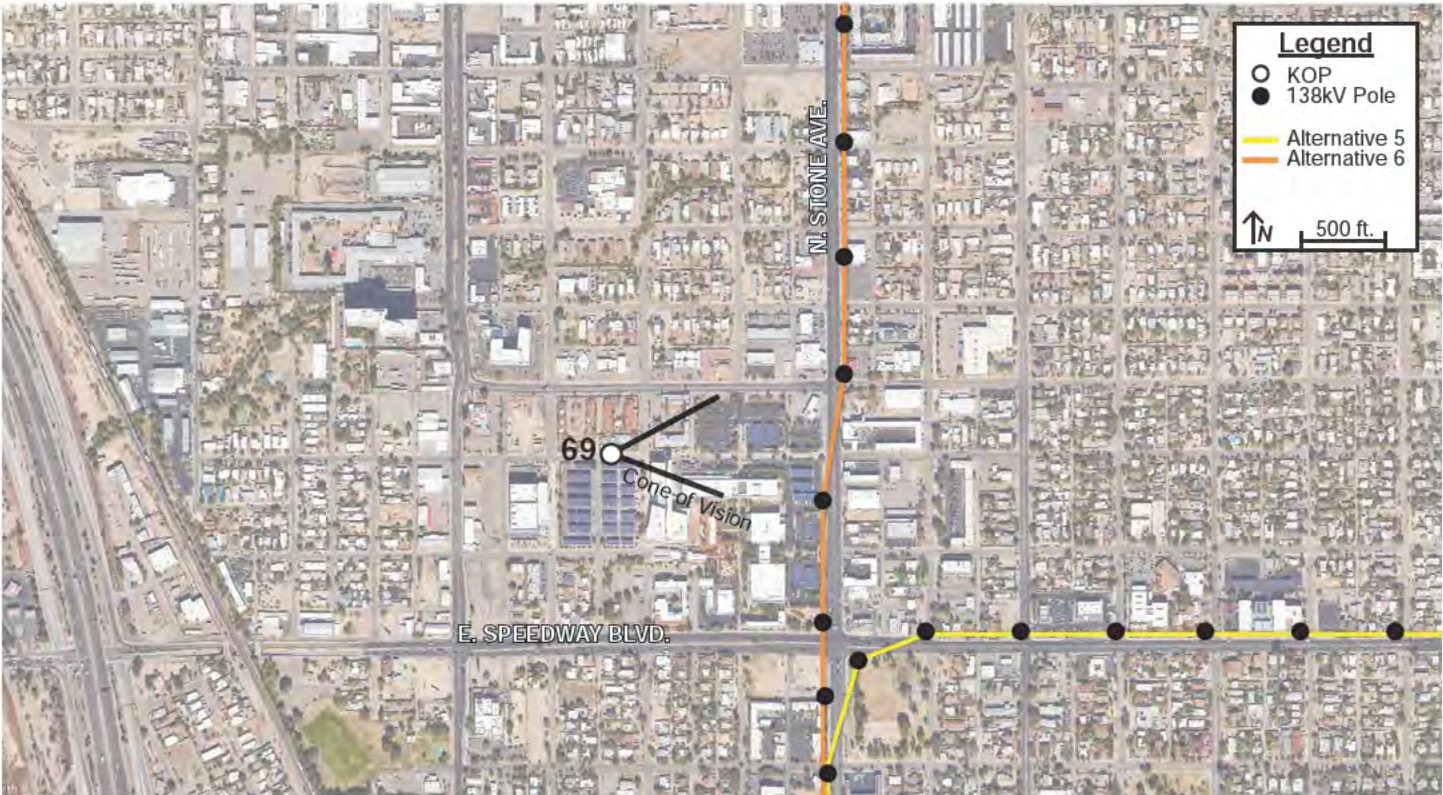
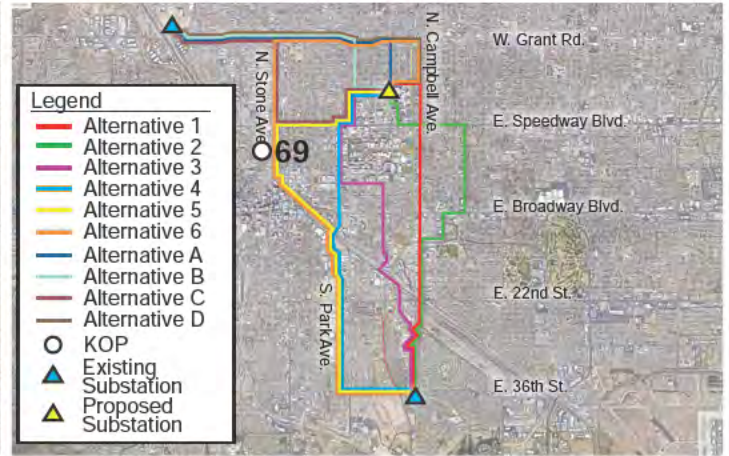
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 69

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: students and staff at Pima CC
- Location: 240 W Mabel
- Latitude: 32.238474° N; Longitude: 110.975384° W
- View Point Elevation at Eye Level: 2,370ft.
- Looking: east
- Poles Visible: Alternative 6 structures
- Image File Name: IMG\_4095.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 2:07pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 1,235 feet west of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #69



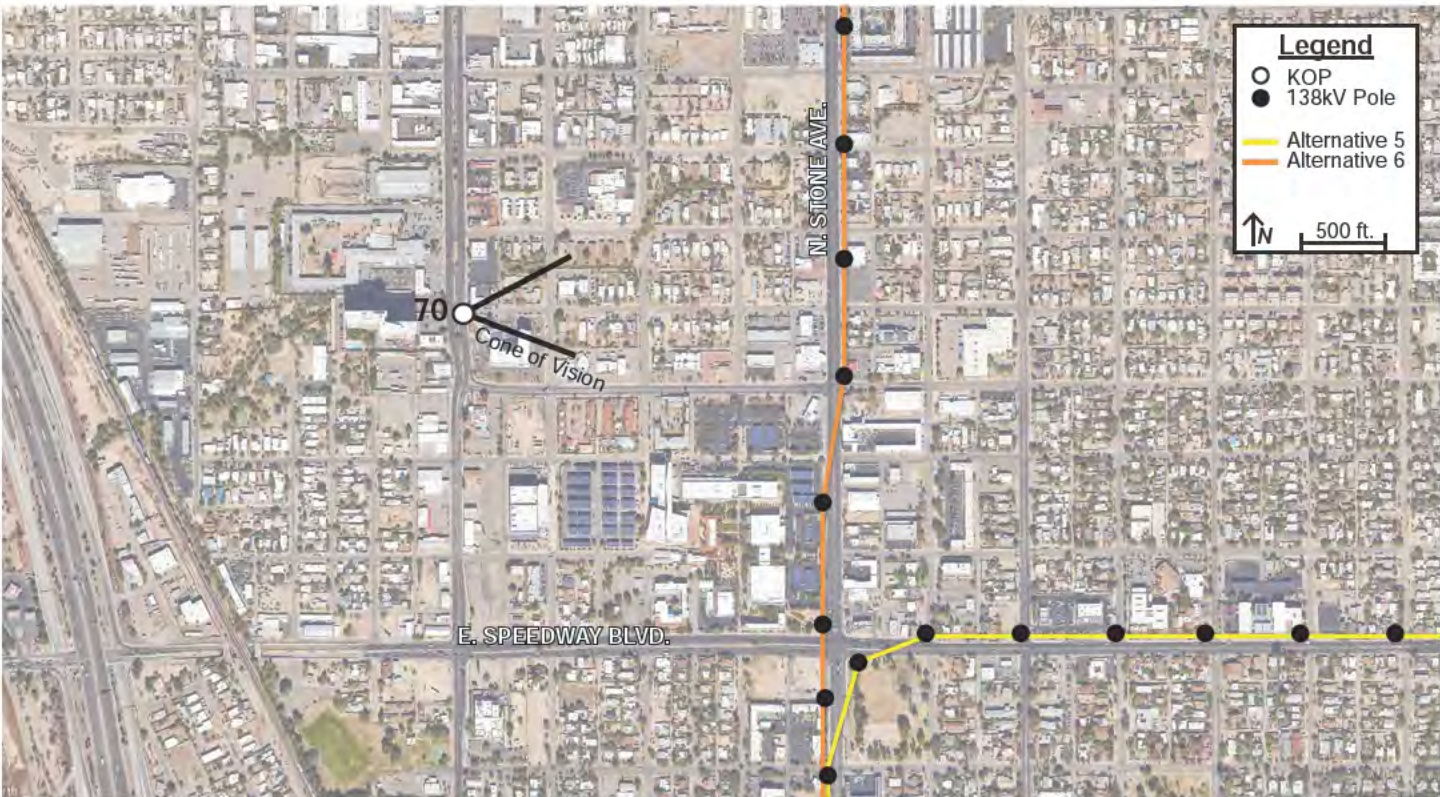
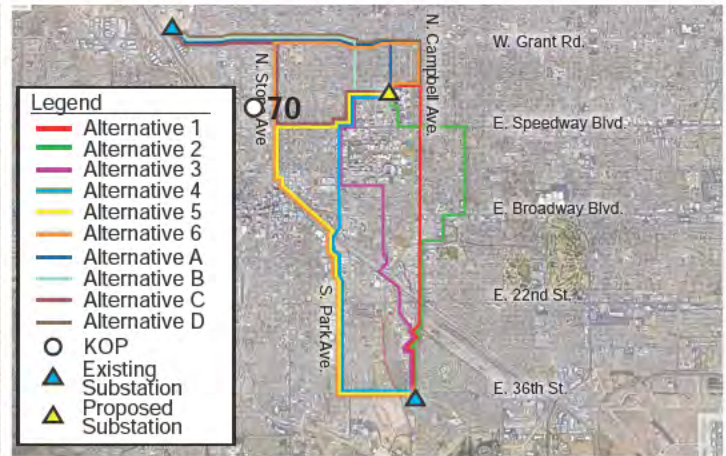
Current Condition



Simulated Condition

# Key Observation Point (KOP) # 70

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 35mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: residents and visitors
- Location: 1548 N Oracle
- Latitude: 32.240545° N; Longitude: 110.978353° W
- View Point Elevation at Eye Level: 2,363ft.
- Looking: east
- Poles Visible: Alternative 6 structures
- Image File Name: IMG\_4102.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 2:12pm
- The image is based on a single photo and represent approximately 54 degree horizontal field of view.
- This view is approximately 2,075 feet west of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

## Key Observation Point (KOP) #70



Current Condition

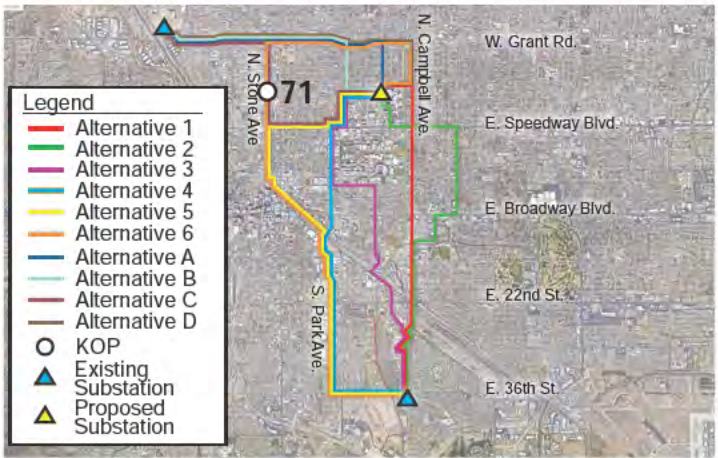


Simulated Condition



# Key Observation Point (KOP) # 71

[return to map](#)



## Notes:

### Camera Information

- Type: Canon EOS RP
- Sensor: CMOS (Full-Frame) 35.9mm x 24mm
- Lens: Canon RF 24-105mm f/4-7.1 IS STM
- Focal Length: 24mm | F-Stop: f/9 | ISO:100
- Dimensions in pixel: 6240 x 4160

### KOP

- Representative View for: commercial traffic
- Location: 1750 N. Stone Ave.
- Latitude: 32.243617° N; Longitude: 110.971994° W
- View Point Elevation at Eye Level: 2,375ft.
- Looking: north
- Poles Visible: Alternative 6 structures
- Image File Name: IMG\_4104.JPG

### Simulation Notes

- Photo Taken: March 4th, 2024 at 2:17pm
- The image is based on a single photo and represent approximately 73.7 degree horizontal field of view.
- This view is approximately 255 feet south of the nearest pole represented in the simulation.
- The simulation is based on the best information available and is preliminary. Final alignment and structure locations are subject to change based on final engineering and other factors.

[return to map](#)

## Key Observation Point (KOP) #71



Current Condition



Simulated Condition

[return to map](#)

## Key Observation Point (KOP) #71



Current Condition



Simulated Condition

Galvanized Finish  
Page 1521

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## Key Observation Point (KOP) #71



Current Condition



Simulated Condition

Sage Green Finish  
Page 1522

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-9**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-9.1**

#### **Neighborhood Listening Sessions Notes**

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# Blenman Elm Neighborhood Association

December 14, 2023

Blenman Elm Residents

*Hybrid Meeting*

## Attendees

### **Blenman Elm**

Randy Hotchkiss	Resident
Steve Kozachik	Ward 6 Council

Additionally, 39 residents, 1 Ward 6 staff, and 2 ASL translators were present.

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
--------------	-----------------------------------

## Notes

Clark shared a PowerPoint presentation detailing the project overview, project benefits, required approvals, planning and siting process, timeline, preliminary segments, evaluation criteria, project schedule, and how to comment.

## Questions/Comments from Attendees

1. Can you explain the ordinance regarding the COT gateway/scenic corridors?
  - Clark provided a brief description of ordinance.
  - Steve commented about a recent appeal by TEP regarding this ordinance.
2. Can you please explain impact to Blenman Elm? What about schools, how are they considered?
3. Why is underground not being considered still? Why not look for the funding? What is the cost?
  - Clark explained cost difference and provided the ACC policy statement regarding underground.
4. What about risks during natural disasters/wildfires with power lines? Isn't undergrounding better?
  - Clark provided information about distribution versus transmission lines.
5. What would be ideal if funding was not an issue?
  - Clark: There's better reliability with overhead and more cost effective.
6. If the project gets approved, would you consolidate power poles? Some areas in town are looking bad with so many poles. Sometimes poles seem like a safety concern for pedestrians.
7. How much space do these metal poles need? Would poles be metal? How far apart are the poles?
  - Clark: Yes, they will be metal. Spacing depends, you can see some examples on the 22<sup>nd</sup> and Alvernon area.
8. What is the likely path in our neighborhood?
  - Clark: We are still working on that.
9. Are you looking at the UofA campus? Is it true UofA is the biggest user in that area?
  - Clark: The UofA utilizes one and a half substations, this is a collective effort and not solely the use of the UofA. We all need reliable service.

10. Is it all or nothing? Can some areas go overhead and some underground?
  - Clark explained that was part of the Prop 412, which failed.
  - Steve commented about special exception option.
  - Clark reviewed the opportunity sites map and how sites are considered for potential routes; constraints with UofA campus, etc.
11. I voted in support of Prop 412. TEP should take responsibility and pay for undergrounding. It's a lot about profit.
12. How do other communities afford underground lines?
  - Randy explained Chandler as an example where Intel provided funds for that project.
  - Discussion led to the idea of maybe finding corporations to help pay for it in Tucson.
13. What permits are needed to go down County Club and Grant? There's no place for poles.
  - Clark: Country Club is not good from an engineering perspective, but Campbell is still viable.
14. From COT perspective, Campbell is scenic but not Tucson Blvd? Shouldn't we all focus on working for solutions?
  - Steve: It's legal definitions and ordinances, if the city makes an exemption for Campbell, TEP can use that in future projects in the city.
15. Can the Vine substation be located somewhere else?
  - Clark: The substation has to be in a central area for customers being served and a specific size. Other space is not available today. TEP recently checked again.
16. What will happen to the substations that could be retired?
  - Clark: TEP will clean them and most likely sell land.
17. One solution may be to paint poles transparent; it would be less trouble.
  - Clark: The team is open to new and creative ideas; we encourage you to share with us.
18. Or you can paint poles as saguaros.
19. Can you create a program for neighborhoods being impacted - perhaps utilize your Trees for Tucson program?
20. What happens if you lose appeal?
  - Response: We will comply and maybe just redo the 46kV, which will include many more lines.
21. Maybe underground from Broadway to Vine and back up and underground on Grant.
22. Can you redo Prop 412? Do you not have a current franchise agreement?
  - Steve: Prop 412 was not a franchise agreement issue.
  - Clark: The franchise agreement expires in 2026 and will go to voters before it expires.
23. Where does TEP purchase the poles from?
  - Clark: I'm not certain of where exactly, but poles are fabricated in the U.S.
24. Clark closed with thanking everyone and let them know that another open house will take place in February.
25. Please avoid ACC hearing for the month of July, no one is in town and it's too hot.
  - Clark: That is what the ACC committee offered. It has been scheduled with a two-week duration.

# Broadmoor-Broadway Village Neighborhood

September 20, 2023

Broadmoor-Broadway Residents

*Meeting at 900 S Randolph Way, Tucson AZ 85716 – 6:30pm*

## Attendees

### ***Broadmoor-Broadway***

Steve Kozachik	Vice Mayor, Ward 6 Council
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Additionally, 33 residents were present.

### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Joe Barrios	Media Relations & Regulatory Communications

## Notes

Steve began the meeting and provided an overview of Kino to DMP, including the scenic corridor requirement to underground and Special Exception Land Use appeal process. He encouraged the group to attend the Board of Adjustments meeting in October. Clark then reviewed the PowerPoint presentation and project video. He stated that TEP is starting completely fresh, that this project is desperately needed, and that TEP will be looking at old and new route options.

## Questions/Comments from Attendees

1. If undergrounding is prohibited, what are the alternatives? What are the costs?
  - Response: Undergrounding transmission costs 10-20 times more than installing overhead lines. It's also more costly to maintain underground lines. It was going to cost an additional \$90 million to underground a short segment of Kino to DMP.
2. Who pays? Will TEP pay to underground?
  - Response: Ratepayers pay for poles, wires, and employee salaries. Our bills are based on those costs. The more we spend, the higher the rates. There's a lot of balancing involved.
3. Would these lines give us the way for zero carbon?
  - Response: Lines allow us to interconnect to the grid. We're transitioning to larger renewable energy portfolio.
4. Will substations hum? Are there health issues involved?
  - Response: The fans that help with cooling make noise. We now add block walls to our substations which help with noise.
5. Are there more effective solutions? Alternative models?
  - Response: We can underground distribution in certain situations, like when a developer pays. Some dense cities (like NYC) have a limited amount of underground.
6. Can transmission line corridors be used for greenways? Are other cities doing this?

- Response: Yes. Done in a lot of cities. Multi use paths. We are open to working with the community on this.
7. Is the proposal for the transmission line to come up Country Club or Tucson Blvd and continue north? Will we be using Treat Ave?
    - Response: There are no routes. We try to focus on major roads before looking at residential streets.
  8. What are the EMF levels from 100 ft away from the line?
    - Response: Directed to fact sheet on website.
  9. Does science back EMF claims?
    - Response: It has been studied for decades. The strength of fields from most lines are comparable to things you find in your homes.
  10. What does it look like?
    - Response: Clark reviewed slide. Comparable to poles on 22nd, east of Alvernon.
  11. What are you basing your decision on?
    - Response: We follow state statues. We look at environmental and land use factors, impact on sensitive receptors, and what the community says. The survey can also guide us once we have our route(s).
  12. Can you move it further east?
    - Response: We have to connect to the Vine Substation, so moving it further east makes for a longer line, which would require us to go through more neighborhoods.
  13. Is the location for Vine Substation fixed?
    - Response: We were challenged in finding this location. It's near the load center. The property is under 2 acres (normally 5-10 acres).
  14. What changed with Campbell?
    - Response: The scenic corridor ordinance.
  15. What are the scenic and gateway corridors?
    - Response: Campbell, Alvernon, and more. They're listed on the city website.
  16. Would we replace poles? Or add to them?
    - Response: If the poles are capable and engineered to hold the new lines, we can use them.
  17. Is there a cost difference in quality of above ground?
    - Response: Visual effects are one of the factors we look at.
  18. Can you explain the city ordinance?
    - Response: There's a question whether the ordinance applies to a new line or if it applies to existing facilities. There's also a question of city or state jurisdiction.
  19. The Vine Substation is close to Banner. Is this project to help out UofA and Banner? Can they provide underground funding?
    - Response: They've grown, as have residents. You could ask them.
  20. Is there any undergrounding in Tucson?
    - Response: No, just OV sub-transmission.
  21. Can you explain the vote that went down?
    - Response: Prop 412 would have paid to underground a portion of the line along Campbell. It failed, so that funding is not available. This brings us back to whether we can build down Campbell. That's why we've taken a step back and are starting fresh.
  22. You say this will set a precedent. TEP is only concerned about its profits. Don't be dismissive of EMF.

23. Poles are an eye sore. I'm concerned that'll happen in midtown.
24. Why would Country Club be better than Campbell? It's a straight shot.
25. There should be a spread of cost. TEP has to absorb some of those costs.
26. Campbell is a major corridor and is a direct line. I don't understand why you're not going down Campbell.
27. I don't think people realize we already have these poles. We may be sitting in the dark one day. The Sam Hughes sign is misleading. We need power. What's the alternative? TEP has to get the word out.
28. Underground lines don't get blown over. Storms will get windier and worse. It feels as though TEP is saying we can't do it.
  - Response: This is one of drivers to make the system more resilient, through redundancy.

# Downtown Neighborhoods and Residents Council

February 5, 2024

Council Members

## Attendees

### ***Downtown Neighborhoods and Residents Council***

David Bachmann-Williams	DNARC Chair, Armory Park
Kristina Scholz	Bronx Park
Andy	Iron Horse
Ron	El Encanto

Additionally, 1 visitor was present.

### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Clark shared the project video and a PowerPoint presentation detailing the project overview.

## Questions/Comments from Attendees

1. Did I hear that you will retire 7 substations?
2. What is the difference between distribution and transmission?
3. Kristina shared the idea of adding art on the "big" poles located in corners to avoid graffiti.
4. Kristina: What if the project hadn't been delayed?
  - Response: Formerly known as Kino to DMP.
5. Ron: Can you expand on how this project will help out on the number of poles?
6. How many transmission poles will be needed for the MRP?
  - Response: Depends on route.
7. What is the height of the pole?
  - Response: 75 feet.
8. David: If project approved, when will it take place?
  - Response: Before summer of 2027.
9. Kristina: Regarding historic Miracle Mile, why is it an option on the current segment map?
10. Ron: Different routes? Are some more costly than others? Is the being considered and how? Use existing ROWs.
11. Kristina: On the south side of Grant, there are little path areas, how did that happen? Would this project do that too?
  - Response: Probably part of the city's public improvement project, you should explore this.
12. David: The video included "will allow for more rooftop solar", can you expand?
13. Kristina: Will you provide translation, snacks, or childcare at your upcoming open house?

# El Presidio Neighborhood Association

March 19, 2024

El Presidio Residents

*Meeting at 166 W Alameda St, Tucson AZ 85701 – 5:00pm*

## Attendees

### **El Presidio**

Guy Dobbins	Resident
Larry Lucero	Activate El Presidio
Nicholas McCullough	Special Staff Assistant, Pima County District 5
Antonio Ramirez	Community Relations Manager, Ward 1
Nathalia Untiveros	Deputy Director, Southern Arizona Office

Additionally, 12 residents and 2 Tucson Police Department representatives were present.

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Guy began the meeting and introduced TEP's project, noting that El Presidio is not in the project study area, but adjacent to it. Clark explained how this is an important project for TEP and how these upgrades are critical for the midtown area. The infrastructure serving the area today is aging and TEP is looking to upgrade its 46kV system to 138kV, as well as its current distribution system. Use has changed with many new homes and businesses, in addition to solar and EVs. 8 substations and about 19 miles of sub-transmission will be retired as part of the project. The proposed Vine substation will be built on a much smaller parcel, 2 acres versus the standard 8 to 10 acres, requiring GIS. The proposed substation will be low profile; no one will see anything behind the fence. The project will create a looped system providing greater reliability to serve power from different directions in the event of an outage. Though transmission poles are larger at the base, our existing 46kV poles are built to the same standard or height. There will be greater spans between poles with no telecommunication wires, as they will be placed underground. As a result, TEP will be reducing a lot of overhead clutter.

## Questions/Comments from Attendees

1. Guy asked Clark to explain the map.
  - Clark explained there are 10 route alternatives, 6 between Vine and Kino, and 4 between DMP and Vine. TEP will not select the route. We'll put together an application, identify a preferred route, present the body of research, and the ACC will decide. The hearing will take place in July. We're looking for public feedback on these alternatives.
2. Guy: What's the likelihood routes 5 or 6 will be selected?

- Clark: 1/3 (laughter). TEP is looking into environmental, cost, and other factors. Routes 5 and 6 are longer, which equals greater costs. But in some ways, those routes go through fewer residential areas and historic designated areas. There's a lot to consider.
3. How long will it take to build?
    - Response: The line and substation will be built by 2027, retirements will take about 10 years.
  4. Will there be road closures?
    - Response: Building the line is pretty quick. We drill holes, set the poles, and hang facilities. Lane closures would be for a short duration, it may be days.
  5. Antonio: What'll happen to the retired substations?
    - Response: We'll remove and clean the sites and sell them. They aren't huge sites, about half an acre each.
  6. Guy: With the prior iteration (Kino to DMP) of this project, there was concern about historic neighborhoods. You've had consistent requests to underground. What's the status?
    - Response: We did look into that thoroughly. TEP and the COT explored a franchise agreement to use as a funding mechanism, which failed. The ACC has told us undergrounding transmission lines is not a prudent expenditure for safety or reliability reasons. Undergrounding would have a substantial impact on rates. We won't place them underground unless there is a funding mechanism.
  7. Clark closed by mentioning the project website and inviting comments via email.



# Iron Horse Neighborhood Association

October 19, 2023

Iron Horse Residents

*Meeting at 503 E 9<sup>th</sup> St, Tucson AZ 85705 – 6:30pm*

## Attendees

### **Iron Horse**

Hannah Vogan-D'Arezzo	Resident
Adelita Grijalva	Pima County Supervisor, District 5

Additionally, 14 residents were present.

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Joe Barrios	Media Relations & Regulatory Communications
Teresa Bravo	Government Relations Representative

## Notes

Clark showed the project video, the interactive map, and reviewed the presentation detailing the project overview and components, next steps, the Vine substation, visual simulations, transmission line specs, pole comparison, distribution system upgrades, retirement of aging assets, required approvals, the project schedule, planning and siting process and timeline, opportunities, and constraints.

## Questions/Comments from Attendees

1. Is it an above-ground project?
  - Response: Yes, it is. Clark referenced that Prop 412 failed and explained the cost comparison of \$2 million (above-ground) versus \$20 million (underground) per mile. The ACC also came out with a policy regarding utilities.
2. Do you have the route yet?
  - Response: No, we are starting out fresh. No routes have been determined yet.
3. What is the relationship between TEP and ACC?
  - Response: ACC regulates TEP.
4. Can you give us independent sources or cost of underground costs? Is there an independent source to verify this information?
  - Response: Clark can provide study from previous Kino to DMP efforts and or you can check for studies done in California. A big expense is the cable.
5. Why are you here? Is this going for a vote?
  - Response: We are in a line siting process. Will make application to the state, etc. and we will have a public hearing with the ACC. The public can also provide comments at that time. We are looking for your feedback and input.

6. Suggestion: Please consider where you put the line, take into consideration the impact in communities and neighborhoods. Particularly historic areas and low-income areas and neighborhoods. Hear all the voices, especially low economic areas.
7. Why is crossing the UofA campus not in your map is it not a consideration?
  - Response: The UofA campus presents a challenge, it's more difficult because it is very dense area. Clark reviewed opportunities and constraints map.
8. There is no agreement to avoid the UofA, correct?
  - Response: No, there is no agreement with anyone. We have a Board of Adjustment appeal next week, pending decision.
9. If the city ordinance or Board of Adjustment prevents - what options do you have?
  - Response: Further appeal if denied, we'll be going through the legal system.
10. Is that why you got eliminated - historical ordinance? What is historic being defined?
  - Response: Not possible to avoid but will do everything in our power to minimize impact.
11. You already have Kino? What if you do not connect the 2?
12. What is the timeline?
  - Response: The line siting will be completed by Q2 of next year, tentative date in July 2024. The line itself will be completed by 2037.

# Jefferson Park Neighborhood Association

November 15, 2023

Jefferson Park Residents

*Hybrid Meeting*

## Attendees

### *Jefferson Park*

C.J. Boyd	Council Aide, Ward 3
Colleen Nichols	Resident

Additionally, 12 residents and 2 UofA representatives were present.

### *TEP*

Clark Bryner	Manager, Transmission Line Siting
Brian Pugh	T&D Supervisor
Joe Barrios	Media Relations & Regulatory Communications
Teresa Bravo	Government Relations Representative

## Notes

Clark shared the project presentation detailing the Vine substation simulations, distribution system upgrades, retirement of aging facilities, required approvals, project schedule, planning and siting process, and next steps. Preliminary segments (segments that are constructable) have been posted to the project website and we're seeking comments.

## Questions/Comments from Attendees

1. The Neighborhood Advisory Group looked at other areas where lines could be located, our understanding was that TEP was going to look at the possibility of rerouting, so we avoid residential areas.
  - Response: There were three sites identified as part of that process.
2. Why are we here? We don't feel like we have a say. You've already made up your mind.
3. Once the UofA puts their own power on the University, you won't have as big of a load.
4. Please be creative problem solvers.
5. What do you do with the input from neighborhoods?
  - Response: If it's actionable, we take it into consideration. We have a list of criteria we use for evaluation purposes. Clark will email list of criteria to Colleen (sent 11/17/2023). Public comments are also included as part of the official public record and considered by the LSC and ACC.
6. You know that no other neighborhood will be as affected as ours if you continue with the current substation site? I want to know what you've done to look at other properties. At the University and the Hospital?

- Response: We began to look at locations in 2019. The load center is in the neighborhood. Want to be able to put the substation in the load center. We looked at 10 different properties and looked at different criteria. We looked at the size of the parcel. That was the only location that was available; we had a willing seller. All the others were too difficult and would have required demolition. We had an extensive set of criteria. We met with the UofA to see if they had additional properties. There was one on Adams and Park that might have been available, but it's just another neighborhood. The others are a no or too far away.
7. What about the Catalina Theater?
    - Response: It's owned by Banner. Our engineers said it's further than they'd like it to be. Clark will check with DP&E about the feasibility of using that site for the substation.
  8. There's a property behind Frys. Why is there an X around the UofA?
    - Response: We looked at Frys, it's too far away from the load center. We put the X there because they have a lot of development.
  9. Location on Grant (phases 5 and 6?), parcel wasn't big enough?
    - Response: We have to stay close to the load center. TEP will be meeting with COT staff.
  10. Couldn't you build it in a more industrial area, and build underground 46kV?
    - Response: Technically that's feasible, now you're adding a new substation and line, and you won't get the benefits of this project.
  11. If this is mainly for the UofA, why don't they give up a parcel?
    - Response: The majority of this neighborhood is served by the Winnie substation. It's one of the eight 46kV substations. It does not serve the UofA, and it's at capacity, which includes this neighborhood. One of the transformers was installed in 1965 and it's been serving this area since then. One and a half substations serve the UofA. The other six and a half substations in the area do not.
  12. TEP needs an exception from the City Council to come down Campbell?
    - Colleen: The Board of Adjustments ruled TEP has to abide by the ruling.
    - Clark: We still have segments down Campbell.
  13. Do you have the pictures of the segments?
    - Response: You can look at the TEP webpage for the preliminary segments. We met with the advisory group on them last week.
  14. Will you tell us the radius that a substation can be built outside of the load center?
    - Response: Our engineers will be there tomorrow, and we will follow up.

# Miles Neighborhood

October 18, 2023

## Miles Residents

*Meeting at 1400 E Broadway Blvd, Tucson AZ 85719 – 6:00pm*

### Attendees

#### **Miles**

Greg Clark	Resident
Lupita Robles	Chief of Staff, Ward 5

Additionally, 16 residents were present.

#### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

### Notes

Clark showed the project video and reviewed the presentation detailing the project overview and components, opportunities, constraints, and next steps.

### Questions/Comments from Attendees

1. Other utilities are undergrounding lines because of fire risk.
  - Response: Most are distribution lines and in natural environments (not urban). Arizona has very little underground transmission, all that were paid for by the requestor.
2. Why are you saying you're starting over if you have the Board of Adjustments appeal next week? Will you still go through with Campbell if you prevail?
  - Response: We aren't sure of the outcome, and we haven't made a decision on what we'd do if we prevail.
3. How long would it be before we see the benefits of the project if there are no delays?
  - Response: About 10 years.
4. Your plan is to go down Campbell?
  - Response: We're back to the drawing board. We have some issues we have to work out with the City on Campbell.
5. I don't trust you or what I've been told. I've been told different information. First we weren't going to be impacted, then we got a newsletter that we were going to be impacted. We aren't as important as Sam Hughes. They have a means of getting to you and the city, we don't.
  - Response: We're sorry you feel that way. Hopefully we can earn back your trust. There will be neighborhood impacts. We prefer to use a major road. Kino and Campbell make a lot of sense.
6. How does renewable energy fit into the project?

- Response: Excess energy has to go back on the grid. We need capacity to get that back on. It takes a lot of space to serve the needs of the city. We're investing in solar panels as we have a major wind farm. That all comes into the city through the transmission system.
7. DG reduces need for larger infrastructure. You have to bring less in.
    - Response: True, but when those are not generating, you still need the grid whether or not the sun is shining, and wind is blowing.
  8. Why is everything so aged? Part of our bill is to pay for that, right?
    - Response: Everything has a life cycle. We try to optimize when we make replacements.
  9. Based on this graphic (neighborhood handout), where are the UofA and Banner served from? Why are they gray?
    - Response: UofA Main in the heart of campus primarily serves that area.
  10. What are the barriers to building an underground system?
    - Response: One of the biggest barriers is cost. We're regulated by the ACC, and they get a say on prudent expenditures. They've established a policy that if not for reliability or safety, undergrounding is not a prudent expense (aesthetic reasons are not prudent). This is a historic area and there are almost definitely underground conflicts. Maintenance is also a factor.
  11. One of the reasons coming through Miles was use existing poles, would the old lines be replaced with the new ones?
    - Response: If it went there, we can't retire the 46kV until we have the 138kV. In some cases, we can use existing structures. We would just add insulators and new conductors (wires). Visually, it would look the same as it does today. We would underground distribution.
  12. Are there no current lines going down Campbell?
    - Response: Correct, some distribution.
  13. Why do they (poles) have to be higher?
    - Response: We can bring them down but would need to increase the number of poles. We can't bring them down to the height of distribution though. We have different clearance standards for different voltages. (Clark reviewed survey results regarding height preferences).
  14. Will you construct new distribution? Last time, we were under the impression it would be new lines.
    - Response: If we were to go where the 46kV is, you wouldn't have a new line. We would take that down.
  15. Have they ever addressed the health problems of living near these lines?
    - Response: There are concerns. We are surrounded by EMF. Most households have more EMF than a transmission line, especially with distance and barriers.
  16. Is there a cost difference for shorter/more poles?
    - Response: Yes, it'll cost us more.
  17. What's the benefit of building a new route down Kino versus using an existing line?
    - Response: There are less obstacles, but that's not a reason not to go there.
  18. What was the problem with using Kino?
    - Response: The city's scenic gateway ordinance.
  19. If we're going to have an eye sore, can we have the benefit of having lower rates?
    - Response: Most of our customers live within close proximity to a transmission line.
  20. We're on Kino, this affects us too.
  21. The city only cared about the scenic gateway ordinance when they got pressure. The underground coalition only cares about Campbell.

Action Items

- Number of comments received under Kino to DMP.
- Percentage difference to have shorter/more poles.

# North University Neighborhood Association

October 11, 2023

North University Residents

*Meeting at 1510 E Grant Rd, Tucson AZ 85719 – 6:00pm*

## Attendees

### **North University**

Mike Attwood	Resident
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Additionally, 2 residents were present.

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Joe Barrios	Media Relations & Regulatory Communications

## Notes

Clark showed the project video, interactive map, and shared a PowerPoint presentation detailing the project overview and components, the Vine substation, visual simulations, transmission line specifications, pole comparison, distribution system upgrades, retirement of aging assets, required approvals, the project schedule, planning and siting process, the timeline, opportunities, and constraints.

## Questions/Comments from Attendees

1. Is the decision not to underground only driven by cost?
  - Response: It is a main driver.
2. Don't you already have lines underground?
  - Response: Not transmission, only distribution. ACC has developed a policy discouraging undergrounding and passing those costs to rate payers.
3. What percentage of underground do you have among Fortis companies?
  - Response: For Arizona, APS and SRP only have a few miles each, all which the developers paid the differential. Some dense cities, like NYC, have it.
4. Where will the transmission lines go?
  - Response: We don't have a route yet. We have an interactive map on the project webpage.
5. What is a rolling blackout?
  - Response: We'd have to pick and choose customers to have in power, and then rotate areas so that not everyone is out of power at the same time due to limited capacity.
6. Why doesn't the route go down Campbell, a major street, and not neighborhoods?
  - Response: We don't currently have a route. We want to use major streets and areas of disturbance.
7. Do you think the Board of Adjustments will go in your favor?



- Response: We don't know. If we are forced to put it underground, you won't hear any complaints from us. If the route went down Campbell, you wouldn't hear any complaints from us either.
8. Do you see any new inventions that'll make things different? Are there innovative ways of transmitting electricity?
    - Response: We get asked, “why we don't build the Vine substation somewhere else?” But we have to build it close to the people who need it the most. So, transmitting the electrons would be that much less efficient. Regarding innovation, part of the answer is yes. We're at the mercy of the market in a lot of ways. We have a program where we have control over use (thermostats), and it's been very helpful with reducing demand. There are opportunities for innovation, and we are always looking for that. We just purchased a battery that wasn't available 5 years ago.
  9. Are there other substation sites?
    - Response: We were not able to find any but are open to options if there are ideas. We spoke to the UofA about additional sites.
  10. Prefer underground.
  11. I get that people who benefit from it should have to pay for it (underground). I'd be willing to pay. I don't think it's a big deal.
  12. I know it's old, and I appreciate the upgrades, as long as they go down major streets.
  13. One of our main concerns is having the lines go through little neighborhoods like ours. In the past, the route went through our neighborhood, not through Jefferson Park.
  14. It's been hard to engage residents, there are a lot of renters and students in our neighborhood.
  15. We'd prefer to see it go down Campbell. Park would be preferred over Mountain. Mountain is more pedestrian and bike friendly. If it came down to one, Park would be a better option.
  16. The theater is being sold soon (Campbell and Grant) and could be used as a substation site.
    - Response: We looked into that, but it's too far from the need.
  17. We'd like to have you back once you have routes. This has been a very good meeting.
  18. Mike is unable to make it to the NAG but recommended Aaron. Clark sent an email on October 12 to request Aaron's contact information.

# Palo Verde Neighborhood Association

October 9, 2023

Palo Verde Residents

*Meeting via Zoom – 6:00pm*

## Attendees

### ***Palo Verde***

Paula Chronister	Resident
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Additionally, 4 residents were present.

### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

TEP began the meeting and shared a PowerPoint presentation detailing the project overview and components, transmission line specifications, the survey, Kino to DMP visual simulations of undergrounding, required approvals, the project schedule, opportunities, constraints, and the next steps.

## Questions/Comments from Attendees

1. Will the telecom be undergrounded?
  - Response: We have to work with the telecommunications companies. It's possible through joint use trenches and/or agreements.
2. Do we avoid trees with new lines?
  - Response: We try to avoid them as much as we can, though it's not always a possibility.
3. Regarding the routes, will we look at alleys or major roadways?
  - Clark reviewed the opportunities/constraints slide.
4. Isn't there also a Board of Adjustments meeting on October 25?
  - Response: Our preferred route for Kino to DMP was down Campbell. But because it's on a scenic corridor, pulled our application. We're appealing the Zoning Examiner's decision that the ordinance applies to us. It's related but separate from this project.
5. You mentioned some of the physical constraints, what are the financial constraints?
  - Response: We try to be prudent with the expenditures we make (whether maintenance or infrastructure). From a financial standpoint, if we build this project, it'll cost us roughly the same amount as replacing the current system. It's more prudent to invest in an improved system. The project provides us three times as much reliability for the same cost. We make investments and then ask to recover costs. We won't know until down the road if this project will be recovered in rates. There are things coming off our books too, so the project may not increase bills. Regarding underground, that costs \$20 million per mile, as opposed to aboveground that's about \$2

million. The Commission has recently established a policy that discourages undergrounding unless necessary.

6. Will the poles have a concrete base?
  - Response: Sometimes, it depends on the poles. Some are directly imbedded, make a hole and drop in a pole. But coming to a turn (at an intersection) that comes with a concrete base usually a couple feet off the ground and is bolted. Until we have a route, we can't say where that'll be.
7. Are you looking at alleys with poles already running through them?
  - Response: Yes. Near Vine Substation, there's an alley with an existing 46kV line. In those cases, we would look at alleys, but not as likely where we don't have existing infrastructure.
8. What's the diameter at the base of the pole?
  - Response: It depends, it's usually 2 feet at the base. There are options we can look into to bring down the height and diameter, but there could be impacts on the rates.
9. Campbell has constraints. Can you talk about those constraints?
  - Response: It's a gateway corridor. It's listed as both an opportunity and constraint.
10. Paula will serve on the NAG.
11. Clean up looks nice (visual simulations). It actually looks better than what's there now. It might be useful to include some of the other NAs in your emails.
12. I didn't realize the cost difference between underground and above ground.
13. I want to commend you all, you're all doing a wonderful job.

### Action Items

- Clark to share PowerPoint presentation with the NA. (Sent to Teresa on October 9<sup>th</sup> to send to neighborhood).

# Pie Allen Neighborhood Association

March 6, 2024

Pie Allen Residents

## Attendees

### ***Pie Allen***

Diana Amado	Chief of Staff, Ward 6
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Additionally, 10 residents were present.

### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
Joe Barrios	Media Relations & Regulatory Communications
Teresa Bravo	Government Relations Representative

## Notes

Clark provided a brief overview of the project and opened up the meeting for feedback and questions.

## Questions/Comments from Attendees

1. How many new poles? How far apart? Are they really 110 ft tall?
2. Why is TEP using residential streets/neighborhoods for alternative routes?
3. Is the transmission line going underground?
4. How long will the project take?
5. Have you canvased residents on 7<sup>th</sup> Street? If they are vocal and oppose this route, does it matter?
6. Why 7<sup>th</sup> Street and not 6<sup>th</sup> Street? Can you move it to 6<sup>th</sup> Street? What is so difficult about 6<sup>th</sup> Street? Where's the Park Avenue option?
7. How is TEP engaging with the different neighborhood associations?
8. Canvas neighborhoods within the alternative routes if neighborhoods are going to be impacted.
9. Just make it a "democratic process" put all NAs in a bowl and pull paper out for alternative routes.
10. Which side of 7<sup>th</sup> Street is being considered currently?
  - Response: the south side.
11. How are sidewalks going to be impacted?
12. Is there any leaning toward the red or purple routes?
13. I'm not satisfied with answer on 6<sup>th</sup> Street that there's not enough space. Can you provide more info?
14. Many of the active neighbors in the Pie Allen NA live on 7<sup>th</sup> Street.

# Pueblo Gardens Neighborhood Association

February 20, 2024

Pueblo Gardens Residents

## Attendees

### ***Pueblo Gardens***

Lupita Robles	Chief of Staff, Ward 5
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Additionally, 15 residents and 7 UofA representatives were present.

### ***TEP***

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting

## Notes

Clark shared the project overview, the benefits of a looped 138kV system and upgraded 14kV system, reviewed preliminary segments (routes down Campbell, 36<sup>th</sup>, and Martin), and encouraged attendance at the next public meeting and hearing.

## Questions/Comments from Attendees

1. So, you're going to raise the rates and do it anyway?
  - Response: If we replace the current equipment with 46kV improvements, it'll cost us the same amount of money it would to replace with 138kV.
2. Are you going to go underground?
  - Response: No, overhead. The ACC authorizes what we're able to expend and they've said it's not a prudent expenditure. It costs 10 times more.
3. We can't get through our alley. Are you going to move?
  - Response: That would be distribution. Yes, we'll be replacing poles and will continue to do that. It'll take about 10 years.
4. Will this raise our electric bills?
  - Response: Not necessarily. The whole TEP customer base will pay for it.
5. Who can we go to if a streetlight is out?
  - Response: Teresa Bravo.
6. Clark mentioned that Campbell did not look ideal and mentioned the wash side of Martin as a possible route.
  - Thumbs up from resident.
7. Will you be going over people's property? Where will it go?
  - Response: If things are working properly, breaking shouldn't be a problem. We expect to put everything in road ROWs and not go through backyards.
8. Where will the meeting in March be?
  - Response: At the Doubletree Reid Park.

# Sam Hughes Neighborhood Association

November 21, 2023

Sam Hughes Residents

*Hybrid Meeting*

## Attendees

### **Sam Hughes**

Gayle Hartmann	Resident
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Additionally, 15 residents were present.

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
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## Notes

Clark shared the Sam Hughes NA handout detailing the substations serving the area, planning and siting process, and project overview map. Clark explained that this area is served by 8 substations, that will be replaced with one.

## Questions/Comments from Attendees

1. What is the legal process? Who makes the decision? How are they made?
  - Response: Anything over 115kV is under the jurisdiction of the ACC and they appoint the Line Siting Committee. We plan to submit our CEC application in May. Hearings before the LSC will happen in July (tentatively July 8-18). There is the opportunity to intervene. The LSC will make a recommendation, ultimately the ACC decides (August/September 2024).
2. What about property values?
  - Response: There have been many studies, generally the further we are from houses, number goes down significantly. The best place is within existing ROWs. There's never been a study on any aesthetic features.
3. You have this plan of various streets you're considering. At some point you'll come to a decision on routes. When will you make that decision?
  - Response: We just shared preliminary segments, which are available on our website. We'll now go through an evaluation assessment. Once we go through that, we'll see what's compatible. January/February is phase 3, February/March is phase 4.
4. Because Country Club is being considered, has TEP given up Campbell Avenue?
  - Response: Kino to DMP is scraped and we're starting fresh. Campbell is identified as an opportunity and a constraint. Country Club is an opportunity because it's a road, but a constraint because it's very narrow.
5. Would you please send us those studies (property values)?
  - Clark to follow up.
6. I'm confused as to why this has to happen here.

- Response: Clark will be creating a handout to show similar facilities. They do exist throughout communities throughout the country.
7. We have a lot of washes, what would be wrong with building the transmission lines in the washes?
    - Response: One of our opportunities are the natural linear features, like washes.
  8. I've been told TEP won't underground anything. We've been told for transmission lines, that it's not a prudent expenditure.
  9. You said you're not opposed to undergrounding, but you don't have a way to pay for it. The voters have said they aren't willing to pay for it and the commission said they won't allow you. We could go to the ACC.
    - Response: Another mechanism is to form a district. Transmission throughout the country is mostly above ground.
  10. We've already beaten you twice. We're ready to beat you at Supreme Court. When will that be?
  11. I would like to argue that this is not just to a particular neighborhood that these poles would be located. It's through the city and people make special trips here. To put these poles through the main part of our historical community, the whole look of the University, it's erroneous to say that only their neighborhood would benefit. It's an issue for the whole city. We need to be careful where we place these poles.
  12. Markets control property values. Seems like we have to go to the ACC.

# South Park Neighborhood Association

September 11, 2023

South Park Residents

*Meeting at 1575 E 36<sup>th</sup> St, Tucson AZ 85713 – 6:00pm*

## Attendees

### **South Park**

Mary Kuchar	Council Aide, Ward 5
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Additionally, 9 residents were present.

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Clark shared a PowerPoint presentation detailing the project components, showed the project video, and reviewed the South Park NA-specific handout.

## Questions/Comments from Attendees

1. Is the Kino Substation working? There are a lot of outages in Las Vistas and Pueblo Gardens, will that be corrected?
  - Response: The transmission system has been upgraded, but we still have to upgrade the 4kV distribution system to 13.8kV to see the benefits. It's going to take a while.
2. Are we closing 4 substations as a result of Kino Substation?
  - Response: We'll be able to retire 8 substations in total, 2 served off of Kino Sub.
3. What are the tall white poles at the Kino Substation?
  - Response: Lightening protection.
4. Do transmission lines have less capacity if they get really hot?
  - Response: It's something we look at when we build our lines, we ensure there's extra capacity. We design them so they have more capacity on the line than we'll ever need. The poles are taller so we can account for the sag (caused by the heat).
5. Was the study area expanded? It seems larger.
  - Response: It is a little larger in some areas. On the south, we shortened it to just south of 36<sup>th</sup>. On the east we expanded to Country Club.
6. What kind of timeframe are we looking at?
  - Response: Over the next 9-10 months we'll be focusing on the routing activities. We plan on having multiple meetings as we go through the process. (Clark reviewed the Project Schedule slide).
7. The upgrade of distribution system, will it continue aside from this project?



- Response: Yes, those will continue forward. The 4kV distribution system is dependent on the project.
8. Do the plans for the project include the growth of the Bridges?
    - Response: Yes, that was one of the drivers for the Kino Substation as we didn't have the capacity to serve the development. We'll have three times the capacity we had before.
  9. How many public meetings are you planning to have?
    - Response: We're planning 4 public meetings. One coming up in two weeks at the DoubleTree Reid Park, and another one in November. The first meeting will focus on the need for the project. In November, we'll start getting feedback on routes and develop criteria we can use to evaluate routes.
  10. Are you still planning to have three proposed routes?
    - Response: We don't have a predefined number. If there are routes that are compatible that are similar in cost and impacts, we'll bring them forward to be considered.
  11. In years past, did you encounter difficulties with continued growth? Has it gotten more complex?
    - Response: We've had to go through the same approval process since the 70s. The applications used to be about 5 pages long, now they're a couple thousand. There's a lot of work that goes into each application. Communities are more heavily involved. This line would have been in service by now, but it's taking us longer than usual to get it approved. We have to do something about this aging infrastructure.
  12. How does Climate Change affect things? What is the capacity of these poles? How much wind can they handle?
    - Response: Our poles are designed to withstand about 150 MPH wind (we will confirm). In Clark's 10-year history with the company, he's never seen us lose a steel transmission pole. The lifespan is about 65 years.
  13. There have been reports of vandalism at substations across the country.
    - Response: Sabotage is a huge concern for all electric utilities. We have a lot of things built into our newer substations to discourage and make it harder for someone to harm them.
  14. When is the public open house?
    - Response: Thursday, September 21<sup>st</sup>. The presentation will be shown at 6:15 and 7:15pm.
  15. Most transformers are produced in China/overseas. Is that the case with us? Are we expecting supply chain issues?
    - Response: Transformers have not been an issue; they are built in California. We don't source any of our equipment from China. Because we're critical infrastructure, we can't source from China or any other adversary. Wires can be an issue.
  16. Old and poor condition sounds like an open criticism. Will the transformers break down?
    - Response: The transformers are oil-filled with copper windings with insulation, and over time they get moisture in them. The concern is more of an internal fault which is more of a reliability issue than a hazard. They typically just stop working. We can use mobile substations to pick up the demand, but it takes us a while to get them connected which means longer outages. Our new system provides redundancy to transfer power.
  17. It must be hard to tell what needs to be done.
    - Response: We do a lot to prevent outages, including regular inspections of our facilities.
  18. Do transformers run hotter with greater demand? Is that monitored?

- Response: Yes, we have cooling mechanisms built into the transformers to cool them down. The older transformers have an alarm, and we manually inspect them. The newer ones notify us of the problem.
19. The team closed by offering to return with further updates and encouraged attendees to participate in the upcoming open house. Teresa offered to be the NA's point of contact.
  20. The neighborhood expressed their gratitude for the update.

# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-9.2**

#### **Neighborhood Advisory Group Notes**

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# Neighborhood Advisory Group 1

October 25, 2023

Representatives of Neighborhoods in Study Area

*Meeting at 325 W 2<sup>nd</sup> St, Tucson AZ 85705 – 6:00pm*

## Attendees

### **Neighborhood Advisory Group**

Meredith Aronson	Broadmoor-Broadway
Andrew Christopher	Arroyo Chico
Paula Chronister	Palo Verde
Greg Clark	Miles
Christie Cummins	Visitor
Jim Cummins	Richland Heights East
Earl O’Neil	Visitor
Sara O’Neil	South Park
Aaron Paxton	North University
Stacia Reeves	Rincon Heights

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative
Tom Baca	Community Relations
Jan Gordley	Community Relations
Aaron Johnson	Community Relations

## Notes

TEP began the meeting and opened the floor to any questions or comments as the group reviewed the topics in the project presentation.

## Questions/Comments from Attendees

### **Presentation**

1. Jim: Question regarding the number of neighborhoods participating?
  - Response: Once we get moving on routes, there should be more participation. Also, participation in the previous project started lighter then picked up.
2. Meredith: Suggestion to maybe provide a little more heads-up and prep time before the next meeting.
3. Sara: It may be helpful to publish meeting dates in their neighborhood newsletters.
4. Paula: Asked if the project team could explain the second expectation in the Meeting Guidelines, related to sharing as a group, and suggested that meeting summaries would be helpful.
5. Meredith: Asked if the project team are meeting with other groups.

- Clark: This project includes open houses, neighborhood advisory group and agency briefings such as UofA, the city, etc. The project team is hoping to really get into the details with the neighborhood advisory group.
6. Stacia: Are we a decision-making body?
- Clark: This is more advisory and to gather feedback and information that will go into the decision-making process. Additionally, per Jan, we want input to be considered by TEP as part of the study.

The meeting guidelines were approved. The group confirmed that substitutions are okay as long as they are informed and coordinated with the project team.

7. Stacia: Is there another GIS substation in Tucson?
- Clark: The Tucson Substation, which is close to the meeting site, is also GIS.
8. Paula: Are gray poles versus weathered/rusty available? Gray blend in better.
- Clark: Gray poles can be an option, but they are harder to maintain and repaint. Additionally, they tend to fade into different colors. These are factors that the group can consider.
9. Meredith: What is changed when the poles/lines are upgraded?
- Clark explained what is replaced and the benefits.
10. Jim: Does “retire” mean remove?
- Clark: In some cases, yes, and in some cases it means that the 46kV portion would be removed, while the distribution lines lower on the pole would remain.
11. Sara: What are the poles with the huge base/diameter?
- Clark explained that these are turning structures.
12. Sara: Regarding the project schedule, which meetings are public meetings?
- Response: Line Siting Hearing, ACC Open Meeting and Zoning Examiner Hearing.
13. Paula: How did the Board of Adjustments hearing go?
- Clark: TEP was denied their appeal on the applicability of the Gateway ordinance, and it was unanimous.
14. Meredith: Question on understanding the ordinance?
- Clark: The ordinance is unclear, and the city’s past direction has been inconsistent. We are not sure when it applies and when it does not. There is a lot to consider.
15. Stacia: What are the “retired” substation properties used for?
- Clark: In the past, TEP sold the properties.
16. Meredith: Costs are kind of ambiguous. Will we talk about costs?
- Clark: We will talk about costs. (Went over some ballpark figures.)
17. Meredith: Why use steel for the poles?
- Clark: TEP has tried other materials but they are not as durable. Also, steel has a longer lifespan.
18. Meredith: Why do the poles include communications lines?
- Clark: If distribution lines are attached, TEP is required to have space available for communication lines.
19. Meredith: What is the criteria for zoning and for substations?
- Clark: Outside of industrial areas, TEP has to get an exception from the city.

### ***Revised Criteria Survey Results***

1. Paula: Is there a possibility that distribution lines can go underground?

- Clark: There are cases where distribution lines can go underground with communication lines. (Provided costs for underground versus overhead, by line type.)
- 2. Greg: Question on the number of miles and the different types of lines.
- 3. Andrew: Question on how TEP would pay or pass along costs for undergrounding.
- 4. Greg: Perception is that TEP is a big corporation, and that is why the measure failed previously.
  - Clark: TEP has to be able to make a profit and pay back shareholders for their investment.
- 5. Aaron: One problem with the survey is that two of the questions that mentioned residential properties were close to the same and that could have skewed the responses.
- 6. Meredith: Some of the criteria is ambiguous, such as “disadvantaged communities.”
- 7. Gary agreed with Meredith’s comment, and asked what that means.
  - Clark: We are looking at income and demographics within the study area and want to make sure that there is a balanced distribution.
- 8. Meredith: It feels like the neighborhood advisory group could help in refining the information, details, questions, etc.
- 9. Meredith: Feels like some info is vague, missing or not specific enough, such as EMF.

### **Criteria Discussion**

1. Meredith: There is nothing in here regarding reliability.
2. Tom: What is important to you all?
3. Stacia: Does the project team have Prop 412 voting info and feedback? That would be helpful. What’s the feedback from the community?
  - Teresa: I think that people were confused about what Prop 412 was and what it included. The messaging may have been off.
  - Clark: For example, the cost of replacing the equipment as is vs. upgrading is about the same.
4. Andrew: Would TEP seek to recoup the entire cost?
  - Clark: Yes.
5. Paula: Is #2 in the “Proposed Evaluation Criteria” even a criteria, since it has to be recouped?
6. Meredith: Could we refine what the project costs are and break them out as well?
7. Aaron Paxton: Would TEP consider undergrounding transmission lines?
  - Clark: Right now, TEP is not considering undergrounding. If you start or make an exception for one neighborhood, then others will want it as well. Also, above ground has almost three times the lifespan.
8. Jim: Can we talk about the mileage of retiring transmission lines? Is there a point of reference for the number of miles of distribution lines as well?
  - Clark: There are hundreds of miles throughout the city/area.
9. Jan suggested that the project team email the neighborhood advisory group more specific info on the project, to review and provide questions via email (such as zoning).
10. Jim: Are there other TEP projects that will be impacted by this project?
  - Clark: Yes, there are other areas that need to be addressed as well.
11. Jim: Does no undergrounding eliminate going down gateways?
12. Jim: Why was the Vine Substation placed where it is? Was UofA a factor?
  - Clark: The substation needs to be as close as possible to the center of the area it will serve. UofA is the largest user in the area so that affects the load center. Also, it was the best parcel that was available to TEP to purchase.

### ***Opportunities and Constraints***

1. Aaron Paxton: Has the Grant Rd widening project been taken into account?
  - Clark: Campbell and Grant was a no-go for a substation location.
2. Turning structures are expensive and larger than other poles, so the best routes generally have fewer turns.
3. Clark: Are there other areas that we should look at to put a line?
4. Meredith: Some roads, like Country Club and Tucson, are not wide enough.
5. Paula: Tucson Blvd. cuts through a lot of neighborhoods.
6. Paula: Would be helpful for the team to provide what was shared previously, regarding pole size and type options.
  - Clark: If there is a distribution line on a 46kV pole, TEP would put it underground.
7. Paula: How long would that take?
8. Meredith: The neighborhood advisory group would want to know where the taller poles are today.
9. Aaron Paxton: Will it be jarring to move from 46 to 138, regarding pole type, size, etc.? Also, how close is TEP to capacity with the 46 equipment?
  - Clark: The impact of the new poles would depend on the area.
10. Meredith: Sam Hughes will be a no go, so that will be a constraint.
11. What's the load ratio of UA/Banner compared to the rest?
12. Greg: The NA does not want disturbance to the wash, but Miles may be amenable to overhead if existing lines would be used.
13. What about Tucson Substation?
  - Response: Part of the grid, but not the project.

### ***Follow-up Discussion***

1. Tom asked the group for their input on criteria, and thoughts on opportunities and constraints.
2. Greg and Paula: We both think that the neighborhood advisory group should have a chance to provide input and feedback, before the 11/16 open house.
3. TEP to provide preliminary segments and non-negotiables.
4. Meredith: Could the group get a projector with an interactive GIS tool, instead of the paper maps? This would help with group engagement using an interactive model.
5. Tom: The open house will be the opportunity to provide additional feedback on opportunities and constraints.
6. Paula: I think the neighborhood advisory group should meet again before the 11/16 open house.

### **Action Items**

- Project team to send neighborhood advisory group meeting summaries to the group.
- TEP to email the neighborhood advisory group more specific info on the project (such as zoning), to review and provide questions via email.
- TEP to provide more comprehensive criteria list by 10/31 EOD.
- Neighborhood advisory group to provide feedback by 11/3.
- Neighborhood advisory group to work on review of opportunities and constraints.
- Reconvene on November 9<sup>th</sup> at 6pm at the Dunbar Pavilion.



# Neighborhood Advisory Group 2

November 9, 2023

Representatives of Neighborhoods in Study Area

*Meeting at 325 W 2<sup>nd</sup> St, Tucson AZ 85705 – 6:00pm*

## Attendees

### **Neighborhood Advisory Group**

Meredith Aronson	Broadmoor-Broadway
Andrew Christopher	Arroyo Chico
Paula Chronister	Palo Verde
Greg Clark	Miles
Jim Cummins	Richland Heights East
Nancy DeFeo	Sam Hughes
Daniel Dempsey	Iron Horse
Sky Dominguez	Country-Glenn
Barbara Miller	Samos
Colleen Nichols	Jefferson Park
Sara O’Neil	South Park
Aaron Paxton	North University
Stacia Reeves	Rincon Heights

Additionally, 6 visitors not part of the Neighborhood Advisory Group.

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Joe Barrios	Media Relations & Regulatory Communications
Tom Baca	Community Relations
Jan Gordley	Community Relations
Aaron Johnson	Community Relations

## Notes

TEP began the meeting with review of the agenda and guidelines and opened discussion as the group went through all topics.

## Questions/Comments from Attendees

### **Criteria Discussion**

1. Meredith: Is undergrounding distribution lines versus transmission lines an option?
  - Clark: Yes.
2. Jim: What is the distance we’re talking about for this project?
  - Clark: Distance is approximately 7.5 miles.

3. Daniel: The current franchise agreement has about \$1.5 million allocated for undergrounding. Has TEP looked into this?
  - Joe: Beyond Prop 412, I'm not sure what's been discussed. TEP team to look at the current franchise agreement, as it relates to budget allocated for undergrounding.
4. Andrew: If TEP were to underground portions of the distribution lines, how would that impact the project?
5. Paula: If undergrounding, would comm lines go underground as well?
6. Aaron Paxton: If TEP were to underground transmission lines within a neighborhood, what is the cost impact?
  - Clark: The cost is approximately \$20 million/mile, but there could be conversion costs as well.
7. Daniel: Where else do we have 138kV lines running through neighborhoods?
  - TEP to provide list/map.

### ***Residential Properties***

1. Greg: Provided feedback regarding historic properties and neighborhoods. Favoring those type of neighborhoods often undoes or works against trying to help disadvantaged neighborhoods. "Historic" designation is pretty easy to get and really nothing special besides investing time and money for the application. Traditionally disadvantaged and minority neighborhoods don't benefit. Applications typically have been, "rich, white people." How do we make a fair and equitable route through neighborhoods? Favoring "historic" neighborhoods could go against that. Doesn't think a "historic" designation serves a point, as it relates to this project.
2. Jim: Agreed. Some groups are trying to overcome this by designating disadvantaged and minority neighborhoods.
3. Nancy: That's great if other areas are applying, but don't make current historic neighborhoods feel guilty.
4. Greg: Criterion for historic versus disadvantaged can cancel each other out.
5. Meredith: I feel like the criteria should be more socio-economic based versus racial/minority based. I think that it should not be removed completely but weighted less.
  - Jan: It is still important to make it equitably considered.
6. Stacia: Regarding criteria, how will this project impact rates? Criteria is important, but we're still missing how this project will impact/increase rates, particularly related to UofA's fixed 20-year rate.

### ***Views***

1. Jim: The visual part of this will drive people's thoughts.
  - Clark: Traditionally in the past we have looked at designated scenic areas. We should look at managing from what's already there, such as pole height and number of poles. There could be a decrease in some areas and an increase in others.
2. Paula: We need to factor in existing infrastructure.
3. Stacia: Regarding the lost appeal a few weeks ago, what does this mean in order to have the line go underground in a specific gateway corridor?

### ***Regulatory and Plan Compliance***

1. Clark: We need to look at regulatory and plan compliance. Are we in compliance with local laws and ordinances? Also, TEP would look at putting in new poles, removing old poles and putting distribution underground.

2. Nancy: Already have issues with old poles still up with communication lines.
  - Joe: TEP is working with other utilities to try and speed that process up. Scope will be limited to start.

### ***Existing Corridor Use***

1. Jim: When it comes to “residential,” what was the intention related to single versus multi-family units?
  - Clark: Multi-family generally lend themselves to being in more commercial areas. For example, we wouldn’t count UofA apartment towers as “residential,” but maybe we could.
2. Greg: Can’t be adjacent to or crossing a gateway corridor. We already have lines in our neighborhood, why not have another neighborhood take on the burden?
3. Nancy: Park Ave is such an industrial area, could we go that way?
4. Tunnels under UofA are not an option.

### ***Constraints***

1. Clark: These are not necessarily a “no go,” but may be much more difficult. Schools and hospitals are normally constraints.
2. Nancy: I think that there should be some sort of sacrifice or concession by UofA.
3. Colleen: Run lines through more industrial areas, not residential.
4. What will happen with the UofA owned substation, if TEP’s are going away?
  - Clark/Joe: We’re not sure.
5. Meredith: Country Club is a constraint, as it is too narrow. Maybe Tucson Blvd is viable in a north/south orientation. Opportunities for substations to move off Vine substation?
6. Maybe UofA could move to Fremont and Helen, or Stone and Speedway?
7. Could we put poles in the medians?
8. Daniel: One constraint is that UofA has to have their own substation. Look at moving UofA substation to a parking lot?
9. Nancy: Maybe close Park Ave near UofA since it’s more of an entertainment district.

### ***Public Messaging***

1. Daniel: Current infrastructure is only one way (not a loop)?
  - Clark: Yes, it’s a single feed.
2. Daniel: Could TEP go from DeMoss Petrie to Vine without a loop?
  - Clark: We could, and it would still increase capacity, but not reliability.
  - Joe: The reason we’re proposing this is that from a reliability standpoint, it’s better. Also, we’re planning for the future and increasing demand.
3. Paula: What happens to the retired TEP properties?
  - Clark: Typically, it is sold off.
4. Daniel: I think that a loop is a “nice to have,” similar to undergrounding.
  - Joe: We do need to increase capacity because some circuits are near overload.
  - Clark: Even if we stay on 46kV, we still would need a 138kV substation somewhere soon. Right now, this project is difficult and will be even more so down the line, similar to not being able to build freeways in Tucson because they didn’t address it earlier.
5. Clark: The project team typically tries to respond to emails within 24 hours.

6. Paula: Pictures are worth 1,000 words. Also, stories are helpful. What does it really mean... like real examples. Make it more personal and clearer. People relate to stories more than numbers.
7. Meredith: You win with what people want to hear in small narrative packages. There is a lack of a really clean, core value message. We need a better value proposition. As far as PR, the media is still eating TEP's lunch. TEP will lose without a narrative or story. What is the value proposition that works for community members?
8. Andrew: It would be helpful to have usage maps, particularly related to the UofA. We need to map out usage, because some neighborhoods usage has not gone up (i.e. lots of people in South Tucson still use swamp coolers).
9. Stacia: UofA got a great deal as part of their green energy program, for the next 20 years. It seems that the message is that the "haves" get a great deal and it has a very sour feel for ordinary people. There needs to be a gift or concession from the UofA, showing that they're working with the community.
10. Daniel: Why is UofA not contributing at all for their increased usage?

### ***Additional Questions***

1. Pueblo Gardens and Las Vistas neighborhoods have history of brown and black outs. They understand that won't be addressed/fixed until the loop is created and provides better reliability.
  - Joe: Improvements to lower voltage has always been part of the overall projects.
2. How come TEP has not identified better routes, in working with U of A, Banner, etc.?
  - Clark: This project does benefit UofA and Banner, but not exclusively. The project team has met with UofA and Banner many times, but they haven't provided a solution. There are opportunities that don't go into neighborhoods. We are trying to avoid this, but you can't completely.
  - Joe: When you look at the study area, of the eight 46kV substations, only 1.5 provide service to UofA. All of the substations are facing overloaded circuits, are nearing capacity, and need to be replaced. This project is literally for everyone.
3. Nancy: South Park and Pueblo Gardens heard that a lot of their problems are distribution lines. It feels like TEP doesn't replace anything unless is falling over. Additionally, she was told that the public needs to report it.
  - Joe: TEP does have proactive inspection and replacing.
4. Nancy: Feels like TEP puts it on the public to report when it should be on TEP.
  - Clark: TEP is on a two-year review/replace cycle and did replace Pueblo Gardens recently. That's part of why TEP is proposing this project, to replace and upgrade old equipment.
5. Stacia: What feels very disingenuous is the extreme profits that TEP is making, and yet supply has not increased. It feels like there isn't a collaborative effort. She also thinks it's important that TEP looks at the social benefit of increasing capacity, and it feels like it's on the public's back. TEP should pay to increase capacity and then pay themselves back profits from increased usage.
  - Joe: Profits do get reinvested into the company, employees, infrastructure, etc., not just shareholders. An example of this is a wind farm in New Mexico that is providing power, which is part of what TEP is looking at to expand renewable energy. But there are important resource decisions that they have to make.

### ***Next Steps and Timeline***

1. Next Neighborhood Advisory Group meeting will be January 11<sup>th</sup> 6pm, at the same location.
2. Meredith: In the future, would we be able to stream or hybrid the open house meetings?

- Clark: We may look at an online or virtual option in conjunction with in-person, but hybrid may not be a good option, particularly for an open house setting.
- 3. For the Open House on November 16<sup>th</sup>, the project team will be looking at Neighborhood Advisory Group feedback. Additionally, the project team will field drive routes to help confirm preliminary segment and suitability assessments. The project team is trying to look at criteria in the best and most fair manner.

### Action Items

- TEP to look at current franchise agreement, as it relates to budget allocated for undergrounding.
- Where else do we have 138kV lines running through neighborhoods? TEP to provide list/map.

# Neighborhood Advisory Group 3

January 11, 2024

Representatives of Neighborhoods in Study Area

*Meeting at 325 W 2<sup>nd</sup> St, Tucson AZ 85705 – 6:00pm*

## Attendees

### **Neighborhood Advisory Group**

Meredith Aronson	Broadmoor-Broadway
John Burr	Visitor
Andrew Christopher	Arroyo Chico
Greg Clark	Miles
Jim Cummins	Richland Heights East
Nancy DeFeo	Sam Hughes
Michael DeSantis	Visitor
Logan Havens	Feldman’s
Barbara Miller	Samos
Colleen Nichols	Jefferson Park
Earl O’Neil	Visitor
Sara O’Neil	South Park
Aaron Paxton	North University
Stacia Reeves	Rincon Heights

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Joe Barrios	Media Relations & Regulatory Communications
Teresa Bravo	Government Relations Representative
Caroline Patrick	GIS Specialist
Tom Baca	Community Relations
Aaron Johnson	Community Relations

## Notes

The group reviewed the agenda, points of agreement, historic properties and neighborhoods, the planning and siting process, public and stakeholder outreach, the suitability assessment, draft refined segments, and engaged in an assessment workshop.

## Questions/Comments from Attendees

1. Jim: Good to see “Reliability” as the first bullet point under Purpose. Equitably is in the eye of the beholder. Overall goal is to do this reasonably and equitably.

2. Meredith: What is the process for optimizing alternative line sites? Is there a parallel path happening with other stakeholders? In other stakeholder channels, is there a parallel conversation regarding undergrounding?
  - Clark: One neighborhood did show interest in looking into an undergrounding district. Dan and John Schwartz formed an underground coalition, and it is our understanding they are working on some type of a proposal.
3. Stacia: Any new data from the November open house?
  - Clark: TEP did receive feedback on constraints, but they weren't necessarily all realistic constraints. The area along Arroyo Chico was marked as a constraint and then extended as part of public meeting.
4. Greg: Doesn't really change much though.
5. John: Anything new from the January 10 Agency Briefing presentation? Also, what are the black dotted lines versus the yellow lines on the Draft Refined Segments map?
  - Clark: TEP met with stakeholders on January 10 and more or less had the same presentation. The group had questions, but no feedback to influence the process.
6. Nancy: Are commercial/industrial routes being considered? Does commercial/industrial through a low-income neighborhood create a conflict?
  - Clark: When grouped, total environment commercial/industrial are weighted more as a criterion.
7. Meredith: Are there things that have been taken out because they are no longer a factor?
  - Clark: No.
8. Andrew: Where are the native lands within the study area?
9. Jim: One thing that struck me is that we seem to have a model that makes each criteria the highest, but it doesn't seem to be a factor in all of the models.
  - Clark: We can try a model like that today.
10. Stacia: Did any open house feedback get taken into account? For example, "historic" was low on the survey but seems higher now.
  - Clark: "Public preferred" will include survey and neighborhood feedback.
11. Meredith: Which ones are the gateway corridors?
  - Clark: Kino/Campbell, Broadway (feels like this would qualify as a special exception) and Oracle.
12. Clark: The black dotted lines are the preliminary segments we plan to eliminate.
13. Nancy: Are criteria models things that are excluded? I don't see a commercial/industrial model.
  - Clark: We don't have a model that is straight commercial/industrial.
14. Clark reviewed criteria factor models and stated that models are represented areas that are based on criteria (better or worse). The goals are to minimize impacts and maximize suitability.
15. Meredith: Are there buffers for biological criteria?
  - Clark explained some data sets include buffers and others do not, depending on the dataset.
16. Jim: Did TEP eliminate any routes using criteria models?
  - Clark: No.
17. Greg: Related to the questionnaire, is "residential" criteria considered zoned or where people reside (i.e. apartments)?
  - Clark: For the project, "residential" excluded high density residential areas such as apartments.
18. Meredith: Is there a way to take model data and say that these are the top 3-5 routes?
  - Clark: We can do that suitability but have not yet.
19. Stacia: Are there any models that show the Vine substation in a different place?

- Clark: No. After a thorough analysis, that is the only available site (also based on available land for sale). We have to have a substation in the area we’re trying to serve.
20. Andrew: Have you received zoning approval for the Vine substation?
- Clark: We plan to apply this fall.
21. John: Has there been reach out to West University?
- Adriana: Yes, Teresa has reached out to every neighborhood but TEP has not heard back. They will continue to reach out and are happy to meet with any neighborhoods again if requested.
22. Meredith: Is there individual outreach with elected officials?
- Adriana: Yes, we meet with elected officials as well as organization and agency staff.
23. John: Timeline for undergrounding telecom once a route is selected?
24. Meredith: Did street width and pole height get taken into account? I feel like it is impactful and should be taken into account. I would like to see it.
- Clark: Yes TEP can do that.
25. Andrew: Are comm lines going to be collocated with distribution and/or transmission?
- Clark: TEP has an agreement stating that anything with distribution has to allow for telecom, but transmission does not.
26. Nancy: Disagreed with the simulation pole size for Tucson Blvd and 5th St.
27. Andrew: I think it looks accurate and I get that it’s a simulation.
28. Stacia: On the Grant Rd and Stone example, why can’t the existing poles be used?
- TEP to explore that question.
29. Andrew: Why can’t you collocate distribution/transmission lines with telecom?
- Clark: Lower voltage distribution and comm lines can. Transmission lines are too big.
30. Nancy: For pole bases, are any of the examples bolted on? It doesn’t look like it. For example, Euclid and 6<sup>th</sup> pole doesn’t look big enough.
31. Michael: I get that these are for visualization and to get an idea.
32. Meredith: In future simulations, is it possible to show perspective of pedestrians or from bike paths as well (in addition to being car centric)?
- Clark: Yes.
33. Meredith: Why is Mountain Ave difficult?
34. Greg: Why won’t the models stay on Aviation?
- Response: Computer model doesn’t take everything into account. A visual drive proved that.
35. John: What if all models include Campbell?
- Clark: That’s why TEP is pushing back against the ordinance. If Campbell is the most suitable location, TEP wants to make sure the City Gateway Ordinance is legal and want the courts to confirm.
36. John: Can TEP share the four models and maps with and without constraints?
- Clark: Yes, we will share them.
37. Michael: Does the gateway ordinance prohibit only overhead lines?
- Clark: Yes, you can go underground though. In this case, there is a local law that trumps state law and that is why TEP wants the courts to confirm.
38. Stacia: What is the goal of the next open house?
- Clark: We want to hear public feedback on what they like and don’t like.
39. Meredith: My concern for the open house is that it would be helpful to have more active outreach for neighborhoods that have not been involved.



40. Greg: And those just outside the project boundaries as well. Neighborhood association info may be old or not active though.
  - Teresa: TEP did make a list of neighborhood associations within and just outside the study area.
  - Adriana: TEP has been working with Ward offices as well to identify and contact neighborhoods.
  - Clark: TEP will reach out to all neighborhoods again and Teresa is sending meeting notes to all neighborhoods as well.
41. Stacia: Would be advantageous to have boards with all four NA models to review and compare. This will also show the work on the advisory group and how it impacts the study. Also, show side by side boards.
42. Jim: Is there anything TEP would prefer they not share with neighborhoods?
  - Clark: Maybe the map or note that it is a draft.
43. Andrew: When comparing, straight versus winding routes should be taken into account as it could be less visually pleasing due to additional larger poles that are needed, turns, etc.
44. Michael: When you see those winding routes, TEP may want to convey that it will cost more as well and could increase rates.
45. Nancy: May want to look at undergrounding part of Jefferson Park, since it's bearing the brunt of it.
46. Colleen: Jefferson Park should and needs to be undergrounded. Also, why didn't TEP look at moving the Vine Substation?
  - Clark: The substation site was based on available property.
47. Do UofA and Banner get better rates?
  - Joe: Generally, the less effort to deliver service and the greater the usage, the lower the rate.
48. If UofA and Banner are the largest users in the area, maybe their rates should go up?
49. Meredith: Curious about ultimately where will the costs be absorbed. There is a whole other economy in this. And, as the project gets more refined, will this be more of a factor?
  - Clark: Ultimately, the Corporation Commission will make that decision and we can't answer that right now. How do you navigate those tradeoffs of paths versus cost and revenue?
50. Stacia: We need to make it clear that TEP is not an undergrounding company for transmission but that they do for distribution.
51. Next Neighborhood Advisory Group will be February 29<sup>th</sup> from 6 to 8 pm.

### Action Items

- Create visual simulations showing impact to sidewalk/pedestrians/cyclists and a turning structure.
- Teresa to reach out to inactive NAs again and share meeting notes.
- Clark to create NAG board with models.

# Neighborhood Advisory Group 4

February 29, 2024

Representatives of Neighborhoods in Study Area

*Meeting at 325 W 2<sup>nd</sup> St, Tucson AZ 85705 – 6:00pm*

## Attendees

### **Neighborhood Advisory Group**

Meredith Aronson	Broadmoor-Broadway
John Burr	Visitor
Andrew Christopher	Arroyo Chico
Paula Chronister	Palo Verde
Greg Clark	Miles
Jim Cummins	Richland Heights East
Nancy DeFeo	Sam Hughes
Dan Dempsey	Iron Horse
Michael DeSantis	Visitor
Chris Gans	West University
Randy Hotchkiss	Blenman Elm
Colleen Nichols	Jefferson Park
Earl O’Neil	Visitor
Sara O’Neil	South Park

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Joe Barrios	Media Relations & Regulatory Communications
Teresa Bravo	Government Relations Representative
Tom Baca	Community Relations
Aaron Johnson	Community Relations

## Notes

TEP began the meeting by reviewing the meeting agenda and guidelines. Clark discussed transmission operation and reliability factors, including the differences between distribution and transmission (46kV versus 138kV). Clark spoke to several case studies, the advantages of a looped system and disadvantages of a radial line. Clark also addressed the Halfway Solution, which would cost \$50 million more and TEP would have to rebuild the existing 46kV line, rather than removing the existing 46kV in midtown. Lastly, Clark reviewed the planning and siting process, compatibility analysis criteria, and alternative route segments.

## Questions/Comments from Attendees

1. Dan: The idea behind doing only one segment is that Kino/Vine will have a legal fight. Assuming that TEP loses their court cases, they may need to underground anyway. The thought is that we are trying to avoid being back here five years from now.
  - Clark: TEP doesn't want to pause on this project because it's not going to get any easier.
2. Randy: What is the status of the TEP/City of Tucson lawsuit?
  - Clark: TEP filed an appeal a few days ago in Superior Court.
  - Joe: TEP is looking at standard options available for a civil case. The city's response is due by April 1<sup>st</sup>.
3. Meredith: Increased capacity in Midtown is important. Also, need to be mindful of State plans. Hope we have a way to articulate and understand the overhead strategy but undergrounding and choosing to protect a dense area is also important. Would be interesting if we could say, "these are the priorities."
  - Clark: We asked what's important to neighborhoods, so as a group we could come to a consensus of what's important.
4. Meredith: Okay with saying this is the criteria that we agreed on, but not okay with being the only message out of this group.
  - Clark: We would love to present the items that we all agreed upon.
5. Michael: Regarding the lawsuit that's going forward, how does the decision come under the jurisdiction of the Corporation Commission?
  - Clark: The appeal on zoning administration decision is in Superior Court. Line siting statute A.R.S. 40-360 applies with conflict of existing zoning and plans. That argument will go to the Corporation Commission and that decision could be appealed which would go to Arizona Superior Court.
6. Greg: The lawsuit is not about undergrounding, not that it must go underground. TEP says that they can go overhead on a gateway route.
  - Clark: TEP's argument is basically, "can a jurisdiction override a state law?"

### ***DMP to Vine Route Alternatives***

1. Clark: A through D labels don't reflect preference. Proposing underground where there are lines on both sides of the road, residential area with an existing line (so that there aren't two lines), and gateway areas.
2. Meredith: What is the distance from Grant to Vine?
  - Clark: Approximately ½ mile.
3. Dan: Would TEP need to acquire private property (mentioned a 100-foot easement)?
  - Clark: All of these routes are road ROW. The 100-foot easement is for rural areas. The 100-foot is not required for the city. "Road" ROW is designed to not go over any buildings.
4. Jim: Are there other alternate routes to go down an alley?
  - Clark: No, the buildings are too close.
5. Paula: On Vine there are no distribution lines, so not undergrounding, correct?
  - Clark: Correct.
6. Andrew: What is the ratio of low income for the entire area, for all four options?
  - Clark: Most of the study area is classified with some degree of low income, except for some neighborhoods.

7. Nancy: Surprised TEP didn't take industrial/commercial areas into account and didn't lump these in with neighborhoods.
  - Clark: Income data was based on census tracts. Just to confirm, what you're saying is TEP should have used low-income only for residential?
8. Nancy: Correct.
9. Greg: The conundrum is that commercial zones back up/run along residential neighborhoods.
10. Jim: Maybe break it down between residential and commercial.
11. Meredith: Thought on Route A, an interesting question must be, is there a path where the City and UofA work to rezone, and how could that impact the project? UofA has used this strategy.
12. Michael: Once could create an overlay of commercial/residential, but it could not change the fact that it's a low-income area, per the census. Many neighborhoods that are low income run along Grant Rd.
13. Paula: Idea to maybe make parts of the segments into non-traffic/park/walking type area. Grant Rd is already a bit of a mess and not pretty.
14. Colleen: Grant and Speedway are basically industrial/commercial, and we need to identify more segments like that, instead of neighborhood routes.
15. Greg: If you count apartments on Stone, it's much more residential than Vine.
16. John: Regarding transit, Stone is the location of bus rapid transit and has a high density of historic homes.
17. Michael: Question on Grant Rd with transmission lines that are there, will TEP use those or new ones?
  - Clark: We are looking at that, but most poles are single circuit poles.
18. Dan: What is the current overhead cost per mile with inflation (materials, property costs), etc.?
  - Clark: Working on estimate now for route alternatives and should know by the end of March.
19. Dan: Difference in cost between ½ mile underground and Route D overhead may not be that different and may be worth it.
20. Meredith: My thought is dependent on keeping it flexible because the lawsuit is still pending.
  - Clark: Trying to keep costs to a minimum while achieving the goals of the project.
21. Colleen: Have TEP come into an agreement with the hospital regarding overhead poles?
  - Clark: The project team has been meeting with them and other agencies.
22. John: Can the group make recommendations with qualifiers or caveats, such as best practices and shortest routes? What are our choices for making recommendations back to TEP?
  - Clark: We don't need the group to commit to making a decision now. We want feedback and will take that into account with the line siting committee.

### ***Kino to Vine Alternatives***

1. Clark: All transmission proposals are overhead.
2. Dan: How do you underground distribution lines?
  - Clark: Same as transmission lines but on a smaller scale. Underground cables are more expensive.
3. Greg: In the end, say five years from now, there would still only be one set of poles, correct?
  - Clark: Yes, the plan would be to install so that both are up and then take the 46kV down.
4. John: Is it possible to combine alternatives? (Will draw it out).

5. Meredith: Looking at it and saying/hoping if the lawsuit sustains the city's rights, then having an alternative route is the way to go.
6. Andrew: I like route 6 because of double circuiting. Is there a threshold needed to meet contingency requirement?
7. Clark: I understand what you are saying but it doesn't solve the need for a north/south circuit.
8. Nancy: Was told previously that TEP could not double up, feels like they were told lies before.
9. Randy: Regarding route 5, I think going down Speedway/Campus is bad. I would get rid of it.
10. Greg: Alternative route 5 would be a double circuit.
11. Clark: We may end up having to go with stacked configuration and taller poles.
12. Randy: What are you looking for from us tonight? Also, I like alternative route 6.
13. Meredith: Maybe we could go around the room and give suggestions or write down preferred routes.
14. Michael: I see value in this exercise but do not want it to be submitted as a consensus, since the group just saw the options and not all members are answering.
15. Clark: You can think about it and get back to TEP later if that is preferred.
16. Dan: How is TEP planning on submitting the application in May, if the court case is still pending?
  - Joe: TEP will present it as a complete a manner and as accurately as possible. There are time considerations, but we are late in upgrading/reinforcing the system. We are not looking to ignore anything and will address the court case with the ACC.
17. John: How does our input today impact the project since it's just individuals versus the rest of their neighborhoods?
  - Clark: Maybe gather feedback from neighborhoods and provide it to TEP.
18. Randy: Should know that these are subject to the court case.
19. Nancy: If you were to do Route A and underground to substation(s), can you at the same time use the same conduit and go back out?
  - Clark: Could do that but not we are not proposing undergrounding transmission.
20. Clark: The project team will send out a form to the committee so that they can respond with their preferred option, with a due date of before the open house on March 28.

### ***Design Elements***

1. John: Will anti-graffiti finish make the poles look shiny?
  - Clark: I'm not sure, we haven't tried it on poles yet.
2. Andrew: Maybe keep rust finish and just sand or use paint remover?
3. John: I recently drove down Columbus, and it's a separate project, but it is hideous (22nd and Grant).
  - Clark: We will drive and see but it could be that the project is in transition phase.
4. Andrew: How long have steel poles been in service and does TEP have data compared to wood poles?
  - Clark: We started using metal in the 1980s and weathered steel in early 2000s. We have been told by the manufacturer that they will last 100 – 125 years. Also, older poles will start becoming less reliable. 46kV is distribution, 130kV and up is used for transmission operation and reliability.
5. John: How short can 130kV poles be?
  - Clark: Maybe around the 60-foot range.
6. Michael: Scaling will depend on where you are and where the lines are going.

7. Paula: When you look at the painted poles, they start to disappear, and we should try to do that to minimize impact.
  - Clark: The project team are creating simulations with multiple pole finishes for review. Also, they are planning on polling preferences at the next open house.
8. Greg: Would appreciate more narrow poles/smaller footprint. That would be my preference.
9. Nancy: Big rust poles next to silver light poles is too much of a contrast.
  - Clark: We can commit to working with the segment neighborhoods on pole options.
10. Dan: Would recommend not crisscrossing streets.

### ***Closing***

1. John: Has TEP posted information/data/feedback from the last open house?
  - Clark: Working on getting the Q&A posted.
2. Meredith: Feels like Clark and the team have done a fabulous job facilitating (applause).
3. Nancy: Much better than the first time around.

### **Action Items**

- TEP will send out a form to the committee so that they can respond with their preferred options, with a due date before the open house on March 28.
- Clark to look into pole finish and get back to Andrew.
- Clark to check on poles at 22<sup>nd</sup> and Grant.

**Application for a Certificate of Environmental  
Compatibility**

**Midtown Reliability Project**

**Exhibit J-9.3**

**Miscellaneous Meeting Notes**

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# Banner Health

March 26, 2024

Banner Health Staff

*Meeting via Microsoft Teams – 11:00am*

## Attendees

### **Banner Health**

Mark Barkenbush	Vice President, Facility Services
Paul Klumb	
Kristian Watkins	Senior Manager, Facilities, Design & Construction

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Martinez	Project Manager, Transmission Line Siting
Manny Romero	Account Manager

## Notes

Clark provided an overview of the franchise effort and showed the remaining draft alternative routes connecting to Vine Substation. He also explained TEP's plans for a private easement along Lester since Ring Road is owned by Banner and TEP has no right to be there. He then asked for feedback.

## Questions/Comments from Attendees

1. Mark: I've been studying the maps. What are you finding in terms of pros and cons? My initial reaction is a touch more favorable than before (over Ring). It's a necessary evil. A touch more natural (poles). A little less intrusive to views.
2. Paul: The issue is more with JPNA agreements. This would be catastrophic and unwind what we did to work with JPNA to protect our encroachment on their environment. I have no idea how we'd open that box.
3. Mark: Views from hospital, I can only imagine anger from the neighborhood. They've looked to us as an ally. The vacant parcels are because of us. We created a buffer and mitigated storm erosion. We've invested a lot to their delight.
4. Paul: Since there are existing private properties, what about the width of the easement? What's the total easement you need?
  - Clark: Easements are dependent on spacing of poles. Typically, we need 30 feet on one side and 16 feet on the other. Typically, 30 feet into the roadway. We'd also have to secure an aerial easement. Our wires would not go over a building, that would require us to purchase/demolish. We don't want to displace anyone. If that's your concern, we can move the line further south.
5. Paul: Either way it involves our commitment and legal agreement with the HOA. There are significant impacts for Banner.

- Clark: Our other option, if this route were selected, we could shift to Lester ROW, which we have rights to be there. There's greater impact to the neighborhood though.
- 6. Paul: We have no control over that. We'd be out of the mix.
- 7. Would TEP need an aerial easement from Banner?
  - Clark: Depends on how far it is from the pole. Might be 3 or 4 feet, or none. Depends on the width of road ROW.
- 8. Was the commitment to JPNA that there'd be no development other than the park?
  - Response: Yes, that it'd be free of anything that'll impact them.
- 9. Paul: We have a significant commitment to keep it visually open as a useable space.
- 10. Clark: If this route (Ring/Lester) were selected, you wouldn't have a way to grant us an easement? We'd have to go in road ROW?
  - Banner: We'd have to study that. Typically, we can grant it, but it'd be going back on our word.
- 11. Clark showed the other route options. JPNA might be supportive of Lester due to the other route options.
- 12. Mark: Is there an exhibit of what goes away when this is done? There's been so much focus on the new. I'm pleased with the way you've approached this. This is more than Banner and UA needing capacity.
  - Clark showed the current/future energy grid slide with the 46kV lines that'll be retired.
- 13. Banner: How much is TEP willing to pay for the easement so we can get that to JPNA and they can support it?
  - Clark: That's an interesting thought. We typically start at full market value and go from there. Not sure what that would come out to be.
- 14. Paul: It would have to be significant. If it's only 2,000 it's probably a non-starter.
- 15. Paul: Do you have any sense that the property owners are willing to participate at all in negotiations? We aren't sure. We may need to go to condemnation on some parts of the line. This line has been pretty controversial. We can't not do the project for the sake of a few property owners that are holding out.
- 16. Mark: Do you have a pros/cons list on the routes?
  - Clark showed the slides.
- 17. Paul: What will you remove?
  - Response: We'll remove 19 miles of sub-transmission lines, what we add in will depend on the route. Maybe as little as 8 miles. No matter how you look at it, JPNA will have less of an overhead impact. We'll have visual sims by tomorrow, I'll share those with you as well. If it goes through a neighborhood, we'll work with that neighborhood to see what works best for them. If it is this route (Ring/Lester) maybe we approach the neighborhood at that point and let them know we have some leeway. We will work with the property owners on what works best for them.
- 18. Banner: Is the committee deciding? Or do you propose an alternative?
  - Clark: We'll have a preferred alternative; it doesn't mean they'll take our preferred route. It's going to fall on this committee to make that decision. Clark reviewed the route alternative considerations (residential neighborhoods, historic districts, etc.) and will email the presentation.
- 19. Mark: It'd be helpful to digest this a bit. I'd like to study these a bit more.

20. Paul: Banner is more significantly exposed to public opinion. We're walking a more difficult tight rope than UofA.
21. Clark: Objective of this week's public open house is for feedback on all routes.
22. Paul: You're undergrounding sections of these routes along the gateway corridors? What's the status of that?
- Clark: We aren't proposing undergrounding. We'd underground existing distribution. We are in litigation with the COT on the applicability of their ordinance. It's in Superior Court. Our stance is that they don't have jurisdiction over transmission.
23. Paul: You'll be going to the ACC without a decision?
- Response: It can be discussed at the line siting hearing in July. We may have a decision by then.
24. Banner: Does that position change anything if the courts side with the city?
- Response: We have other routes that avoid the gateway corridor that are still options. We'd be able to move forward.
25. Paul: Target filing date?
- Response: End of May.

### Action Items

- Manny to facilitate follow up meeting scheduled for early May.

# Banner Health

May 16, 2024

Banner Health Staff

*Meeting via Microsoft Teams – 2:00pm*

## Attendees

### **Banner Health**

Mark Barkenbush	Vice President, Facility Services
Paul Klumb	
Kristian Watkins	Senior Manager, Facilities, Design & Construction

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Manny Romero	Account Manager

## Notes

Clark shared after extensive analysis and public feedback, Ring Road would not be selected as the preferred route and that TEP has chosen 4B as their preferred to present to the ACC. TEP will file the CEC application next week and will be making its case to the Siting Committee during the hearing in July.

## Questions/Comments from Attendees

1. Banner: Did you get support for those routes?
  - Clark: We got differing support and opposition for each route, but some were less controversial than others.
2. Banner: Would you be cleaning up Euclid?
  - Clark: Yes, we would retire existing 46kV lines and underground distribution. There will be fewer/newer facilities with long spans.
3. Banner: Does route 4 come up Ring Road? Or is it outside of Ring?
  - Clark: It's completely outside, it uses Vine to get to the substation. The line on Vine will be very similar to what's already there. Distribution would be undergrounded in Jefferson Park.
4. Banner: We think you found a strong route. It's not easy, it's a necessity.
5. Clark: We plan to ask for a 400' wide siting corridor. If committee chose the route north of Ring, we'd find middle ground to make it work.
6. Banner: Is the process that you'll present your preferred route, but it's the committee who has the ultimate say?
  - Clark: We'll file our application with the data, a summary of public outreach, and reasons for the preferred route. The Committee will hear our evidence and make a recommendation to the ACC.

7. Clark: There will be interveners that can try to make another case. Committee members will hear all the evidence and arguments. They'll vote to make a recommendation to the ACC who will vote to approve, ratify, or deny the application.
8. Banner: What is the timeframe to get to the Commission's decision?
  - Clark: The Siting Committee will hear the case between 30-60 days after the filing. TEP will file its application next Friday for a hearing scheduled for July 8-19. The ACC will consider the Committee's recommendation within 30-60 days. It's likely to be considered by the ACC on September 10.
9. Banner: What groups will intervene?
  - Clark: Once we submit our application parties can file to intervene. The Underground Coalition (Underground Arizona) and Sam Hughes are expected to intervene, and the COT will be invited to discuss the Gateway Corridor issue. That's who we know of for now.
10. Banner: This helps us with our agreement with Jefferson Park Neighborhood Association (JPNA). We appreciate the effort you put into this. Working with JPNA is how we were able to get the Planned Area Development and zoning approval for Banner.
11. Clark: We appreciate you coming to the table and working with us.
12. Banner: Would it be appropriate to support the preferred route?
  - Clark: That would be great.
13. Banner: Will the University support it as well?
  - Clark: We believe so, but are unsure of the method (letter, intervenor, public comment). The UofA previously provided written support of the Euclid route.
14. Banner: This process has been well done and you've done a nice job communicating with us and the public along the way.

# Banner Health Line Siting Discussion

June 6, 2023

Banner Health Staff

*Meeting via Microsoft Teams – 8:00am*

## Attendees

### **Banner Health**

Mark Barkenbush	Vice President, Facility Services
Phillip Dague	Operations Managers
Kristian Watkins	Senior Manager, Facilities, Design & Construction

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Ryan Anderson	Manager, Business Development

## Notes

The group discussed the community’s rejection of Prop 412 and TEP’s revised approach to ensure reliability in midtown, noting that the project is needed by more than just for UofA and Banner. TEP shared the associated line and substation for the Midtown Reliability Project and discussed the Ring/Campbell substation site. TEP provided the new outreach schedule, project status and plans. Banner stated TEP can count on their support at community working sessions and they will discuss who their representative will be. TEP will send the working group dates as soon as they are scheduled. Banner noted they are happy to provide feedback on outreach regarding their experiences.

# Boys & Girls Club of Tucson

February 8, 2024

Boys & Girls Club Staff

*Meeting at 3155 E Grant Rd, Tucson AZ 85716 – 10:00am*

## Attendees

### **Boys & Girls Club**

Tola Barker	Human Resource Business Partner
Kellen Berkenpas	Facilities Manager
Ryan McIntyre	Controller
Jose Quijada	Vice President of Facilities
Julie Trujillo	Vice President of Clubhouse Operations
Denise Watters	Chief Executive Officer

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Clark shared the project video and discussed the siting process, required approvals, and refined segments. Because the Boys and Girls Club on 36<sup>th</sup> Street was affected by past outages, Clark explained the need for infrastructure upgrades and the loop to Kino. TEP has started conversion work on the existing distribution system in the area and stated that this work will continue for the next 10 years.

## Questions/Comments from Attendees

1. Will this allow more renewables?
  - Response: No, but we do have a plan to provide 70 percent renewables by 2035.
2. What's the controversy?
  - Response: We don't see it. COT has Kino/Campbell designated as a gateway corridor. Vine substation is also controversial.
3. What will happen to the retired substations?
  - Response: We'll remove the equipment and sell it. So that would be a benefit to the residents? Yes.
4. Do you have a cost estimate?
  - Response: No, it will be baked into future rates. The cost differential is high for undergrounding transmission (10 times). The ACC has said undergrounding is not a prudent expenditure. It does not increase reliability or safety, it's only for aesthetic reasons. Undergrounding this line would set a precedent for other projects and increase rates overall. TEP will not be going through neighborhoods unless there's an existing 46 kV corridor.
5. How can we help?

- Response: We would love your support. People who support it don't usually take the time to speak up.
6. In response to visual simulations of the project: "So much cleaner. That's nice."



# Community Resident

March 27, 2024

Pie Allen Residents

*Meeting at E 7<sup>th</sup> St and N Tyndall Ave, Tucson AZ 85719*

## Attendees

### *Pie Allen*

Pam Homan	Resident
-----------	----------

### *TEP*

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting

## Notes

Pam requested a meeting with Clark and Adriana to discuss one of the proposed route alternatives. The group met at the corner of East 7<sup>th</sup> Street and North Tyndall Avenue, joined by an additional resident of Pie Allen. The residents were initially concerned about the route along East 7<sup>th</sup> Street and were pleased to hear that existing 46kV in the nearby alleyway would be removed. Pam and her neighbor were glad that TEP was agreeable to working with the City of Tucson to incorporate chicanes (or bulb-outs) in the design of the proposed line to improve visual aesthetics and traffic issues in the neighborhood.

# PNM Resources Historic Provisions Discussion

November 21, 2023

PNM Resources Staff

*Meeting via Webex – 2:00pm*

## Attendees

### **PNM Resources**

Suzanne Landin	Senior Account Manager
Shelby Magee	Environmental Scientist, Archaeology
Alaina Pershall	Natural & Cultural Resource Manager

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Rustyn Sherer	Senior Key Account Manager
Jesus Martinez	Civil/Transmission Engineer
Keri Tallorin	Consulting General

## Notes

The purpose of the meeting is for PNM to share best practices when possibly needing to run overhead service in historic or sensitive areas. Though PNM does not have transmission going through historic districts, they do have distribution through historic areas. In these areas, they avoid impacting buildings by staying in the road right-of-way. For a current PNM project, they are planning on building their new transmission line and substation where the need is (in a sensitive area) and supplementing this with a viewshed analysis and holding open houses in the community to learn what the residents want to see. The viewshed is a large part of the historic district's character so it is important to determine how the line would affect contributing elements of the area. Ways to lessen visual impact may include slimmer and self-weathering poles. Once the design is chosen, it would likely need to go through SHPO for approval. An area PNM serves has an undergrounding ordinance in their city code, including how it will be funded, which results in higher costs for rate payers.

# Tucson Metro Chamber

January 31, 2024

Metro Chamber Staff

*Meeting via Microsoft Teams – 11:00am*

## Attendees

### **Tucson Metro Chamber**

Stephanie Spencer	Business Advocacy Specialist
Zach Yentzer	Vice President of Business Advocacy

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Adriana Marinez	Project Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative

## Notes

Clark showed the project video and displayed a presentation detailing the project overview, required approvals, planning and siting process, photo simulations, and the next steps.

## Questions/Comments from Attendees

1. What kind of comments have you heard from the public?
  - Response: Underground preference, need for project, support for direct route and avoidance of neighborhoods.
2. Have you heard from businesses?
  - Response: Other than UofA and Banner, really none.
3. How can we help?
  - Response: We're happy to receive letters and comments in support. We're also looking for feedback on segments. Comments will be taken through summer.
4. Would you like us to solicit development plans?
  - Response: Yes, please. If you could reach out and ask for large plans that'll be helpful.
5. Would you like to brief our membership (we can also invite SAHBA and TAR to participate)?
  - That would be valuable.
6. It would be helpful to have a member meeting/open house at an hour that business owners can attend. They can't always make night meetings. Can we make mid-morning or mid-afternoon work? Maybe we can explore food/snacks as an option.
  - Maybe Tues, March 5 from 2-3 with hybrid option, at TMCC. TMCC will hold date and send invite to members within the study area. TEP will provide appetizers or snacks.

# Tucson Metro Chamber

March 5, 2024

Metro Chamber Staff

*Hybrid Meeting*

## Attendees

### **Tucson Metro Chamber**

Mohit Lokane	Mintropy	LEED AP, CAPM
Alexa Lucchese	Tucson Metro Chamber Cox Communications	Public Policy Council Member Manager, Government Affairs
Larry Lucero	Tucson Metro Chamber	Public Policy Council Member
Eli Peart	Tucson Metro Chamber Port of Tucson	Chair, Public Policy Council Chief Operating Officer
Kevin Quinlan	Mintropy	Principal, LEED GA
Stephanie Spencer	Tucson Metro Chamber	Business Advocacy Specialist
	Hughes Federal Credit Union	

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Teresa Bravo	Government Relations Representative
Joe Cruz	Supervisor, Commercial Account Manager

## Notes

Clark introduced the TEP team and shared the project video and PowerPoint presentation.

## Questions/Comments from Attendees

1. Is TEP solely relying on feedback? Has there been any surveying?
2. How many businesses are in the study map area for this project? Will there be power outages? How many commercial accounts?
3. How often do outages happen and how long do they last?
4. Why is it this specific area for the project? Is it in more critical condition than other areas?
5. Why do people with solar panels in their homes still rely on TEP?
6. Do most homes have battery storage? Do we have an understanding of how many people have solar in their homes?
7. What is the storage capacity at TEP? (solar ray vs. storage)
8. What will happen to the substations that will be retired?
9. How quickly does TEP - track technology? Will the new equipment be outdated by the time the project is over?
10. How many poles are going up?
11. Are there any commercial properties in alternate routes? Will entrances to businesses be blocked?
12. What is TEP's response about EMF's?

# University of Arizona Equipment/Land Discussion #1

May 23, 2023

University of Arizona Staff

*Meeting via Microsoft Teams – 12:00pm*

## Attendees

### **University of Arizona**

Chad Brandt	Utilities Project Manager
Ryan Goodell	Vice President, Facilities, Operations, and Campus Planning
Jeremy Heston	Medium Voltage Supervisor, Facilities Management
Christopher Kopach	Associate Vice President, Facilities Management
Richard Lower	Superintendent of Central Plant
Bruce Vaughan	Executive Director, Engineering, Design & Construction

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Brian Pugh	T&D Supervisor
Christopher Lindsey	Transmission Business Strategy & Development
Rustyn Sherer	Senior Key Account Manager
Michael Riesgo	Lead Associate Engineer

## Notes

TEP and UofA staff shared introductions and began the meeting discussing Prop 412 and its impact on the next steps for the project. Following the group's review of alternative substation locations, TEP requested UofA's support at future meetings.

# University of Arizona Infrastructure Meeting #2

May 30, 2023

University of Arizona Staff

*Meeting via Microsoft Teams – 3:00pm*

## Attendees

### **University of Arizona**

Chad Brandt	Utilities Project Manager
Ryan Goodell	Vice President, Facilities, Operations, and Campus Planning
Jeremy Heston	Medium Voltage Supervisor, Facilities Management
Christopher Kopach	Associate Vice President, Facilities Management
Richard Lower	Superintendent of Central Plant
Bruce Vaughan	Executive Director, Engineering, Design & Construction

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Brian Pugh	T&D Supervisor
Rustyn Sherer	Senior Key Account Manager
Michael Riesgo	Lead Associate Engineer

## Notes

TEP provided information for the upcoming Community Working Group meeting and the Public Open House. The group evaluated possible substation locations and reviewed the Euclid route that UofA favors. UofA stated their plans to build south of 6<sup>th</sup>, between Santa Rita and Park and would prefer the 46kV structure in that area be moved. The group would need to evaluate the cost associated with moving the structure and whether or not it could be done as part of this project.

# University of Arizona Distribution Line Meeting #3

June 14, 2023

University of Arizona Staff

*Meeting via Zoom – 9:00am*

## Attendees

### **University of Arizona**

Chad Brandt	Utilities Project Manager
Peter Dourlein	Associate Vice President & Campus Architect Planning Design & Construction
Ryan Goodell	Vice President, Facilities, Operations, and Campus Planning
Jeremy Heston	Medium Voltage Supervisor, Facilities Management
Christopher Kopach	Associate Vice President, Facilities Management
Richard Lower	Superintendent of Central Plant
Bruce Vaughan	Executive Director, Engineering, Design & Construction

### **TEP**

Clark Bryner	Manager, Transmission Line Siting
Brian Pugh	T&D Supervisor
Christopher Lindsey	Transmission Business Strategy & Development
Rustyn Sherer	Senior Key Account Manager
Michael Riesgo	Lead Associate Engineer

## Notes

The group reviewed maps of the potential Euclid route and made some edits. The route was not finalized, but UofA's preferences were noted. UofA discussed their decarbonization plan that will be in place by 2040 and stated their electric needs will potentially increase by 60%. TEP and UofA will discuss if the plan will affect the substation/transformer during their quarterly meeting. As a follow-up from the group's last meeting, Ring Road ownership information was sent to Rustyn. TEP shared the working group and open house information and how the working group will have one representative per organization. Chris Kopach stated he may not be able to attend the working group, but his staff will be present. TEP discussed planned distribution improvements and plans for Summer 2025-27. UofA will provide their thoughts on improvements next year.

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-10**

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MRP-Neighborhood-Advisory-Group (<https://groups.io/g/MRP-Neighborhood-Advisory-Group>)



Topics (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,20,104362561>)

Date (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104362561?>

p=Created%2C%2C%2C20%2C20%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C20%2C104362561)

### A Low Cost Solution to TEP's Legal Conflicts: the Halfway Solution



Feb 14 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/149>)

Hi NAG Reps,

What's the lowest cost connection? No connection.

We propose that TEP only connects Vine to DeMoss-Petrie and does not further connect Vine to Kino (see attached proposal). The reliability gained by connecting Vine to Kino is minimal at best given the increased resiliency of steel pole 138kV lines compared to existing wood pole 46kV lines. This allows everyone to avoid the legal conflicts, delays, and costs required to make a new high voltage connection through the oldest and densest part of Tucson.

Not connecting Vine to Kino leads to some obvious questions that we address in the two-page paper but I am happy to answer you or your neighborhood's questions here or directly. We consulted with licensed engineers, attorneys, and other experts in the process of devising this solution. It allows TEP to achieve its primary goal of increasing capacity to the University area while also achieving significant gains in resiliency. And it protects all of our neighborhoods from downed high voltage transmission lines and diminution of property values, among other things.

It has already been presented to TEP and has support from the City. Ideally, TEP will accept this good faith offer of compromise and together we can take it to the ACC.

Feel free to share this with anyone in your neighborhood that is concerned about the project. We welcome any and all feedback and support.

Best,



(<https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/149/0/20240214 A New Solution for TEP.pdf>)





Feb 14 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/150)

Great solution that I think all of the stakeholders can get behind. Thanks for sending this info and map



On Wednesday, February 14, 2024 at 03:01:44 PM MST, [Redacted] wrote:

Hi NAG Reps,

What's the lowest cost connection? No connection.

We propose that TEP only connects Vine to DeMoss-Petrie and does not further connect Vine to Kino (see attached proposal). The reliability gained by connecting Vine to Kino is minimal at best given the increased resiliency of steel pole 138kV lines compared to existing wood pole 46kV lines. This allows everyone to avoid the legal conflicts, delays, and costs required to make a new high voltage connection through the oldest and densest part of Tucson.

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Best,



(https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/150/0/20240214 A New Solution for TEP.pdf)



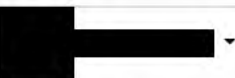
20240214 A New Soluti...



Feb 14 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/151)

We think so too. You're welcome.

Show quoted text



Feb 14 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/152)

I'm interested to learn more for sure.

Show quoted text



Feb 15 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/153)

Thanks

[Redacted text block]

[Redacted text block]

On Wednesday, February 14, 2024 at 03:01:44 PM MST, [Redacted] wrote:

Hi NAG Reps,

What's the lowest cost connection? No connection.

We propose hat TEP only connects Vine to DeMoss-Petrie and does not further connect Vine to Kino (see attached proposal). The reliability gained by connecting Vine to Kino is minimal at best given the increased resiliency of steel pole 138kV lines compared to existing wood pole 46kV lines. This allows everyone to avoid the legal conflicts, delays, and costs required to make a new high voltage connection through the oldest and densest part of Tucson.

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Feel free to share this with anyone in your neighborhood that is concerned about he project. We welcome any and all feedback and support.

Best,



(https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/153/0/20240214 A New Solution for TEP.pdf)



Feb 15 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/154)

I would love to know what "has support from the City" means, and see a list of the licensed engineers, attorneys and consultants and other experts, and see the source material from them that you and [Redacted] rely on when you conclude that half of the MRP is unnecessary. It is difficult for regular members of the public to understand or weigh the merits of TEP's plan against those of this proposal without knowing more.

While I admire your commitment, it is disappointing to see (at the bottom of page 1 and in footnote 1 of the halfway proposal) you and [Redacted] continuing to misrepresent the Zoning Administrator's May 2021 decision letter. That decision does reference the University Area Plan's language to place utilities underground "wherever possible," but this is not a conclusion, only a reference, and there is no evaluation of where it would be possible versus where it would be impossible. The ZA conclusion was that the request for a special exemption for the Vine Substation was premature:

*"At the present time, and on this record, the Zoning Examiner cannot determine whether the proposed special exception land use complies with Plan Tucson and the University Area Plan, or whether the proposed special exception would adversely affect the surrounding neighborhoods."*

The ZA denied the application without prejudice, welcoming TEP to apply again when the entire project is better planned out.

It is simply false that the May 13, 2021 decision letter legally requires a half mile of transmission line to be buried.





Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/155\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/155)

Why did the Zoning Examiner deny the rezone? What was it that he wanted to determine compliance with?

If non-compliance is not an issue, why deny the rezone?

Best,



Show quoted text



Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/156\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/156)

That answer is in the decision letter and the conclusion. (It is the same letter that you cite in your proposal, and, have cited to this group many times. ) The Zoning Administrator is quite clear about the why: Premature application. There were too many unknowns about the route. Reapply later. It was not denied on the merits, but on the vagueness of the entire project. And it was a special exemption, not a re-zoning.

*"At the present time, and on this record, the Zoning Examiner cannot determine whether the proposed special exception land use complies with Plan Tucson and the University Area Plan, or whether the proposed special exception would adversely affect the surrounding neighborhoods."*



Show quoted text



Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/157\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/157)

So the Zoning Examiner is okay with specific non-compliance but not vague non-compliance?

Could TEP re-apply with a compliant plan?

Show quoted text



Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/158\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/158)

Don't know the distinction. You might want to read the decision letter. If you do, you will see that the ZA essentially told TEP to define the route first, get it through the line-siting committee, then come back with the particulars of what and where lines will be coming in and out of the proposed substation.

This seems like what TEP is trying to do, with this advisory groups help.



Show quoted text



Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/159\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/159)

The ZE denied for vague non-compliance. Does the line-siting committee approving a non-compliant route create compliance?

Show quoted text



Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/160\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/160)

I don't see how this plan could conflict with Plan Tucson, University Area Plan or a neighborhood plan. So the Zoning Examiner would have easy work to approve it if TEP does their homework to detail it out. I assume they don't want to go very far on it without consulting the mother-ship.

Regards,



Show quoted text



Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/161\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/161)

Agreed. We're proposing a huge reduction in conflict surface area. If TEP removes emotion, the business math says to jump at it.

Show quoted text



Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/162\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/162)

I don't have the answers you seek. My guess is that TEP will do as the ZA decision letter directs, and come back before it to apply for a special exemption once the route is exactly defined. I think that this is the schedule of the project that TEP has explained in its statements, but you can read the Zoning Administrator's decision letter as well as I can.

I am merely pointing out that your "halfway proposal" misrepresents the ZA decision that you introduce and reference in that proposal, specifically at the bottom of page 1. Your proposal claims ZA conclusions that the ZA did not make.

I and others are looking forward to hearing what part of "the City" supports the halfway proposal, and to seeing a list of the licensed engineers, attorneys and consultants and other experts, you mention, and seeing the source material from them that you and [redacted] rely on when you conclude that half of the MRP is unnecessary.

Thanks,

Show quoted text



Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/163\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/163)

It does not misrepresent anything. ZE denied the rezone because he could not determine compliance with the undergrounding requirements of the UAP (the green). It seems like maybe you're just reading the pink and interpreting that to mean a route being selected somehow solves the green. It does not. I can't really help you beyond

Based on the testimony at the Zoning Examiner hearing and the record, the Applicant does not intend to place the transmission lines underground. While this proceeding is separate from the line-siting process, as a practical matter the two are interrelated. Given the uncertainty regarding the route(s) to be selected for the Kino DMP Transmission Line Project, and the uncertainty of the location of the power lines which will connect with the proposed Vine substation, compliance with PT and UAP cannot be determined on the current record.

that. Sorry.

The Zoning Examiner denies the special exception request, without prejudice to the Applicant to resubmit its request when the additional information discussed above is available.

Show quoted text



Feb 15 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/164\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/164)

Here's a more complete picture. Maybe that additional sentence will help you. Below this text is also what we wrote in our footnote. I'm not sure what the misrepresentation is. Sorry.

As a result, compliance with PT and UAP cannot be determined at this time. PT provides policy direction to protect established residential neighborhoods by supporting compatible development and environmentally sensitive design that protects the integrity of existing neighborhoods, complements adjacent land uses, and enhances the overall function and visual quality of the street, adjacent properties, and the community. The UAP specifically directs that utility lines be placed underground where possible to mitigate impacts on adjacent uses.

Based on the testimony at the Zoning Examiner hearing and the record, the Applicant does not intend to place the transmission lines underground. While this proceeding is separate from the line-siting process, as a practical matter the two are interrelated. Given the uncertainty regarding the route(s) to be selected for the Kino DMP Transmission Line Project, and the uncertainty of the location of the power lines which will connect with the proposed Vine substation, compliance with PT and UAP cannot be determined on the current record.

The Zoning Examiner denies the special exception request, without prejudice to the Applicant to resubmit its request when the additional information discussed above is available.

<sup>1</sup> In denying TEP's request for rezoning the Vine substation property in May 2021, the City's Zoning Examiner determined that TEP's project will need to be in compliance with the University Area Plan (enacted in 1989) stipulating that new utilities within the extended area the plan covers be constructed underground wherever possible. Tucson's Unified Development Code (UDC)

Show quoted text

MRP-Neighborhood-Advisory-Group (https://groups.io/g/MRP-Neighborhood-Advisory-Group)



Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,20,2,20,104391708)

Date (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104391708?

p=Created%2C%2C%2C20%2C20%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C20%2C104391708)

[EXTERNAL E-Mail] Re: [MRP-Neighborhood-Advisory-Group] A Low Cost Solution to TEP's Legal Conflicts: the Halfway Solution



Clark Bryner

Feb 16 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/165)

Let me chime in on behalf of TEP. First, thank you [redacted] for sharing your idea. This is a demonstration of the type of input we appreciate in order to complete this project in a way that is acceptable to the community. City Council Members Dahl and Kozachik recently shared with us that they hope this alternative – not connecting Kino to Vine – will be given consideration. So I'll borrow from the response TEP provided to them:

Much of the value this project will provide derives from its design, which will complete a 138-kilovolt (kV) loop around central Tucson by linking our 138-kV DeMoss Petrie (DMP) and Kino Substations to the proposed Vine substation. This design provides much greater reliability and resiliency than would the single, radial 138-kV connection you have proposed, as each substation will be served by separate feeds that allow continued service when one feed is interrupted. While your letter suggests such failures are unlikely, TEP's experience in providing safe, reliable electric service has taught us otherwise. Even the strongest, best-built facilities are subject to failure for multiple reasons, including external damage, equipment failure, extreme weather, intrusions by animals, and faults caused by trees, tarps or other objects that cross power lines. That's why redundancy is at the heart of resiliency. It provides capacity to accommodate multiple contingencies that could compromise the reliability of a service that supports not just quality of life, but life itself in our hot, desert climate.

The looped system we've designed will benefit more than just the areas surrounding the new Vine substation. The Kino Substation near South Kino Boulevard and East 36th Street was designed to be powered through 138-kV links to both the Vine and Irvington substations. The modification you've proposed would leave that recently built substation isolated on a single radial feed, significantly reducing the resiliency of facilities serving an area that includes many neighborhoods and a fast-growing cluster of businesses. We believe these residents and businesses deserve the same level of reliability and climate resiliency as those living in other areas served through looped 138-kV facilities.

We feel the proposal would leave many in our community at risk of reduced reliability for the reasons shared above. At our next meeting on February 29th, I'd like to discuss additional project designs that have been proposed by the public and remain under consideration to minimize project impacts and disturbances. These might include undergrounding distribution lines and other utility providers' lines depending on the proposed route alternatives, and adjusting pole heights through and adjacent to residential properties when possible.

Thanks,

Clark Bryner, AICP  
Manager, Transmission Line Siting  
Tucson Electric Power/UNS Electric Inc.

Show quoted text



Feb 16 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/166)

Clark, what is sufficient reliability? If 138kV lines virtually never go down then why spend a decade fighting for a second connection when all of these areas can get needed capacity upgrades with one connection? Why delay capacity increases?

That's the core of the solution that TEP's response doesn't meaningfully address. We aren't arguing that two connections aren't better than one. We're accepting your statements that the one connection is better than anything that came before it and is over engineered to hurricane levels. If that proves insufficient, then nothing prevents you from adding the second connection later on.

I could add a second meter to my house in case the first one goes down but it never goes down (at least for very long) so why would I spend that time and money? Actually, the data says that if I want to maximize resiliency, I should underground my first line...

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< (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104584865?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C20%2C104584865)

→ (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104362561?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C20%2C104362561)



MRP-Neighborhood-Advisory-Group (<https://groups.io/g/MRP-Neighborhood-Advisory-Group>)



Topics (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,20,104788441>)

Date (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104788441?>

p=Created%2C%2C%2C20%2C20%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C20%2C104788441)

ACC



Mar 7 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/197>)

Good Morning Clark,

I'm still struggling with this concept of applying to ACC while a lawsuit is pending. I am assuming the idea is you have "if we lose"-route and a "if we win"-route, right?

So, if the ACC is flexible enough to do what ifs, then why aren't we considering routes that say what if the City and other interveners prevail on enforcing o her laws like the UAP? The City has already told TEP and adopted a resolution that it will enforce these laws.

Why wont we have to restart this process if things we were instructed not to consider are then required to be considered?

I get that you don't want to consider them publicly but doesn't not considering them publicly risk pushing this thing even further back? Or does this process and what we are asked to consider not materially matter to the ACC?

Thanks,



Mar 7 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/199>)

And, I am still confused by your and Joe's repeated statements that the ACC is in the loop. Who at the ACC is in the loop about your "what ifs" strategy? What are you telling them and what are they telling you?

It remains bizarre to me that the ACC would be okay with TEP applying with multiple "what ifs" while a court case clouding that very application is pending. Will that court case not be appealed? Why would the ACC not tell TEP to wait until it was completely done? Does the ACC routinely spend time and resources on hypotheticals when waiting for actual results is more resource efficient for all parties?

You've claimed you can appeal the ACC decision straight to the AZ Supreme Court and skip the lower courts. If TEP wants to proceed expediently, shouldn't it drop the lower court case and just go to the ACC?

Thanks,



Show quoted text



Clark Bryner

Mar 7 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/200>)

I understand you have a lot of questions. I'm not the legal expert on this, but I'll pass your concerns along.



Mar 7 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/201>)

The questions are based on statements you've made to us publicly. So I hope we can get some answers publicly. The ACC stuff is a big deal.

Show quoted text



Mar 9 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/204\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/204)

No need to worry. The ACC line siting committee hearing is set for July, if my memory is correct.

The Superior Court case should be done by then. It is based on 3 straightforward points of law, about which TEP and CoT advance opposing interpretations. The hearing is set for April 30. Judge Bryson will have up to 60 days to issue a decision, so the ruling should be out by end of June before the ACC hearing. At that point, TEP can advance a preferred route without "what-ifs."

If one of the parties really wants to appeal to the ASC, then maybe TEP will just pull the hearing like they did 3 years ago when the Sam Hughes NA and CoT formerly intervened.

But I think all that is beyond the scope of this advisory group.



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Mar 9 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/205\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/205)

A decision in a lower court does not mean it's the end of the court process.

Moreover, the application has to be submitted well before the hearing. As it currently stands, TEP seems to be planning to submit its application before a decision is rendered and before any appeal window closes.

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1 - 6 of 6 < 1 >

[← \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/105072596?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C105072596\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/105072596?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C105072596)

[→ \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104539075?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C104539075\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104539075?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C104539075)

MRP-Neighborhood-Advisory-Group (<https://groups.io/g/MRP-Neighborhood-Advisory-Group>)



Topics (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,20,102855424>)

Neighborhood-Advisory-Group/topic/102855424?

%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102855424%2Cprevid%253D1701293847846622445%2Cnextid%253D1700061454437883834)

### additional criteria from bbvn neighbors



11/28/23 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/73>)

Input coming in incrementally. Additional criteria to consider is not on bike paths/boulevards, which is not in the current set. E.g., Winsett from Reid Park as a constraint in specific, along with Treat. But I think the criteria at large makes sense to add to the collection for the midtown area.

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1 - 1 of 1 < 1 >

[← \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102662390?p=%2C%2C%2C20%2C0%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102662390\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102662390?p=%2C%2C%2C20%2C0%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102662390)

[→ \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102652874?p=%2C%2C%2C20%2C0%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102652874\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102652874?p=%2C%2C%2C20%2C0%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102652874)

MRP-Neighborhood-Advisory-Group (https://groups.io/g/MRP-Neighborhood-Advisory-Group)



Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,0,103178371)

orhood-Advisory-Group/topic/103178371?

%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C0%2C103178371%2Cprevid%253D1713156984057039642%2Cnextid%253D1701462611249739756)  
any info on a Feb open house for MRP?



12/14/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/123)

Someone in BBVN mentioned hearing there was going to be another open house in February for the project? Can anyone confirm date/time and location?



12/14/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/124)

Hello everyone. The next Open House is scheduled for February 8, 2024, at the DoubleTree Reid Park from 6 to 8 p.m. Thank you.



**From:** MRP-Neighborhood-Advisory-Group@groups.io <MRP-Neighborhood-Advisory-Group@groups.io> on behalf of [redacted] via groups.io [redacted]

**Date:** Thursday, December 14, 2023 at 1:51 PM

**To:** MRP-Neighborhood-Advisory-Group@groups.io <MRP-Neighborhood-Advisory-Group@groups.io>

**Subject:** [MRP-Neighborhood-Advisory-Group] any info on a Feb open house for MRP?

Someone in BBVN mentioned hearing there was going to be another open house in February for the project? Can anyone confirm date/time and location?

1 - 2 of 2 < 1 >

← (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/103178193?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C0%2C103178193)

→ (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/103062391?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C0%2C103062391)

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Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,0,103062391)

Arroyo Chico Greenway - Winsett Street

Arroyo Chico Greenway - Winsett Street

### Arroyo Chico Greenway - Winsett Street



12/08/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/99)

Note planned work on winsett the city is involved in - likely want to remove that as a constraint else stop the project - broadmoor.

Would this have come up naturally in the greenway constraints?

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1 - 1 of 1

← (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/103178371?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C103178371)

→ (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102989702?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C102989702)

MRP-Neighborhood-Advisory-Group (https://groups.io/g/MRP-Neighborhood-Advisory-Group)



Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,0,102989702)

orhood-Advisory-Group/topic/102989702?

%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C102989702%2Cprevid%253D1713156984057039642%2Cnextid%253D1701462611249739756)

### Broadmoor historic district not captured in current map



12/05/23 @ (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/95)

Neighbors have asked that broadmoor broadway village be added to the map as a historic district (happened last year). It is not currently indicated that way. Thanks



Clark Bryner ▾

12/06/23 @ (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/98)

Thank you [redacted], to both you and your neighbors for pointing out that oversight. When we put together that map, we had not yet refreshed our cultural resource data, so were relying on the data we had from the old Kino-DMP analysis. We will have that corrected on future maps and incorporated into any analysis, as appropriate.

1 - 2 of 2 < 1 >

← (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/103062391?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C103062391)

→ (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102881281?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C102881281)



ighborhood-Advisory-Group/topic/102995542? 62C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C20%2C102995542%2Cprevid%253D1713156984057039642%2Cnextid%253D1701462611249739756) City of Tucson Reference Material



12/05/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/96)

Hi All,

We only really get TEP's opinion at these meetings. Here are some of the City of Tucson's documents and opinions, which counter TEP's and may help fill in some of the gaps for you as to why many of us push back and question the design of this process:

1. October 2023 City of Tucson Legal Memo (https://file.notion.so/ff/85e84c2a-d8f7-4d57-9894-e4471c88112c/e085b09e-7b2f-4927-b85a-61ddec8e11ed/Permit\_T21SA00378\_\_File\_Name\_COT\_LEGAL\_MEMO\_CASE\_C10-21-09\_(FINAL).PDF\_\_Doc\_Type\_DOCUMENTS.pdf?id=38c2f62d-4a52-4ddc-8391-74740ede2008&table=block&spaceld=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701885600000&signature=Tx3pVOHG93nsHNsEHxd1u3CFMQKvJkR0SVA40eh-8YE&downloadName=Permit+%23+T21SA00378+\_+File+Name+COT+LEGAL+MEMO+CASE+C10-21-09+%28FINAL%29.PDF+\_+Doc+Type+DOCUMENTS.pdf)
2. October 2023 City of Tucson Staff Report (https://file.notion.so/ff/85e84c2a-d8f7-4d57-9894-e4471c88112c/7632fa0b-c048-49f0-a479-79f4f74c252a/Permit\_T21SA00378\_\_File\_Name\_C10-21-09\_STAFF\_REPORT.PDF\_\_Doc\_Type\_SPECIAL\_APPLICATIONS.pdf?id=c2d1ee74-b0c1-4799-9f15-c9bbb098ab54&table=block&spaceld=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701885600000&signature=MoTvzPbroiOH8LSfu\_P6rrsM\_grbOSH7\_hyc7ZerRPc&downloadName=Permit+%23+T21SA00378+\_+File+T21-09+STAFF+REPORT.PDF+\_+Doc+Type+SPECIAL+APPLICATIONS.pdf)
3. 2000 TEP Franchise Agreement (https://file.notion.so/ff/85e84c2a-d8f7-4d57-9894-e4471c88112c/3edbc0ad-7858-4e38-ba5a-683278b1b3de/ORD\_9429\_TEP\_Franchise\_OCR.pdf?id=bc20453b-07ec-4267-b676-d36e3eb985bc&table=block&spaceld=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701878400000&signature=5zOZgwr-CqQdn2NNzw8h69cK4Lil5WtS4HLRptiNnBw&downloadName=ORD+9429+TEP+Franchise+OCR.pdf)
4. May 2021 Zoning Examiner's Decision (https://docs.tep.com/wp-content/uploads/TEP-Vine-Substation-Zoning-Examiner-decision-and-transcript-May-2021.pdf)
5. August 2021 City of Tucson Opinion (https://file.notion.so/ff/85e84c2a-d8f7-4d57-9894-e4471c88112c/417963ec-5c56-4f06-b766-327d335b8a25/Permit\_T21SA00285\_\_File\_Name\_T21SA-285\_LTR\_REPLY\_ZAD\_TEP.PDF\_\_Doc\_Type\_SPECIAL\_APPLICATIONS.pdf?id=c9763784-3828-46ba-be5b-11732cf028a8&table=block&spaceld=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701885600000&signature=zIFSCRo5veuZw4ybmBX61UAWkBTj4ZXHP4DIJWRgsw&downloadName=Permit+%23+T21SA00285+\_+F285\_LTR\_REPLY\_ZAD+TEP.PDF+\_+Doc+Type+SPECIAL+APPLICATIONS.pdf)

As TEP found the first ime around, the City's opinions cannot simply be ignored and overridden. So, for any of your neighbors that are cynical and scared, please share with them that there is reason for hope and that TEP cannot simply do whatever it wants.

And, once again, here is how TEP must expense transmission assets (taken from its 2022 10-K SEC filing):

NOTE 3. UTILITY PLANT AND JOINTLY-OWNED FACILITIES

UTILITY PLANT

The following table shows Plant in Service on the Consolidated Balance Sheets by major class:

(\$ in millions)	Annual Depreciation Rate <sup>(1)</sup>	Average Remaining Life in Years <sup>(1)</sup>	December 31,	
			2022	2021
<b>Plant in Service</b>				
Generation Plant <sup>(1)</sup>	3.11%	17	\$ 3,491	\$ 3,753
Distribution Plant	1.93%	32	2,149	2,024
Transmission Plant	1.69%	34	1,295	1,210
General Plant	6.01%	6	653	540
Intangible Plant, Software Costs, and Other <sup>(2)</sup>	Various	Various	224	268
Plant Held for Future Use	—	—	2	3
<b>Total Plant in Service <sup>(1)</sup></b>			<b>\$ 7,814</b>	<b>\$ 7,798</b>

<sup>(1)</sup> In June 2022, San Juan Unit 1 was retired by PNM, the operator of San Juan. Contemporaneously, TEP's obligations ceased with respect to: (i) costs incurred for San Juan Unit 1 and the related common facilities stemming from continued operations at San Juan; and (ii) purchases under the coal supply agreement between PNM and San Juan Coal Company.

<sup>(2)</sup> Primarily represents computer software, which is amortized over three to five years for smaller application software and 10 years for large enterprise software and has an average remaining life of three years.

<sup>(3)</sup> Includes plant acquisition adjustments of \$(206) million as of December 31, 2022 and 2021.

<sup>(4)</sup> Based on the 2018 depreciation study available for the major classes of Plant in Service, effective January 1, 2021, as approved as part of the 2020 Rate Order. Transmission Plant depreciation rates are based on the 2018 depreciation study, effective August 1, 2019, as approved as part of the 2022 Final FERC Rate Order.

Best,



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12/5/23

Thanks

[Redacted text block]

[Redacted text block]

On Tuesday, December 5, 2023 at 09:47:03 AM MST, [Redacted] wrote:

Hi All,

We only really get TEP's opinion at these meetings. Here are some of the City of Tucson's documents and opinions, which counter TEP's and may help fill in some of the gaps for you as to why many of us push back and question the design of this process:

1. October 2023 City of Tucson Legal Memo ([https://file.notion.so/f/f/85e84c2a-d8f7-4d57-9894-e4471c88112c/e085b09e-7b2f-4927-b85a-61ddecae11ed/Permit\\_T21SA00378\\_\\_File\\_Name\\_COT\\_LEGAL\\_MEMO\\_CASE\\_C10-21-09\\_\(FINAL\).PDF\\_\\_Doc\\_Type\\_DOCUMENTS.pdf?id=38c2f62d-4a52-4ddc-8391-74740ede2008&table=block&spaceId=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701885600000&signature=Tx3pVOHG93nsHNsEHxd1u3cFMQKvJKR0SVA40eh-8YE&downloadName=Permit+%23+T21SA00378+\\_+File+Name+COT+LEGAL+MEMO+CASE+C10-21-09+%28FINAL%29.PDF+\\_+Doc+Type+DOCUMENTS.pdf](https://file.notion.so/f/f/85e84c2a-d8f7-4d57-9894-e4471c88112c/e085b09e-7b2f-4927-b85a-61ddecae11ed/Permit_T21SA00378__File_Name_COT_LEGAL_MEMO_CASE_C10-21-09_(FINAL).PDF__Doc_Type_DOCUMENTS.pdf?id=38c2f62d-4a52-4ddc-8391-74740ede2008&table=block&spaceId=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701885600000&signature=Tx3pVOHG93nsHNsEHxd1u3cFMQKvJKR0SVA40eh-8YE&downloadName=Permit+%23+T21SA00378+_+File+Name+COT+LEGAL+MEMO+CASE+C10-21-09+%28FINAL%29.PDF+_+Doc+Type+DOCUMENTS.pdf))
2. October 2023 City of Tucson Staff Report ([https://file.notion.so/f/f/85e84c2a-d8f7-4d57-9894-e4471c88112c/7632fa0b-c048-49f0-a479-79f4f74c252a/Permit\\_T21SA00378\\_\\_File\\_Name\\_C10-21-09\\_STAFF\\_REPORT.PDF\\_\\_Doc\\_Type\\_SPECIAL\\_APPLICATIONS.pdf?id=c2d1ee74-b0c1-4799-9f15-c9bbb098ab54&table=block&spaceId=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701885600000&signature=MoTvzPbroiOH8LSfu\\_P6rrsM\\_grbOSH7\\_hyc7ZerRPe&downloadName=Permit+%23+T21SA00378+\\_+File+Name+C10-21-09+STAFF+REPORT.PDF+\\_+Doc+Type+SPECIAL+APPLICATIONS.pdf](https://file.notion.so/f/f/85e84c2a-d8f7-4d57-9894-e4471c88112c/7632fa0b-c048-49f0-a479-79f4f74c252a/Permit_T21SA00378__File_Name_C10-21-09_STAFF_REPORT.PDF__Doc_Type_SPECIAL_APPLICATIONS.pdf?id=c2d1ee74-b0c1-4799-9f15-c9bbb098ab54&table=block&spaceId=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701885600000&signature=MoTvzPbroiOH8LSfu_P6rrsM_grbOSH7_hyc7ZerRPe&downloadName=Permit+%23+T21SA00378+_+File+Name+C10-21-09+STAFF+REPORT.PDF+_+Doc+Type+SPECIAL+APPLICATIONS.pdf))
3. 2000 TEP Franchise Agreement ([https://file.notion.so/f/f/85e84c2a-d8f7-4d57-9894-e4471c88112c/3edbc0ad-7858-4e38-ba5a-683278b1b3de/ORD\\_9429\\_TEP\\_Franchise\\_OCR.pdf?id=bc20453b-07ec-4267-b676-d36e3eb985bc&table=block&spaceId=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701878400000&signature=5zOZgwr-CqQdn2NNzw8h69cK4Li5WtS4HLRp\\_iNnBw&downloadName=ORD+9429+TEP+Franchise+OCR.pdf](https://file.notion.so/f/f/85e84c2a-d8f7-4d57-9894-e4471c88112c/3edbc0ad-7858-4e38-ba5a-683278b1b3de/ORD_9429_TEP_Franchise_OCR.pdf?id=bc20453b-07ec-4267-b676-d36e3eb985bc&table=block&spaceId=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701878400000&signature=5zOZgwr-CqQdn2NNzw8h69cK4Li5WtS4HLRp_iNnBw&downloadName=ORD+9429+TEP+Franchise+OCR.pdf))
4. May 2021 Zoning Examiner's Decision (<https://docs.tep.com/wp-content/uploads/TEP-Vine-Substation-Zoning-Examiner-decision-and-transcript-May-2021.pdf>)
5. August 2021 City of Tucson Opinion ([https://file.notion.so/f/f/85e84c2a-d8f7-4d57-9894-e4471c88112c/417963ec-5c56-4f06-b766-327d335b8a25/Permit\\_T21SA00285\\_\\_File\\_Name\\_T21SA-285\\_LTR\\_REPLY\\_ZAD\\_TEP.PDF\\_\\_Doc\\_Type\\_SPECIAL\\_APPLICATIONS.pdf?id=c9763784-3828-46ba-be5b-11732cf028a8&table=block&spaceId=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701885600000&signature=zIFSCRo5veuZw4ybmBX61UAWkBTj4ZXHJP4DIJWRgsw&downloadName=Permit+%23+T21SA00285+\\_+File+Name+T285\\_LTR\\_REPLY\\_ZAD+TEP.PDF+\\_+Doc+Type+SPECIAL+APPLICATIONS.pdf](https://file.notion.so/f/f/85e84c2a-d8f7-4d57-9894-e4471c88112c/417963ec-5c56-4f06-b766-327d335b8a25/Permit_T21SA00285__File_Name_T21SA-285_LTR_REPLY_ZAD_TEP.PDF__Doc_Type_SPECIAL_APPLICATIONS.pdf?id=c9763784-3828-46ba-be5b-11732cf028a8&table=block&spaceId=85e84c2a-d8f7-4d57-9894-e4471c88112c&expirationTimestamp=1701885600000&signature=zIFSCRo5veuZw4ybmBX61UAWkBTj4ZXHJP4DIJWRgsw&downloadName=Permit+%23+T21SA00285+_+File+Name+T285_LTR_REPLY_ZAD+TEP.PDF+_+Doc+Type+SPECIAL+APPLICATIONS.pdf))

As TEP found the first time around, the City's opinions cannot simply be ignored and overridden. So, for any of your neighbors that are cynical and scared, please share with them that there is reason for hope and that TEP cannot simply do whatever it wants.

And, once again, here is how TEP must expense transmission assets (taken from its 2022 10-K SEC filing):



**NOTE 3. UTILITY PLANT AND JOINTLY-OWNED FACILITIES****UTILITY PLANT**

The following table shows Plant in Service on the Consolidated Balance Sheets by major class:

(\$ in millions)	Annual Depreciation Rate <sup>(4)</sup>	Average Remaining Life in Years <sup>(4)</sup>	December 31,	
			2022	2021
<b>Plant in Service</b>				
Generation Plant <sup>(1)</sup>	3.11%	17	\$ 3,491	\$ 3,753
Distribution Plant	1.93%	32	2,149	2,024
Transmission Plant	1.69%	34	1,295	1,210
General Plant	6.01%	6	653	540
Intangible Plant, Software Costs, and Other <sup>(2)</sup>	Various	Various	224	268
Plant Held for Future Use	—	—	2	3
<b>Total Plant in Service <sup>(3)</sup></b>			<b>\$ 7,814</b>	<b>\$ 7,798</b>

<sup>(1)</sup> In June 2022, San Juan Unit 1 was retired by PNM, the operator of San Juan. Contemporaneously, TEP's obligations ceased with respect to: (i) costs incurred for San Juan Unit 1 and the related common facilities stemming from continued operations at San Juan; and (ii) purchases under the coal supply agreement between PNM and San Juan Coal Company.

<sup>(2)</sup> Primarily represents computer software, which is amortized over three to five years for smaller application software and 10 years for large enterprise software and has an average remaining life of three years.

<sup>(3)</sup> Includes plant acquisition adjustments of \$(206) million as of December 31, 2022 and 2021.

<sup>(4)</sup> Based on the 2018 depreciation study available for the major classes of Plant in Service, effective January 1, 2021, as approved as part of the 2020 Rate Order. Transmission Plant depreciation rates are based on the 2018 depreciation study, effective August 1, 2019, as approved as part of the 2022 Final FERC Rate Order.

Best,

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12/11/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/100)

Below is another interesting piece of the puzzle. The City Council and Mayor voted to fight TEP at the ACC on 9/1/21 for the foregoing reasons, none of which have changed (excerpted below and linked here):

https://tucsonaz.hylandcloud.com/221agendaonline/Meetings/ViewMeeting?id=1574&doctype=2  
(https://tucsonaz.hylandcloud.com/221agendaonline/Meetings/ViewMeeting?id=1574&doctype=2)

Essentially, the City's position has always been: you have to follow the law (UDC, plans, ordinances, etc.). It's baffling that TEP thinks the City is going to or even can take a different position this time. The ACC has no legal ability to override the City or its laws and, presumably, that is why TEP abandoned its pursuit of the ACC last time. The City already called TEP's bluff. It's baffling that we're doing it all over again.

"

**MAYOR AND COUNCIL DIRECTION REGARDING EXECUTIVE SESSION – ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE DOCKET NO. L-000000C-21-0288-00192, KINO TO DEMOSS-PETRIE TRANSMISSION LINE PROJECT; INCLUDING DIRECTION AND INTERVENING IN THE COMMITTEE PROCEEDINGS (WARDS 5 AND 6, CITY WIDE) SEP01-21-268**

*It was moved by Council Member Fimbres, duly seconded, and CARRIED by a voice vote of 6 to 0 (Vice Mayor Lee absent/excused), to authorize and direct the City Manager, City Attorney and staff to proceed as discussed in Executive Session; and specifically as follows:*

1. *The City will intervene as a party in the CEC proceedings;*
2. *The City's position is that TEP's proposed Route 5A must be rejected as either a preferred route or an alternate route under the statutory criteria that the Committee and the ACC are bound to apply to the application. Reasons for the rejection of Route 5A include, and are not limited to, the following:*
  - a. *The route's incompatibility with existing plans of the City, including voter-approved projects under Propositions 101, 407 and 409, and the City's General Plan;*
  - b. *The route's interference with and negative impact to previously funded neighborhood improvement projects such as the South Campbell median improvements that benefit Las Vistas, Western Hills, Pueblo Gardens and South Park neighborhoods, AS WELL AS PROJECTS IN OTHER NEIGHBORHOODS AND NEIGHBORHOODS IN OTHER WARDS ; and*
  - c. *The rejection of Route 5A two years ago following review by the Community Working Groups through TEP's own procedures.*
3. *With respect to route 1B; the City's position is that this route - or any proposed preferred or alternate route – cannot be considered for approval unless TEP complies with all City requirements, including but not limited to the undergrounding requirements as described in the Mayor and Council Communication and as further discussed in executive session; and*
4. *That to the extent TEP proposes to seek relief from any City requirements in connection with Route 1B or any other Route, the City Manager and City Attorney are directed to address those issues as discussed in executive session."*

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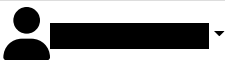
12/11/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/101)

That was related to the so-called "gateway corridor" ordinance. The city and the "underground coalition" won that fight, and forced TEP to not place overhead lines on a gateway corridor. Now, TEP is seeking to place overhead lines on non-gateway routes. The city does not have any type of ordinance that prevents overhead power lines anywhere else other than gateway and scenic corridors.

Perhaps it should pass an ordinance forcing all future transmission lines within the city limits to be buried underground, but it has not done so.



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12/11/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/102)

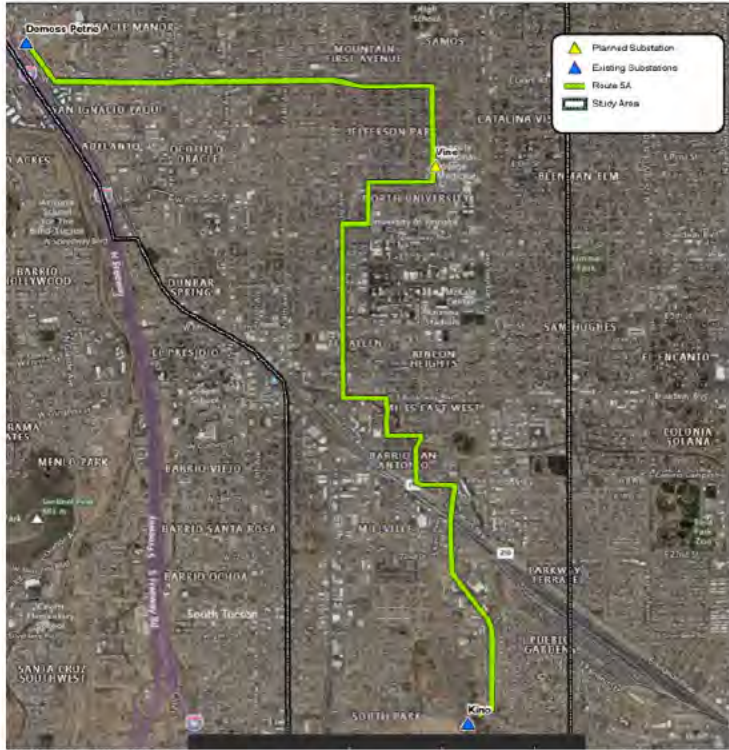
Route 5A was not through the gateway.

Show quoted text



12/11/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/103)

Here was Route 5A. The City took a position on much more than just the gateway.



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12/11/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/104)

"The city does not have any type of ordinance that prevents overhead power lines anywhere else other than gateway and scenic corridors."

This is also incorrect and it would be prudent of you to read the May 2021 Zoning Examiner's Decision (particularly page 8) then re-read what I sent today. There are ways that you could be pressuring the City to protect your neighborhood by amending documents instead of hoping someone else does it for you.

I am happy to walk you through exactly what I would do and even willing to help you pressure the City to gain the same legal protections that other neighborhoods have -- according to the May 2021 Zoning Examiner's Decision and the City's legal position.

Best,



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12/11/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/105)

Question for group, as I had to leave the open house, but had a person at our neighborhood meeting this evening say she was told in response to a question there that transmission lines could not be underground. That is in direct conflict with my understanding, and I just need to be clear I'm not radically refused, as she said she was quite clear.

Also, folks asked for clarification on the shielding for the 128kV lines -- if there is a storm event and a line comes down, how is it shielded from causing hazard on the ground?

Show quoted text



12/12/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/106>

TEP's opinion is that it does not have to follow local laws, be they for undergrounding or otherwise that it is above the law

As cited, he City and the law disagree It's a bigger battle than mere undergrounding

At these events, TEP presents its opinion to us and our neighbors as objective fact, which is why it's so important to educate neighbors as to the full picture especially the parts TEP omits

This happened last time too And I fail to see how con inuing this strategy benefits TEP's shareholders It has a low probability of success (wasted time and money) and success would be catastrophic to its business interests

There isn't a magical longer route in the expanded study area that avoids conflict with local laws To succeed, TEP has to be declared above local laws, and that just cannot be allowed to happen

Thankfully, the City gets that even if it needs the occasional reminder

Thanks,



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12/12/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/107>

Correct Route 1A was Route 5A was the last minute alternative that TEP tried to propose to stick it to the city and neighborhoods after the August 2021 Zoning Examiner's decision stated that route 1A could not be used Route 5A had been previously rejected by the open public route selection



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12/12/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/108>

Yes, because route 5A was pulled out from the coffin. The other objections were applicable to Route 1A. Due to that letter and the ZA decision of August 2021, TEP cancelled its request for a Line Siting Committee hearing in September 2021, and worked with the city and the interveners to come up with the Special Exception process and embed funding for burying transmission lines in a new franchise agreement that became known as proposition 413.

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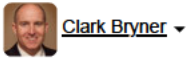
12/12/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/109>

Please cite the UDC ordinance that prohibits TEP from hanging transmission lines overhead along roads that are not scenic or gateway corridors  
The zoning examiner's decision is in an interpretation, but it seems you may be mixing up the zoning examiners decisions The one you cited previously from May, that had a page 8, is related to permitting for a substation I am speaking of the ZA decision of August 2021 that is related to the gateway and scenic corridor ordinances that were applicable to Route 1A That decision is now the subject of legal action (which Clark posted to this group some weeks ago), asking a superior court judge to rule on the validity of that interpretation  
The Miles neighborhood does not seek protection, does not want amend documents, or hope that anybody does anything for us  
We are in favor of a direct, cost effective overhead route for the 138 kV power lines, and we are participating in this advisory committee hoping to contribute to he process of selecting one

Thanks,



Show quoted text



Clark Bryner

12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/110)

Thanks to all for keeping the dialogue and discussion going. Just a quick reminder to please speak on your behalf, and let others speak for themselves, including TEP.

TEP does not feel it is above the law and as a company adheres to all applicable laws and ordinances. That does not mean that we roll over if we believe a law to be faulty. Just as you would as an individual, TEP is standing up for what we believe and pushing back against a local ordinance that we believe oversteps the City's jurisdiction and infringes on our ability to provide a critical service to members of our community. We are exercising our right to challenge the legality of that law through the legal process.

To answer the question [redacted] fielded from her neighborhood regarding hazards in the event of a storm. If a fault (electricity is travelling an unexpected path or is interrupted) is detected on the transmission line we have breakers that operate within fractions of a second to open resulting in a de-energized line before it ever makes contact with the ground. That said, TEP has not seen a 138kV steel pole fail.

And to set the record straight on constructing a transmission line underground. Yes, it can be done. It is very costly and the Arizona Corporation Commission has stated installing a transmission line underground due to stakeholder preference is not a prudent expenditure. If stakeholders would like these lines installed underground an improvement district for underground utilities should be formed. TEP does not have any underground transmission lines (> 100kV) in operation and there are very few in operation in Arizona.



12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/111)

My understanding is the same as yours. I think the speaker at your meeting is slightly incorrect. The closest argument that I recall from TEP, is the contention that TEP is prevented from passing on the additional cost of burying the lines to all ratepayers when the burying is for only aesthetic considerations. That is from an ACC opinion letter that Clark Bryner posted to this group.

Show quoted text



12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/112)

For clarity, you're referring to the Zoning Administrator's Determination ("ZAD", August 2021), which is independent of the Zoning Examiners Decision ("ZED", May 2021). And, if local laws don't matter, Route 5A should've been a done deal then and there. However, they do matter and TEP cannot overcome the City's objections with the ACC.

TEP has lost multiple decisions because of ordinances and plans, among other things. Fundamentally, a utility cannot unilaterally make development decisions for a municipality. As a first principle, any municipality would have to oppose any utility that attempted to ignore its regulations.

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12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/113)

Thank you

Show quoted text



12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/114)

It's all laid out in an easy to understand format in the May 2021 ZED.

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12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/115)

I was not speaking for TEP but rather distilling its legal filings, which seek to override local laws. I don't think that's a controversial statement?

The ACC's policy statement does not say anything new or different. The issue here isn't simply preference, it's law. And, as the City has told TEP repeatedly, even citing case law, the ACC rules are unambiguous as to compliance with local laws.

Best,



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12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/116)

Here is the relevant UDC from page 7 of the ZED:  
*Pursuant to UDC 3.4.5(A), to grant a special exception the Zoning Examiner must find that the requested special exception: ... 5. Complies with the General Plan and any applicable sub-regional, area, or neighborhood plan.*

How and why TEPs plans are non-compliant with Plan Tucson or the University Area Plan is laid out in the ZED.



12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/117)

The "Aesthetics" of a gateway/scenic corridor has monetary value for the entire city, and it should not be dismissed as only benefiting immediately adjacent properties, which includes the UofA! Historic neighborhoods all around central Tucson have monetary value for the entire city. People go to walk and bike them and spend money to take tours through the historic homes. They are an important and integral part of the whole character of our city as much as our surrounding mountains, and are a reason people visit and stay here; which translates into money for our economy. More than half the homes in historic neighborhoods are rentals and B&Bs, VRBOs, etc, because people want to visit the UofA, our vibrant downtown, 4th Ave, and participate in events held centrally, like the gem show, El Tour, rodeo, etc. The "aesthetics" of a city contributes to the monetary health of a city, which is a better economy for all who work and have homes and own businesses here.

Please don't dismiss "aesthetics"! Aesthetics are valuable to our entire city economy, and TEP seeks an easy out because of how that statute is written. It has to be rewritten.

Regards,



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ory-Group/topic/city\_of\_tucson\_reference/102995542?  
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← (https //groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104258717?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C104258717)

→ (https //groups.io/g/MRP-Neighborhood-Advisory-Group/topic/103178193?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C103178193)

MRP-Neighborhood-Advisory-Group (https://groups.io/g/MRP-Neighborhood-Advisory-Group)



Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,0,102995542)

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City of Tucson Reference Material



12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/118)

TEP is allowed to use the City's right-of-ways because of the 2000 Franchise Agreement. The Franchise Agreement contains the same provision that TEP must comply with local laws, *even those that require it to underground*. The City lays this out throughout its legal opinions.

Given that all of these local laws were written in the 1980s and 1990s, and TEP agreed to its franchise in 2000, none of this should be as controversial as TEP is making it. This should all be baked into its costs already and there's no way the ACC is going to deny TEP the right to recover the cost of complying with local laws. That's a red herring and if it's not, TEP's strategy should be to fight the ACC not to fight the City.

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12/12/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/119)

Good points [redacted]. I'd only add that TEP doesn't have any "easy outs." Even if a law is passed for purely aesthetic reasons, that does not make it optional. That's why the ACC's statement is written in such an ambiguous way.

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12/12/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/120>

-Very well said -I think most of us totally agree with you-I have always stressed the importance of thinking long term considering city beautification vs. short term about the price per share for TEP stock. Tucson belongs to the people who live here and we have a responsibility to make sure our attractiveness continues

Thank you !

[Redacted text]

[Redacted text]

On Tuesday, December 12, 2023 at 10:21:46 AM MST, [Redacted] wrote:

The "Aesthetics" of a gateway/scenic corridor has monetary value for the entire city, and it should not be dismissed as only benefiting immediately adjacent properties, which includes the UofA! Historic neighborhoods all around central Tucson have monetary value for the entire city. People go to walk and bike them and spend money to take tours through the historic homes. They are an important and integral part of the whole character of our city as much as our surrounding mountains, and are a reason people visit and stay here; which translates into money for our economy. More than half the homes in historic neighborhoods are rentals and B&Bs, VRBOs, etc, because people want to visit the UofA, our vibrant downtown, 4th Ave, and participate in events held centrally, like the gem show, El Tour, rodeo, etc. The "aesthetics" of a city contributes to the monetary health of a city, which is a better economy for all who work and have homes and own businesses here.

Please don't dismiss "aesthetics"! Aesthetics are valuable to our entire city economy, and TEP seeks an easy out because of how that statute is written. It has to be rewritten. Regards,

[Redacted signature]

Show quoted text



12/13/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/121>

Agreed. Not only do most of us agree with you, every single one of these local laws (UDC, ordinances, plans, etc.) was democratically-passed by the City Council under democratically-enacted State Law decades ago. Thus, the community and state via its democratically-elected representatives agree with you too.

That TEP expects laws to be optional is offensive, frankly. They're not optional to the rest of us.

Show quoted text



12/18/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/127>

I am all for beautification and the good of Tucson Where many take issue is with the selective decisions about where aesthetic considerations are allowed I think the ZA decision referenced in this thread is being misconstrued. It is specifically discussing the special exception process. This may be why TEP has determined not to use this process related to Kino/Campbell.

There is still no UDC regulation or amendment that prevents TEP from placing poles and overhead lines along non-gateway and non-scenic corridor routes. There just isn't. Tucson could adopt one. But it hasn't. If Tucson adopted a regulation to force undergrounding city-wide, then it would be fair and respect the aesthetics of all places within our city. It would also be a stronger defense against overhead line placement than is the current claim that a neighborhood plan holds the force of UDC code or law.

I and I think most in our neighborhood would be supportive of this as a city code or regulation that applies to all. We do not support some kind of special burial for parts of this project when TEP continues business as usual every other place in Tucson with overhead lines criss-crossing every other part of our city.

[Redacted signature]

Show quoted text





12/18/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/128)

You need to read the May 2021 Zoning Examiners Decision. He walks through the logic of why plans matter and are enforceable and cites the UDC.

I used to think the same thing. I used to think plans were mere suggestions.

Then I read the Zoning Examiners Decision, the statutes, and the code, and it's quite clear that plans are not suggestions. My mind was changed. They have the same force of law as any other regulation enacted by a municipality.

Here is some of the statutory law that establishes the legal enforceability of plans: https://www.azleg.gov/viewdocument/?docName=https://www.azleg.gov/ars/9/00461-08.htm (https://www.azleg.gov/viewdocument/?docName=https://www.azleg.gov/ars/9/00461-08.htm)

TEP focused on the gateway so that's why we did the same thing. That does not mean TEP does not have other legal obstacles.

Best,



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12/18/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/129)

I have read the ZA decision. Many times since you began advancing it. It applies to TEP's application for a special exemption for a substation adjacent to residential zoning. To claim otherwise is inaccurate.

TEP now seeks to identify the best overhead route for transmission lines.

Overhead power lines are not prohibited by any city UDC or other code. Despite requests to cite the ordinance/code/law that prohibits overhead lines along city streets or other rights-of-way, you have only offered a zoning examiner decision that was the denial of a substation special exemption. Now, a generic state statute that allows cities to establish rules and laws. Still, I see nothing that prohibits overhead transmission lines in the city of Tucson.

The Miles neighborhood is participating in this Neighborhood Advisory Committee process because we would like to see a reliable, efficient, and economical transmission project built as soon as possible.

If overhead lines are against the law, then this MRP should be stopped, as should every other current and future attempt to construct lines above ground within Tucson's boundaries.



Show quoted text



12/18/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/130)

I don't claim otherwise. It's been shared with you many times. It's the University Area Plan, at a minimum, as interpreted by the zoning examiner, which you claim to have read. It's also in the City's opinions as cited in the original email.

Whether a regulation is called an ordinance, a plan, a zone, or something else, the City has the power to enforce its regulations under statutory and case law. And the City lays out how and why repeatedly. A franchise agreement does not allow a utility to ignore those regulations, even if it can sometimes get away with non-compliant things because of the lack of review provided by a franchise agreement.

Like anything else, the squeaky wheel gets the oil. And the oldest and densest part of town will have the squeakiest wheels.

This is why any TEP court case is so dangerous to its long-term business interests. If it succeeds in undermining the City's land use regulations, there are many ways that the City can make business substantially more difficult for TEP. And, why I advised TEP to do a better risk analysis.

The best path forward is to find compromise. Otherwise this will take a decade or more to resolve.

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MRP-Neighborhood-Advisory-Group (https://groups.io/g/MRP-Neighborhood-Advisory-Group)  
/ Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,0,105278187)



Date (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/105278187?  
p=Created%2C%2C%2C20%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C105278187)  
Close Group Chat on April 15

 Clark Bryner ▾

Apr 1  (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/220)

I plan to close the group chat on April 15th so that it can be buttoned up and included in the CEC application. I had a request to keep the group informed of any updates. I am happy to accommodate that request, but plan to do so by email.

Once again, I want to take this opportunity to share my sincere thanks to each of you individually for sharing your time and energy to collaborate on this project. I know in the end, not all are happy with the alternative routes on the table. But they are a better selection of routes, and we have a better plan for design of the line and neighborhood mitigation baked into the project than we had when we began. Once the decision is made on a route, I hope you'll be content with the result.

 [Redacted Name] ▾

Apr 4  (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/221)

Thanks for your work on this, Clark. [Redacted Name]

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Neighborhood-Advisory-Group/topic/102711633?

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### Comment on the Policy Statement & Cost



11/20/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/51)

Good Morning Clark (cc'ing everyone in study group),

TEP is saying, "we cannot underground because the ACC will not allow us to recover the costs from ratepayers" while the law (40-360.06.D) plainly says a utility must comply with local ordinances and plans unless there is a technical reason it cannot. Therefore, by pushing the ACC to make the policy statement ("SPS") and pushing it in your PR, TEP may be making a very costly error. I'll explain why below.

My reading of the law and the SPS is: in the absence of a local rule, you cannot underground for purely aesthetic reasons. And this is, at least in part, why I've been arming everyone, including TEP (if it would wake up and listen), with cost and financial arguments to use at the ACC and elsewhere.

Under the Arizona Constitution (Article 2, Section 17), TEP cannot damage your private property without compensating you. And the studies that TEP gave us show that property value damage of 10% or more can occur up to 1,000 ft or more adjacent to new high voltage transmission lines in urban settings.

If you assume a court splits the baby (5%) on a class residential property damage claim, you get to like a \$14m/mile cost in the densest areas. The worst case scenario for TEP is double that or \$28m/mile. Meaning the cost to go above ground could be double or more the cost of going underground. And juries determine these damages so the high end is realistic.

Presumably such a cost would be deemed an unforced error by TEP management and borne by its investors and not ratepayers.

This is the business math for undergrounding as I see it. Aesthetics are only indirectly relevant. This is a big reason why it makes financial sense to avoid the densest of areas and why the higher the density, the more cost effective undergrounding becomes.

This is also why I keep pushing TEP to strike an agreement. It's better to have everyone on the same side against the ACC than to have TEP opposite the City and neighborhoods.

Regards,



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11/26/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/62)

That is a super interesting point.

I would love to know how much TEP has paid out in jury awards to date for harming property values along overhead routes.

Is this just a price of doing business for the company?

I know folks on Country Club, Fairview, and on Glenn, where overhead transmission lines run in the ROW exactly at the frontage property line, but they haven't received a TEP-property-devaluation payout. When and how will TEP make this required compensation to all those who have already had their property values cut by 10%?

I would assume that the property owners along this proposed MRP route would be at the back of the line for demanding compensation... If so, when might those payouts be expected?

Thanks,



11/27/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/63)

When did they sue?

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11/28/23 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/78\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/78)

Who sue? What? Nobody has ever sued. That's my point. This legal theory doesn't hold anything. If it were the case that TEP must pay for property devaluation within 1000 ft. of an overhead line, there would have been a long list of class-action lawsuits already, and the baby would have already been split, and it would, by now, be a cost of the infrastructure, and TEP would be making payouts along every route it installs. To me these seem like really hollow threats of legal action toward TEP and by extension against the whole rate-paying community. But truly, if you have a lawyer lined up who is willing to press this action, I can refer them to several impacted property owners.



11/28/23 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/79\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/79)

No property owner has ever sued a utility for property damage? What? They may be able to be added on once we reach that stage. I'll ask.

Show quoted text



11/29/23 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/80\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/80)

You misconstrue my words, [redacted]. This was in answer to your original post in this thread. I was not referencing property damage, but rather your novel legal theory that TEP will be liable for damages due to depressing property values within 1,000 ft. of overhead lines, and a jury will necessarily "split the baby" and award property owners 5% of their property value as soon as the next overhead lines are installed. As far as I can tell, property owners near any existing TEP overhead transmission lines have not even brought his cause of action, much less prevailed with it.



11/29/23 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/81\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/81)

Diminution of property value isn't a novel legal theory. The calculations are based on the studies that TEP provided. I do not have access to West Law nor the time to index for you diminution of value or similar such property damage claims.

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### Fallacy of diminution of property values



Apr 14 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/230>)

Another useful note-- From what I can tell, no Arizona jury has ever awarded damages for the diminution of property values due to placement of electric lines in proximity to that property.

I invite any case citation to prove me wrong, but until then, this threatened litigation about future costs to TEP through liability for damage awards appears to be far-fetched conjecture and scare tactic.

Show quoted text



Apr 14 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/231>)

Whether it has been done before isn't really relevant. If you have evidence that diminution in value claims are precluded by law, that would be relevant and we'd welcome the citations.

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[← \(https //groups io/g/MRP-Neighborhood-Advisory-Group/topic/104951254?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C104951254\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104951254?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C0%2C104951254)

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February 29 Advisory Group meeting agenda and input sought



Feb 23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/167)

Hello Advisory Group members. As you know, we are scheduled to meet on Thursday at 6 p.m. for our final neighborhood advisory group meeting, which will again be at the Dunbar Pavilion. Here is the meeting agenda so you have it ahead of time:

- Welcome and Agenda (6:00 p.m.)
- Reliability (6:05 p.m.)
- Review DMP to Vine Route Alternatives (6:10 p.m.)
- Review Kino to Vine Route Alternatives (6:40 p.m.)
- Design Elements Input (7:40 p.m.)
- Questions and/or Comments (7:45 p.m.)
- Next Steps and Wrap-up (7:55 p.m.)

The following is my understanding of what to expect during the major portions of the meeting as outlined in the agenda. There were several emails from this group with questions about the reliability of build-out of the DMP to Vine only vs the entire loop to Kino. Clark will address that. Then, during review of the route alternatives, he will present information about under-grounding of distribution and telecommunication cables along each potential route. He will also share information on the potential for anti-graffiti finish and other design elements they are putting forth in response to this group's and public feedback.

In addition, TEP's team said the following are design elements on which they would like any additional input from you. We will likely not have much time, if any, to discuss these in depth during the meeting. TEP will consider any of your additional input as the team prepares to make final design decisions for the potential new transmission line. Would you please share your thoughts between now and next week's meeting on these items:

- **Poles** – the survey TEP conducted showed a strong majority of people preferred taller and fewer poles; TEP would consider thinner/shorter structures where possible if it is your preference in neighborhoods.
- **Right of Way beautification** – The City discussed with TEP considering ways to beautify the areas where the potential new route would go in, including vegetation, a mural on the substation, etc. If you have any ideas or general opinions on this, please share.
- **Pole finish options** – again, the survey results showed that people preferred the rusted metal poles to galvanized. Again, this would be open to additional input from this group.

Thank you for sharing your thoughts and perspectives. Enjoy a safe and pleasant Rodeo weekend, everybody!



Mar 1 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/175)

Well, we are done. Not getting to share our final thoughts and preferences after TEP's presentation of possible routes, was a let down that no amount of dross from China in a bag can assuage. I do hope that there will be a chance for us to share our thoughts, ideas and preferences with each other, in an online format. The idea of splitting the project into two parts, so at least some of it can go forward, is a good one. It separates the scenic/gateway issue, which will be tied up in courts, from the rest.

Wishing you all a happy spring!

Regards,



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Mar 1 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/176)

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Mar 2 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/177\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/177)

I also wish all of you a safe and healthy spring and summer--If anyone receives an update on the status of the TEP vs. City of Tucson action please share with the group

[Redacted text]

[Redacted text]

On Friday, March 1, 2024 at 07:32:51 PM MST, [Redacted] wrote:

Show quoted text



Mar 2 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/178\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/178)

I would concur on splitting the project - makes good sense. And any recommendation on route is certainly related to the outcome of the court case.

As much as 'asking for input from the neighborhood' is reasonable I will say that in broadmoor's case unsurprisingly neighbors withdrew opinions once they felt it would not impact them. The nuance and complexity of the tradeoffs isn't a yes/no, but for those of us who invested in becoming more informed as a collective of neighborhoods, we deserve a voice for that collective.

Show quoted text



Clark Bryner

Mar 4 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/179\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/179)

Again, I want to express my sincere thanks to each of you for dedicating so much of your valuable time and effort to provide neighborhood specific insight into a solution for the Midtown Reliability Project. I can assure you that your efforts have, and will continue to shape the strategy, design, and ultimate route selection of this project.

I regret we ran short on time at the meeting the other night and were not able to hear more input on the proposed route alternatives. Per our conversation, we have prepared an anonymous form, that I'll send out shortly, for you to provide additional feedback and express preference for specific route alternatives. Also, we'll keep this chat open until April so that you can share thoughts/ideas or ask for additional information from TEP.



Mar 4 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/180\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/180)

Thanks Clark! Please also send these updated route costs you mentioned you're working on as soon as you can.

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Mar 4 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/181\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/181)

Thank you !



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Mar 4 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/182\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/182)

I have concerns about splitting the project. Clark stated that with only a radial line they would not be able to decommission any of the 8 46 kV substations or remove the 19 miles of OH 46kV lines as currently planned. Given an uncertain date of when the second part of the project would be approved and built, Tucson could be left with a spider web of poles, transmission and distribution lines. This split would accomplish only some added reliability to the area but potentially a very ugly network. I'm uncertain how long this would last but given capital projects the city and our residents could be stuck a long time with an eye sore that will not engender support from the public for further TEP development. Grant is already known as one of the ugliest streets in Tucson. I don't believe a piece meal approach to this project over a period of many years is a good idea. Let's do it well and do it right. If we can minimize the visual impact of these poles and lines while TEP is invested in working with us let's do it. Employing the design elements and working directly with impacted neighborhoods can make a significant difference on how this looks and how our community feels about the project.

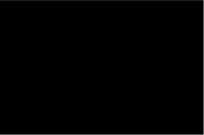
Before I moved back to Tucson several years ago my accountant, who attended the UofA said, "Tucson is the ugliest city in the most beautiful landscape"; unfortunately, this is our primary corridors reputation. Let's not add to it.

Thanks,



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(<https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/182/0/E04060D5AC394483B926FEF35132F3B0.png>)



Mar 4 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/183\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/183)

Piecemeal is about getting capacity more quickly (like with Kino) since the second segment has the most layers of legal conflicts. The 46kV system would stay during the entire fight anyways with Grant 46kV becoming 138kV.

If you want to fight to underground Grant, that's another level of fight as you'd need M&C to pass new laws making Grant a gateway or something like that. It's doable but a lot more work and we have not seen anyone seriously take on that political fight. The closest proposal I have seen is new transmission undergrounding requirements for all neighborhoods but that would still leave arterials without other conflicts as fair game.

Best,



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Mar 5 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/184\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/184)

I understand your thinking on this [redacted] and I just don't agree that splitting the project is the best approach. My concerns remain as I outlined below. I think we need a full solution that respects and improves our quality of life in Tucson.

Thanks,



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(https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/184/0/90718B16A98A4FA8989F9494F8933A1B.png)



Mar 6 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/185\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/185)

I agree with [redacted]. This project should be done in its entirety to benefit all, not in little bits, cannibalizing budget to benefit the few who insist that just one section should be buried. If some of the project is to be buried, then all of it should. Yet, a source to finance a large portion of undergrounding was already resoundingly defeated by voters last May. There is no valid or fair reason that Pueblo Gardens, Las Vistas, South Park, Millville, or 200 other named neighborhoods should endure substations in their midst, overhead lines along their streets, while favoritism is granted to a scant handful.



Mar 6 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/186\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/186)

What 138kV substations are in those neighborhoods? The only neighborhood that I am aware of getting a proposed substation ins de of it is Jefferson Park.

Laws passed by M&C must be enforced. While you may view the University Area as a bastion of wealth and privilege, not everyone else does. However, it is the economic center of the City and M&C of 30+ years ago acted to protect it from becoming as bad as TEP's carelessness has made some other areas. To me, tearing down what has protected an area because some other area wasn't protected as well is a backwards approach.

Best,



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Mar 6 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/187\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/187)

I agree with [redacted] -Let's insist that TEP adhere to the gateway scenic route ordinance. The ordinance was created for a reason and it must be followed. This does not need to be a complicated issue



Show quoted text



Mar 6 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/188\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/188)

I agree with [redacted] and [redacted], do the whole project. [redacted]

Show quoted text



Mar 6 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/189\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/189)

The courts will decide that issue. [REDACTED]

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Mar 6 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/190\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/190)

Hi Clark,

Please keep my contact information and send me yours, so we can stay connected after this email group is closed in April. Also, please send me a brief summary of the legal actions around this project, which courts they're in and their status. I'd like to include some of that in my update to the [REDACTED] NA this month. I think you and TEP have done a very good job with the community engagement piece of this project.

Best,



Show quoted text



Clark Bryner ▾

Mar 6 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/191\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/191)

I'll answer [REDACTED] question regarding legal actions for the benefit of everyone in the group.

TEP is involved in just a single legal action related to this project. This is TEP's appeal of the decision made by the Board of Adjustment with respect to the applicability of the City's Gateway Corridor Overlay Zone ordinance. This case is in Pima County Superior Court as Case No. C20235484 (<https://www.cosc.pima.gov/PublicDocs/>). At present, TEP has filed its brief and the City will be filing it's response. All documents that have been filed are available at the courthouse, but not online. Oral argument is scheduled for April 30<sup>th</sup> at the Pima County Superior Courthouse.

Not a legal action, but something good to share with your neighborhoods is that once TEP files its application for a Certificate of Environmental Compatability with the Arizona Corporation Commission, an evidentiary hearing will be held before the Arizona Power Plant and Transmission Siting Committee. This hearing will be public, and will be held in Tucson, with opportunity for both public comment and to intervene as a party to the case. The hearing is tentatively scheduled for July 8-19.



Mar 6 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/192\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/192)

Is that the City of Tucson or Pima County Board of Adjustment? [REDACTED]

Show quoted text



Clark Bryner ▾

Mar 6 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/193\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/193)

City of Tucson Board of Adjustment

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- 20 of 26 > ([https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/february\\_29\\_advisory\\_group/104539075?p=Created%2C%2C%2C20%2C1%2C20%2C0%3A%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C104539075&next=1](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/february_29_advisory_group/104539075?p=Created%2C%2C%2C20%2C1%2C20%2C0%3A%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C104539075&next=1))

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MRP-Neighborhood-Advisory-Group (<https://groups.io/MPR-Neighborhood-Advisory-Group>)



Topics (<https://groups.io/g/MPR-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,20,104539075>)

Date (<https://groups.io/g/MPR-Neighborhood-Advisory-Group/topic/104539075?>

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### February 29 Advisory Group meeting agenda and input sought



Mar 6 (<https://groups.io/g/MPR-Neighborhood-Advisory-Group/message/194>)

Thank you, Clark, for realizing information should go to all members and not just one. Have you revised the % to include a category for industrial/commercial segments, which is a land use that should have been included in the original ranking. Without including it, the results are skewed to look like most routes are taking advantage of low income neighborhoods, when industrial sized poles are less visually disruptive in industrial areas where homes are not directly on those streets.

Regards,



Show quoted text



Clark Bryner

Mar 6 (<https://groups.io/g/MPR-Neighborhood-Advisory-Group/message/195>)

Yes, we have updated the alternative route summaries to included the breakdown of land use through low income areas. The break down is very simple, just residential or other. The other category is generally commercial/industrial but could include a smattering of other less predominant land use types. These summaries are posted to the project webpage, but here is a direct link <https://docs.tep.com/wp-content/uploads/MPR-Alternative-Route-Descriptions.pdf> (<https://docs.tep.com/wp-content/uploads/MPR-Alternative-Route-Descriptions.pdf>)



Mar 6 (<https://groups.io/g/MPR-Neighborhood-Advisory-Group/message/196>)

City of Tucson



On Wednesday, March 6, 2024 at 03:29:38 PM MST, wrote:

Is that the City of Tucson or Pima County Board of Adjustment?

Show quoted text



Mar 7 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/198\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/198)

I'm looking at your breakdown with category % for routes. It doesn't make sense to use percentage the way you have used categories, because that would assume an amount out of 100%. Your categories overlap and add up to way more than 100% and are extremely misleading. You have low income subcategory of residential and it is repeated separately as just residential and includes historic residential. Very poor data reporting. It makes it look like many more miles if you add things up. You should have taken the Residential category and relabeled it Low Income Residential with subcategories showing the % of that that is historic, and made the remainder a separate category: Other use/ industrial/commercial. Don't overlap the low income residence mileage to make it look like many more miles of low income residences. This would include overlapping Low Income Historic residential. Extremely misleading for someone just perusing quickly; or is this the intention?

Regards,



Show quoted text



Clark Bryner ▾

Mar 7 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/202\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/202)

█, the percentages are relative to the overall route length, specific to that category. These numbers are strictly facts. There is no intention to mislead anyone.



Mar 7 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/203\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/203)

The categories you have, overlap and misrepresent. Residential should be one category %, and then under it break into historic, low income, etc as parts of the residential. The "Other, commercial, industrial " should be its own category. It's messy data.

Regards,



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MRP-Neighborhood-Advisory-Group (https://groups.io/g/MRP-Neighborhood-Advisory-Group)



Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,20,102662390)

Neighborhood-Advisory-Group/topic/102662390?

franchise agr. and undergrounding



11/17/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/37)

We all interpret old agreements as we may. I see that smidgin of \$ set aside as, some folks thought that some money to fund burying some lines was ok. Noticeably absent is any directive about burying all lines, or when or how, or what evaluation mechanism to use to decide if or when to do it. Thanks,



Show quoted text



Clark Bryner

11/17/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/39)

When I saw this post, I realized that I failed to address the question about the money allocated to underground in the Franchise Agreement. This is addressed in Section 10(c) and is called a Public Benefits Fee, the text of this section reads:

(c) Public Benefits Fee.

(1) Imposition of Fee. Of the total revenues received by the City from the fee imposed by Subsection (a), one-ninth (1/9) of such revenues may be used in accordance with Paragraph (2).

(2) Use of Fee. The revenues described in Paragraph (1) may be appropriated by the Council to be used as follows:

(A) Low Income Assistance. To fund low-income energy assistance programs such as weatherization, residential lifeline service, senior discount, bill assistance, and rate discount programs.

(B) Undergrounding. To pay the City's share of electric transmission and distribution line undergrounding expenses incurred under Section 21.

(C) Renewable Energy Incentives. To Fund programs designed to encourage the use of renewable energy.

Once remitted to the City, TEP has no control over the use of these funds.



11/17/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/42)

A big mistake TEP made the first go around was not sharing the 2001 Franchise Agreement. We had no idea this language was—or even could be—in there until we got a redline of Prop 412 in like April of this year. A substantial amount of pressure that went in other directions over the last four years could have been aimed at the City of Tucson instead.

We're going to find out where that money is.

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11/26/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/61)

So Gratifying!

I know two elders on our block in their 80's (born 1936, and 1942), who survive on the minimum social security allotment of about \$800/mo., while paying rent of around \$550/mo. The reason they keep heat and lights is because of the Low-Income Assistance fund provided by TEP and Southwest Gas. Thanks to this fund, they don't have to choose between food and electricity.

So glad that this was addressed in the Public Benefits Fee section.

From my perspective, a much greater use of the fund than using it to bury power lines beneath the ground.

Such an important fund!

Renewable energy too!



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11/27/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/64>

That is funded through the city?

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11/28/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/74>

TEP has a fund of money from rate payers who want to give.

Regards,



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Historic issues RE: [MRP-Neighborhood-Advisory-Group] Project Evaluation Criteria



11/15/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/5)

Hi [redacted], and others,

My invitation link expired so I can't seem to join the group.

I couldn't find anything in the city historic preservation ordinances that state that overhead power lines are disallowed in/through/adjacent to any historic property, district, or preservation zone.

My suggestion isn't to ignore ordinances. My point is that since ordinances are lacking, TEP shouldn't unilaterally decide that it is going to avoid placing its lines through those zones, or favor placement of its lines away from those zones. If historic zones/districts/buildings are no-go zones, then the entire map of opportunities changes, and the ability to reach the goals of Criterion 1 probably can't be met.

When you refer to the City historic person, was that Jodie Brown, the City's current Historic Preservation Officer, or another person?

Thanks,



Show quoted text



11/15/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/6)

Jodie Brown, I believe. It's in my emails. It may not be explicitly disallowed but development goes through a board and anything non-historical is strongly discouraged. So it would be a bit rich to tell someone they can't change out a light fixture that doesn't match the history and then put a 120ft pole in their backyard when there are many alternative locations.

I'm referring to HPZ. I'm less familiar with NPZ. I really doubt the boards and people that invested in those HPZs will allow the ordinance to be ignored without a fight. A fight that they have the actual legal high ground on. Hence, pretending they don't exist or matter is a good way to waste a lot of time.

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11/15/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/7)

Furthermore, in the ACC rules, ARS 40-360.06(A5) says:

"A. The [Line Siting] committee may approve or deny an application and may impose reasonable conditions on the issuance of a certificate of environmental compatibility and in so doing shall consider the following factors as a basis for its action with respect to the suitability of either plant or transmission line siting plans:" ...

"5. Existing scenic areas, **historic sites** and structures or archaeological sites at or in the vicinity of the proposed site." [Emphasis Added]

To say that a historic designation by the City doesn't matter but that one by some other entity does is to repeat the same mistakes as the last process did in ignoring the Scenic Gateway ordinances.

We should not ignore any ordinances, including the most likely way they will apply. It is improbable that an HPZ Board will green light transmission lines in an HPZ. You or I may not like that but those self-imposed, highly-restrictive ordinances matter and are legally enforceable.

So, as a pragmatist that likes to avoid easily foreseeable problems, I disagree with deleting that language.

Regards,



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11/16/23  (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/22>)

Hi [REDACTED], Clark, and all,

I don't want to burden everybody with unwanted email.

I found the way to adjust e-mail preferences.

If you go down to the links way down below, or can open these communications through the Groups.io webpage Homepage, then you can select different categories on the tabs to the left. Top tab is "Subscription" which allows you to get all posts, just daily collections, or none at all and just read when you open the webpage.

Thanks [REDACTED],

I was unaware of that ACC rule describing protection of "historic sites."

While I appreciate that, it does seem open to a lot of interpretation. Is there an ACC definition of a "historic site"?

I can see that being an important archeological site, like the "Pit House" downtown, but maybe not all of the countless historic district property inventory items that stretch across midtown.

I have been trying to verify what (if any) ordinances would prohibit power lines through historic zones and am still having trouble finding any.

I agree that it is rich for Jodie Brown to force you to get approval to change a light fixture when she would be forced to resign to the fact that power towers are allowed. However, "richness" is a well-honed talent of the Historic Preservation Office going back decades. (I would be happy to meet you over refreshments to discuss all the ridiculousnesses that I have witnessed.)

Perhaps Officer Brown can prevail that HPZ's can't be crossed by power lines, but only 1.5 HPZs are in the MRP Project Area: The east half of Armory Park, and all of West University. If those areas became "Constraints," that that would push the western 4<sup>th</sup> Ave. boundary of the project area over to Tyndall, and would extend that UofA Campus constraint westward a good bit, maybe or maybe not prohibiting a path up Euclid.

All that is a perfect argument to push the alignment eastward to Plumer, Tucson Blvd., or Country Club.

At yesterday's (Nov. 15) meeting of the Tucson Pima County Historic Commission, the TEP project was discussed. The two speakers who opined about the project were in favor of an underground solution, but not because overhead is prohibited in "historic" areas.

Introducing his opinion that the Commission should be a united front, Commissioner Carlos Lozano stated, "We will be expected to say: 'Don't put it through a historic neighborhood,' but ethically, I can't say that. Because then it will just go through a poor neighborhood that has not been zoned historic yet. Also, we know that a lot of the neighborhoods that are not zoned historic yet, are potentially historic."

Another prominent historic preservation expert and member of the commission wrote me in a personal communication this week:

"To my knowledge there is nothing that specifically prohibits the installation of large transmission/powerlines within a historic district, zone, or property...except in cases where there is a significant archaeological site, but even then, they could still place it there if there is no alternative. My impression for why they are avoiding historic districts or at least attempting to do so is for the following reasons: 1) Historic districts are the most vocal, 2) The installation of these poles would destroy "integrity of setting and feeling" and could potentially de-list a district (this is a stretch as it would be very unlikely to happen), and 3) that the installation of these poles in historically designated areas would trigger compliance with cultural resource laws and they would have to do various studies before they could install anything and this adds time and money to the project.

While I sympathize with these districts and the intrusive effects of such transmission lines, I do not think they should get priority in the discussion. What this does, as you note, is - it pushes these lines into low-income, non-historic or at least not designated historic areas. These are the folks who are always the target of these kinds of projects and its blatantly discriminatory in my opinion. If it eases your mind at all, the historical commission is sending a letter to TEP to recommend undergrounding the lines (which won't happen) and that the proposed route should not target low-income areas over historic districts because its not equitable to those neighborhoods."

I too am a pragmatist, but I think that deleting the favoritism toward historic zones is far and away more practical than trying to force undergrounding, which, ultimately, will require the City Council to adopt a requirement that TEP do so, then for the ACC and state legislature to consent and change state laws and ACC rules to back the City Council's regulation. That does not seem to be a pragmatic solution to me at this point. But if we can flip the ACC board and the House and Senate, then somehow gut and bankrupt the Goldwater Institute (who will be filing suit) and expand the US Supreme Court, maybe we have a shot.

I am happy to take on Jodie Brown while you focus your pragmatist energies on the Mayor and Council, ACC, State Legislature, and Supreme Court. This seems like a good 2-front strategy.

With regards,

[REDACTED]



11/17/23 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/24\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/24)

You're mistaken about the hurdles to undergrounding. There are no laws that have to be changed. I can walk you through whatever it is you think is a legal constraint.

An HPZ requires at least board approval for substantive changes to the neighborhood. In the prior go around, the City said it was against routing a new transmission line through an HPZ. I do not know about an NPZ.

I strongly disagree with recommending that 40-50 year old historic designations by the City are less meaningful than other historic designations. That's a path to nowhere.

On that note, have you found any ordinance or otherwise that protects the University? Other than Section 6, bullet 6 of the UA Area Plan (see here ([https://beta.tucsonaz.gov/files/sharedassets/public/v1/city-services/planning-development-services/documents/university\\_area\\_plan.pdf](https://beta.tucsonaz.gov/files/sharedassets/public/v1/city-services/planning-development-services/documents/university_area_plan.pdf))), I have not. In a worst case scenario, I believe Cherry is the most direct route across campus and I would underground through Rincon Heights from the industrial area near the Cox Building to get there. Then I would underground out of Jefferson Park on the other side.

I maintain, and so do the adjacent neighborhoods last I checked, even those that were originally opposed to ANY transmission line on Campbell, that undergrounding on Campbell is the best long-term outcome for everyone in the City.

If the City, the neighborhoods, the UA, TEP, etc. all pulled in the same direction, it would be impossible for the ACC to undermine -- which seems to be TEP's only material concern (a weak one at that as the ACC approves underground transmission lines regularly).

Another alternative is to pass a cleaner Franchise Agreement without all of the mess of the last one and in a general election where TEP is not in the midst of requesting multiple rate increases. Additionally, Prop 412 created an unnecessary conflict between climate change mitigation and protecting gateways/neighborhoods from new high voltage transmission lines. It was just a sloppy mess overall and didn't need to be.

Anyways, the point is, it's not as black and white as TEP likes to present it. Tens if not hundreds of millions have been invested in the Kino Gateway from the airport. That TEP thinks it can unilaterally undermine all of that without strong opposition is why TEP has wasted so much time and money to date.

To my mind, the Libertarian perspective would be to minimize private property damage. According to TEP's cited studies, a new transmission line adjacent to your property decreases its value by 10% or more, especially in urban areas. There will be property damage claims and TEP does not control for such costs in its estimates, which perverts the process of trying to find the best path.

Regards,



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[Clark Bryner](#) ▾

11/17/23 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/28\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/28)

I'd like to chime in and address a few things on behalf of TEP.

First off, as a regulated utility, TEP works very hard to comply with all applicable laws and ordinances. Of course, there are circumstances where we have a difference of opinion about the applicability of certain laws on the books.

Second, and thank you for pointing this out . Yes, part of state line siting statute requires a review of impacts to historic sites. What a historic site includes is subject to interpretation and is not defined in the statute. But this has typically included sites that are listed or eligible for listing on the National and/or Arizona Register of Historic Places. That said, while it is helpful to include historic sites (however we interpret this) as part of the criteria to review different routes during the siting process, it is not required. What is required is that we review and disclose any impacts the proposed project will have on these sites so that it can be considered by the Arizona Power Plant and Transmission Line Siting Committee, and subsequently the ACC, in making their decision to grant or deny a Certificate of Environmental Compatibility for the project.

TEP's understanding is that as long as we are in road right-of-way, the terms of our franchise agreement with the city allow poles in a Historic Preservation Zone or in a city designated historic neighborhood. We will certainly confirm this understanding.

TEP is working to schedule a meeting with the City of Tucson Historic Preservation Officer and will consult with the State Historic Preservation Officer about this project.



11/17/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/30>

Great. Your input is appreciated. I believe the only HPZ is West University. From what I recall, what was determined last time was that Euclid was not wide enough to stay in the right of way and the 78ft? diameter base of the poles would have to go into the HPZ.

On one side of the road, you have ~8 story dormitories and on the other, either the HPZ or also very tall condos. There aren't really any setbacks to work in to maintain the ADA compliant sidewalk thus it was not a practical pathway.

If we're dancing around tall structures, I would dance around East of the football stadium through the parking lots and garages and then up Cherry. There's much more space to work with and no ordinances to fight with.

Regards,



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- [← \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102612647?p=,,20,0,0,0::recentpostdate%2Fsticky%2C%2C%2C20%2C20%2C102612647\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102612647?p=,,20,0,0,0::recentpostdate%2Fsticky%2C%2C%2C20%2C20%2C102612647)
- [→ \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102626896?p=,,20,0,0,0::recentpostdate%2Fsticky%2C%2C%2C20%2C20%2C102626896\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102626896?p=,,20,0,0,0::recentpostdate%2Fsticky%2C%2C%2C20%2C20%2C102626896)

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Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,20,102662302)

Neighborhood-Advisory-Group/topic/102662302?

%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C20%2C102662302%2Cp%2Fprev%253D1701293847846622445%2Cnextid%253D1700061454437883834)

HPZs in project area and ACC definition of "historic site"



11/17/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/36)

West University and Armory Park Historic Preservation Zone are the Historic Preservation Zones within the boundaries of the project area. Armory Park extends east of 4th Ave. from about 20th st. to 12th St. These HPZs are marked as 1 and 5 in the attached map:

https://www.tucsonaz.gov/files/sharedassets/public/v/1/city-services/planning-development-services/historic-preservation/documents/22x34\_nrhds\_zones\_index\_011122.pdf (https://www.tucsonaz.gov/files/sharedassets/public/v/1/city-services/planning-development-services/historic-preservation/documents/22x34\_nrhds\_zones\_index\_011122.pdf)

If I were TEP, I would consult folks more professional than the city preservation officer to define "historic sites" according to the ACC statute. SHPO is probably appropriate. TEP will be receiving a letter soon from the Tucson Pima County Historic Commission, which outranks the Tucson preservation officer. My understanding is that the "historic sites" moniker in the ACC rule was meant more for archaeological sites, rather than some line of houses that happens to have been designated a "historic district" by Tucson or SHPO.

And as long as we are discussing ARS 40-360.06.A.5, please notice .7 and .8, which state the Line Siting Committee shall consider:

7. The technical practicability of achieving a proposed objective and the previous experience with equipment and methods available for achieving a proposed objective.

8. The estimated cost of the facilities and site as proposed by the applicant and the estimated cost of the facilities and site as recommended by the committee, recognizing that any significant increase in costs represents a potential increase in the cost of electric energy to the customers or the applicant.

Finally, I forgot to mention in my post from last night, but also discussed at Wednesday's meeting of the Tucson Pima County Historic Commission, was the new ACC rule that prevents passing on excess costs to ratepayers if an increased cost is being done for merely aesthetic reasons. I believe this is the rule that Clark referred to during some of our meetings. Clark, could you please tell us which regulation this is?

Thanks, good weekend to all.



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Clark Bryner

11/17/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/38)

So its not a regulation, but a policy that was approved by the ACC with respect to costs. It was recorded in Decision No. 79140 and you can view the full text of the decision here: https://docket.images.azcc.gov/0000209995.pdf (https://docket.images.azcc.gov/0000209995.pdf)

The text of the policy reads:

*The Commission does not have jurisdiction over the undergrounding of electric transmission lines. A.R.S. § 40-360(10).*

*Installing electric transmission lines underground is much more expensive than building them above ground. Underground transmission lines also can be more costly and challenging to maintain and repair.*

*As a general matter, utilities under the Commission's jurisdiction should avoid incurring these higher costs unless underground installation of a transmission line is necessary for reliability or safety purposes, or to satisfy other prudent operational needs. Installing a transmission line underground for other reasons, such as stakeholders' preferences, would add unnecessarily to costs recovered through rates.*

*Third parties, including cities, customers, and neighborhood groups, seeking to fund the underground construction of a transmission line may do so, among other ways, by forming an improvement district for underground utilities as provided in A.R.S. § 48-620 et. seq.*



11/17/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/41)

It's not a regulation. It's a policy statement about cost recovery.

The HPZ and NPZ zoning decisions are enforced by the City AFAIK. Not the state or anybody else.

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11/20/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/48>

Thanks, I noticed Clark's detailed citation. It seems like a good and reasonable finding, no matter what it is called.

Related to who controls historic preservation—

It is a rather complicated mix of federal state and local control.

Yes, city has codes that describe certain rules and the way historic preservation zones and individual buildings are treated. But these codes take their direction and legal foundation from the National Historic Preservation Act of 1966 and some amendment from the 1980s that essentially deputizes state (in AZ, the State Historic Preservation Office – SHPO) and some local governments (through a detailed certification process) to enforce the federal regulation. Under this setup, the Secretary of the Department of the Interior through the National Parks Service and the tool of the National Register of Historic Places is the ultimate authority over the treatment of historic items, and administration of these is the duty of SHPO in Arizona, which then supervises local governments in the sphere.

My point about consulting the State Historic Preservation Office (SHPO) rather than the city preservation officer, is because ultimately it is the ACC that has authority over TEP, not the Mayor and City Council. Being a state department, and the one authorized by the Secretary of the Interior to administer historic preservation on its behalf, SHPO is more co-equal to the ACC than a clerical worker hired by Development Services in Tucson.



11/20/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/49>

Copy. I have no dog in your fight against City historical zoning decisions, or who the ultimate authority is.

My point has always been: ordinances matter and are enforceable generally and under ACC rules. We should not treat them as optional or we'll waste a lot of time. Therefore, I object to removing them as a constraint. That TEP prefers ordinances to be optional isn't new information.

I do find it interesting that you're pushing a historical society to make a statement that transmission line placement in historical areas shouldn't be avoided. It seems counterproductive to the mission of preservation but to each their own.

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11/20/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/50>

Hi [redacted],  
I am not pushing a historical society. I just follow meetings, and reported to this group about statements made at a public meeting. I am in total agreement with you. Ordinances matter. Lack of ordinances matter. There are no ordinances that prohibit overhead power lines crossing through historic districts, or passing near historic properties. Therefore, TEP shouldn't adopt its own favor toward avoiding these districts, especially when doing so is in conflict with the evaluation criteria #1 which tries to avoid unfair placement through economically disadvantaged areas. While the Line Siting Committee will "consider" historic sites within its many factors to consider, this is not an "ordinance" or a "literal law" that prevents an overhead route.  
Thanks,  
[redacted]



11/20/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/52>

HPZ and NPZ are ordinances enforced by boards and then the City. The boards will be opposed to transmission lines. TEP is unlikely to be able to override those decisions.

Ignoring them as a constraint is a waste of time. As others and I said, treat areas that have expressed interest in becoming an HPZ or NPZ as though they are. Then your problem is solved without making a bigger problem.

Regards,

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11/20/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/53>

I can't remember all the criteria but a less preferential alternative could be to increase the weighting of avoiding running lines through neighborhoods altogether. Maybe that's already in there. That would avoid ranking neighborhoods higher or lower relative to one another and encourage TEP to run lines along thoroughfares instead.



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11/20/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/54>

Thanks [redacted]! That's exactly what I've advocated for. I believe that anything materially through any neighborhood should be avoided and if it cannot be, then undergrounded.

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Clark Bryner

11/27/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/69>

Yes, we definitely have a criterion that evaluates routes that pass through, or are located adjacent to, residential areas with a lower suitability. I believe we have agreement on that one.

However, it seems apparent to me that there still exists a difference of opinions between members of the advisory group on the historic properties' criterion. I don't believe that we're going to resolve that difference.

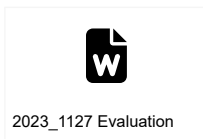
To move forward, I would like to propose that we create two separate Suitability Factor models for historic properties, one that includes historic neighborhoods, and one that does not. We can then evaluate the results to see if it makes much of a difference in the suitability model or not. And to Aaron's point, we can adjust the weighting of each as well.

I've attached a map illustrating some of the raw data that would go into the models, including the low-income areas (as defined under our proposed criterion "Impact on low-income and/or disadvantaged communities") as well as the historic neighborhoods. The areas in orange would fall under the low-income category and the cross hatched areas are the historic neighborhoods. In all but a few neighborhoods they are either one and the same, or they are in different geographic areas of the study area that are independent of one another. What I mean by that, is it seems improbable that because an area is a historic neighborhood that it would push routing to a lower income area or vice versa.

I've also attached an updated Detailed Criteria document that outlines a Criterion 5A and 5B. Please provide your thoughts on moving forward with this approach.



Historic\_LowIncome\_N



2023\_1127 Evaluation

([https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/69/0/Historic\\_LowIncome\\_Neighborhoods.pdf](https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/69/0/Historic_LowIncome_Neighborhoods.pdf))  
([https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/69/1/2023\\_1127\\_Evaluation\\_Criteria\\_-\\_Detailed.docx](https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/69/1/2023_1127_Evaluation_Criteria_-_Detailed.docx))



11/27/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/70>

Just to clarify Clark, I believe the criteria for impacting low income areas does not mean they won't be impacted but that they would not be unevenly impacted. Where there is some equal distribution of the impact vs. traditional sock it to the "poor" folks.

I'm not sure how to word that but that's what I think we intend. We may need some further discussion if that is not the commonly shared understanding.

Thanks,



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(<https://groups.io/g/MRP-Neighborhood-Advisory-Group/attachment/70/0/8E6F776BD66D41FAA796AAEAA0EC1DA6.png>)



11/27/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/71>

I can support this recommendation.

I am increasingly sensitive to the fact that most of us in this advocacy group really don't have the tools to find a limited set of approaches that are politically (ACC and CoT and voters as well as ACC), economically or strategically relevant. In my day-to-day life, I'd pull together strategic and collaborative stakeholders who could work intensively to hammer out viable options that could be refined. I increasingly feel like a pawn in the current process. My personal hope would be that folks with the depth of technical, economic, policy, legal, political chops could define viable core strategies for refinement. TEP is a critical player, but the solution lies with a shared solution that is viable to the ACC and voters.

The recent proposition tried to do too much and confused voters, wrapping together franchise with the cost of the undergrounding AND renewables. I double there is political capital for leadership to go back to the table, but expect the reliability project needs to move first, then the franchise agreement, which required public vote. In the end, the ACC has a huge impact on the potential outcome, and they are less concerned with local considerations.

Is there a path to a more limited committee with the breadth of appropriate and knowledgeable stakeholders? I appreciate that this is a political process, and the power lies with TEP and the ACC, but I'd like to imagine there's a productive path that voters and stakeholders could line up behind. Neighborhoods likely aren't particularly valuable in the outcome but could be helpful in vetting and refining possible scenarios.

I'd personally be curious if such a thing could happen during this phase.



Show quoted text



11/28/23  (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/72>)

I agree. We're removing constraints when people in those neighborhoods aren't even represented here. TEP still shows the UA as a giant constraint in every map when it has no legal constraint — and other areas have actual legal constraints.

The zoning examiner denied Vine at least in part because it was not compliant with the University Area Plan (which excludes UA property), which requires undergrounding new electric infrastructure and has since the 1980s.

TEP's franchise agreement, which it voluntarily entered into in 2001, says it will underground where required by local laws. And it says the city can pay the difference for undergrounding where not required by local laws. It even says cost cannot be a consideration.

This whole thing feels like we're pawns for a TEP talking point and not a process for an actual solution that will withstand the legal process.

We should be exploring the most efficient undergrounding paths that comply with the laws. Assuming nobody is going to care to enforce those laws is why TEP wasted the last four years.

TEP has a lot more challenges than simply the gateway ordinance. The general plan, specific plans, ordinances, the franchise agreement, the cost of private property damage, etc. Having us ignore all of that is to waste our time.

The laws apply to TEP too. They always have and TEP should reasonably know this. And if it had any doubt, the franchise agreement says it unequivocally.

Best,



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11/28/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/75>

[Redacted]-Thanks for your comments -We will work through all of this and hopefully come to a solution that everyone can live with-Yes I also rely on those involved who have extensive power line and electric transmission expertise--I do not but I know what we do not want in our neighborhoods

[Redacted]

[Redacted]

On Monday, November 27, 2023 at 06:24:53 PM MST, [Redacted] wrote:

I can support this recommendation.

I am increasingly sensitive to the fact that most of us in this advocacy group really don't have the tools to find a limited set of approaches that are politically (ACC and CoT and voters as well as ACC), economically or strategically relevant. In my day-to-day life, I'd pull together strategic and collaborative stakeholders who could work intensively to hammer out viable options that could be refined. I increasingly feel like a pawn in the current process. My personal hope would be that folks with the depth of technical, economic, policy, legal, political chops could define viable core strategies for refinement. TEP is a critical player, but the solution lies with a shared solution that is viable to the ACC and voters.

The recent proposition tried to do too much and confused voters, wrapping together franchise with the cost of the undergrounding AND renewables. I double there is political capital for leadership to go back to the table, but expect the reliability project needs to move first, then the franchise agreement, which required public vote. In the end, the ACC has a huge impact on the potential outcome, and they are less concerned with local considerations.

Is there a path to a more limited committee with the breadth of appropriate and knowledgeable stakeholders? I appreciate that this is a political process, and the power lies with TEP and the ACC, but I'd like to imagine here's a productive path that voters and stakeholders could line up behind. Neighborhoods likely aren't particularly valuable in the outcome but could be helpful in vetting and refining possible scenarios.

I'd personally be curious if such a thing could happen during this phase.

[Redacted]

Show quoted text



11/28/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/76>

I agree wholeheartedly with [Redacted] view that decisions should be made thoughtfully and with expertise. The Miles Neighborhood Association fully supports this. We also agree with [Redacted] sentiment that overhead lines should be routed along thoroughfares and not through neighborhoods. The only exception I would suggest is in the case of neighborhoods that are already transected by thoroughfares. It doesn't make sense to prohibit large roadways as overhead power line routes simply because a named neighborhood encompasses both sides of a large street.

On another topic, this un-ceasing discussion of undergrounding has become tedious.

We were invited to this group to find an optimal recommended overhead route. I feel that this insistence on burying lines is an improper imposition on this group, and that this is not the proper forum.

It can be better addressed at the Fortis shareholder or board level, to the ACC or Arizona Legislature, or brought to the Mayor and City Council, which could enact a city-wide zoning ordinance, or requirement in a new Franchise Agreement to force all electric transmission lines to be buried. Without taking action toward those bodies, this seems like so much hollering at local Starbucks baristas and customers that the chain must stop using plastic containers.





11/28/23 <https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/77>

As long as consideration of "historic" areas doesn't push lines into disadvantaged or unrepresented neighborhoods (those that are not yet participating in this advisory group), or into neighborhoods that simply haven't been deemed "historic" yet but could be were it not for the expensive and labor-intensive application and acceptance process, or that would prevent routing along right-of-ways on major roads, even if they pass along "historic" neighborhoods, then I don't see a problem with considering historic areas.

1 - 16 of 16 < 1 >

← (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102711633?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102711633>)

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Topics (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,20,104098078>)

Date (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/104098078?>

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### Infrastructure Act



Feb 1 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/131>)

Good Morning Clark,

Was this funding looked into by TEP?

<https://www.scenic.org/2022/05/20/undergrounding-resources-in-the-infrastructure-investment-and-jobs-act/> (<https://www.scenic.org/2022/05/20/undergrounding-resources-in-the-infrastructure-investment-and-jobs-act/>)

Thanks,



Feb 1 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/132>)

The Undergrounding Resources in the Infrastructure Investment and Jobs Act specifically notes

"use these federal relief funds to bury any utility infrastructure downed by extreme weather or other natural disasters ..."

The TEP lines are not being used "to bury any utility infrastructure downed by extreme weather or other natural disasters ..." an important distinction here



Show quoted text



Feb 1 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/133>)

TEP has told us repeatedly that monsoons take down their 46kV infrastructure every monsoon season.

It should not be too hard of a case to make that undergrounding hardens against extreme weather here as much as anywhere else.

It certainly should be a case that someone should try to make, even if unsuccessful. If Arizona is allocated X amount of dollars and Phoenix doesn't really have monsoons anymore, I'd think we'd have a decent chance. Our politicians are supposed to fight for those federal dollars.

Show quoted text



Feb 1 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/134>)

It will be interesting to see Clark Bryner's answer, but another distinction is probably between transmission and distribution lines. I wonder how often TEP transmission lines have come down due to extreme weather?

Also, the grants seem to be mainly directed to preventing power-grid-caused wildfires, or to "reduce the likelihood and consequences of disruptive events." where a disruptive event is one, "in which operations of the electric grid are disrupted, preventively shut off, or cannot operate safely due to extreme weather, wildfire, or a natural disaster."

Wouldn't Tucson rank near the bottom na ionally in any kind of scale of "disruptive event" likelihood?

I, for one, would prefer to see those federal dollars go to help prevent entire landscapes from burning up like in Paradise, CA, or to prevent large-scale power disruptions in earthquake-, hurricane-, or tornado-prone regions.

Also, that LIMITATION language about the grant amount not exceeding what the entity has spent in the 3 previous years to protect against "disruptive events," would seem to be far less than what would be required to bury the MRP transmission lines.



Clark Bryner ▾

Feb 2 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/135\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/135)

I will definitely chime in. I have reached out to the group at TEP who looks into the various grants and will provide a response once I hear back from them.

**Clark Bryner, AICP**  
**Manager, Transmission Line Siting**  
*Tucson Electric Power/UNS Electric Inc.*

4350 E. Irvington Rd.  
Mailstop CB200  
P.O. Box 711 Tucson, AZ 85702  
Phone: 520-918-8254  
Mobile: 520-401-1175  
E-mail: cbryner@... (mailto:cbryner@...)



Feb 2 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/136\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/136)

Thanks!

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Clark Bryner ▾

Feb 12 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/147\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/147)

Sorry for the slow response time on this question.

TEP did indeed look into a federal grant that would provide funds to help pay for underground construction of the transmission line. It was determined that the Midtown Reliability Project did not meet the requirements, so no grant application was ever submitted.



Feb 12 [🔗 \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/148\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/148)

Thanks!

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### Next In-Person Meeting?



11/26/23 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/58>)

Hello,

I have not been able to attend any of the open meetings for the MRP yet. When is the next open meeting, either of this group or related to the project in general?

Many thanks,



11/26/23 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/60>)

Jan. 11 is what we were told at our last meeting on Nov. 9. It seemed that TEP or the mediator contractor didn't know of the availability of the Dunbar Pavillion for that night, so the location is still TBD.

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Clark Bryner

11/29/23 (<https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/83>)

TEP has confirmed the availability of the Dunbar Pavilion. So our next planned in-person meeting of the Neighborhood Advisory Group will be January 11th @ 6:00pm.

1 - 3 of 3 < 1 >

[← \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102881281?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102881281\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102881281?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102881281)

[→ \(https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102711633?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102711633\)](https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102711633?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102711633)

MRP-Neighborhood-Advisory-Group (https://groups.io/g/MRP-Neighborhood-Advisory-Group)



Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,20,102584474)

Neighborhood-Advisory-Group/topic/102584474?

%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C20%2C102584474%2Cp%2Fprev%253D1701293847846622445%2Cnextid%253D1700061454437883834)

### Project Evaluation Criteria



Clark Bryner

11/14/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/1)

I wanted to continue our discussion from the other night, in particular on criterion 5 of the Proposed Evaluation Criteria (https://groups.io/g/MRP-Neighborhood-Advisory-Group/files/2023\_1031%20Evaluation%20Criteria%20-%20Detailed.docx) on "Historic properties and neighborhoods adjacent to the transmission line."

With respect to historic neighborhoods, [redacted] raised some valid points on the inclusion of this criterion as written "undoing" the intent of criterion 1 which aims to minimize impacts on low income/disadvantaged communities. There is also a concern about double counting with criterion 4 which seeks to minimize impacts on residential areas.

I'm certain there are additional thoughts on the inclusion/exclusion of this criterion. For purposes of hearing further viewpoints, I'd like to propose a modified criterion 5, as written below, for your consideration. This removes the blanket historic neighborhoods, but keeps in specific sites that are recorded in either the National or Arizona Register of Historic Places.

1.

#### 1. Historic properties and neighborhoods adjacent to the transmission line.

##### Detailed Description

- Historic properties are those listed, or eligible for listing, on the National Register of Historic Places and/or the Arizona Register of Historic Places. ~~Historic neighborhoods are those designated by the City of Tucson.~~

##### Phase 3 Suitability Assessment

- A qualified archaeologist will conduct a records review to identify known historic and pre-historic sites within the project study area. ~~Historic neighborhoods will be identified through the City of Tucson.~~ Any preliminary links that pass through, or are located within the vicinity of a historic property or historic neighborhood, as defined under the detailed description will be given a lower suitability for this criterion, where preliminary links that do not will be given a higher suitability for this criterion.

##### Phase 4 Compatibility Analysis

- A qualified archaeologist will review each potential transmission line route and evaluate the level of impact of any potential route. Routes with greater impact will be given a lower compatibility, while routes with a lower impact will be given a higher compatibility for this criterion.



11/15/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/2)

Good Morning Clark,

I think you have to include historic zoning. You could maybe distinguish between the types; HPZ, NPZ, etc. You could add neighborhoods that have applied and treat them as though they have it.

The reality is historic zoning ordinances have strict rules, especially the HPZ. To pretend those rules don't exist would be to make a plan that would be unlikely to get zoning approval. I think it's a more efficient use of time to find a route that respects the ordinances.

I disagree that having an HPZ is a panacea of positive benefits for privileged folks. It's costly and burdensome to comply with. It's like an HOA but worse. NPZs were used recently to stop mini-dorm re-development and destruction of neighborhoods (see Feldmans, etc.).

I agree that there should be financial support for neighborhoods that want to apply for historic status but lack the funds if that's indeed the primary impediment.

Best,



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11/15/23 @ (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/3)

I'd be surprised if the lines would impact historic status it'd be worth a call to SHPO to confirm when it comes up:

## Kathryn Leonard

**State Historic Preservation Officer**

kleonard@... (mailto:kleonard@...)  
(602) 542-4009

My comment was to let it remain but weight it low as a criteria, which respects the two opinions without a line in the sand...

Show quoted text



11/15/23 @ (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/4)

We did that last time around. IIRC, the City historic person was against transmission lines in HPZ, at a minimum.

My point is ordinances matter. So down-weighting or deleting them from consideration is not an efficient use of time. Indeed, they're one of the things that cannot be ignored because they're highly likely to be enforced.

Best,



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1 - 4 of 4 < 1 >

← (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102626896?p=%2C%2C%2C20%2C0%2C0%2C0%3A%3Arecentpostdate%2Fsticky%2C%2C%2C20%2C2%2C20%2C102626896)



MRP-Neighborhood-Advisory-Group (https://groups.io/g/MRP-Neighborhood-Advisory-Group)



Topics (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topics?p=recentpostdate/sticky,,,20,2,0,103178193)

Neighborhood-Advisory-Group/topic/103178193?

question from neighbor



12/14/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/122)

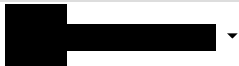
I had a question I didn't know the answer to – what are the other stakeholder groups that TEP is convening apart from the neighborhood advisory group? Thx



Clark Bryner

12/14/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/125)

I'm sure I'll miss someone, but other stakeholders that TEP is working with include staff from various organizations including: 1) City of Tucson; 2) Pima County; 3) ADOT; 4) Banner Health; 4) Davis-Monthan Air Force Base; 5) Metropolitan Pima Alliance; 6) Pima Association of Governments; 7) THRIVE in the 05; 8) Tucson Airport Authority; 9) Tucson-Pima County Historical Commission; 10) Union Pacific Railroad; and 11) University of Arizona. At the neighborhood level, TEP is not only working with the Neighborhood Advisory Group, but also specific neighborhoods through neighborhood meetings and follow-up. And we consider the general public a stakeholder that we work with and engage through open houses, comment forms, project email, project phone line, and at the individual level by meeting with and speaking with folks one on one to discuss concerns and answer questions. Lastly, TEP is also coordinating with elected officials at all levels of government (local, state, and federal).



12/14/23 (https://groups.io/g/MRP-Neighborhood-Advisory-Group/message/126)

Thanks Clark

Show quoted text

1 - 3 of 3 < 1 >

← (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/102995542?p=recentpostdate/sticky,,,20,2,0,102995542)

→ (https://groups.io/g/MRP-Neighborhood-Advisory-Group/topic/103178371?p=recentpostdate/sticky,,,20,2,0,103178371)

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-11**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-11.1**

#### **Facebook Screenshot**

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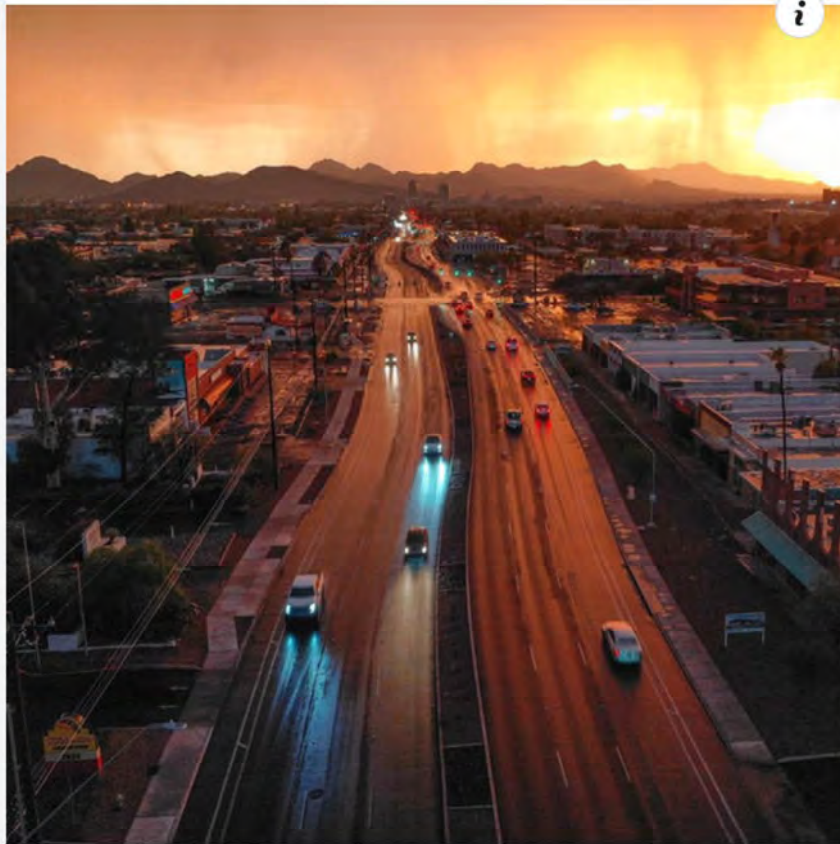


**Tucson Electric Power**

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TEP invites residents and other stakeholder in to attend an upcoming open house to learn more about improvements needed to maintain reliability in central Tucson.



TEP.COM

**Midtown Reliability Project**

[Learn more](#)

TEP invites residents and other stakeholder in to ...

1

Like

Comment

Share

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-11.2**

#### **Social Media Completion Report Jan-Feb 2024**

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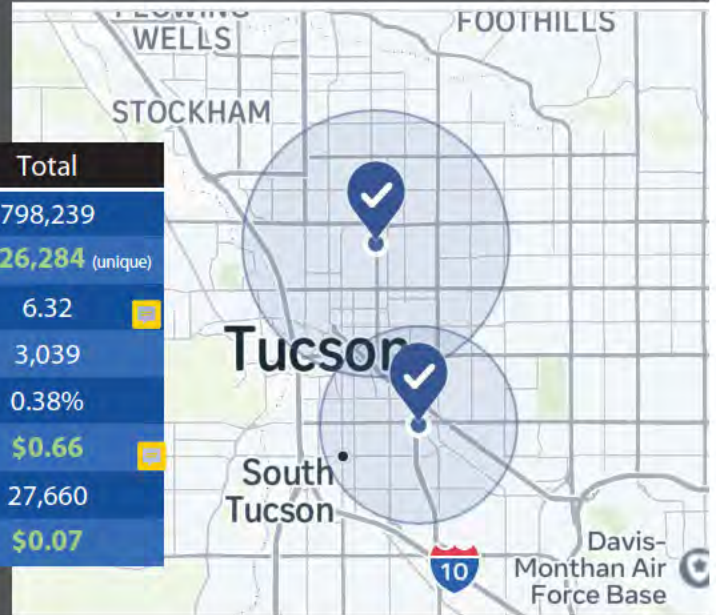
# MIDTOWN RELIABILITY PROJECT

Social Media Campaign | Open House #3

January 18 – February 8

## Completion Report

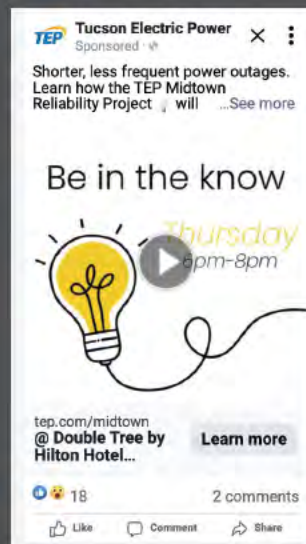
	English	Spanish	Total
Impressions	543,230	255,099	798,239
Reach	110,862	36,330	126,284 (unique)
Frequency	4.9	7.02	6.32
Clicks	2,550	489	3,039
CTR	0.47%	0.19%	0.38%
Cost Per Click	\$0.59	\$1.02	\$0.66
Post Engagement	24,768	2,892	27,660
Cost Per Engagement	\$0.06	\$0.17	\$0.07



# TEP MIDTOWN RELIABILITY PROJECT

Social Media Campaign | Open House #3

January 18 – February 8





# TEP MIDTOWN RELIABILITY PROJECT

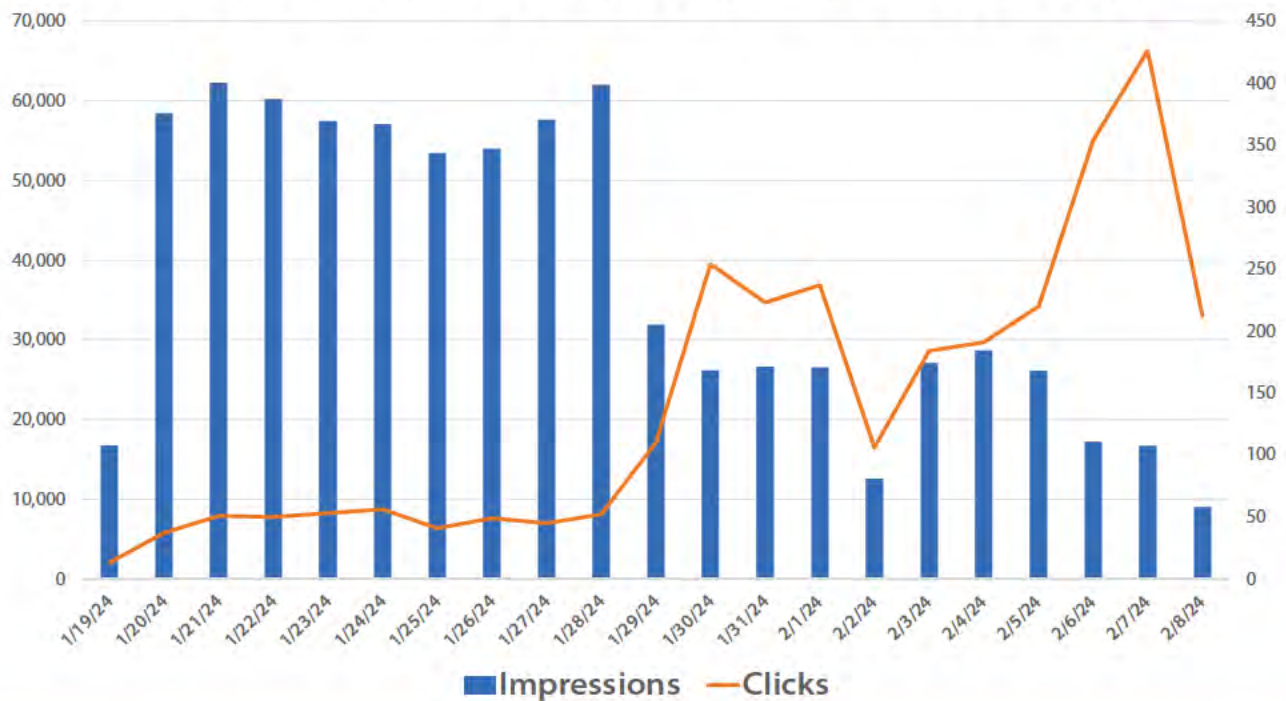
## Social Media Campaign | Open House #3

### English & Spanish | Rotating Headlines (4)

1. Learn more about upgrades that will benefit your neighborhood. 📍 Get the details about how the TEP Midtown Reliability Project will help build a stronger, smarter grid for Tucson.
  2. Energy grid improvements = more reliable power for your neighborhood! 📍📍 Learn more about how the TEP Midtown Reliability Project will reinforce systems that provide safe, reliable service.
  3. More reliable power for your neighborhood. 📍 Learn about the TEP Midtown Reliability Project now and discover how we'll meet our community's future energy needs.
  4. Shorter, less frequent power outages. 📍 Learn how the TEP Midtown Reliability Project will help build a stronger, smarter grid for Tucson.
- 
1. Conozca más sobre las actualizaciones que beneficiarán a su vecindario. 📍 Obtenga los detalles sobre cómo el Proyecto de Confiabilidad del Centro de Tucson de TEP ayudará a construir una red más fuerte e inteligente.
  2. ¡Mejoras en la red de energía = energía más confiable para su vecindario! 📍📍 Conozca más sobre cómo el Proyecto de Confiabilidad del Centro de la Ciudad de TEP reforzará los sistemas que brindan un servicio seguro y confiable.
  3. Energía más confiable para su vecindario. 📍 Conozca el Proyecto de Confiabilidad del Centro de la Ciudad de TEP ahora y descubra cómo satisfaremos las necesidades energéticas futuras de nuestra comunidad.
  4. Cortes de energía más cortos e infrecuentes. 📍 Conozca cómo el Proyecto de Confiabilidad del Centro de la Ciudad de TEP ayudará a construir una red más fuerte e inteligente para Tucson.



# TEP MIDTOWN RELIABILITY PROJECT | January 18 – February 8





## MIDTOWN RELIABILITY PROJECT

Social Media Campaign | Open House #3

January 18 – February 8



# Progress Reports



## MIDTOWN RELIABILITY PROJECT

Social Media Campaign | Open House #3

January 18 – February 8



### In-Progress | Data through February 2

	English	Spanish	Total
Impressions	466,640	196,088	662,728
Reach	90,693	29,141	105,364 (unique)
Frequency	5.15	6.73	6.29
Clicks	1,209	166	1,375
CTR	0.26%	0.08%	0.21%
Cost Per Click	\$0.86	\$2.11	\$1.01
Post Engagement	16,761	1,168	17,929
Cost Per Engagement	\$0.06	\$0.30	\$0.08

**Tucson Electric Power** Sponsored ·

More reliable power for your neighborhood. Learn about the TEP Midtown Reliability [...See more](#)

**Be in the know.**

[tep.com/midtown](http://tep.com/midtown)  
@ Double Tree by Hilton Hotel... [Learn more](#)

4 2 comments

Like Comment Share



## MIDTOWN RELIABILITY PROJECT

Social Media Campaign | Open House #3

January 18 – February 8

### In-Progress | Data through January 25

	English	Spanish	Total
Impressions	275,054	90,551	365,605
Reach	57,513	19,193	64,856 (unique)
Frequency	4.78	4.72	5.64
Clicks	221	80	301
CTR	0.08%	0.09%	0.08%
Cost Per Click	\$2.19	\$2.00	\$2.14
Post Engagement	7,857	540	8,397
Cost Per Engagement	\$0.06	\$0.30	\$0.08



# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-11.3**

#### **Social Media Completion Report March 2024**

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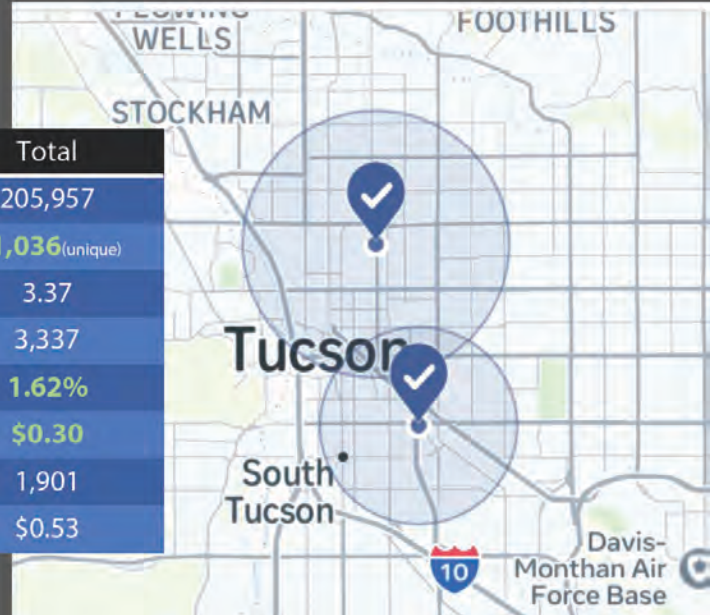
# MIDTOWN RELIABILITY PROJECT

Social Media Campaign | Open House #4

March 11 – March 28

## Completion Report

	English	Spanish	Total
Impressions	151,333	54,624	205,957
Reach	51,138	16,492	<b>61,036</b> (unique)
Frequency	2.96	3.31	3.37
Clicks	2,286	1,051	3,337
CTR	<b>1.51%</b>	<b>1.92%</b>	<b>1.62%</b>
Cost Per Click	\$0.31	\$0.29	<b>\$0.30</b>
Post Engagement	1,348	553	1,901
Cost Per Engagement	\$0.52	\$0.54	\$0.53



# TEP MIDTOWN RELIABILITY PROJECT

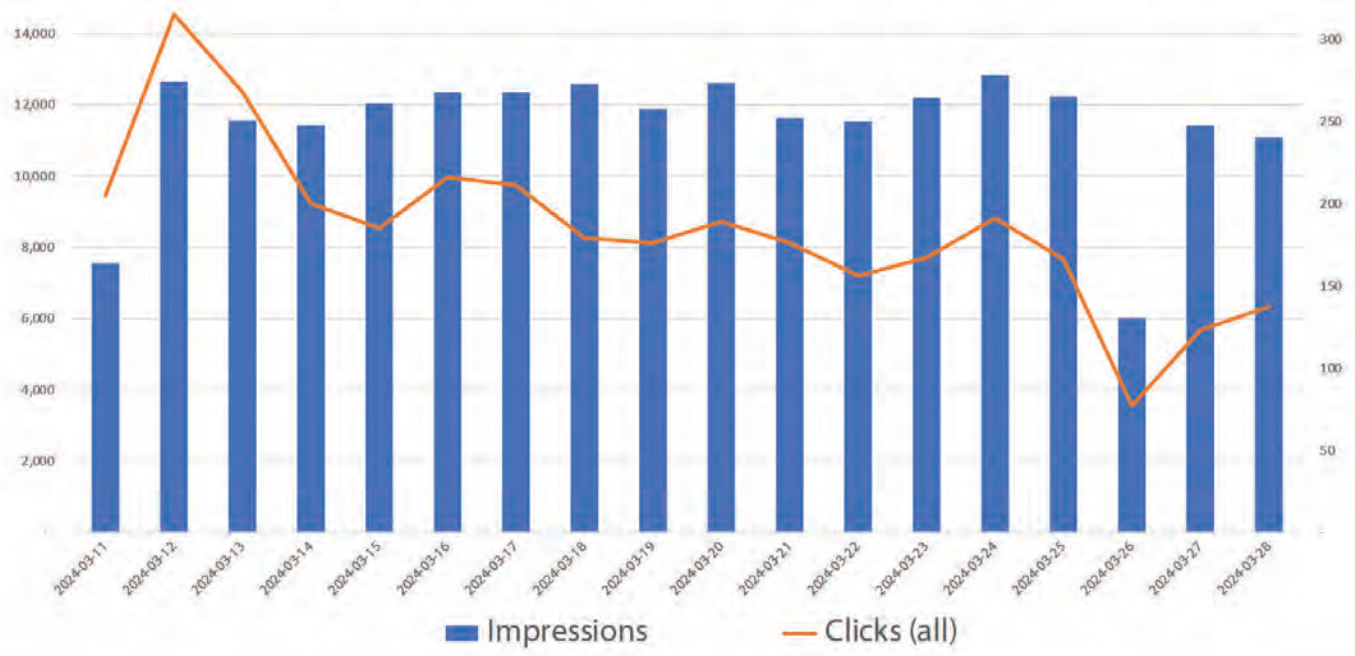
Social Media Campaign | Open House #4

March 11 – March 28





# TEP MIDTOWN RELIABILITY PROJECT | MARCH 11 – MARCH 28



**MIDTOWN RELIABILITY PROJECT**  
 Social Media Campaign | Open House #4  
 March 11 – March 28



## Progress Reports





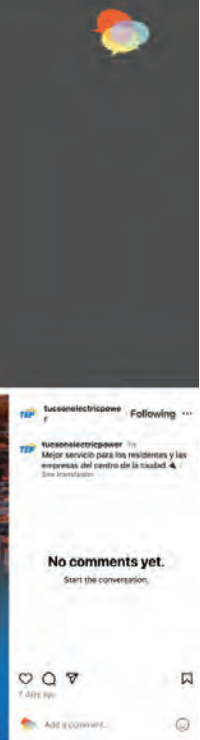
## MIDTOWN RELIABILITY PROJECT

### Social Media Campaign | Open House #4

March 11 – March 28

#### In-Progress | Data through March 24

	English	Spanish	Total
Impressions	121,067	44,133	165,200
Reach	44,530	14,281	<b>52,812</b> (unique)
Frequency	2.72	3.09	3.13
Clicks	1,940	894	2,834
CTR	<b>1.60%</b>	<b>2.03%</b>	<b>1.72%</b>
Cost Per Click	\$0.29	\$0.27	<b>\$0.28</b>
Post Engagement	1,115	470	1,585
Cost Per Engagement	\$0.51	\$0.52	\$0.51



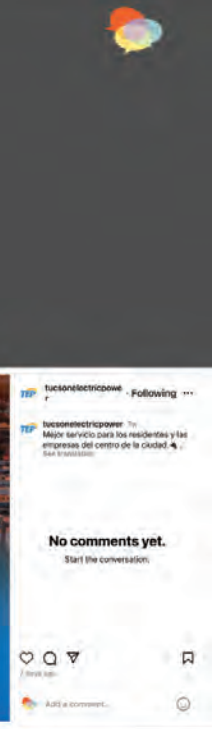
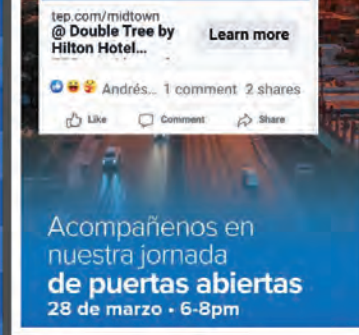
## MIDTOWN RELIABILITY PROJECT

### Social Media Campaign | Open House #4

March 11 – March 28

#### In-Progress | Data through March 17

	English	Spanish	Total
Impressions	57,698	22,217	79,915
Reach	26,736	9,209	<b>33,269</b> (unique)
Frequency	2.16	2.41	2.40
Clicks	1,064	535	1,599
CTR	<b>1.84%</b>	<b>2.41%</b>	<b>2.00%</b>
Cost Per Click	\$0.26	\$0.22	<b>\$0.25</b>
Post Engagement	558	239	797
Cost Per Engagement	\$0.50	\$0.50	\$0.50



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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-12**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-12.1**

#### **Webpage – English**

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Watch on YouTube

[Páginas en español](#)

## Midtown Reliability Project

Tucson Electric Power is helping Tucson thrive by building a stronger, smarter grid that supports our community's growth, facilitates additional use of clean energy resources and maintains reliability during extreme weather conditions.

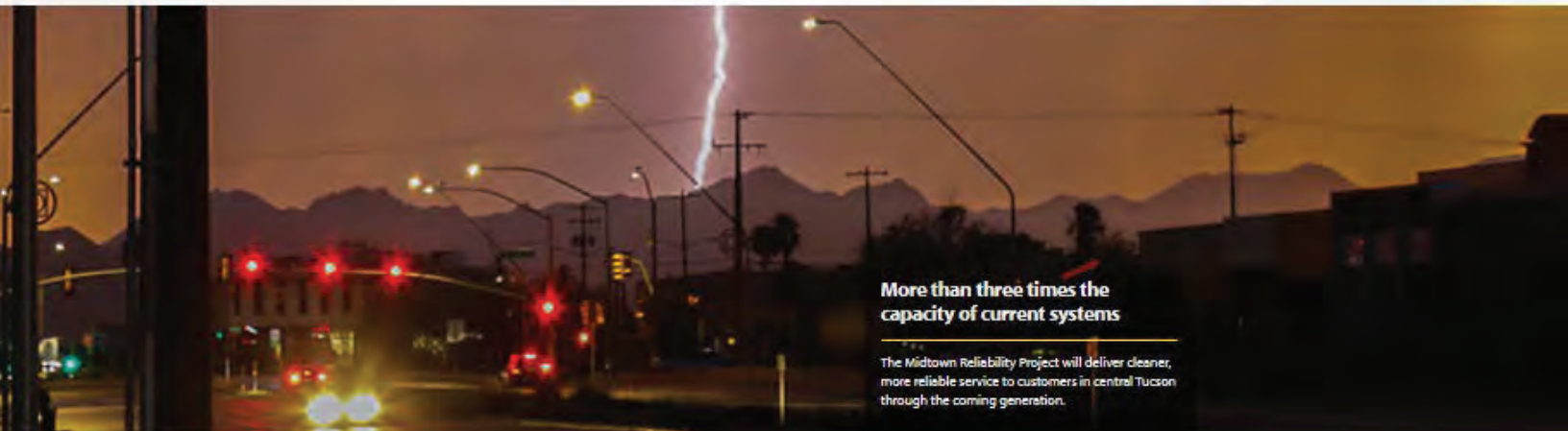
The TEP Midtown Reliability Project will support these efforts by reinforcing systems that provide safe, reliable service. It will include a new higher-voltage transmission line, a new substation and other upgrades to modernize our energy delivery systems in central Tucson.



### More Information

- [Interactive Map](#)
- [Study Area Map PDF revised July 2023](#)
- [Transmission Line Comment Form](#)
- [Comments](#) — May 3, 2024
- [Project Newsletter](#) — March 2024
- [Páginas en español](#)

Comments submitted after April 30, 2024 using our online [comment form](#) will not be included in TEP's application for a certificate of environmental compatibility.



### More than three times the capacity of current systems

The Midtown Reliability Project will deliver cleaner, more reliable service to customers in central Tucson through the coming generation.

## Route Alternatives

Using input from midtown residents and other stakeholders, TEP has identified 10 draft alternative routes for a new overhead transmission line. These alternatives remain under consideration for inclusion in TEP's application for a certificate of environmental compatibility.

To view potential routes, check one letter and one number below. Four routes (A-D) connect the DeMoss-Petrie Substation to the proposed Vine Substation. Six routes (1-6) connect the Vine and Kino substations. [Click here for alternative route descriptions.](#)

## Benefits and Need

The Midtown Reliability Project will replace older, lower-voltage equipment that cannot keep pace with the increasing energy use in central Tucson, an area that includes historic neighborhoods, popular business districts and the University of Arizona campus. Peak power demand in the area has nearly reached the capacity of that older system, reducing electric reliability and leading to longer power outages on some circuits.

Because these facilities are urgently needed to maintain reliable service, TEP will seek to complete construction by the summer of 2027.

Components include:

- A new overhead transmission line and substation that connect midtown neighborhoods to our modern 138 kilovolt (kV) system, more than tripling electric capacity in the area.
- Significant investments in distribution systems that link customers to our local energy grid.
- Retirement of up to eight aging substations and other equipment in neighborhoods throughout central Tucson, helping keep our service affordable.

Benefits



Need





### Tucson's peak energy needs have more than tripled since 1975

The largest proportion of Tucson homes was built in the 1970s. Most of Tucson's 40 kilovolt system was designed to serve the energy needs of homes and other buildings built in the 1950's through the 1990's.

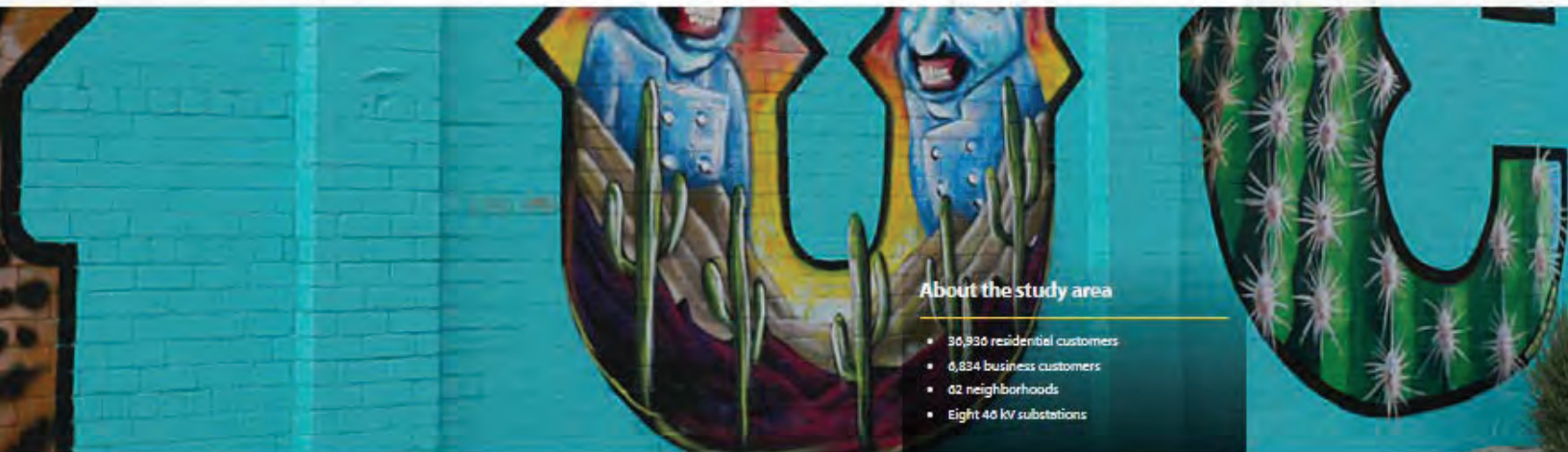
## About the Transmission Line

TEP's largest local energy resources are located at our southside Irvington Campus. Our DeMoss-Petrie Substation, near Interstate 10 and West Grant Road, provides a crucial connection point for our remote energy resources.

The Midtown Reliability Project will provide central Tucson with a new higher-voltage connection to these two critical hubs, closing a gap in our local transmission network. That connection would be part of a 138 kV loop that also encircles downtown Tucson and growing southside neighborhoods served by our Kino Substation, which currently has just a single 138 kV connection.

This part of the project, which includes the proposed Vine Substation, was previously known as the Kino-DeMoss Petrie Transmission Line (Kino-DMP Project). Because the line is urgently needed to maintain reliable service, we will seek to complete construction of this overhead transmission line by the summer of 2027.

Design	+
Required Approvals	+
Public Participation	+
Recent Outreach Efforts	+
Outreach Materials	+



### About the study area

- 30,930 residential customers
- 6,834 business customers
- 62 neighborhoods
- Eight 40 kV substations

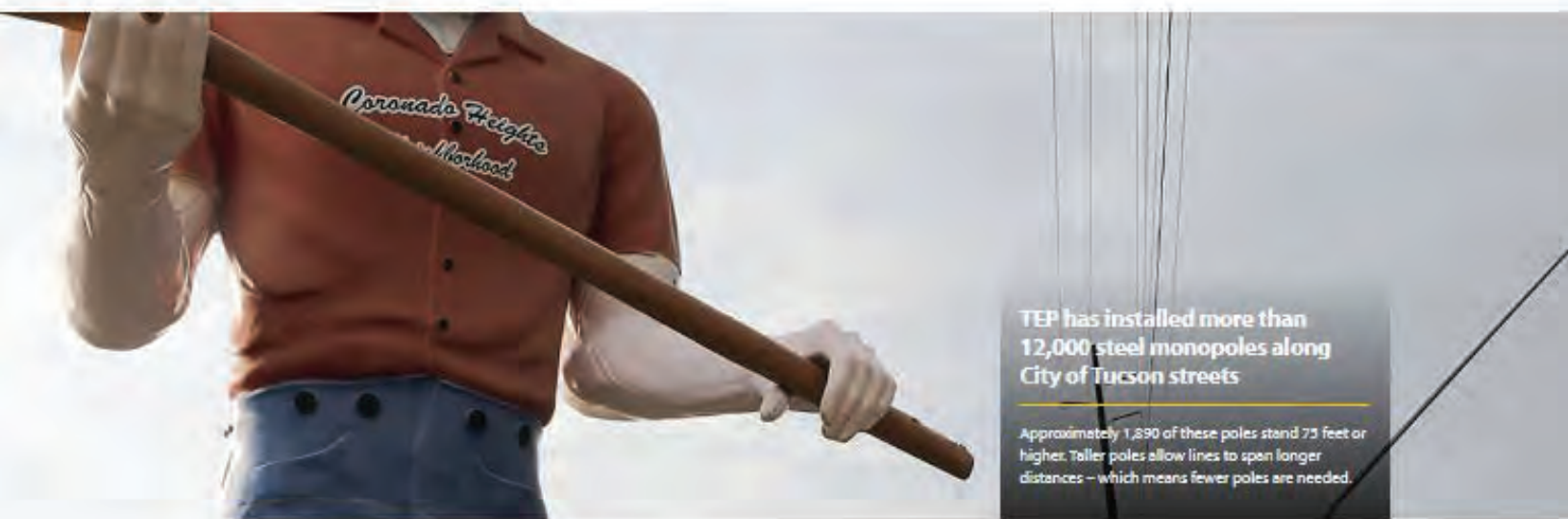
## About the Vine Substation

The proposed Vine Substation is planned for construction on 1.0 acres along North Vine Avenue just west of the Banner-University Medical Center Tucson staff parking garage. It's a critical part of the Midtown Reliability Project, which will improve electric reliability throughout central Tucson.

## About the Vine Substation

The proposed Vine Substation is planned for construction on 1.8 acres along North Vine Avenue just west of the Banner-University Medical Center Tucson staff parking garage. It's a critical part of the Midtown Reliability Project, which will improve electric reliability throughout central Tucson.

- [Design](#) +
- [Required Approvals and Timeline](#) +
- [Contact](#) +



**TEP has installed more than 12,000 steel monopoles along City of Tucson streets**

Approximately 1,890 of these poles stand 75 feet or higher. Taller poles allow lines to span longer distances – which means fewer poles are needed.

## FAQs

- [How does TEP determine where new transmission lines are needed?](#) +
- [Why doesn't TEP develop transmission lines underground?](#) +
- [Why would it cost more to build and maintain underground transmission lines?](#) +
- [Will these proposed lines produce electric and magnetic fields \(EMFs\)?](#) +
- [Is the Midtown Reliability Project part of a new franchise agreement with the City of Tucson?](#) +
- [Open House Questions and Answers](#) +

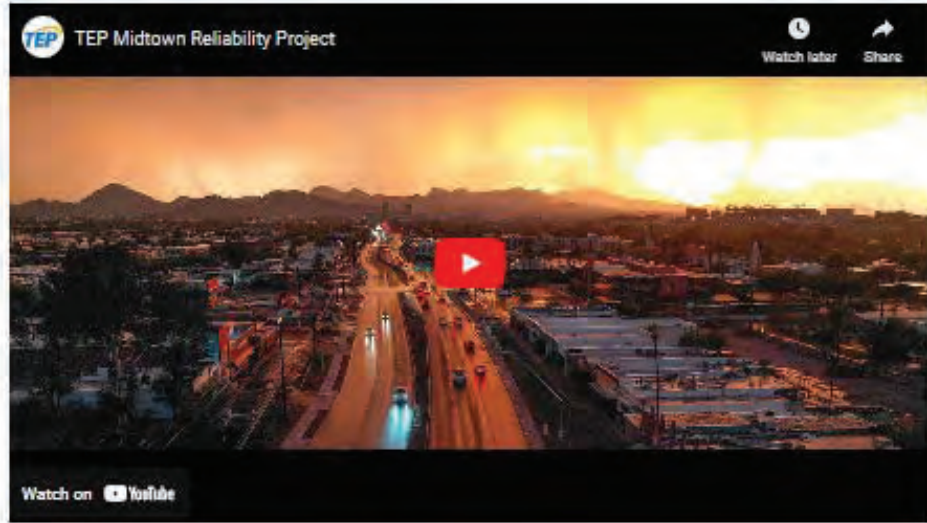
# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-12.2**

#### **Webpage – Spanish**

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## Proyecto de Confiabilidad del Centro de la Ciudad

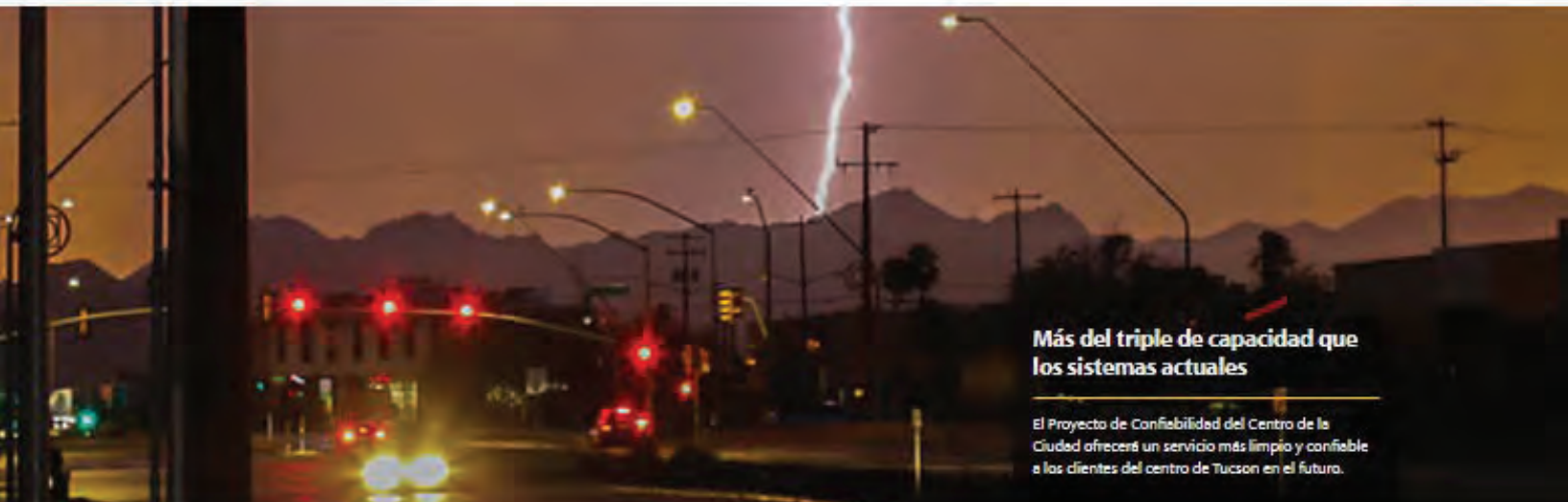
Tucson Electric Power ayudará a Tucson a progresar mediante el desarrollo de una red más sólida e inteligente que respaldará el crecimiento de nuestra comunidad, facilitará el uso adicional de recursos de energía limpia y mantendrá la fiabilidad en condiciones climáticas extremas.

El Proyecto de Confiabilidad del Centro de la Ciudad de TEP respaldará estas iniciativas mediante el fortalecimiento de sistemas que proporcionan un servicio seguro y fiable. Incluirá una nueva línea de transmisión de alto voltaje, una nueva subestación y otras actualizaciones para modernizar nuestros sistemas de suministro de energía en el centro de Tucson.



### Más información

- [Mapa interactivo](#)
- [Mapa del área de estudio PDF revisado en julio de 2023](#)
- [Formulario de comentarios de la línea de transmisión Encuesta interactiva](#)
- [Boletín informativo marzo de 2024](#)
- [Págine en inglés](#)



### Más del triple de capacidad que los sistemas actuales

El Proyecto de Confiabilidad del Centro de la Ciudad ofrecerá un servicio más limpio y confiable a los clientes del centro de Tucson en el futuro.

### Rutas alternativas

Utilizando la opinión de los residentes del centro de la ciudad y demás partes interesadas, TEP identificó 10 bocetos de rutas alternativas para una nueva línea de transmisión aérea. Estas alternativas se siguen considerando para su inclusión en la solicitud de TEP de un certificado de compatibilidad medioambiental.

Para ver las posibles rutas, marque una letra y un número a continuación. Cuatro rutas (A a la D) conectan la subestación DeMoss-Petrie con la subestación de Vine propuesta. Seis rutas (1 a 6) conectan las subestaciones Vine y Kino. [Haga clic aquí para ver descripciones de las rutas alternativas.](#)

The map displays Tucson, Arizona, with several alternative routes for a new transmission line. The routes are color-coded and labeled as follows:

- Route A (Orange):** Connects DeMoss-Petrie to Vine via the University of Arizona campus.
- Route B (Green):** Connects DeMoss-Petrie to Vine via the downtown area.
- Route C (Blue):** Connects DeMoss-Petrie to Vine via the University of Arizona campus.
- Route D (Purple):** Connects DeMoss-Petrie to Vine via the downtown area.
- Route 1 (Red):** Connects Vine to Kino via the University of Arizona campus.
- Route 2 (Orange):** Connects Vine to Kino via the downtown area.
- Route 3 (Green):** Connects Vine to Kino via the University of Arizona campus.
- Route 4 (Blue):** Connects Vine to Kino via the downtown area.
- Route 5 (Purple):** Connects Vine to Kino via the University of Arizona campus.
- Route 6 (Red):** Connects Vine to Kino via the downtown area.

On the right side of the map, there are two selection panels:

- Seleccione una ruta de DeMoss-Petrie a Vine:**
  - A
  - B
  - C
  - D
- Seleccione una ruta de Kino a Vine:**
  - 1
  - 2
  - 3
  - 4
  - 5
  - 6

Below the selection panels, there is a note: "Al darme su opinión, indique la letra y el número de la ruta que prefiere. (Ejemplo: A1)".

### Beneficios y necesidades

El Proyecto de Confiabilidad del Centro de la Ciudad reemplazará los equipos más antiguos y de menor voltaje que no pueden satisfacer el creciente uso de energía en el centro de Tucson, un área que incluye vecindarios históricos, distritos comerciales populares y el campus de la Universidad de Arizona. La demanda de energía en hora pico en el área casi alcanza la capacidad de ese sistema más antiguo, lo que reduce la fiabilidad eléctrica y provoca cortes de energía más prolongados.

Debido a que la línea se necesita de manera urgente para mantener un servicio fiable, TEP intentará finalizar la construcción para el verano de 2027.

Los componentes incluyen:

- Una nueva línea de transmisión y una subestación que conectan los vecindarios del centro de la ciudad con nuestro moderno sistema de 138 kilovoltios (kV), lo que triplica la capacidad eléctrica en el área.
- Inversiones significativas en sistemas de distribución que conectan a los clientes con nuestra red de energía local.
- Retiro de hasta ocho subestaciones antiguas y otros equipos en vecindarios a lo largo del centro de Tucson, lo que ayuda a que nuestro servicio siga siendo asequible.

Retiro de hasta ocho subestaciones antiguas y otros equipos en vecindarios en todo el centro de Tucson, lo que ayude a que nuestro servicio siga siendo asequible.

Beneficios	+
Necesidad	+

### Las necesidades máximas de energía en hora pico de Tucson se han más que triplicado desde 1975

La mayor proporción de viviendas en Tucson se construyó en la década de 1970. La mayor parte del sistema de 40 kilovoltios de Tucson fue diseñado para satisfacer las necesidades energéticas de los hogares y otros edificios construidos entre los años 1950 y 1990.

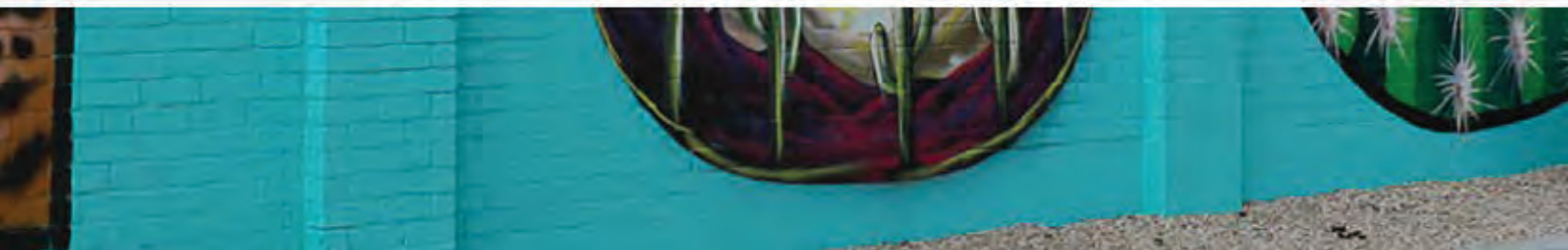
## Acerca de la línea de transmisión

Los recursos de energía locales más importantes de TEP se encuentran en nuestro campus Irvington, en el área sur. Nuestra subestación DeMoss-Petrie, cerca de la Interestatal 10 y West Grant Road, proporciona un punto de conexión esencial para nuestros recursos de energía remotos.

El Proyecto de Confiabilidad del Centro de la Ciudad proporcionará al centro de Tucson una nueva conexión de alto voltaje a estos dos centros esenciales, lo que cerrará una brecha en nuestra red de transmisión local. Ese conexión formará parte de un circuito de 138 kV que también rodea el centro de Tucson y los crecientes vecindarios del área sur a los que presta servicio nuestra subestación Kino, que actualmente tiene una sola conexión de 138 kV.

Esta parte del proyecto, que incluye la subestación Vine propuesta, se conocía anteriormente como la línea de transmisión Kino-DeMoss-Petrie (proyecto Kino-DMP). Debido a que la línea se necesita de manera urgente para mantener un servicio confiable, intentaremos tener lista la construcción para el verano de 2027.

- Diseño +
- Aprobaciones requeridas +
- Participación pública +
- Esfuerzos de difusión recientes +
- Preguntas y respuestas de la jornada de puertas abiertas +
- Materiales de difusión +





### Acerca del área de estudio

- 30,936 clientes residenciales
- 6,834 clientes empresariales
- 62 vecindarios
- Ocho subestaciones de 40 kV

### Acerca de la subestación Vine

La subestación Vine propuesta está prevista para su construcción en 1,6 acres (0,5 hectáreas) a lo largo de North Vine Avenue, justo al oeste del estacionamiento para el personal de Banner-University Medical Center Tucson. Es una parte esencial del Proyecto de Confiabilidad del Centro de la Ciudad, que mejorará la fiabilidad eléctrica en todo el centro de Tucson.

- Diseño +
- Aprobaciones requeridas y cronograma +
- Contacto +



### TEP ha instalado más de 12,000 monopolos de acero en las calles de la ciudad de Tucson

Aproximadamente 1,890 de estos postes tienen una altura de 75 pies (23 metros) o más. Los postes más altos permiten que las líneas abarquen distancias más largas, lo que significa que se necesitan menos postes.

### Preguntas frecuentes

- ¿Cómo determina TEP dónde se necesitan nuevas líneas de transmisión? +
- ¿Por qué TEP no desarrolla líneas de transmisión subterráneas? +
- ¿Por qué costaría más construir y mantener líneas de transmisión subterráneas? +
- ¿Estas líneas propuestas producirán campos eléctricos y magnéticos (EMF)? +
- ¿El proyecto Midtown Reliability forma parte de un nuevo acuerdo de franquicia con la ciudad de Tucson? +
- Preguntas y respuestas de la jornada de puertas abiertas +



# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-12.3**

#### **Interactive Map on Webpage**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-13**

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**Comment Method: Comms/Online****Comment Date** 4/30/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Location

**Heard About****Issues/Phone Message/Comments**

Eyesore and obstruction of view as well as any annoying humming that sometimes accompanies the transmission of electricity.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/30/2024**Category** Resident in Study Area**Concerns Topics**Health, Appearance, Location,  
Property Value, Support  
Underground, Historic**Heard About** Project Website, Word of Mouth**Issues/Phone Message/Comments**

Avoidance of residential neighborhoods. Concerns about how ugly the power lines are. The lines should be buried. Someone should appeal the ACC decision or take them to court again.

**Additional Info**

The effects of high voltage lines on health.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online**

**Comment Date** 4/30/2024

**Category** Live/Work near Study Area

**Concerns Topics**

Location, Support Underground

**Heard About**

**Issues/Phone Message/Comments**

The aboveground line is detrimental to the neighborhood

**Additional Info**

An aboveground line would be detrimental to the neighborhood,

**Requested Info**

---

**Unable to send response**

**Response Notes:**

Wrong email address provided

**Comment Method: Comms/Online****Comment Date** 4/30/2024**Category** Live/Work near Study Area**Concerns Topics**Health, Appearance, Property Value,  
Support Underground, Environment**Heard About** Project Website, Newsletter Mailing,  
Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

The physical and emotional health of those living under these lines; the environmental impact on the city; negative effects on tourism; the loss of property values

**Additional Info****Requested Info****Response sent****Response Notes:**

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TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/30/2024**Category** Live/Work near Study Area**Concerns Topics**

Support Underground, Historic

**Heard About** Project Website, Newsletter Mailing,  
Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

I think corporations should follow the laws.

**Additional Info****Requested Info****Response sent****Response Notes:**

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**Comment Method: Comms/Online****Comment Date** 4/29/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Support Underground, Historic**Heard About** Project Website, Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

This stays away from main university corridors, most historic neighborhoods, and through the most already industrial areas.

**Additional Info**

Keeping the poles off Campbell and Tucson boulevards and out of historic neighborhoods. Campbell is a commercial corridor with many outside seating establishments and people-scaled businesses (as opposed to massive plazas).

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online****Comment Date** 4/29/2024**Category** Resident in Study Area**Concerns Topics**Appearance, Location, Support  
Underground, Historic**Heard About** Word of Mouth**Issues/Phone Message/Comments**

Prefer partial underground route

**Additional Info****Requested Info****Response sent****Response Notes:**

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**Comment Method: Comms/Online**

**Comment Date** 4/29/2024

**Category** Resident in Study Area

**Concerns Topics**

Location

**Heard About** Project Website, Newsletter Mailing

**Issues/Phone Message/Comments**

In public sessions that I have attended about the issue, TEP indicated that they would make every effort to use major arterial roadways and minimize intrusion in residential neighborhoods. There seem to be only two options--D & 6--that align with these objectives.

**Additional Info****Requested Info**

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**Unable to send response**

**Response Notes:**

No contact information provided

**Comment Method: Comms/Online**

**Comment Date** 4/28/2024

**Category** Resident in Study Area

**Concerns Topics**

Appearance, Support Underground,  
Historic

**Heard About**

**Issues/Phone Message/Comments**

Overhead lines violate our city's guidelines for maintaining the scenic route along Campbell/kino.

**Additional Info**

You are not giving me my only preferred option

**Requested Info**

Aesthetic interest in preserving our city's scenic route, which includes historic neighborhoods

---

**Response sent**

**Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online****Comment Date** 4/28/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Property Value, Historic

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Jefferson Park is an historic neighborhood with schools, churches, a hospital, etc., besides the many residential homes. It makes not sense to put these poles and overhead lines here. It will greatly distract from the beauty of the neighborhood and significantly decrease property values near the lines.

**Additional Info**

This would eliminate much of the proposed problematic lines through our neighborhood.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online****Comment Date** 4/28/2024**Category****Concerns Topics**Cost, Location, Support Underground,  
Historic**Heard About****Issues/Phone Message/Comments**

Re No 138kV poles and overhead lines in Jefferson Park or along Campbell/Kino

We request that all of the finally chosen route from Kino to De Moss Petrie sub-station be placed underground. TEP must respect the ~ home ~ of it's Tucson customers, especially the Tucson gateway and historic precincts affected by the construction proposal.

In agreement with independent professional evaluation and comparison to comparable projects elsewhere we resent the egregious over-valuation of the costs of undergrounding. We can only assume that the TEP valuation is an attempt to avoid all local social and contextual responsibilities. Without undergrounding for this project we would support the suggestion before the City to establish an alternative electricity provider commission.

**Additional Info****Requested Info**

---

**Response Notes:**

**Comment Method: Comms/Online****Comment Date** 4/24/2024**Category** Resident in Study Area, Business Owner in Study Area, Live/Work near Study Area**Concerns Topics** Appearance, Property Value, Support Underground, Historic**Heard About** Project Website, Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

visual blight in historic neighborhoods

**Additional Info**

Go underground. It will help maintain our property value

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

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**Comment Method: Comms/Online**

**Comment Date** 4/23/2024

**Category** Resident in Study Area

**Concerns Topics**

Appearance, Location, Historic

**Heard About** Newsletter Mailing, Word of Mouth

**Issues/Phone Message/Comments**

Keep Tucson as attractive as possible by using routes that are already industrialized.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online****Comment Date** 4/17/2024**Category****Concerns Topics**Location, Support Underground,  
Historic**Heard About****Issues/Phone Message/Comments**

All potential routes go through neighborhoods or along arterials protected by one or more of the following ordinances: Historic Preservation Zone, Neighborhood Preservation Zone, University Area Plan, Scenic Routes Ordinance, and Gateway Routes Ordinance. Building the power lines overhead violates these ordinances. This problem could best be solved by burying lines in the areas affected by the relevant ordinances, rather than by continuing to battle the City of Tucson in court for the putative "right" to degrade the quality of life for all who live here by overthrowing our laws.

**Additional Info****Requested Info**

---

**No response required****Response Notes:**

**Comment Method: Comms/Online**

**Comment Date** 4/17/2024

**Category**

**Concerns Topics**

Location

**Heard About**

**Issues/Phone Message/Comments**

Keep to direct routes and large thoroughfares as much as possible.

**Additional Info**

**Requested Info**

---

**No response required**

**Response Notes:**

**Comment Method: Comms/Online**

**Comment Date** 4/17/2024

**Category**

**Concerns Topics**

Location, Support Underground

**Heard About**

**Issues/Phone Message/Comments**

Only underground if along Kino / Campbell. Only underground if going through Jefferson Park

**Additional Info**

**Requested Info**

---

**No response required**

**Response Notes:**

**Comment Method: Comms/Online****Comment Date** 4/17/2024**Category****Concerns Topics**

Cost, Location, Environment

**Heard About****Issues/Phone Message/Comments**

I would like engineers at TEP to make the final decision thinking carefully about project cost and impact on the environment. I find the arguments surrounding appearance of the powerlines to be short sighted. This project is important for fixing our aging infrastructure and allows for the growing demands of electricity from development, rising temperatures, and the introduction of electric cars.

**Additional Info****Requested Info****No response required****Response Notes:**

**Comment Method: Comms/Online****Comment Date** 4/17/2024**Category****Concerns Topics**Appearance, Location, Support  
Underground**Heard About****Issues/Phone Message/Comments**

Make this a win/win for the city. Do not skimp on mitigations. Do everything you can to improve the look of Mid-town. If you don't you'll never get anything done here. Think about repurposing decommissioned 46K stations for small community parks. Be a real community partner. Let's get innovative. Treat the city like you do the foothills. Consider your scheduling for new lines and removal of old lines. Do it quickly so you manage the impact on the community. Again don't be cheap about how you manage the project to minimize the impact on the community. I am supporting this project at this time but I'm new here. Many old timers don't trust TEP and there must be some reason for that. Please don't disappoint us.

**Additional Info****Requested Info**

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**No response required****Response Notes:**



**Comment Method: Comms/Online**

**Comment Date** 4/17/2024

**Category**

**Concerns Topics**

Location, Support Underground

**Heard About**

**Issues/Phone Message/Comments**

Underground through neighborhood areas!

**Additional Info**

**Requested Info**

---

**No response required**

**Response Notes:**

**Comment Method: Comms/Online**

**Comment Date** 4/16/2024

**Category** Business Owner in Study Area

**Concerns Topics**

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

Whether there is room to add the poles in a way that doesn't impact existing businesses, visibility of signage, and traffic flows. Pedestrian safety. Alternative Routes C and 6 are too congested.

**Additional Info**

N Stone Ave is not a suitable route.

**Requested Info**

Please provide additional information about what side of the street the poles would be specifically placed in each of the proposed routes.

---

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online****Comment Date** 4/11/2024**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

TEP cannot place 138kV lines in residential neighborhoods. The lines will destroy residential areas. These neighborhoods simply cannot be asked to take the full burden of boosting electricity to UA and UAMC. I support the proposed "Halfway Solution" <http://www.jeffersonpark.info/tep-138-kv-poles.html>

The solution is to connect the Vine substation to Demoss-Petrie (1 in the image to the right) but to drop the connection from the Vine substation to Kino (2), which would have cost around \$10 million to construct overhead. That \$10 million saved can be used to defray the legally required cost to underground the remaining approximate half-mile from the Vine substation to Grant Road.

**Additional Info**

Do not run overhead lines through residential neighborhoods. We should not bear the burden of providing electricity to the UA. Underground everything running through neighborhoods.

**Requested Info**

---

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We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.

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We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/10/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Support Underground

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Walkability and attractiveness matters in low-income areas, so perhaps sort by income levels.

**Additional Info**

Consider the longterm benefits of going underground. The visual quality of a place contributes to how people treat the area. Don't make neighborhoods unsightly, stark, and unattractive for years to come. People need community.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.

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**Comment Method: Comms/Online****Comment Date** 4/9/2024**Category** Resident in Study Area, Live/Work  
near Study Area**Concerns Topics** Location, Environment**Heard About** Word of Mouth**Issues/Phone Message/Comments**

I'm really worried about the idea of putting a high voltage line so close to my home, especially along the route proposed on Tucson Boulevard. It's not just about my house; this area is home to several schools and the Broadmoor neighborhood, which is a cherished green space and a vital corridor for birds. I strongly feel that TEP should look into options that take these lines through more industrial areas instead. Putting them through Broadmoor just doesn't sit right with me, as a mother of two children and cancer patient.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online****Comment Date** 4/8/2024**Category** Resident in Study Area**Concerns Topics**

Historic

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments****Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/8/2024**Category** Resident in Study Area**Concerns Topics**

Support Underground

**Heard About** Other**Issues/Phone Message/Comments**

ALL TEP routes should be underground!!

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/7/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Appearance, Location**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

Aesthetic and function of final installation.

**Additional Info**

Would be willing to assist with local neighborhood opinion survey.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online**

**Comment Date** 4/6/2024

**Category** Resident in Study Area

**Concerns Topics**

Location, Support Underground

**Heard About** Newsletter Mailing, Public Meeting

**Issues/Phone Message/Comments**

I sent a letter with more detail

**Additional Info**

Underground all transmissions lines in residential neighborhoods

**Requested Info**

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**No response required**

**Response Notes:**

Responded to 4/6/2024 email

**Comment Method: Comms/Online****Comment Date** 4/6/2024**Category** Resident in Study Area, Live/Work  
near Study Area**Concerns Topics****Heard About** Newsletter Mailing**Issues/Phone Message/Comments****Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 4/6/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

I was unable to attend the April 4th meeting about the midtown reliability project, are there note about what transpired at the meeting somewhere?

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

The most recent Public Open House was held on March 28th. All materials presented and discussed can be found on the project website under the "Outreach Materials" drop-down.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

Please let me know if there is anything else I can help with.

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 4/6/2024**Category** Resident in Study Area**Concerns Topics**

Cost, Appearance, Location, Property Value, Support Underground, Environment

**Heard About** Project Website, Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

I've lived at my home since 2015, and have actively been involved in the Board of the Jefferson Park Neighborhood Association since I moved here. I'm also on the neighborhood Green Committee and Clean-up Committee. We've been fortunate to receive two generous grants from the City of Tucson, one from the Care2Enhance program back in 2014 and one from the Neighborhood Stormwater Harvesting Program in 2019. These grants have been used to create the Vine Avenue Green Corridor which runs between Lester and Grant, adding passive rainwater harvesting basins to the right of ways that are now filled with rapidly growing desert willows, velvet mesquites, and desert ironwoods, and a variety of other plants. These plants shade our houses and streets, providing cooling, cleaner air, and the mental health benefits we receive from nature.

We also have informational signs near the corner of Vine and Seneca which educate passersby about rainwater harvesting and local species they are likely to encounter thanks to the native vegetation. We are proud to do our part to contribute to the Tucson Million Trees Initiative. We installed a Little Seed Library at our home at Vine and Waverly to provide native plants to our neighborhood and our neighbors even have installed a Little Free Library at the corner of Vine and Lester.

Adding 110ft tall industrial poles with large bases that would destroy our planting and basins would ruin the Vine Avenue Green Corridor and all that we've worked so hard to build here.

**Additional Info**

It is truly intolerable for Tucson Electric Power to continue to insist on routes and overhead lines that have long-term injurious effects on many citizens and, ultimately, to the entire city.

Please listen to the very real concerns of the literally thousands of residents who will be affected by this project be taken into consideration. Thank you for your attention to this matter.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.

**Comment Method: Comms/Online**

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/5/2024**Category** Resident in Study Area, Live/Work  
near Study Area**Concerns Topics** Location, Historic**Heard About** Other**Issues/Phone Message/Comments**

Impact to historic communities and utilization of already utilized heavily for infrastructure

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/5/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Location

**Heard About** Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

Keep it in commercial areas, not residential ones

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online****Comment Date** 4/5/2024**Category** Resident in Study Area**Concerns Topics**

Support Underground

**Heard About** Public Meeting**Issues/Phone Message/Comments****Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.

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We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 4/5/2024

**Category** Resident in Study Area

**Concerns Topics**

Support Underground

**Heard About**

**Issues/Phone Message/Comments**

Not placing the transmission lines underground is not included as an option.

**Additional Info**

Please reconsider placing the lines underground.

**Requested Info**

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**Response sent**

**Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online**

**Comment Date** 4/5/2024

**Category** Resident in Study Area

**Concerns Topics**

Support Underground

**Heard About**

**Issues/Phone Message/Comments**

**Additional Info**

It would be better and safer to bury the line underground. I hope this option will be pursued rather than the above ground options listed here

**Requested Info**

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**Unable to send response**

**Response Notes:**

No contact information provided

**Comment Method: Comms/Online**

**Comment Date** 4/5/2024

**Category** Resident in Study Area

**Concerns Topics**

**Heard About** Newsletter Mailing, Public Meeting

**Issues/Phone Message/Comments**

Sidewalks are too narrow to accommodate large poles for the poles.

**Additional Info**

Bigger is not better

**Requested Info**

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**Response sent****Response Notes:**

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We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/5/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Health, Location, Environment**Heard About** Project Website, Newsletter Mailing**Issues/Phone Message/Comments**

I am not completely familiar with all the issues related to the runs south of Broadway, but I do live and work in the study area, surrounded by historic districts. Though underground runs would mitigate the disruption, I am not convinced the the final budget will support underground runs. I also have some environmental and health concerns for runs that route through residential areas.

**Additional Info****Requested Info****Response sent****Response Notes:**

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We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/5/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Historic**Heard About** Project Website, Newsletter Mailing, Public Meeting**Issues/Phone Message/Comments****Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/5/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Health, Appearance, Location, Property Value, Support Underground, Historic, Environment

**Heard About** Project Website, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

This just feels like a scam. We've made our opinions know previously with this project under a different name and now we have to protest this sham again.

**Additional Info****Requested Info****Response sent****Response Notes:**

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We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We acknowledge that a lot of work went into the past Kino-DMP project, and many residents and stakeholders spent countless hours considering the issues and developing potential solutions. While we're starting from a blank canvas on routing, all the understanding and knowledge gained through your participation and that of so many others will be carried forward to inform the transmission line routing solutions developed as part of the Midtown Reliability Project.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 4/5/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Support Underground**Heard About** Project Website, Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

Keep the transmission lines on major streets.

Campbell\Kino north of the railroad tracks should only be used if underground, as it is a gateway route into the city.

**Additional Info**

TEP and the UofA should share costs of undergrounding on Kino.

**Requested Info****Response sent****Response Notes:**

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We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online****Comment Date** 4/5/2024**Category** Resident in Study Area**Concerns Topics****Heard About** Newsletter Mailing**Issues/Phone Message/Comments****Additional Info****Requested Info**

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**Response sent****Response Notes:**

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**Comment Method: Comms/Online****Comment Date** 4/5/2024**Category** Resident in Study Area, Live/Work  
near Study Area**Concerns Topics****Heard About** Word of Mouth**Issues/Phone Message/Comments****Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online****Comment Date** 4/4/2024**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Project Website, Newsletter Mailing**Issues/Phone Message/Comments**

STOP Gaslighting, Bullshitting, and being disengenous. Commit to community wants and needs.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

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**Comment Method: Comms/Online**

**Comment Date** 4/2/2024

**Category** Resident in Study Area

**Concerns Topics**

Location, Historic

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

Protecting the integrity of designated historic neighborhoods

**Additional Info**

**Requested Info**

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**Unable to send response**

**Response Notes:**

No contact information provided

**Comment Method: Comms/Online****Comment Date** 3/31/2024**Category** Resident in Study Area**Concerns Topics**Location, Support Underground,  
Historic, Substation**Heard About** Project Website, Newsletter Mailing,  
Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

TEP must consider all options that do not violate the City Ordinances and do not bring overhead lines through neighborhoods

**Additional Info**

Investigate other cities who have undergrounded lines. Do your research. And value your customers

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP conducted a very thorough review of alternative substation sites before purchasing the site on Vine Avenue. After an exhaustive search, followed by reaching out to property owners, the Vine location was the only site within the "load center" that was of a sufficient size and was available to purchase.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 3/29/2024**Category** Resident in Study Area, Live/Work near Study Area, Special Interest Group**Concerns Topics** Support Underground**Heard About** Project Website, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

Adhering to current restrictions to underground lines according to Area Plans and Scenic/Gateway ordinances.

**Additional Info**

Get up to speed on current technology that will make most of this unnecessary. Consider “reconductoring” line technology to increase loads and efficiency on current energy pathways and structures and increasing capacity in existing substations to handle it.

This is all to bring huge amounts of solar and wind generated power to the increasing demands of huge data centers in and around the university The State of Arizona (aka UofA) needs to comply with local laws and foot the bill for their publicized “green” identity.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP’s proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC’s policy, TEP is not considering an underground transmission line. Instead, we’ve started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 3/29/2024**Category** Resident in Study Area**Concerns Topics**Location, Support Underground,  
Historic**Heard About** Project Website, Public Meeting,  
Word of Mouth**Issues/Phone Message/Comments**

I think it is just lazy to not place lines underground. Regardless if it is for aesthetic purposes or not all new lines should be placed underground to preserve the integrity not just of the Historic neighborhoods of Tucson, but Tucson itself.

**Additional Info**

I think canvassing should be done in the evening instead of during the middle of the day so residents can actually voice their opinions to a person instead of being left a door hang. Seems like TEP is actively trying to avoid person-to-person contact on this matter.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

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**Comment Method: Comms/Online****Comment Date** 3/28/2024**Category** Resident in Study Area**Concerns Topics**Location, Support Underground,  
Historic**Heard About** Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

The most important factor to me is keeping this project out of residential and historic neighborhoods like where I live. We have enough to deal with trying to keep the University in check and not invading our neighborhood let alone something such as this that belongs buried or in a more industrial setting as much as possible!!!

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online**

**Comment Date** 3/28/2024

**Category** Resident in Study Area

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Please consider "reconductoring" on existing corridors with ACCC advanced conductors. A video on the application of this method is

<https://www.youtube.com/watch?v=5545T-Kb4AI>

ACCC has been used by AEP and Nevada Energy in distributed applications in neighborhoods whose residents opposed huge new pylons for high voltage lines.

While the cable is more expensive, the cost relative to new high voltage transmission lines was much less.

**Additional Info**

I would like TEP engineers to review the feasibility of reconductoring and provide the public the reasons for and against this method as compared to the proposed high voltage transmission lines. I talked with TEP electrical engineer Don at the Double Tree open house on March 28, 2024, who agreed to review the suggestion.

**Requested Info**

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**No response required**

**Response Notes:**

Responded to 3/31/2024 comment

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 3/28/2024**Category** Resident in Study Area**Concerns Topics**Location, Property Value, Historic,  
Safety, Environment**Heard About** Project Website, Public Meeting,  
Word of Mouth**Issues/Phone Message/Comments**

I am a resident of 7th Street in the Pie Allen Neighborhood. I am writing to express my strong opposition to the proposal of running overhead transmission lines directly through the Pie Allen neighborhood.

Here are several reasons why Alternative Route 3 should be a last resort:

**Environmental Impact:** The Pie Allen Neighborhood Association has plans for a rain harvesting project that involves constructing rock basins along sidewalks. These basins are crucial for our goal of a greener neighborhood. Overhead power lines would likely obstruct this project, especially during monsoon season when rainwater needs to pool for extended periods.

**Safety and Property Concerns.** Many homes in our neighborhood, including mine, require specialized equipment like cranes for roof repairs due to their elevated structures. Power lines strung through the neighborhood would create a major safety hazard and hinder necessary maintenance projects.

**Loss of Mature Trees:** The proposed overhead lines would necessitate the removal of mature trees lining our streets. These trees provide much-needed shade, especially for south-facing houses like mine. Losing them would be detrimental to our fight against climate change and overall neighborhood comfort.

**Preserving Neighborhood Character.** The Pie Allen Neighborhood is aiming for Neighborhood Preservation Zoning (NPZ) status to safeguard its unique and historical character. Overhead power lines running through the neighborhood directly contradict this goal and would negatively impact the aesthetic we strive to maintain.

**Property Value Reduction:** Studies have shown a significant decrease in property values for homes located near overhead power lines. This is a major concern for residents and could negatively impact the entire neighborhood.

I urge you to consider alternative solutions for the new transmission line placement. I support TEP's goal of finding options to achieve reliable energy infrastructure without sacrificing the safety, character, and environmental well-being of the Pie Allen neighborhood. Thank you.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

**Comment Method: Comms/Online**

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 3/28/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Appearance, Location, Property Value, Historic**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

The visual and financial impact of having large monopoles cutting through residential areas.

**Additional Info**

Please consider the lives and livelihoods of the people that will be impacted by this project. A home is the greatest single investment most people will make in their lives, financially and in some cases, emotionally. Running large power poles through residential neighborhoods while other options are available would not only unnecessarily diminish the residents' quality of life, but it would also irreparably damage the character of the neighborhood.

**Requested Info**

The final route decisions

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**Response sent****Response Notes:**

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We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 3/28/2024**Category** Resident in Study Area**Concerns Topics**Location, Support Underground,  
Safety**Heard About** Other**Issues/Phone Message/Comments**

Safety! As mentioned above the 83' poles are wider in diameter and the visibility barriers they cause for traffic, bicyclists, scooter riders, pedestrians is dangerous on narrow neighborhood streets. The population density of an area is the biggest reason the lines cannot go through the U of A, therefore the reasoning applies to the neighborhoods in the area. Main streets with at least 2 lanes of traffic and sidewalks are more conducive. Otherwise, bury the lines in the densely populated areas for safety reasons.

**Additional Info**

I am not understanding why Aviation is not being considered as a possible route. The reason of it not fitting the compatibility assessment would apply to Route 1, so why is that a possible route? Securing ADOT right of way makes complete sense in this project. Yes, it will slow down the process and have an expense greater than using existing routes, however it is cheaper than underground transmission lines or continued rejection of the proposed project from the voters and the city. Many cities are using these industrial areas along the railroads for their upgrades to their old infrastructure. TEP can be an innovative collaborator with ADOT, COT and the community by including these options.

**Requested Info**

Removal of existing 46kv poles that will no longer be needed once a new route is considered.

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**Response sent****Response Notes:**

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We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online****Comment Date** 3/28/2024**Category** Resident in Study Area**Concerns Topics**Health, Location, Property Value,  
Historic**Heard About** Newsletter Mailing, Public Meeting,  
Word of Mouth**Issues/Phone Message/Comments**

I dont want a new huge pole in my personal feomt yard. I am at a corner of route 3, on 8th at mountain. The corner will be a huge pole to support the load with a major foundation or worse, guy wires. This will have a significant effect on property value, and potential or perceived health hazards, which makes the property less desireable. This should be run on the more industrial routes, like up Campbell, where this sort of thing is expected

**Additional Info**

There are existing 46kv limes on 8th. Would those be buried first, and then the poles replaced, or would you move the new lines across the street, essentially into my front yard(south side)? I would have less objection if I knew the lines would rain i. The same place, and all existing lines like cable, phone, and lower voltage was moved to the underground.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

Completion of the new, higher-capacity transmission line and associated improvements would allow TEP to retire up to eight 46 kV substations and associated facilities within 10 years, avoiding approximately \$42 million in replacement costs for facilities in need of replacement today. Additional 46 kV facilities could be retired in the near future, avoiding these significant additional replacement costs.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 3/27/2024**Category** Resident in Study Area, Live/Work  
near Study Area**Concerns Topics****Heard About** Project Website, Newsletter Mailing**Issues/Phone Message/Comments**

The shortest route is always the best and most economical.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

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We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online****Comment Date** 3/27/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Do not Support Underground**Heard About** Project Website, Other**Issues/Phone Message/Comments**

There are going to be a bunch of loud wealthy nimbys all layered up yelling to underground the project near them, or to make the line go way out of the way so they don't have to see it. Don't listen to them. These people care only about themselves. Do the route that is least expensive and makes the most sense. I can't make it to the meeting because I have to wake up at 415 the next morning.

**Additional Info**

If you are considering undergeounding look at the cluster LA got themselves into by undergrounding their line.

**Requested Info**

You all are doing great, keep it up

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**Unable to send response****Response Notes:**

No contact information provided

**Comment Method: Comms/Online****Comment Date** 3/27/2024**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments****Additional Info****Requested Info****Response sent****Response Notes:**

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We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online****Comment Date** 3/27/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Property Value, Historic, Safety

**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

Such a large transmission line running through a neighborhood will be ugly, will impact property values negatively, and poses a danger. I realize that power companies like to deny impacts of EMF, but it has been proven epidemiologically, and even if refutable, the public perception of that would impact the property value and our ability to enjoy our home.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online****Comment Date** 3/27/2024**Category** Business Owner in Study Area,  
Live/Work near Study Area**Concerns Topics**

Location

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Coordinating with other projects, especially the 22nd Street Bridge project will be affecting residents in some of the same area. Protecting natural areas and elementary schools. Paying attention to the kind of vehicles and other traffic using the area and the alternate access that will or will not be available during construction.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 3/27/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Historic

**Heard About** Word of Mouth**Issues/Phone Message/Comments**

Keeping up the beautiful historical neighborhoods and not ruining it with this ugly project that does not even serve this area.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 3/25/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Cost, Appearance, Location, Support Underground, Historic, Safety

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

All of the proposed routes are bad if they involve giant, ugly pylons running up streets in central Tucson.

Route 3 is particularly bad, as it violates the integrity of several densely populated and already stressed historic neighborhoods.

Transmission lines must be undergrounded, according to Tucson ordinances and the Board of Adjustment. In an era of increasingly unpredictable weather due to climate change, underground lines are safer and will prove less expensive in the long run.

Last summer, 30,000 Tucson ratepayers lost power for several days amid a killer heat wave. To characterize this as an "act of God" is credible only the first time it happens: after that it is deliberate negligence.

**Additional Info**

All of the proposed routes are bad if they involve giant, ugly pylons running up streets in central Tucson.

Route 3 is particularly bad, as it violates the integrity of several densely populated and already stressed historic neighborhoods.

Transmission lines must be undergrounded, according to Tucson ordinances and the Board of Adjustment. In an era of increasingly unpredictable weather due to climate change, underground lines are safer and will prove less expensive in the long run.

Last summer, 30,000 Tucson ratepayers lost power for several days amid a killer heat wave. To characterize this as an "act of God" is credible only the first time it happens: after that it is deliberate negligence.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy,

**Comment Method: Comms/Online**

TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online****Comment Date** 3/25/2024**Category** Resident in Study Area**Concerns Topics**Location, Support Underground,  
Safety**Heard About** Project Website, Newsletter Mailing,  
Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

Keeping those power lines out of residential neighborhoods wherever possible. Looks are one thing, but safety is paramount. UA should NOT be 'above' hosting those power lines and should be a partner in the undergrounding of lines they don't want to see strung across or along the Cambell edge of campus. Nobody gets a 'free lunch' at the expense of the neighborhoods.

**Additional Info**

Any that TEP and ACC would find compelling?

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online****Comment Date** 3/24/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Historic**Heard About** Project Website, Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

Do not place power poles along Vine Ave, which currently does not carry electrical lines North from the proposed substation location. This will destroy the integrity of the historical neighborhood. Plus this is not cost effective and is waste of tax payer money.

**Additional Info**

Seriously consider following existing power transmission routes from the new Substation going in at Vine and Lester intersection. The existing power transmission route currently goes South down Vine Ave to Chauncey St. From here the current power transmission route goes West to Park ave where there are already major power transmission lines that head North along Park Ave to Grant road.

**Requested Info****Response sent****Response Notes:**

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**Comment Method: Comms/Online**

**Comment Date** 3/24/2024

**Category****Concerns Topics**

Location, Historic

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

We own a home in Sam Hughes that we plan to retire to in the next couple of years.

**Additional Info**

Avoiding historic neighborhoods and residences.

**Requested Info**

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**Response sent****Response Notes:**

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We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online****Comment Date** 3/22/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments****Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 3/21/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Appearance, Location, Support Underground, Historic**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

The beauty of our town must be preserved, and not marred by unsightly overhead transmission lines. This is especially important with regard to our scenic thoroughfares such as Campbell Ave, and streets such as Tucson Blvd in historic neighborhoods like Sam Hughes.

**Additional Info**

At all costs, bury these transmission lines -- rather than permanently scar the view of our city!

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

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**Comment Method: Comms/Online**

**Comment Date** 3/21/2024

**Category** Resident in Study Area

**Concerns Topics**

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

See above.

**Additional Info**

See above.

**Requested Info**

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**Response sent**

**Response Notes:**

Thank you for being engaged with this important project, and thank you for your question. I am happy to clarify.

Yes, it is technically possible to connect the Kino and DeMoss Petrie substations directly and then build a single circuit from DeMoss Petrie to Vine. Doing so would satisfy the transmission need for the project. This would also provide added capacity to serve the Midtown area. However, our transmission system is designed to operate as a looped system. This would mean that all customers served from the Vine Substation would be subject to reliability issues and would be out of power anytime something occurred, unplanned (e.g., weather or equipment failure) or planned (e.g., routine maintenance) to cause that circuit to be out of service. This would not meet system planning guidance provided by the Arizona Corporation Commission for system adequacy and reliability, so would not be acceptable over the long-term. Ultimately two circuits into Vine are needed, so building the circuit from DeMoss Petrie to Vine and Vine to Kino satisfies both the transmission need and the reliability requirements to serve customers.

Hopefully that provides the information needed in order to complete your response and provide a route preference.

**Comment Method: Comms/Online****Comment Date** 3/20/2024**Category** Live/Work near Study Area**Concerns Topics****Heard About** Project Website, Newsletter Mailing**Issues/Phone Message/Comments****Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online**



**Comment Method: Comms/Online****Comment Date** 3/18/2024**Category** Resident in Study Area**Concerns Topics**Location, Support Underground,  
Historic**Heard About** Other**Issues/Phone Message/Comments**

According to its website, TEP has resided and done business in Tucson since 1892. As a tax-paying citizen of Tucson for 132 years, TEP will be held accountable to follow local laws and ordinances. It cannot claim ignorance of nor exemption from local, State, and national laws. Indeed, doing so would violate the UNS Energy Corporate Code of Ethics and Business Conduct 2021:

"our Company is committed to maintaining the highest ethical standards. "

"We do the right thing."

"A critical component of the Compliance Program is the requirement that members of the UNS Energy Board of Directors (Board) and our officers and employees always comply with the law, the Code and our Company policies."

"The Company is subject to a complex set of federal, state, and local environmental laws and regulations. The policy of the Company is to comply with those laws and regulations. Each employee must be aware of environmental requirements and must exercise good judgment regarding the environmental impact of the Company's operations."

"Contractors who perform work for the Company are also expected to act ethically and comply with all applicable policies and laws. "

Given it's code of conduct, TEP proposes to violate at least one of the following ordinances with each proposed route: Historic Preservation Zone, Neighborhood Preservation Zone, University Area Plan, Scenic Routes, and Gateway Routes.

Historic Preservation Zone neighborhoods and Neighborhood Preservation Zone neighborhoods are protected by specific design standards, as well as the general protections of the University Area Plan, the Scenic Routes Ordinance, and the Gateway Routes Ordinance. Every one of the proposed routes violates one or more of these ordinances. This problem could best be solved by burying lines in the areas affected by the relevant ordinances.

**Additional Info**

Right-of-way enhancements are a concept I haven't heard of until this survey. It raises questions. The routes, paths, and potential uses would affect design selection, and I would expect a public process like we see in other road projects. (The project will be broken into segments, and local segment stakeholders will participate in a public process to design their segment.)

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

**Comment Method: Comms/Online**

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

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**Comment Method: Comms/Online****Comment Date** 3/17/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Property Value, Support Underground, Historic**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

All power lines should be buried. Stump wooden poles no longer used should be removed.

**Additional Info**

High voltage overhead power lines in historic residential neighborhoods are inappropriate, short-sighted, and detract from property values. TEP needs to bury all transmission lines and related equipment and immediately remove wooden poles no longer in use.

Other service providers, e.g. Century Link and Cox, use TEP's poles. How does the use of TEP's poles by Century Link and Cox factor into the decision on routing?

**Requested Info**

This needs to be a transparent decision. How can I be assured that lobbying, political contributions, and other sub-rosa activities are not used by TEP to obtain the design and routing that TEP desires, but is not in the public's interest? Please send me detailed information about each step in the decision-making process with names and contact information of the decision-makers at each step in this process.

Please email me documentation that the comments I've submitted are in the public record.

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online**

**Comment Date** 3/16/2024

**Category** Live/Work near Study Area

**Concerns Topics**

Support Underground

**Heard About** Newsletter Mailing, Word of Mouth

**Issues/Phone Message/Comments**

UNDERGROUND THE LINES.

**Additional Info**

UNDERGROUND THE LINES

**Requested Info**

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**Unable to send response**

**Response Notes:**

No contact information provided in 3/16/2024 comment

**Comment Method: Comms/Online****Comment Date** 3/15/2024**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Running the lines as far away from residential neighborhoods as possible. Lines this size should not be run through midtown neighborhoods.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online**

**Comment Date** 3/14/2024

**Category** Resident in Study Area, Live/Work near Study Area

**Concerns Topics**

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

neighborhood impact

**Additional Info**

**Requested Info**

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**Unable to send response**

**Response Notes:**

No contact information provided

**Comment Method: Comms/Online****Comment Date** 3/13/2024**Category** Resident in Study Area, Live/Work  
near Study Area**Concerns Topics**

Location

**Heard About** Public Meeting**Issues/Phone Message/Comments**

Looking at the map most of the routes don't go smaller residential streets. 7th St and Adams look to be a few of "exceptions" for this. I just don't see any good reason for streets like those to be considered when Aviation Highway, Speedway, Tucson, Broadway are much better and already have a less residential feel and look to them.

**Additional Info**

We understand people will be impacted by this, as someone who owns on 7th and works on 16th st and commutes these streets daily, I know there are better alternate routes than the smaller residential streets.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 3/12/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Historic

**Heard About** Project Website, Newsletter Mailing,  
Other**Issues/Phone Message/Comments**

Wherever it is will be ugly. Too bad Tucson's appearance is not considered worth the cost of burying all lines such as this. That being the case, It appears the most energy demanding user will be the UA Medical Ctr. campus, and Campbell is the most direct route. Campbell is the street most generally in use as a concentrated commercial development, and it's really only notably attractive for 6 blocks. Run it straight down Campbell so only one major artery will be disrupted during construction. It has the least dense spread of residences directly fronting the street, and it bores through less historic districts. Downtown is just starting to look good. Speedway N to Grant is already behind walls. Sam Hughes will howl, but what's new about that.

**Additional Info**

I live in Ward 6, which includes Campbell/Sam Hughes.

**Requested Info**

Keep the updates coming.

**Response sent****Response Notes:**

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**Comment Method: Comms/Online****Comment Date** 3/12/2024**Category** Live/Work near Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Project Website, Newsletter Mailing,  
Public Meeting, Word of Mouth,  
Other**Issues/Phone Message/Comments****Additional Info****Requested Info****Response sent****Response Notes:**

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TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

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**Comment Method: Comms/Online****Comment Date** 3/12/2024**Category** Resident in Study Area**Concerns Topics****Heard About** Project Website, Public Meeting,  
Other**Issues/Phone Message/Comments****Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online****Comment Date** 3/12/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Property Value, Safety

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Safety, home values, aesthetics

**Additional Info****Requested Info****Response sent****Response Notes:**

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**Comment Method: Comms/Online****Comment Date** 3/12/2024**Category** Live/Work near Study Area**Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

I just want it to impact families and schools the least.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

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**Comment Method: Comms/Online****Comment Date** 3/12/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Other**Issues/Phone Message/Comments**

Beauty of Tucson, tourism dollars, ease of commuting and shopping

**Additional Info****Requested Info****Response sent****Response Notes:**

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**Comment Method: Comms/Online****Comment Date** 3/11/2024**Category** Resident in Study Area**Concerns Topics**

Support Underground

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

ANY OVERHEAD LINES AREN'T ACCEPTABLE. AS A TAXPAYER, I suggest TEP SHOULD PAY FOR UNDERGROUND LINES, not citizens.

What I've selected is the least disagreeable choice

**Additional Info**

ANY OVERHEAD LINES AREN'T ACCEPTABLE. AS A TAXPAYER, I suggest TEP SHOULD PAY FOR UNDERGROUND LINES, not citizens.

What I've selected is the least disagreeable choice

**Requested Info**

ANY OVERHEAD LINES AREN'T ACCEPTABLE. AS A TAXPAYER, I suggest TEP SHOULD PAY FOR UNDERGROUND LINES, not citizens.

What I've selected is the least disagreeable choice

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online****Comment Date** 3/10/2024**Category** Resident in Study Area**Concerns Topics**

Location

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

No one likes power lines near their property... there are noisy transformers in the alley behind my house, terrible!

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

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**Comment Method: Comms/Online****Comment Date** 3/4/2024**Category** Resident in Study Area**Concerns Topics**

Support Underground

**Heard About****Issues/Phone Message/Comments**

I strongly believe that any transmission lines which will be located on Campbell Ave should be placed underground from at least Broadway Blvd. to Grant Rd. This area is a piece of an irreplaceable Tucson and University of Arizona gateway

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

Using input from midtown residents and other stakeholders, TEP has identified 10 draft alternative routes for a new overhead transmission line. These alternatives remain under consideration for inclusion in TEP's application for a certificate of environmental compatibility.

You'll be able to find all the latest information, as well as the potential routes on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

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**Comment Method: Comms/Online****Comment Date** 3/4/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Support Underground**Heard About** Project Website**Issues/Phone Message/Comments**

TEP needs to follow existing policy and underground transmission lines along the Campbell gateway corridor.

**Additional Info**

TEP needs to follow existing policy and underground transmission lines along the Campbell gateway corridor.

**Requested Info**

TEP needs to follow existing policy and underground transmission lines along the Campbell gateway corridor.

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

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Using input from midtown residents and other stakeholders, TEP has identified 10 draft alternative routes for a new overhead transmission line. These alternatives remain under consideration for inclusion in TEP's application for a certificate of environmental compatibility.

You'll be able to find all the latest information, as well as the potential routes on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

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**Comment Method: Comms/Online****Comment Date** 3/4/2024**Category** Live/Work near Study Area**Concerns Topics** Substation**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Preferred Route: D1

Select one DeMoss-Petrie to Vine route: D

Select one Kino to Vine Route: 1

**Additional Info**

I was wondering if it is possible to put the proposed 138kV substation in an unused section at Mansfield Park and in exchange for using the land the park receives free electricity so long as the substation is located at the park.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP conducted a very thorough review of alternative substation sites before purchasing the site on Vine Avenue. After an exhaustive search, followed by reaching out to property owners, the Vine location was the only site within the "load center" that was of a sufficient size and was available to purchase. The Vine location was actually near the northern edge of the "load center" that would meet the project need. If the substation site were located further north/east/west, it would result in a different project and would not allow TEP to retire the eight 46kV substations that have been discussed and to complete the subsequent improvements to the distribution system. In the past year, TEP conducted another search to see if any new properties had become available within the "load center" that would be suitable. Ultimately, the Vine location was deemed the only viable site.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 3/4/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Health, Appearance, Location, Property Value, Historic, Safety**Heard About** Newsletter Mailing, Public Meeting**Issues/Phone Message/Comments**

To all involved in where to place the new transmission lines to serve Midtown, The Midtown Reliability Project.

I live in Pie Allen Neighborhood, a popular quaint historical neighborhood between 6th and Broadway. My house was built in 1935 and was purchased by my aunt in 1960 when it was a nice quiet central neighborhood. Unfortunately, we are right on Euclid, which is a main street, however, it is lined with historical homes dating back to the late 1800s. Putting huge powerlines in this area would be detrimental to our living conditions. It is already a densely populated area, being close to the University and Tucson High School. It's already very noisy with the train, the recent extension of Aviation Parkway, and the recent widening of Broadway. These poles would also affect our views and our property values. Not to mention I already have 5 telephone poles I can view from my patio table in my backyard which is a visually eyesore.

I am totally against these poles going up in the Pie Allen Neighborhood. TEP should value Tucson family's daily quality of life, safety, and our cities historic neighborhoods.

**Additional Info**

EMF Impact??

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

For more than 30 years, scientists and researchers from universities, national laboratories, health agencies, the World Health Organization and other groups have conducted research activities into possible health effects of EMFs. According to this large body of peer-reviewed research, there are no confirmed health risks caused by exposure to low-level EMFs. The National Cancer Institute states "Extremely low-frequency EMFs include power lines, electrical wiring, and electrical appliances such as shavers, hair dryers, and electric blankets."

For more information, please visit [www.tep.com/electric-and-magnetic-fields/](http://www.tep.com/electric-and-magnetic-fields/).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 2/23/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Historic**Heard About** Project Website, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

I oppose the installation of monopoles in the Pie Allen Neighborhood. TEP has chosen these poles due to their affordability; however, these poles would be built along Euclid, the alley between 6th and 7th St, and all along Park Ave between 6th St and Broadway, close to my home. This placement would impact my quality of life. The poles would be placed in densely populated areas where high school and college students learn and live. They would be where renters, people with disabilities, retirees, and young families are trying to build their future lives. They even would detract from the Pie Allen aesthetic as a National Historic District. TEP has publicly committed to avoiding installing these poles and lines in densely populated areas and historic districts. Installing these poles in the proposed areas in Pie Allen undercuts that commitment.

TEP should value the Tucson family's daily quality of life and neighborhood well-being over its desire to save money on this project. TEP's efforts to modernize the grid are just as achievable whether lines run under or above ground. We cannot afford to sacrifice peace and equity in our neighborhoods for the sake of TEP's economic preferences. We ask TEP to apply this same standard to all neighborhoods, especially those that serve as home to historically marginalized groups.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Comms/Online****Comment Date** 2/23/2024**Category** Resident in Study Area**Concerns Topics**Health, Location, Support  
Underground, Historic, Safety**Heard About** Project Website**Issues/Phone Message/Comments**

We already have 5 power lines that we can see outside our back yard. They are a total eye sore. Increasing the size of these would be even more of an eye sore. Euclid is a historic neighborhood seeping in history. We already have a busy road and high school that congests the area. The road is busy with daily traffic and the high school. We have the noise of the tram / train and bright street lights along the main road. Additionally adding larger poles along Euclid will be a danger to drivers trying to navigate the busy road of Euclid and the pedestrians from Tucson High and students walking to class etc.

**Additional Info**

Why can the power lines be placed under the street. We are getting emissions from the power lines that can only be detrimental to our health and daily living.

**Requested Info**

The meetings a map of the proposed areas impacted on a plan would help.

**Response sent****Response Notes:**

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TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

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**Comment Method: Comms/Online****Comment Date** 2/9/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Appearance, Support Underground, Environment

**Heard About** Project Website, Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

TEP played political games and got our city council to disallow a rule related to your operations. Burying the line is the right thing to do even if it more expensive. Protect our environment and aesthetics!

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

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**Comment Method: Comms/Online**

**Comment Date** 2/9/2024

**Category** Resident in Study Area

**Concerns Topics**

Location, Support Underground

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

Don't put poles in the pedestrian areas and make walking and using wheelchairs harder than it already is. There is no continuous space for the large poles along roads in midtown between the substations.

**Additional Info**

Underground lines are the best option

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comms/Online**



**Comment Method: Comms/Online****Comment Date** 2/7/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Health, Appearance, Location, Support Underground, Historic, Safety**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

As a community leader who lives and works in the Miracle Mile Historic District of Tucson (located on Stone, Drachman, Oracle, Miracle Mile) in Tucson, Arizona, I am deeply concerned about your proposal to install high-voltage power lines (segments 11, 12, 14, and 15) above ground on streets that have been designated as historic places by the National Register of Historic Places.

The Miracle Mile Historic District is home to many historic buildings and neon signs that reflect the rich and diverse history of Tucson. These places are not only important for their cultural and historical value, but also for their economic and social benefits. They attract tourists, generate revenue, and foster a sense of community and pride among residents and visitors alike. TEP's proposal to install high-voltage power lines above ground would severely damage the aesthetic and historic character of this unique area. The power lines would create visual clutter, obscure the views of the historic buildings, and pose potential safety and health hazards. Moreover, the installation process would likely require digging, cutting, and drilling, which could harm the structural integrity of these historic places—and could possibly put the historical designation at risk.

I urge TEP to exclude segments 11, 12, 14, and 15 from any future route as a way to protect those who live, work, and cherish the Miracle Mile Historic District.

**Additional Info**

Please also note that segments 8, 7, 4, 6, 13, 11, 12, 14 transverse an economically and ecologically depressed area of the city that's the focus of a substantial HUD grant for revitalization. Construction and installment of high-voltage power lines undermine the work of this grant and the aim to uplift areas that have been otherwise neglected. Neighbors would also view the installation of the power lines as another blight and sign of disrespect to our quest for a better life.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. In addition, a public open house will be held tomorrow, February 8th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

**Comment Method: Comms/Online**

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**Comment Method: Comms/Online**

**Comment Date** 2/6/2024

**Category** Resident in Study Area

**Concerns Topics**

Location

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

to whom it may concern...

As a residence of Bronx Park, Tucson. I would like to submit my objection to huge telephone poles along miracle, mile and in this neighbourhood. Its character does not support such immense structures. Please note that I am not in favour. Thank you

**Additional Info**

your proposal

**Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

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**Comment Method: Comms/Online****Comment Date** 1/31/2024**Category** Resident in Study Area**Concerns Topics**Appearance, Location, Support  
Underground**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Until TEP attempts to form an improvement district to underground the line along whichever route is selected, and until TEP seriously considers a route between 6th Street and Speedway Boulevard that generally follows a Cherry Street alignment, this project should not proceed.

**Additional Info**

TEP customers, the University of Arizona, and Banner Health are the three major benefactors of this project. Yet only the first is being asked to live with the enormous visual blight that the project will impose. That is not fair and must be changed.

**Requested Info****Response sent****Response Notes:**

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**Comment Method: Comms/Online**

**Comment Date** 1/30/2024

**Category** Property Owner in Study Area

**Concerns Topics**

Location, Safety

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

I think the most important thing to stay away from residential areas. These are high powered transmission lines. That is a fact. The only place I have seen them used is along highways and in open rural areas. By design they are more dangerous than the lower voltage distribution lines. So, it would seem to make sense to keep them away from people.

To that end, run the line up Interstate 10. Then go up Speedway Blvd and enter just south of the UA hospital. Go out the same way. The proceed up I10 to the DeMoss Petrie station.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 1/29/2024

**Category** Live/Work near Study Area

**Concerns Topics**

**Heard About** Project Website

**Issues/Phone Message/Comments**

Of primary concern to the Tribal Historic Preservation Office of the Tohono O'odham Nation is the avoidance of ancestral archaeological sites

This will involve checking archaeological databases at the Arizona State Museum and the Arizona State Historical Preservation Office to tell what areas have been surveyed for archaeological sites and what have not

Those areas that have not been surveyed for archaeological sites will need to have surveys completed

All surveyed reports will need to be reviewed by the Tohono O'odham Nation THPO

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for sharing your concerns on behalf of the Tohono O'odham Nation. Cultural resources are an important consideration in the planning and siting process that TEP is engaged in to identify the best route for the proposed transmission line and substation. To assist, TEP has engaged Tierra Right-of-Way services to provide expert archaeological support on the project. A review of the archaeological databases has been conducted, with data on known archaeological sites used in all of the analysis that has been conducted up to this point to inform the selection of possible routes. Once a route is approved, TEP would conduct any archaeological survey required and share the results with the Tohono O'odham Nation THPO for review.

Please do not hesitate to reach out with further questions or comments. We look forward to your continued participation in this important project.

**Comment Method: Comms/Online****Comment Date** 1/29/2024**Category** Live/Work near Study Area**Concerns Topics**Appearance, Property Value, Support  
Underground, Safety**Heard About****Issues/Phone Message/Comments**

I believe that tall transmission lines should not be located above ground, but rather, underground. This placement is both aesthetically pleasing (maintaining property values) and safe from high winds. Please resist placing them on Campbell Avenue and the adjoining residential streets.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/26/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Property Value, Support Underground, Historic

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

I've been watching the high voltage transmission lines being installed on Grant road. The height of these poles may be less than or equal to the height of the proposed poles along Campbell or Tucson Blvd. These are unsightly creating a blighted appearance to that area. IN the University/Historic Neighborhoods this blighted look will permanently damage the neighborhoods, the property values and the aesthetics of the surrounding area. the only answer is to follow the City master plan and underground the lines through these historic and highly visible areas. It's so simple, good citizens follow the law, why are you so opposed to following the City master plan and the laws of our community?

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on February 8th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined.



**Comment Method: Comms/Online****Comment Date** 1/23/2024**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Project Website, Newsletter Mailing,  
Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

I believe that Tucson Blvd should not be considered for these lines. Between Speedway and Grant, Tucson Blvd is mostly residential although there are some commercial properties especially at N Tucson Blvd and E Elm St. These commercial properties are residential in scale and fit in with their neighbors.

**Additional Info**

I believe that the Campbell corridor should be considered, and that the lines will have to be under grounded to comply with the City of Tucson's Gateway ordinance.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/23/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Appearance, Location, Support Underground, Historic**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Please do not make our city more unsightly with further overhead electrical transmission lines. Bury them underground. Please also avoid Tucson Boulevard, with its proximity to Himmel Park and the historic Sam Hughes Neighborhood.

**Additional Info**

You must consider the disastrous effect for years to come of marring our view with overhead power lines. Your decisions based on short-term cost concerns will irreparably damage the image of Tucson for decades.

**Requested Info**

Please keep me informed of the next phase of segments that you will be continuing to consider after this current round of elimination.

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/23/2024**Category** Resident in Study Area**Concerns Topics**

Location

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

i live just south of the Kino substation. I wanted to say I feel that TEP did a good job making the substation blend in with the neighborhood. I don't know if there were underground lines or not. but I don't recall really noticing those huge steel poles going up. I have noticed those big steel ones elsewhere in the city and feel if they need to be used keep them out of residential areas and maybe use them on major roadways like aviation hwy where they aren't so noticeable. just my 2 cents.

**Additional Info**

read above

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/23/2024**Category** Resident in Study Area**Concerns Topics**Appearance, Location, Support  
Underground, Historic, Reliability**Heard About** Project Website, Newsletter Mailing,  
Word of Mouth**Issues/Phone Message/Comments**

High voltage lines should as much as possible follow highway/freeway paths where they cause both less scenic damage as well as less damage to surrounding properties. Thus, Aviation Highway and I-10 should be first choices.

Historic neighborhoods and their circumference thoroughfares should be absolutely avoided.

While increasing the reliability of the mid-town grid is certainly important, in particular at the hospital, and while old equipment should certainly be brought up to date, TEP should NOT disregard quality of life in Tucson's neighborhoods. If other areas of the city and other projects have been able to include undergrounding of such lines, then, it is not unreasonable to expect the same here. Underground lines are indeed even less at risk of storm damage than massive high steel poles. If we are to modernize, then let's modernize sensibly.

**Additional Info**

Cost to TEP should not be the overwhelming singular consideration.

**Requested Info**


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**Unable to send response**

**Response Notes:**

No contact information provided

**Comment Method: Comms/Online**

**Comment Date** 1/22/2024

**Category** Resident in Study Area

**Concerns Topics**

Location

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

The route segments along Tucson boulevard should not be used. This is a 2 lane residential street with a busy park. It is the heart of the neighborhood.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/22/2024**Category** Resident in Study Area, Business Owner in Study Area**Concerns Topics** Location, Historic, Environment**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

My greatest concern regarding this project is to minimize disruption to residential areas. I believe a route that follows existing major roadways would be the least disruptive to low-income and historic neighborhoods as well as other biological and cultural criteria (as per the additional considerations cited in the newsletter) because these potential routes would bypass neighborhoods altogether (or otherwise present the least possible incursion) and are already highly developed areas given they are major roadways.

Using the map tool, it seems to me the following segments present the simplest path connecting the existing and proposed substations along major roads--roughly Grant Rd to Campbell Ave/Kino Pkwy-- 99, 100, 113, 114, 111, 109, 106, 92, 86, 84, 78, 74, 73, 77, 91, 107, 97, 67, 68, 5, 6, 4, 7, 8, 9. The total distance for this route looks to be about 12km using the map measurement tool.

Alternatively, if it is beneficial to avoid running along roadways colored in red under the Constraints overlay, the following segments seem to accomplish much the same objective, merely crossing constraint paths instead: 8, 1, 2, 3, 10, 13, 14, 15, 16, 17, 18, 24, 41, 36, 62, 88, 85, 101, 116, 117, 121, 102, 104, 97, 76, and joining the proposed substation along segments 71, 72, 87. I believe the total distance for this route was approximately 13km. However, my ignorance as to what the Constraints layer actually indicates is acknowledged, as are any further considerations beyond my basic assumption of "connect the triangles with the numbered lines."

**Additional Info**

Thank you for keeping the community informed. I look forward to further communications as segments are refined.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/22/2024**Category** TEP Customer**Concerns Topics**

Renewable Energy

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Allow in town residents the freedom to be completely off-grid via solar or other alternative options. This would remove load & dependence on your structure. You have to consider that perhaps Tucson ultimately isn't engineered for so much population density and you're going to have to let go of aspects of your compulsory monopoly to allow for that.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP is planning to provide more than 70 percent of our power from wind and solar resources as part of a cleaner energy portfolio that will reduce carbon emissions 80 percent by 2035. I'd encourage you to view our Integrated Resource Plan, which I believe will answer many of your questions. You can access this at <https://www.tep.com/tep-2020-integrated-resource-plan/>.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/22/2024**Category** Property Owner in Study Area**Concerns Topics**Location, Support Underground,  
Historic**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

TEP should do its best to avoid impacting residential and culturally sensitive neighborhoods in determining the location of the proposed new high-voltage lines. My husband and I own two small cottages that we rent for residential purposes on Tucson Boulevard in the Blenman-Elm neighborhood. We are concerned that one of the proposed routes will run down Tucson Blvd. cutting through the middle of the Blenman-Elm and Sam Hughes neighborhoods and running on one side of the Catalina Vista neighborhood. All of these neighborhoods are designated historic and Tucson Blvd. is largely residential along the area of the proposed line. If the new line is needed, it should run along a street that is already largely commercial or industrial and not impact historic residential neighborhoods.

**Additional Info**

The proposed line down Tucson Blvd. appears to be a significant detour East from the proposed substation Vine and Kino substations. The line would be significantly longer if run along this route with no apparent upside and a disaster to the residential neighborhoods along its path. We believe this line should be eliminated from consideration.

**Requested Info**

The feasibility of placing at least part of the proposed line underground to avoid impact to sensitive residential areas. We are not persuaded by the arguments against this solution. Has it seriously been considered?

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered.

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online****Comment Date** 1/22/2024**Category** Resident in Study Area**Concerns Topics**

Location, Historic

**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

I haven't yet seen by post or online a map which makes clear the segments under consideration for the area between S. 4th Ave. and S.Kino and between Broadway and 22nd St. The snarl of segments under consideration in that rather significant area, much of it registered historic districts, is indecipherable both by scale and by street names. Please help. Thanks.

**Additional Info**

It's hard to tell for an individual. I'm sure neighborhood associations are involved. I question the integrity of my neighborhood association officers/leaders, who have in the past secured changes in publicly announced street planning to advantage their private property, e.g. on 18th St.

**Requested Info**

See above. I haven't been able to get on the project web site, e.g., from the link on the Jan. 24 Energy Grid Update mailing.

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on February 8th from 6:00-8:00pm at the Doubletree Reid Park.. We hope you can join us.

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Comms/Online****Comment Date** 1/21/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Appearance, Location, Support Underground, Historic, Substation**Heard About****Issues/Phone Message/Comments**

Living in Tucson, the first preference should be underground the lines. As cities grow and densify, underground lines are the only practical solution.

With that said, if lines must be placed above ground, they must follow along major arterial roads and not pass through historical or other special districts that improve scenic Tucson. Numerous neighborhood streets and smaller roads have been identified as "highly suitable", which is crazy!

Aboveground lines must only be placed along major arterials which are already semi-industrial or heavily commercial zones such as Grant or Speedway. Power lines must avoid major disruption to peoples lives or scenic Tucson. I am tired of ugly lines in residential areas.

**Additional Info**

Right now TEP is forcing a solution the city does not want. Just look at the actions. Trying to overrule the scenic corridor. Listing residential roads and smaller roads as "highly desirable" routes.

No ballot will get my vote as long as TEP continues to work against what people want. Try working with us residents instead.

**Requested Info**

Why not move the substation location? As example of better location is further south near the parking garage at the corner of Speedway and Cherry Ave or one of the nearby streets? That would allow lines to be placed along Speedway with minimal disruption to residential neighborhoods. Since this substation mostly benefits the enormous consumer (the University), they should bear the brunt of the disruption and eyesore.

**Unable to send response****Response Notes:**

No contact information provided

**Comment Method: Comms/Online****Comment Date** 1/20/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Location

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

I appreciate reliability and redundancy, but also care about the visual blight of power poles and lines.

**Additional Info**

Is there any engineering reason not to double up the lines on one set of poles? It looks like the route could go north from Kino, follow Aviation to Stone, Stone to Grant, east on Grant to the Vine substation, and then back west along Grant to DeMoss Petrie. That would be a slightly longer route than most, but could utilize poles along Grant that would already be required for the Vine to DeMoss Petrie route. And it would follow several major roads (Aviation, Stone, Grant) that already have heavy commercial and industrial infrastructure.

**Requested Info****Response sent****Response Notes:**

Thank you for your thoughts on a potential routing solution. No, there is not an engineering reason that TEP cannot place two lines (circuits) on the same set of poles. In fact there are many examples around town with 2, 3, or even 4 circuits on the same set of structures. From a reliability perspective it is preferred to have independent paths, but we understand that in an urban environment finding a solution that minimizes impact to both the natural and built environment requires compromise. The solution you are recommended compromises reliability in order to minimize visual impacts, but is certainly worth considering.”

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/11/2024**Category** Resident in Study Area**Concerns Topics**

Location, Environment

**Heard About** Public Meeting**Issues/Phone Message/Comments**

There are 2 reasons that I strongly oppose the 442 Rt in the residential neighborhood between Country Club and Tucson Blvd.

1. East of Treat, the street (Winsett) is exceptionally narrow. There are the backyards of Stratford St on the North side with very little easement. On the South side of Winsett, there are the front porches of Country Club Manor Condominiums with no easement.

2. West of Treat, the backyards of Stratford continue and then the 442 Rt runs along or in the Citation Wash. Planting poles with a lot of concrete is an environmental disaster. Washes should be free of concrete in order to allow what little rain that falls to percolate into the ground and refill our aquifer.

The Tucson Reliability Project will provide better service but this should not be done at the expense of residential neighborhoods and our precious resources.

**Additional Info**

Maybe there can be a conversation about conservation and the environment with city officials and residents.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

A member of our Neighborhood Advisory Group let us know about the City's plans to close down a lane of traffic along Winsett and to build a multi-use path. We've noted these plans to be considered in the evaluation of the preliminary segments.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 1/10/2024**Category** Resident in Study Area**Concerns Topics**

Location, Historic, Safety, Environment

**Heard About** Word of Mouth**Issues/Phone Message/Comments**

I live on E. Stratford Drive in the Broadmoor neighborhood. I am extremely concerned about E. Stratford/Winsett being listed as an "opportunity route" with TEP. I strongly oppose Route #442 for these 4 reasons:

\*Work has just begun on Winsett as part the Arroyo Chico Greenway multi-use project, as part of Proposition 407. Winsett is a very busy and exceedingly narrow street. Residents of both Broadmoor and Arroyo Chico neighborhood bicycle, walk, and dog walk. Winsett is the gateway street that leads to the hawk light at Country Club that allows pedestrians and cyclists to cross over to Reid Park. The street runs between houses in the Broadmoor neighborhood and the Arroyo Chico neighborhood.

Winsett will now become a one-way street with the Arroyo Chico Greenway project underway, and the street will host a multi-use path. The finished design of the project will connect this part of the multi-use path to 3 other segments of the Greenway and will beautifully encourage even more people to travel Winsett. Running tall electrical towers along a multi-use path will be incompatible and detrimental to the purpose of a multi-use path.

\*Robison Elementary School is located less than a half block from the possible route. Powerlines so closely located to a neighborhood elementary school is both harmful and unsafe to the lives of children.

\*This route would also run towers through Citation Wash, which is a flood basin and riparian area that leads into Reid Park.

\*Broadmoor neighborhood has Historic Designation, and the addition of power lines would change the features of the historic designation as it was established.

For these 4 reasons, that provide significant restraints, in addition to strong neighborhood opposition, would not make Route #442 a viable segment for placing the towers.

I request this segment be reclassified as one with serious constraints, and \*not\* be considered as a viable route.

Thank you.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

**Comment Method: Comms/Online**

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered.

A member of our Neighborhood Advisory Group let us know about the City's plans to close down a lane of traffic along Winsett and to build a multi-use path. We've noted these plans to be considered in the evaluation of the preliminary segments.

As a result of a number of comments citing the environmental sensitivities of Arroyo Chico and its importance to the community, the arroyo will be classified as a constraint in our siting study.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/9/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Health, Location, Historic, Environment**Heard About** Word of Mouth**Issues/Phone Message/Comments**

I recognize the need to update our existing energy grid, and I appreciate the fact that TEP has undertaken this project. I also recognize that few people would want such a system running through their neighborhood. Having said this, I'd like to make note of my reservations. Broadmoor neighborhood, and Stratford Drive where I live, is a distinctive, historic, and family-friendly neighborhood. Unlike much of the greater Tucson area, it still has the feeling of a real neighborhood with a great variety of houses. I loved living here. Flocks of birds live here. Javelina regularly move through. Most importantly, many families with children live here. I want this to continue to be the case. My neighbor, who has 2 children, has said that she'll leave if the line runs down Winsett. I'm certain she's not alone in this. Please design, build, and locate this necessary project so that it has the least chance of harming the health of children, destroying the unique & warm character of the Broadmoor neighborhood, and of disrupting the pathways that bring birds and other wildlife through.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

A member of our Neighborhood Advisory Group let us know about the City's plans to close down a lane of traffic along Winsett and to build a multi-use path. We've noted these plans to be considered in the evaluation of the preliminary segments.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online****Comment Date** 1/9/2024**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Historic

**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

We are very concerned to hear about the area that TEP is thinking to install powerlines (specially on Winsett St.).

There are several reasons that this is a very bad location:

\*the Arroyo Chico Greenway project is going to be there with two bike lanes, landscaping, and a one-way street. This is an area to be enjoyed by bikers and pedestrians, not an area to install visible eyesores.

\*This area receives heavy pedestriation foot traffic as it's close to the Reid Park recreation area and entire neighborhoods traverse this path to recreate there. Again, an area to be enjoyed.

\*The Broadmoore Historic District just received historic neighborhood status--something the neighborhood has worked for for many years. Installation would absolutely detract from that status and become an eyesore for the neighborhood. The neighborhood is community-oriented and vocal--if Winsett is determined as a street, TEP can expect vociferous protests from the Broadmoor community.

My husband and I strongly encourage TEP to find alternatives to Windsett St. for the installation of these power lines.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered.

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

A member of our Neighborhood Advisory Group let us know about the City's plans to close down a lane of traffic along Winsett and to build a multi-use path. We've noted these plans to be considered in the evaluation of the preliminary segments.

As a result of a number of comments citing the environmental sensitivities of Arroyo Chico and its importance to the community, the arroyo will be classified as a constraint in our siting study.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/9/2024**Category** Resident in Study Area**Concerns Topics**

Location, Historic, Environment

**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

I submitted a comment specifically about power lines placed on Winsett St, but after reviewing the map realized that power lines are also, according to the plan, going to be placed inside the Arroyo Chico wash!

This is a \*TERRIBLE\* idea. That wash is home to many birds and other wildlife. In addition, it is a place that many people in our historic neighborhood walk alongside to recreate. This would be VERY damaging both to wildlife and people.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

I replied to your initial comment at 12:25pm today addressing both Winsett and Arroyo Chico.

We are taking the City's plans regarding Winsett into consideration and we have marked the Arroyo Chico segment as a constraint. We are currently working on getting the Interactive Map up to date.

I would also like to reiterate that no transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered.

Please let me know if you have any further comments or questions.

**Comment Method: Comms/Online****Comment Date** 1/8/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Health, Appearance, Location, Property Value, Historic, Environment**Heard About** Word of Mouth**Issues/Phone Message/Comments**

I oppose this project. I'm a long time resident of Broadway-Broadmoor and this project would cause irreversible damage to our area. One, the installation of the project would directly impact our neighborhood's historical status, creating an architectural and landscape affront to what is a meticulous and well-kept area. The installation will impact property values, sightlines, and architectural integrity. Two, our neighborhood is home to a vast array of desert animals: hawks, javelina, various birds, rabbits, lizards, and coyotes. The installation itself will cause mass upheaval to natural inhabitants of this neighborhood, impacting their health and numbers. Directly across the street from me is a natural thruway path between two houses that is in constant use by javelina and coyote to reach the arroyo on the other side. That arroyo and Arroyo Chico are safe pathways and homes to numerous javalina and coyote, keeping them safe from streets and traffic. This installation will impact their survival routes, health, and routine, possibly causing injury and death. This project will also directly impact the health and well being of many neighborhood residents, many of whom are elderly/physically impaired, or currently battling life-threatening illnesses. If moved forward, the process of installing this project will cause traffic, noise, and construction upheaval that will directly impact the physical and emotional health of many people in the neighborhood.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

As a result of a number of comments citing the environmental sensitivities of Arroyo Chico and its importance to the community, the arroyo will be classified as a constraint in our siting study.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/7/2024**Category** Resident in Study Area**Concerns Topics**

Cost

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

While I am all for increasing the reliability and availability of the grid, my main concerns are ones that I'm sure many people have already expressed - where is the money for this project coming from, and who will be negatively impacted by it?

To make a specific example, the Vine substation listed on the website will cost \$34 million to build. Who will be paying for that - the City of Tucson, TEP, or TEP's customers? A lot of Tucsonans already struggle to pay their electric bills normally - increasing rates to have us pay for TEP's projects could hurt a lot of us, especially seeing as how TEP is one of Tucson's only electricity suppliers, and seeing how electric bills already skyrocket in the summer, which is the closest date to the project start listed on the website. Such a monopolic situation would force the community to pay even higher bills, which they may not be capable of doing, which would ultimately harm the people TEP is attempting to help. Additionally, how would this project impact rates in the future? Would TEP be able to commit to bringing rates back to or even lower than where they were before the start of the project, or would rates raise at some point and remain raised as a result of this project? That would also ultimately hurt the community, for similar reasons as what I stated earlier.

Ultimately, because the Midtown Reliability Project appears to be born out of TEP, rather than Tucson's citizens, I find myself skeptical about the Project when I consider who will be paying for it. Forcing the community to pay for it, or pay more because of it, is ultimately counterproductive.

**Additional Info****Requested Info****Unable to send response****Response Notes:**

No contact information provided

**Comment Method: Comms/Online****Comment Date** 1/3/2024**Category** Resident in Study Area, Live/Work  
near Study Area**Concerns Topics** Cost, Appearance**Heard About** Other**Issues/Phone Message/Comments**

skyline views-sunset and mountain- are valued in Tucson; they are part of our community character. As early as the 1950s developers were locating their utilities underground to protect these views. Every effort should be made to minimize the impact this installation has on this valued community asset.

The growth of the University of Arizona is largely driving the increased demand. The increase in the campus size, the increase in the campus population, and the increase in the supporting housing have all grown considerably in recent years. By contrast, existing nearby neighborhoods have likely reduced their energy consumption in recent years, with more efficient hvac and lighting systems. The university should bear the brunt of the impact and contribute to the cost to minimize the impact on its neighbors.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 1/2/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Support Underground, Historic**Heard About** Project Website, Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

If you cannot follow the existing rules for the historic Jefferson Park, you need to come up with a different solution. If you don't want to go underground, go elsewhere.

**Additional Info**

How much have you already spent trying to skirt the existing rules for building this project and none of it has gone towards putting the lines underground.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

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The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. In addition, a public open house will be held on February 8th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 12/31/2023**Category** Resident in Study Area**Concerns Topics**Health, Location, Property Value,  
Support Underground, Historic,  
Environment**Heard About** Word of Mouth**Issues/Phone Message/Comments**

I've heard the lines are potentially going down WINSETT which is where I exit enter my unit as to many others (Off winset) since we live in a single-story complex with separate parking and due to our location the alley is less of a walk than our front door on 17th. Regardless, I will probably be able to hear and feel these lines as I am sensitive to EMFs and have auto-immune issues. People who live here at the vintage 1948 Country Club Condos take pride in our community. This would be a travesty to put such an eye soar and health hazard up so close to where I sleep, bathe, eat, LIVE! As well as by the park! We have wildlife daily javalina, coyotes, dog walkers etc. No one is going to walk this route. I am sickened by this thought and although I purchased this unit as my retirement place I may have to MOVE to live in a condition that is healthy and acceptable to my needs. This type of line should be put down south near the train tracks not in the center of two beautiful historic areas! PLEASE DO NOT DO THIS! I am getting ready to make upgrades to my place, but this will lower my home value, so now I am questioning what to do at all! TEP SHOULD PUT UNDERGROUND OR GO SOUTH, STAY OUT OF NEIGHBORHOODS!!!!!!!!!!!! I BEG YOU!

**Additional Info**

DON'T DO THIS! I NEVER RECEIVED A BALLOT WITH THIS CRAZY INFORMATION TO VOTE!!!! HOW DARE YOU PUT THIS UP ON LITERALLY ON TOP OF MY PLACE !!!!!

**Requested Info**

WHAT THE HELL IS GOING ON!

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered.

A member of our Neighborhood Advisory Group let us know about the City's plans to close down a lane of traffic along Winsett and to build a multi-use path. We've noted these plans to be considered in the evaluation of the preliminary segments.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to



**Comment Method: Comms/Online**

find all the latest information, as well as the segments in the “Interactive Map” link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 12/26/2023

**Category** Business Owner in Study Area

**Concerns Topics**

Location, Safety

**Heard About** Project Website, Newsletter Mailing

**Issues/Phone Message/Comments**

I just want to make sure power lines are away from schools as possible (charter, private, and traditional public) for safety reasons.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 12/24/2023**Category** Resident in Study Area**Concerns Topics**

Health, Location, Historic

**Heard About** Word of Mouth**Issues/Phone Message/Comments**

I have been informed that the newest proposed area for improved power lines is the street directly behind my home (Winsett). My neighbor has two young children and suffers from a rare form of blood cancer. The possibility of this install is very detrimental to her health simply because of the stress it is already causing her. Our homes have historic status and in addition to her health concerns, she is worried it will impact that. The area is also slated to become a new multi-use pathway and the addition of power lines would seem to hinder that.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered.

A member of our Neighborhood Advisory Group let us know about the City's plans to close down a lane of traffic along Winsett and to build a multi-use path. We've noted these plans to be considered in the evaluation of the preliminary segments.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 12/23/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Health, Location, Historic, Environment**Heard About** Project Website, Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

I am writing to you with a deep sense of urgency and concern regarding the proposed installation of electrical poles directly behind my property. This plan, I fear, profoundly overlooks several critical aspects that not only affect the well-being of my family and myself but also significantly impact environmental and community interests.

Firstly, it is imperative to recognize that my property is registered as a historical property. Erecting modern electrical infrastructure in such proximity would undermine the historical integrity of the area. It is not only a disservice to our community's heritage but also potentially violates regulations protecting historic properties.

Additionally, my property serves as an avian refuge, boasting trees that have been a sanctuary for birdlife, including rare species, for over 70 years. The proposed electrical poles would not only disrupt this habitat but could also pose a direct threat to the birds, especially during migration seasons.

The presence of many families of javelina and coyotes on my land further underscores its status as a critical wildlife corridor. Nestled between two arroyos, this area is a thriving ecosystem for local fauna. Introducing electrical poles and the associated human activity would disrupt the delicate balance of this ecosystem, potentially causing irreversible damage to the wildlife populations.

Furthermore, the area is slated to become a recreational bikeway, enhancing our community's access to outdoor activities and promoting a healthy, active lifestyle. The installation of electrical poles in this vicinity could deter this development, robbing the community of a valuable resource for recreation and well-being.

On a more personal note, I am compelled to express my health concerns. As someone battling blood cancer, the proximity of high-voltage electrical infrastructure raises serious apprehensions. Research indicates potential health risks associated with exposure to electromagnetic fields (EMFs), particularly for individuals with existing health conditions. The thought of my young children being exposed to such risks is deeply troubling.

In light of these considerations, I strongly urge you to reassess the proposed plan and explore alternative locations for the electrical poles. The current proposal not only jeopardizes the environmental integrity and historical significance of our area but also poses potential health risks and disrupts community development projects.

I look forward to your prompt response. Thank you for your attention to this matter

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

**Comment Method: Comms/Online**

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered.

A member of our Neighborhood Advisory Group let us know about the City's plans to close down a lane of traffic along Winsett and to build a multi-use path. We've noted these plans to be considered in the evaluation of the preliminary segments.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 12/4/2023**Category** Resident in Study Area**Concerns Topics**

Location, Historic

**Heard About** Public Meeting, Word of Mouth,  
Other**Issues/Phone Message/Comments**

Historic districts.

**Additional Info**

In Tucson City Council Member Kozachik's current (12/4/23) newsletter, he has reproduced a TEP map which shows, among other things, the neighborhoods in the study area that are designated as historic. Our neighborhood, Broadmoor-Broadway Village (BBVN), has been listed as the Broadmoor Historic District on the National Register of Historic Places, but is not represented as such on the map. Please be sure that BBVN is correctly identified as historic as you consider routing options. Thank you.

**Requested Info****Response sent****Response Notes:**

Thank you for catching that! TEP has not yet conducted a full cultural resource review of the project study area to identify all listed properties, or properties eligible for listing. We were using old data for the map you referenced, which was preliminary and never intended to be shared broadly. We will definitely include Broadmoor-Broadway Village with its correct designation as a historic neighborhood on our maps in the future and for purposes of analysis.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 12/4/2023**Category** Resident in Study Area**Concerns Topics****Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

How project affects the properties adjacent to TEP easements and timelines as well as other impacts of projects on existing structures and properties.

**Additional Info****Requested Info**

project management information

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No specific route has been identified for the project at this time, so it's premature to answer definitively and for any specific location. However, TEP anticipates the transmission line would be located within road right-of-way, resulting in no impact to private properties or existing structures.

Pertaining to project management, the planning and transmission line siting process is anticipated to continue through Q2 of 2024. TEP plans to have a preferred, and possibly alternative routes identified in March/April 2024. An application for a Certificate of Environmental Compatibility (CEC), authorizing construction of the transmission line in a specific route, will be submitted shortly thereafter. The application will be vetted in a public hearing before the Arizona Power Plant and Transmission Line Siting Committee is tentatively scheduled for July 2024. Once the CEC has been granted, TEP will apply to the City of Tucson for a Special Exception Land Use Permit authorizing the proposed Vine Substation. TEP's project schedule details all permits received by early 2025, with construction beginning in 2026 and the transmission line and substation energized and operational in 2027.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online****Comment Date** 11/28/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Location

**Heard About** Project Website, Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

Since the study area has expanded away from Campbell, the original placement for these, new concerns arise. Please only stick these on major streets (Speedway? Grant?) and avoid running them through quieter residential roads like those in Blenman/Elm. I consider Treat BLVD to also be a quieter residential road. If Speedway or Grant can be used to bypass anything in the neighborhood in between, please do that.

Secondly and very importantly to me, please avoid adding even more street lights to these poles, as we have plenty in our area and our residents highly value being a dark-sky city in a neighborhood that still affords an amount of natural darkness at night.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

While a lot of work was done around the previous Kino to DMP 138kV Transmission Line Project, we are beginning fresh, and are only in the initial planning phases of the Midtown Reliability Project.

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Comms/Online****Comment Date** 11/27/2023**Category** Resident in Study Area**Concerns Topics**Appearance, Location, Historic,  
Environment**Heard About** Newsletter Mailing, Public Meeting,  
Word of Mouth**Issues/Phone Message/Comments**

I attended the public meeting on November 16th and spoke with several TEP representatives regarding your routes labeled "opportunity" or "constraint". I listened to the reasoning and asked clarifying questions. My primary focus was on route 444 since it would intersect my neighborhood and run quite close to my (historic) house. Coming out of your meeting, I oppose the use of route 444 (the Arroyo Chico wash) for the TEP midtown upgrade poles. This wash is a riparian area as well as the primary storm water route through the Broadmoor-Broadway Village neighborhood. It is quite narrow (30 ft?), and I do not see how large poles could be used within or on the sides of the wash without extreme damage to the flora, fauna, and natural infrastructure, as well as a major eyesore through the heart of this nationally designated historic neighborhood. The Arroyo Chico wash is an important part of this residential neighborhood. It provides a cool shady place to walk. The pedestrian bridge that crosses the wash is a gathering place for neighbors, where children can meet up to run and play and parents can socialize. I cannot imagine that happening directly under your wires. This is not an appropriate site for your power lines. There is strong opposition from the neighborhood.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

As a result of a number of comments citing the environmental sensitivities of Arroyo Chico and its importance to the community, the arroyo will be classified as a constraint in our siting study.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/22/2023**Category** Resident in Study Area**Concerns Topics**

Location, Historic, Environment

**Heard About** Project Website, Newsletter Mailing,  
Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

I do not believe 444 is a viable route for the poles in the wash from the perspective of the wash. I don't believe any section of this is even 35 feet wide. The top of the bank, oleanders, are protected habitat for the Mexican lizards that run the neighborhood.

The neighborhood itself has historic status and part of that application included the arroyo, its vegetation and the islands throughout the neighborhood.

I believe your machines in there efforts to put in the poles would destroy the arroyo/ or the banks.

For these reasons, I oppose 444 as a viable plan for the TEP upgrade.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/22/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Appearance, Support Underground

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Don't you dare irreparably uglify our city further by installing more above-ground poles with electrical lines. Bury your ghastly cables!

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/21/2023**Category** Resident in Study Area**Concerns Topics**Appearance, Location, Support  
Underground**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Undesirable aesthetic outcome of overhead power lines next to where I live in Miramonte neighborhood. I would prefer undergrounding of power lines either down Campbell Ave or Country Club road.

**Additional Info**

Add value by undergrounding power lines.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

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We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Comms/Online****Comment Date** 11/20/2023**Category** Resident in Study Area**Concerns Topics**Cost, Appearance, Location, Support  
Underground**Heard About** Project Website, Newsletter Mailing,  
Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

Large poles carrying the line are unacceptable to residents of this area. Country Club is already a narrow thoroughfare. Do not rob these midtown neighborhoods of their beauty and charm! Underground the lines to preserve our beautiful city, and your corporate reputation!

**Additional Info**

Costs and profits.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Comms/Online****Comment Date** 11/20/2023**Category** Resident in Study Area, Business Owner in Study Area, Live/Work near Study Area**Concerns Topics** Location, Support Underground**Heard About** Project Website, Newsletter Mailing**Issues/Phone Message/Comments**

My wife and I are property/ business owners in both Rincon Heights, and Sam Hughes. As a retired general contractor and community member, I have a common sense solution to the problem of above or below ground installation. Bring the service from the Kino Substation above ground to the intersection of Broadway and Campbell. Then below ground from that point North along Campbell Avenue.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/19/2023**Category** Resident in Study Area**Concerns Topics**Location, Support Underground,  
Substation**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

The new substation should not be in a residential neighborhood. Above ground lines should be put on major streets and routes, not in residential neighborhoods. Major streets and routes should not be avoided just because city code requires under grounding of lines. TEP is not exempt from city codes and should not try to get around them.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined.



**Comment Method: Comms/Online****Comment Date** 11/18/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Environment**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

The Barrio San Antonio and Miles neighborhoods should be avoided for this project. Both of these neighborhoods have a long history of environmental problems. We are forced to deal with excessive noise from Aviation Highway, overflights from Davis Monthan airbase, and the train. We have contaminated groundwater from the long history of contamination at the Mission Laundry site. Recently, cell towers were installed with little to no notification and no opportunity to fight back due to state laws sanctioning cell towers no matter the impacts to our community. We've only just escaped the hassles associated with the long construction project on Broadway. We could really use a break from corporations seeking to make a profit off our community.

The area where the lines would be installed would disrupt our community, again, for a construction project that would provide little to no benefit to us directly. It will also cause harm to our green spaces. I'm especially concerned that the project could go through Arroyo Chico which would disrupt the restoration of native plants and would cause harm to the regal horned lizard. There were great efforts made to protect this species in the past and every effort should be made to avoid additional harm to this important habitat.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

As a result of a number of comments citing the environmental sensitivities of Arroyo Chico and its importance to the community, the arroyo will be classified as a constraint in our siting study.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/17/2023**Category** Resident in Study Area**Concerns Topics**Location, Property Value, Support  
Underground, Historic, Substation**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**Quality of life  
Scars on a historic neighborhood  
property values diminished

the vine substation does not belong in our neighborhood,  
neither do the poles  
Underground along a large urban street is the only acceptable option

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 11/16/2023**Category** Resident in Study Area**Concerns Topics**

Location, Property Value, Historic, Environment

**Heard About** Newsletter Mailing, Word of Mouth, Other**Issues/Phone Message/Comments**

I attended the open house tonight (11/16/23), and did not have enough time to complete a comment card. So please use this online submission as additional input from tonight's meeting.

I am concerned about inclusion of the Arroyo Chico as a preliminary segment.

**Additional Info**

I strongly oppose the Arroyo Chico wash as a route, as I think it is contrary to a number of important criteria. First, from an engineering perspective, I asked for examples of other washes where large transmission lines were successfully installed. Examples: the Rillito, Pantano, and Santa Cruz river beds. Those are all wide stream beds. The Arroyo Chico is no more than 50 feet wide. Not a good comparison at all. I think the width of the water way might be 15 feet, with similar width banks on either side. Neither the stream bed nor the banks would be appropriate for 75 foot poles.

Second, the primary purpose the Arroyo Chico is to manage storm water. It connects to the retention basins at Reid Park and in the area on the west side of Tucson Blvd., and is a critical factor in the current flood control plan for our neighborhood.

Third, the arroyo serves as a major natural environment, an important habitat and corridor for numerous types of wildlife through our part of the city. Installation of transmission lines would completely upset that urban / nature balance.

Fourth, the arroyo runs in very close proximity to residential homes on both sides. Transmission lines replacing or dwarfing the current natural vegetation would have an extremely significant negative impact on the desirability and real estate values to all of those affected homes.

Fifth, the arroyo is an iconic feature of the Broadmoor-Broadway Village neighborhood, now designated as the Broadmoor Historic District. Transmission lines bisecting the neighborhood would completely change the characteristics of the neighborhood upon which the historic designation was founded. And it would sever the unified sense of community within the neighborhood.

For all of these reasons, I believe that including the arroyo on the list of potentially viable segments violates the criteria that has been established, would have very negative consequences, and would encounter significant opposition from the neighborhood's residents.

My request is that this segment be reclassified as one with serious constraints, and not be considered as a viable route.

Thank you.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and

**Comment Method: Comms/Online**

will include them in the project record provided to the Arizona Corporation Commission (ACC).

We received a number of similar comments, both written and verbally at the open house held last week. As a result, Arroyo Chico will be classified, as you've suggested, as a constraint.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/16/2023**Category** Resident in Study Area, Business  
Owner in Study Area**Concerns Topics**

Location

**Heard About** Word of Mouth**Issues/Phone Message/Comments**

no lines thru residential areas - no to routes 323, 296, 259, 240, 210

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/16/2023**Category** Resident in Study Area**Concerns Topics**

Location, Historic, Safety, Substation

**Heard About** Project Website, Public Meeting,  
Word of Mouth**Issues/Phone Message/Comments**

1. The proximity of the current Vine substation to residences is unacceptable. TEP made a grievous error in purchasing that property several years ago.

2. The "possibility" of 138Kv poles through an historic district with a "Neighborhood Preservation" zoning is totally unacceptable.

TEP must research another site for the substation preferably in an industrial area.

**Additional Info**

"Add value to the project" is not an issue. How to provide the service safely with the least impact on residences is the issue. How to maintain Tucson's community in the safest, least demeaning way is how to add value.

**Requested Info**

Jefferson Park has repeatedly asked for the "radius" of acceptable area for locations of substations that might replace the Vine substation. To date we have not received. Tho' TEP reports having researched initially which 1.6 acre lots were available. I am not sure that there has been any reserch currently and that is what the JP neighborhood is asking.

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP conducted a very thorough review of alternative substation sites before purchasing the site on Vine Avenue. After an exhaustive search, followed by reaching out to property owners, the Vine location was the only site within the "load center" that was of a sufficient size and was available to purchase. The Vine location was actually near the northern edge of the "load center" that would meet the project need. If the substation site were located further north/east/west, it would result in a different project and would not allow TEP to retire the eight 46kV substations that have been discussed and to complete the subsequent improvements to the distribution system. In the past year, TEP conducted another search to see if any new properties had become available within the "load center" that would be suitable. Ultimately, the Vine location was deemed the only viable site.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 11/16/2023

**Category** Resident in Study Area

**Concerns Topics**

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

Looks good. Thank you for the opportunity to comment. (No complaints.)

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comment and will include it in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 11/16/2023**Category** Resident in Study Area, Business  
Owner in Study Area**Concerns Topics**Appearance, Location, Property  
Value, Support Underground, Historic,  
Environment**Heard About** Other**Issues/Phone Message/Comments**

Please keep these huge power lines out of our historic neighborhoods. I find the purposed Vine street option as detrimental to my quality of life.

Vine has been turned into one of the only quiet shady walkway for me to enjoy with my dogs. The families in the neighborhood have built water retention basins along the road.

TEP has more options and underground would limit the impact on so many vital historical neighborhoods.

We have had to fight continuously with developers, the city, 5G towers, for better roads, and for the right as basic home owner to live in our neighborhoods.

TEP has the resources and the responsibility to protect our community and our property values. Just look what TEP did to Kleindale between Country Club and Dodge BLVD...

**Additional Info**

Respect the work our neighbors put into becoming Historical Neighborhoods... Respect our homes and our streets... These huge metal poles do not belong running down quiet streets with older homes.

**Requested Info**

Why do we have to keep fighting to protect our homes? Why does a corporation have more rights than the thousands of homeowners who will be negatively impacted? Our property values will plummet. Our view will destroyed... Why is this acceptable? It's all about the money!

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting

**Comment Method: Comms/Online**

process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. In addition, a public open house will be held tonight, November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/16/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Cost, Support Underground, Historic

**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

The map was a little difficult to read, but thank you for making it available. I continue to support this upgrade to the system, but am STRONGLY OPPOSED to building it above ground and degrading and possibly harming a whole swath of the central city. It is simply not right and it seems very confusing that while other cities can underground in heavily residential areas, TEP is unable to make this decision.

If voters had known that all future such projects, anywhere in the city, would be undergrounded, I believe they would've supported last May's initiative.

**Additional Info**

Why couldn't the University of Arizona pay more for this undergrounding? The inner city is growing very slowly and not causing a big lean on the system--except for developments related to the University. They need to be at the table and in this discussion, before another historic part of Tucson is ruined.

**Requested Info**

I would like to know exactly where the growth is that makes this project necessary. Thank you.

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We'd like to encourage you to visit the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown) where you'll find additional information on how the Midtown Reliability Project will help to address reliability in the area. In addition, we'll be holding a public open house tonight, November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us and we can further discuss the need for, and benefits of the project. We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Comms/Online****Comment Date** 11/16/2023**Category** Resident in Study Area**Concerns Topics**Appearance, Location, Historic,  
Substation**Heard About** Project Website, Newsletter Mailing,  
Public Meeting, Word of Mouth,  
Other**Issues/Phone Message/Comments**

What is important to me is that our historic neighborhood not be destroyed and desecrated with massive overhead lines to serve primarily the power needs of the University of Arizona and Banner hospital. Another location for the substation needs to be found, perhaps in a more industrial area, which will not require lines to be routed along the streets of our neighborhood. TEP has been completely tone deaf to our concerns, intent only on what they wish and plan to do. And, they are not even an American company, and answer to their Canadian stockholders!

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Comms/Online****Comment Date** 11/15/2023**Category** Resident in Study Area**Concerns Topics**

Appearance, Location

**Heard About** Newsletter Mailing, Other**Issues/Phone Message/Comments**

Our neighborhood is already overrun with massive ugly poles, lighting and other infrastructure (except pedestrian friendly ones of course). Add to that the constant encroachment/expansion of UA into local neighborhoods there is now an unending number of profit driven organizations looking to make more money off your little piece of land and little neighborhood because you're easy pickings. Its depressing to witness first hand the textbook unethical practice of shoving all of your negative externalities onto the poorer neighborhoods because they do not have the same political clout as those in the original path. The one we watched you spend months working on. That was your preferred route but suddenly it is off limits. I oppose routing any additional, or taller lightning rods near our neighborhood than the ones that already surround us.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

While a lot of work was done around the previous Kino to DMP 138kV Transmission Line Project, we are beginning fresh, and are only in the initial planning phases of the Midtown Reliability Project.

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). We hope you continue to stay engaged in the project as details of the project become more defined. In addition, a public open house will be held tomorrow, November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/15/2023**Category** Resident in Study Area, Live/Work near Study Area, Special Interest Group**Concerns Topics** Location, Historic, Environment**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

This project is the most devastating Project to ruin this entire subdivision Broadmore is a legal historic area, and is a Riparian area. TEP has not done due diligence in alerting Broadmore Broadway Village. Another railroaded job with no Red flag warning. TEP HAS DONE MORE DAMAGE TO OTHER AREAS.

**Additional Info**

Please stop this. It's criminal to ruin our neighborhood.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). We hope you continue to stay engaged in the project as details of the project become more defined. In addition, a public open house will be held tonight, November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/14/2023**Category** Resident in Study Area**Concerns Topics**Health, Appearance, Location,  
Support Underground**Heard About** Project Website, Newsletter Mailing,  
Word of Mouth**Issues/Phone Message/Comments**

These huge transmission lines do not belong in neighborhoods. Unsightly & has negative health effects with the massive electromagnetic waves as a result. Put the lines underground.

**Additional Info**

Study the health effects , not good!!

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held this Thursday, November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.



**Comment Method: Comms/Online****Comment Date** 11/10/2023**Category** Resident in Study Area**Concerns Topics**Cost, Appearance, Support  
Underground**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Your options appear to be only poles and not underground wires. I agree we need to plan for growth, but I strongly urge you to look at the long term value to our community. Power lines are not attractive and ruin our beautiful views of the mountains. I also have read that underground wires require less maintenance. That suggests a better life cycle cost savings. Please consider burying the new lines. Give us the 30 year cost difference - or even savings if you do a fair cost benefit analysis using life cycle costing.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

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**Comment Method: Comms/Online****Comment Date** 11/9/2023**Category** Resident in Study Area**Concerns Topics**

Support Underground, Renewable Energy

**Heard About****Issues/Phone Message/Comments**

I favor underground transmission lines and a firm commitment to renewable energy by TEP.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

TEP is planning to provide more than 70 percent of our power from wind and solar resources as part of a cleaner energy portfolio that will reduce carbon emissions 80 percent by 2035. I'd encourage you to view our Integrated Resource Plan, which I believe will answer many of your questions. You can access this at <https://www.tep.com/tep-2020-integrated-resource-plan/>.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/8/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Cost, Location, Support Underground, Historic**Heard About** Public Meeting**Issues/Phone Message/Comments**

Why would you plan overhead lines in a National Historic Neighborhood with schools, a hospital, churches, etc. and one of the oldest neighborhoods in the city.

It does not make sense to be fighting over something that is both illegal and irrational.

TEP has the funds to underground the lines if you want to, right?

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The Arizona Corporation Commission has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

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**Comment Method: Comms/Online****Comment Date** 11/8/2023**Category** Resident in Study Area, Live/Work near Study Area      **Concerns Topics** Location**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**Impact to low income residents  
Impact to schools**Additional Info**

I am not sure why most routes are constrained to the road grid.  
I assume that the best route would be closer to the population center, and therefore the best path would be on the east side of the study area

**Requested Info**

It is likely there will be a need for imminent domain. Has TEP set aside funds for imminent domain purchases and lawsuits.

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/8/2023**Category** Resident in Study Area**Concerns Topics**

Cost, Location, Support Underground

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

1. Convincing TEP to form an improvement district that would include affected property owners, the University of Arizona and Banner Health to pay to underground the line;
2. To request a written answer as to why the University of Arizona is considered to have a "Route Constraint" but no other built-up area in the study area is;
3. To urge evaluation of a modified Cherry Street route between 6th Street and Elm Street for the new line, if it is not placed underground.

**Additional Info**

See #2 above.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The Arizona Corporation Commission has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

TEP identified the heart of the UofA campus as a constraint due to the building density that exists over a large area. A constraint does not mean that a line cannot be built in that location, it simply means some type of a challenge exists that would need to be overcome. The line siting focuses on areas of opportunity because, in general, challenges are fewer. That said, the opportunities and constraints are not final. TEP is seeking input from the public right now on both opportunities and constraints. If you are aware of any additional constraints, or opportunities, that you think should be considered we would appreciate hearing from you. You can provide that feedback by responding to this email or attending the open house next week on November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/7/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Support Underground, Environment**Heard About** Project Website, Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

TEP must not put the transmission line through the Miles and Barrio San Antonio neighborhoods (where we previously lived for 9 years and still own a home). More specifically, there is rare, natural open space in that area for wildlife, pedestrians, and cyclists that would be compromised by this transmission line.

TEP needs to bite the bullet and underground the line on Campbell/Kino. Their profiteering and (failed) attempt to pass the costs onto taxpayers alone was underhanded, and makes me excited for the day when I can put solar panels and a battery on my house and not have to deal with TEP.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/7/2023**Category** Resident in Study Area**Concerns Topics**Cost, Appearance, Location, Support  
Underground, Historic, Safety,  
Renewable Energy**Heard About** Newsletter Mailing, Other**Issues/Phone Message/Comments**

Historic nature of housing in areas proposed for transmission line routing

Deafness of TEP to community outcry regarding need/appropriateness for undergrounding transmission lines.

This seems to be a project necessitated by the UA agreement w/ TEP for renewable energy being foisted upon residents of mid-town.

**Additional Info**

Residents of Tucson need TEP to be transparent about its cost calculations for undergrounding. We also need comparison of TEP estimation with costs for undergrounding in other communities.

**Requested Info**

It is way past time for electric companies to take ownership of not evolving the overland routing technology of transmission lines. As they are, they pose risks in the landscape for fire, terrorist acts, among other dangers.

Beyond everything else, they are a visual blight that depresses the economic value and visual experience in communities everywhere.

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The Arizona Corporation Commission has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 11/7/2023**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Property Value

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

One of the green lines (proposed routes) is only a block from my house. We already have a lot of electricity in this neighborhood--lots of higher-power electric lines and tall poles, as well as a substation-- and adding more might take the upward trajectory of this neighborhood and reverse it. When I moved here seven years ago the house next to me was blighted, drug dealers lived across the street, and most of my neighbors were students. Since then--probably thanks to a strong neighborhood association and a lot of committed homeowners--our neighborhood has exponentially improved. The blighted house next door was renovated and sold. We no longer have drug dealers on our block. Many former rentals are now family-owned. In fact, our house doubled in value since we bought it seven years ago. My two boys can ride their bikes to nearby Mitchell Park, and we have a trick-or-treat culture that never existed before. Having this large project cut right through this neighborhood will disrupt quiet play areas for our children, lower property values, and make our neighborhood look more industrial. I am strongly opposed to having even more electrical infrastructure installed in this very tiny, very vibrant, growing neighborhood where children gather to play.

**Additional Info**

I believe this project should stick to major roads and leave residential areas alone.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.



**Comment Method: Comms/Online****Comment Date** 11/6/2023**Category** Resident in Study Area**Concerns Topics**

Location, Property Value, Safety

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Firstly, our electric power has not been unreliable. Our neighborhood never loses power. Secondly, we are densely populated with many small houses tightly packed together on small lots on a grid of residential streets: a high voltage power line carved through our neighborhood would be both dangerous and cause a severe depression in property values. As we are also a partly-mostly blue collar neighborhood, it would be economic discrimination to burden us with the voltage lines that other more affluent neighborhoods/UofAZ need but, don't want to be sullied by. 3rdly, the 2600 block of Alta Vista St is a residential street and not a wash. To install very tall, high voltage power lines in our narrow alleys and have them loom over our homes would be gross malfeasance.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/6/2023**Category** Live/Work near Study Area**Concerns Topics**Cost, Appearance, Support  
Underground, Reliability**Heard About** Newsletter Mailing, Other**Issues/Phone Message/Comments**

Tucson's ability to attract businesses and new residents, and the University of Arizona's ability to attract faculty and students depend in significant part upon aesthetic appeal. The proposed route is one in which the transmission lines will look aesthetically unappealing. For this reason, as well as the increasing number of severe weather events that affect transmission lines, the midtown reliability project lines should be installed underground.

**Additional Info**

I would prefer to pay slightly higher fees for service, and believe the University likewise should pay slightly higher fees for service, in order to pay for underground transmission lines.

**Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined.

With the failure of Proposition 412 earlier this year, the voters of Tucson declined a solution that would have raised the funds to pay for the difference in cost between an overhead and underground transmission line.

You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/6/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Location, Support Underground**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

So now that undergrounding on Kino/Campbell is too expensive) the only viable choice is north on Euclid from Broadway to Helen~Park and an alley to the Vine substation?

How about a underground Euclid through the neighborhood to Vine Substation?

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/5/2023**Category** Resident in Study Area**Concerns Topics**Appearance, Location, Support  
Underground**Heard About** Other**Issues/Phone Message/Comments**

The most important aspect of this project is that TEP follow the city's Gateway regulations and other zoning rules requiring undergrounding these power lines on Campbell Avenue from the north to at least Broadway on the southern end of your proposed project.

High voltage lines on areas abutting residential areas on the east side of Campbell are completely inappropriate. I have lived in many parts of this country include other areas of Tucson where power lines are buried. There is no reason - other than your shareholder returns - for putting in ugly high power lines in the midst of a residential area. You can't put lipstick on a pig and high voltage power lines are definitely a pig.

I will support our city and its leaders in every way possible to prevent this travesty from happening,

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/5/2023**Category** Live/Work near Study Area**Concerns Topics****Heard About** Project Website, Newsletter Mailing,  
Public Meeting**Issues/Phone Message/Comments**

The public participation effort has been excellent. The most important thing would be not to burden any street or neighborhood more than any other to get the needed transmission lines completed and serving the community.

**Additional Info**

"not to burden any street or neighborhood more than any other"

**Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on November 16th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 11/4/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Cost, Location, Support Underground

**Heard About** Project Website, Newsletter Mailing**Issues/Phone Message/Comments**

Underground transmission lines in or adjacent to residential neighborhoods!

**Additional Info**

Deceitful survey presented false choices. Choices in support of underground lines were obfuscated to support TEPs desired plan.

Evasive responses are provided in "Stakeholder FAQs Submitted at Sept. 21, 2023 Open House". Several questions ask about how much power is used by large consumers such as UA and Banner. Answer only talks about general trends.

False response provided in "Stakeholder FAQs Submitted at Sept. 21, 2023 Open House". Question 15 says "costs are passed along to customers" and question 12 says "TEP avoids unnecessary expenditures". Consumers pay more than TEPs costs. Consumers pay TEP profit and now we want TEP to use a fraction of that yearly profit to underground this transmission line through residential neighborhoods. No additional costs are necessary for this project.

**Requested Info**

In the "Stakeholder FAQs Submitted at Sept. 21, 2023 Open House" question 12 includes a statement by Arizona Corporation Commission saying:

"As a general matter. utilities under the Commissions jurisdiction should avoid incurring these higher costs unless underground installation of a transmission line is necessary for reliability or safety purposes or to satisfy other prudent operational needs."

TEP repeatedly states how this transmission line is necessary for reliability and operational needs. Public outcry insists on underground lines. What additional proof is needed that undergrounding the lines will best satisfy Arizona Corporation Commission guidelines?

**Unable to send response****Response Notes:**

No contact information provided

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 11/4/2023**Category** Resident in Study Area, Live/Work near Study Area      **Concerns Topics** Substation**Heard About** Project Website, Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

Project need is not apparent--your verbiage makes it sound like the need is caused by residential but my understanding is that UA/Banner is driving the need.

Substation value is not apparent--your verbiage makes it sounds like Vine and another substation provide our energy but my understanding is that we are located at the junction of service from substation on Hedrick and another to the east. Why is the new Vine substation needed for residential service? If it is really for UA-Banner benefits, maybe those locations ought to bear more of the impacts as well.

Transformers--your project need mentions old transformers. This does not explain why transformers can't be replaced independent of a transmission line. A transformer in front of our house was replaced recently and steel poles erected. I appreciate the value in this but it does not seem to support the need for the elevated, additional transmission line now proposed.

**Additional Info**

Your project need is not believable, but I would be happy to see it better explained on your website. I'm sure you could bury me and others in detail if you wanted, and that would be better than the blurb that currently exists. I am hopeful there's also a happy medium. I understand you don't want to burden people, but some of us just want more facts, without having to go to your meetings. More detailed, written material is a quicker way to communicate with people who want more facts, and it promotes transparency.

**Requested Info**

1. Please help me understand the value of Vine in relation to the existing network of substations. 2. Please help me understand the relative need for more energy and reliability for the UA-Banner complex as opposed to Jefferson Park and other neighborhoods. 3. Please help me understand the relationship between the ongoing maintenance of the existing distribution lines (and its transformers) in the study area vs the transmission line and new substation. 4. Please show the location of Vine in relation to other substations and distribution lines.

**Response sent****Response Notes:**

Thank you for your interest in the Midtown Reliability Project and for your thoughtful questions and comments.

Attached is a handout that shows how you receive your electricity today, and what will change as a result of the Midtown Reliability Project. I will caveat that, based on your address, you are located at the very edge of the area that may be transferred over and served from the new Vine Substation or may also be transferred to one of the other nearby 46kV substations.

It sounds like you've thoroughly explored the project webpage, but I'll be referring to a number of materials found on the webpage, with direct links, as I try to answer the four questions you've listed.



**Comment Method: Comms/Online**

1. Currently the Midtown Area is served electricity through our 46kV system. There are 8 46kV substations and approximately 19 miles of 46kV lines that serve them. The areas served by these 46kV substations are near capacity, in addition the equipment at these substations is very old and needs to be replaced (see Project Video). Rather than replace the existing 46kV substations and lines, TEP is proposing to replace those 8 46kV substations with a single 138kV substation, the Vine Substation and the 19 miles of 46kV sub transmission lines with 7-8 miles of 138kV transmission line. The cost of the proposed project is roughly the same as replacing the existing equipment but will increase reliability and capacity in the area by 3 times. It will also reduce future maintenance and replacement liability associated with that much more equipment.

2. TEP has seen increased energy usage throughout the study area by all customer classes (residential, commercial, industrial). Of the 8 existing substations that will be replaced by this project, only 2 provide service to the UofA and Banner. As you'll note in the project video and in the attached handout, many of these primarily residential substations are close to capacity as a result of this growth. As far as reliability, TEP strives to provide the same level of reliability to all of our customers.

3. A majority of the infrastructure in this area is older, both the 46kV sub transmission and distribution systems. TEP performs routine inspection, maintenance, and when merited, replacement of all of this equipment. The new 138kV transmission line and substation would receive similar periodic inspection and maintenance. Even with routine maintenance, no equipment can be expected to last forever, and TEP has found much of the substation equipment and lines in the area in need of replacement.

4. I'll reference you to slide #4 of the Agency Briefing presentation available on the project webpage. This shows a map of the Vine Substation and the other 46kV substations (blue triangles) and sub transmission lines (blue lines) that will be replaced by this project. There are distribution lines originating at each of these substations and running down most streets or alleys in the project area.

I sincerely hope this response is helpful. If a discussion is desired, I would be happy to set up a time to chat over the phone.

**Comment Method: Comms/Online**

**Comment Date** 10/30/2023

**Category** Live/Work near Study Area

**Concerns Topics**

Cost, Do not Support Underground

**Heard About** Other

**Issues/Phone Message/Comments**

I oppose requiring Tucson residents outside of the mid-town area to pay higher electrical bills for putting the new transmission line underground.

If the residents of the area prefer the installation of the line underground, they should pay the cost.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP is not proposing to underground any part of the transmission line proposed as part of the Midtown Reliability Project. The Arizona Corporation Commission, who regulates TEP at the state level, recently approved a policy statement addressing their position on underground transmission:

The Commission does not have jurisdiction over the undergrounding of electric transmission lines. A.R.S. § 40-360(10).

Installing electric transmission lines underground is much more expensive than building them above ground. Underground transmission lines also can be more costly and challenging to maintain and repair.

As a general matter, utilities under the Commission's jurisdiction should avoid incurring these higher costs unless underground installation of a transmission line is necessary for reliability or safety purposes, or to satisfy other prudent operational needs. Installing a transmission line underground for other reasons, such as stakeholders' preferences, would add unnecessarily to costs recovered through rates.

Third parties. Including cities. Customers, and neighborhood groups. Seeking to fund the underground construction of a transmission line may do so, among other ways, by forming an improvement district for underground utilities as provided in A.R.S. § 48-620 et. Seq.

Docket - ALS-00000A-22-0320

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 10/23/2023

**Category** Live/Work near Study Area

**Concerns Topics**

Cost, Location, Support Underground

**Heard About** Word of Mouth, Other

**Issues/Phone Message/Comments**

Copy of email sent to the Board of Adjustment on 10/23/23

Dear Members of the City of Tucson Board of Adjustment,

RE: Case C-10-21-09 Tucson Electric Power – Kino to DMP 138KV Transmission Line Project

I oppose TEP's request for a variance from the City of Tucson's requirement that power lines in the city's Campbell Avenue Gateway Corridor Zone be placed underground.

I appreciate that, given the increased need for reliable electricity throughout the City of Tucson, our power grid needs upgrading. However, that is the cost of doing business – it is the same as replacing aging vehicles in a company's fleet when the vehicles get older.

Moreover, as more people and businesses use more electricity, TEP will earn more money – thereby offsetting the increased cost of putting the power lines underground.

TEP should not be exempt from following the City's ordinances.

TEP should act like a good citizen and follow the rules, just like the rest of us.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 10/14/2023

**Category** Live/Work near Study Area

**Concerns Topics**

Location

**Heard About** Other

**Issues/Phone Message/Comments**

Why is project only south of Prince & not expanded north to River Rd (In First Avenue Area on your map)?

TEP serves this area, so why stop upgrades south of the service area boundary along First Avenue?

When there are power outages or switches, there have been problems with power surges (specifically during the past 3 years) when the power is turned back on. Protecting smart appliances and essential medical equipment that now all contain micro circuits, sensitive to surges, is important for all customers, not just in the UA area.

So, hoping you will reconsider and extend this project to include those in your service area north of Prince in First Avenue area, up to River Rd, the boundary that you provide service for.

**Additional Info**

I'd appreciate a reply

**Requested Info**

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**Response sent****Response Notes:**

They were very disappointed that the benefits of the Midtown Reliability Project would not be extended to where they live. They explained that over the past three years every time the power goes out, they get massive power surges that have damaged equipment and appliances in their home. They're on oxygen and had to get a large surge protector to protect the compressor. I told them that TEP could install a chart so that we could gather data on what is going on and determine if we need to make any system improvements. They very much liked the idea. Their information was passed on to Distribution Planning & Engineering for further investigation.

**Comment Method: Comms/Online****Comment Date** 10/13/2023**Category** Business Owner in Study Area,  
Live/Work near Study Area**Concerns Topics**

Renewable Energy

**Heard About** Project Website**Issues/Phone Message/Comments**

We need this project to keep sustainability in the aress

**Additional Info**

With our transition away from fossil fuels to alternate forms of energy. This project is very important in keeping our livelihood in Tucson safe and prosperous.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP is planning to provide more than 70 percent of our power from wind and solar resources as part of a cleaner energy portfolio that will reduce carbon emissions 80 percent by 2035. I'd encourage you to view our Integrated Resource Plan, which I believe will answer many of your questions. You can access this at <https://www.tep.com/tep-2020-integrated-resource-plan/>.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 10/13/2023**Category** Outside of Study Area**Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

I think TEP should install over power lines on Campbell as proposed right through Sam Hughes Neighborhood. It's not fair to other TEP customers to bear the burden of higher rates for a selected few. Equality for all I wouldn't get and haven't gotten a choice in what TEP does as rate payer.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 10/2/2023**Category** Resident in Study Area, Live/Work  
near Study Area**Concerns Topics**

Support Underground

**Heard About** Project Website**Issues/Phone Message/Comments**

Underground power utilities in midtown. TEP is not a good citizen partner when you try to get around laws and city beautification projects.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 10/1/2023

**Category** Resident in Study Area

**Concerns Topics**

Support Underground

**Heard About** Other

**Issues/Phone Message/Comments**

The lines must be undergrounded!

**Additional Info**

The lines must be undergrounded!

**Requested Info**

The lines must be undergrounded!

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**Response sent**

**Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online****Comment Date** 9/23/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Cost, Appearance, Support Underground

**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

Utilities in the right of way or visible from the street should be placed underground.

**Additional Info**

Overhead lines are in direct conflict with UA Area Plan and Major Streets and Routes Plan. Tucson values it's distinctive character and neighborhoods and massive overhead lines run against these values. Cost to TEP to underground is negligible and undergrounding will safeguard our city's extraordinary views. No to massive overhead power lines!

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 9/22/2023

**Category** Resident in Study Area

**Concerns Topics**

Support Underground, Safety

**Heard About** Other

**Issues/Phone Message/Comments**

Future climate is unpredictable and undergrounding would be safer and cheaper to repair in the event of extreme winds and other contingencies due to climate change. Even strong earthquakes have been known to occur in this region.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/22/2023**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Project Website**Issues/Phone Message/Comments**

All lines must be underground, and the gateway provisions be followed. None of this project should impact residential areas.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/21/2023**Category** Live/Work near Study Area,  
Neighborhood Association Board  
member**Concerns Topics**Appearance, Location, Support  
Underground, Safety**Heard About** Project Website, Newsletter Mailing,  
Word of Mouth**Issues/Phone Message/Comments**

The RillitoBend Neighborhood (north of Prince Road) has already suffered from the poor planning and construction of large diameter power poles on Prince Road. Site visibility triangles for vehicle safety, bicycle paths, and pedestrian paths have all been adversely impacted. Compounding the poor planning is that many existing poles remain with remnant communication lines which add to the visual clutter and safety issues.

**Additional Info**

With the new midtown project, we have an opportunity to plan and install power lines properly which may include above and below ground options.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/21/2023**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

Undergrounding lines along Campbell/Kino corridor is the only approach that respects the affected neighborhoods. Renaming the project was clearly an excuse for discarding several years of public input that showed a clear consensus on this issue.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We acknowledge that a lot of work went into the past Kino-DMP project, and many residents and stakeholders spent countless hours considering the issues and developing potential solutions. While we're starting from a blank canvas on routing, all the understanding and knowledge gained through your participation and that of so many others will be carried forward to inform the transmission line routing solutions developed as part of the Midtown Reliability Project.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/21/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Cost, Location, Support Underground, Historic, Safety, Renewable Energy, Reliability, Substation

**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

Primarily human safety, and resilience of the system in a fast changing climate; as well as leveraging the natural solar potential of this area. And lastly, avoiding destroying historic neighborhoods (such as Jefferson Park near the large substation upgrade) who is celebrating 125 years in 2023.

**Additional Info**

Specific safety and cost comparison side by side of overhead and underground lines have not been provided. It's not obvious how the overhead lines are more resilient and safe than underground for the residents. Especially in light of the extreme weather (prolonged heat exposure, increased dry thunder storms and high wind speeds). Additionally, as a resident of the Jefferson Park neighborhood - our neighborhood is lumped in with the electricity use of the U of A and their hospital - and would like to know why the U of A isn't burdening most of real estate required for the substation upgrades.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP is planning to provide more than 70 percent of our power from wind and solar resources as part of a cleaner energy portfolio that will reduce carbon emissions 80 percent by 2035. I'd encourage you to view our Integrated Resource Plan, which I believe will answer many of your questions. You can access this at <https://www.tep.com/tep-2020-integrated-resource-plan/>.

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/21/2023**Category** Resident in Study Area, Special Interest Group**Concerns Topics** Appearance, Location**Heard About** Other**Issues/Phone Message/Comments**

YOUR PYLONS BELONG ON ARTERIAL STREETS, NOT RESIDENTIAL. UNTIL TEP MAKES A COMMITMENT TO ABATE GRAFFITI APPROPRIATELY AND NOT HAVE HODGE PODGE COLORS ON YOUR RUSTY POLES, TEP SHOULD NOT BE ALLOWED TO PUT THEM ANYWHERE. I HAVE BEEN FIGHTING THIS FOR 20 YEARS AND NOTHING HAS CHANGED. BUT...YOU KEEP RAISING YOUR RATES

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/21/2023**Category** Resident in Study Area**Concerns Topics**Location, Support Underground,  
Historic**Heard About** Word of Mouth**Issues/Phone Message/Comments**

There exists a gateway ordinance that prohibits the construction of large transmission poles along Cambell Ave, past the university. I live in one of the affected neighborhoods, and your plans will severely mar the historic nature of our neighborhood. Please respect the wishes of the community and laws that are in place. The only appropriate action is to underground the transmission lines through mid-town Tucson.

**Additional Info**

There is a gateway ordinance for the City of Tucson. Please respect our community and our law.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online****Comment Date** 9/20/2023**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About****Issues/Phone Message/Comments**

-- At this date Sept. 20, 2023, proposed route(s) and line segments have not been published for comment. I am concerned and plan to comment on the proposed route(s) and line segments.

-- Lines will be laid underground as required by Tucson law. I expect TEP to understand and to follow established City, County, State, and Federal laws.

**Additional Info**

Not at this time.

**Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held tonight, September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 9/20/2023**Category** Resident in Study Area**Concerns Topics**

Support Underground

**Heard About** Project Website, Newsletter Mailing,  
Word of Mouth**Issues/Phone Message/Comments**

While I understand the increasing demand for area electricity, I support underground lines or a solution less intrusive than the proposed high pole system.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 9/20/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Cost, Appearance, Location, Property Value, Support Underground, Historic, Substation

**Heard About** Project Website, Newsletter Mailing**Issues/Phone Message/Comments**

Points for the TEP meeting and online comments:

1. An overhead project is in direct conflict with the UA Area Plan (UAP) and Major Streets and Routes Plan (MS&R Plan), both adopted plans governing the development and growth of the Tucson region.

"The UAP [University Area Plan] specifically directs that utility lines be placed underground where possible to mitigate impacts on adjacent uses." ZE Decision dated 5-13-21; see also UAP §6, Policy No.6.

"[U]tilities in the right of way or visible from the street should be placed underground, wherever possible" MS&R Plan at Policy 5 & 6 Guideline 4.

2. Tucson values its distinctive character, vibrant city neighborhoods, and thoughtful growth, as reflected in numerous development codes, ordinances, area and neighborhood plans, and scenic gateway routes such as Kino/Campbell. To allow an unprecedented invasion of the massive overhead lines runs completely against these longstanding values.

3. The presence of residential neighborhoods adjacent to or directly within the proposed route will lead to a loss of property value. TEP cites studies that show the devaluation of private property from overhead lines reaches a minimum of 10% when within 500–1,000 feet of the proposed right-of-way.

4. Quite a few affected neighborhoods within the study area are designated as National Historic Districts, and two neighborhoods are Neighborhood Preservation Zones (NPZs). Citizens worked for years to implement these safeguards to protect the unique historic neighborhoods of Tucson.

5. The cost to TEP to go underground is negligible, estimated to be 2/100th of the most current 11.5% rate increase, or about .20 per month per customer. The ACC could very possibly allow a zero rate increase for such a project, so TEP might have to absorb the expenditure as an ordinary cost to TEP and its shareholders of doing business in Tucson and complying with Tucson ordinances and plans, which were known to TEP when they signed the current franchise contract. The city, U of A, and Banner should help as well. They are huge energy users, and this is to their advantage as much, if not more, than anyone else.

6. Coalitions, neighborhood groups and associations, and individual citizens have invested an immense amount of time, effort, and financial commitment into the goal of ensuring the undergrounding of lines. To dismiss the need to go underground is not acceptable. A collaborative group of stakeholders willing to discuss the issue should be formed.

7. The 2026 renewal of the franchise fee will be difficult to pass if the overhead lines and massive pylons are running through the heart of the city; the public feels betrayed by TEP's unwillingness to consider undergrounding.

8. The proposed Vine substation will be located in a densely populated area, with the hospital nearby, residential neighborhoods on two sides, and Uof A buildings and residences on the other. TEP stated the Vine location as most appropriate due to the need to remain in the "Load Center". What is the radius of the load center, and could the substation be moved to a more industrial area?

**Comment Method: Comms/Online**

9. The issue of undergrounding affects the entire community—residences, businesses, and scenic areas. Undergrounding will safeguard the city's extraordinary views. Pre-pandemic, in 2018–19, tourists spent \$2.4 billion for the year in the Tucson market. That comes to more than \$5,000 per household.

**Additional Info**

Do the right thing. You'd be surprised by what can happen as a result.

**Requested Info**

Believe in the goodness in yourselves.

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. With the failure of Proposition 412 earlier this year, the voters of Tucson declined a solution that would have raised the funds to pay for the difference in cost between an overhead and underground transmission line.

There isn't really a radius to the load center, rather it's the center of the area to be served power by that substation. TEP tries to locate substations as close as possible to the center of this service area in order to minimize costs associated with extending higher capacity distribution lines, known as feeders throughout the substations service area. TEP conducted an extensive search of available properties in the area, which is primarily comprised of residential, commercial, and institutional land uses as opposed to industrial. The Vine location was the best site that we could secure with respect to a central location and while it is adjacent to residential on one side, the other three sides are commercial in nature.

While many of APS and SRP "distribution" lines are buried, in all but a few very limited instances, their "transmission" lines are constructed overhead. There is a very big difference between constructing and operating a distribution line underground and constructing and operating a transmission line underground.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 9/20/2023**Category** Resident in Study Area**Concerns Topics**

Cost, Appearance, Location, Property Value, Support Underground, Safety

**Heard About** Project Website, Newsletter Mailing**Issues/Phone Message/Comments**

I write to protest TEP's plans to use extraordinarily tall, and even taller, above-ground utility poles in midtown Tucson, the University area generally, and specifically along Campbell Avenue. We protest this proposal for four reasons.

First, the decision appears based upon socioeconomic factors. In richer cities also served by TEP (e.g., Scottsdale) there are no imposing above ground power poles. Hence, the decision of if and where to use above ground poles seems to be blatant economic discrimination: relatively higher socioeconomic areas receive service from underground utilities, less affluent areas get aversive above-ground structures that destroy views, seriously erode property values, and discourage citizens from living in the city, particularly midtown.

Second, the City of Tucson has long supported an attractive corridor from the Tucson International Airport. A friendly, attractive introduction to the city is useful in attracting visitors, businesses, and students to Tucson. TEP's reluctance to use underground utilities is an acute indifference to city and community interests.

Third, increasing fires, wind, and storm damage have shown the vulnerability of above-ground power lines in these changing and challenging climate conditions. Above-ground power lines add greater risk for longer and more expensive power shortages, equipment repair, property damages, and threats to human safety. Any cost differences in constructing underground vs above-ground utilities would seem to be a prudent insurance investment for TEP to make, given the instances of lawsuits for fires and other damages caused by falling power lines.

Undergrounding estimates of the cost of constructing underground utilities is overestimated by TEP and the related payment schedule over time is not accurately presented by TEP. The City of Tucson should call for an independent audit of TEP's calculations and claims. Complete Transparency is in the best interest of Tucson Citizens.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered.

While many of APS and SRP "distribution" lines are buried, in all but a few very limited instances, their "transmission" lines are constructed overhead. There is a very big difference between constructing and operating a distribution line underground and constructing and operating a transmission line underground.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held tonight, September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online**



**Comment Method: Comms/Online****Comment Date** 9/20/2023**Category** Resident in Study Area, Business Owner in Study Area, Live/Work near Study Area**Concerns Topics** Cost, Appearance, Property Value, Support Underground, Safety, Reliability**Heard About** Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

The survey you sent out about pole preferences was ludicrous and insulting. The only acceptable solution is undergrounding these lines. Not tall poles, not short poles, not green poles or brown poles. No poles. Underground lines. That is the best solution when it comes to safety, aesthetics, reliability and property values.

**Additional Info**

The cost of undergrounding these lines are insignificant to TEP or ratepayers.

Let's say the cost differential of undergrounding to TEP is \$20 million. Spread out over 59 years, that's \$340,000 per year.

This cost can easily be absorbed by TEP, whose investors made \$150 million in profit last year. But even if TEP customers pay the tab for this, we are looking at \$28000 per month for the whole city -- a few extra cents per month per household.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

With the failure of Proposition 412 earlier this year, the voters of Tucson declined a solution that would have raised the funds to pay for the difference in cost between an overhead and underground transmission line.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 9/20/2023

**Category** Resident in Study Area

**Concerns Topics**

Location

**Heard About**

**Issues/Phone Message/Comments**

Stay out of Arryo Chico and don't even think in runt this on country club.

**Additional Info**

**Requested Info**

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**Unable to send response**

**Response Notes:**

No contact information provided

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 9/20/2023**Category** Resident in Study Area**Concerns Topics**Location, Renewable Energy,  
Reliability**Heard About** Other**Issues/Phone Message/Comments**

"We'll use road right-of-way for placement of most poles." And for the other poles, placement will be . . . front yards? Fighting these placements on private property that you seem to foretell will cost Tucsonans exorbitant amounts in legal fees. Legal fees that will, in all likelihood, be paid in vain as private citizens have little ability to fight what amounts to a taking by a "public" utility.

**Additional Info**

Why isn't it feasible to work with the existing structures to improve reliability? How do the proposed new structures aid in the handling of bi-directional flow from small renewable sources connecting to the grid? What improved technologies to monitor and control the lines and the power load through the lines come with these new structures? For instance, will there be updated temperature monitoring? Will there be improved ability to control flow through the lines in response to up-to-date weather monitoring? Will phase-shifting transformers be a part of the new high voltage lines?

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

The Midtown Reliability Project will improve reliability by making improvements at all levels of the electrical grid. This includes upgrading poles at the distribution level in need of replacement and removal of old 46kV lines, while installing the new 138kV transmission line. While distribution poles are not engineered to support transmission, it may be possible in some places to re-use either the poles supporting the current 46kV lines or the 46kV line routes. Since we don't have a transmission line route identified at this time, it's premature to provide a definitive answer on this, but certainly an opportunity we can look for.

The new transmission structures will simply support the transmission line conductor which will energize the proposed Vine Substation. Small renewable sources would be connected at the distribution level of the grid. The distribution system improvements, including upgrading lower capacity circuits from 4kV to our current standard 14kV circuits will provide the needed capacity to bring any renewable energy generated at a home or business in excess of their needs back onto the grid.

No new monitoring and control technology will come with the new structures. However, TEP does install fiber optic communications in an optical ground wire (OPGW) as part of the project which will allow TEP to remotely monitor and control equipment in the proposed Vine Substation.

At this time, there will not be updated temperature monitoring.

There will not be improved ability to control flow through the lines in response to up-to-date weather monitoring.

Phase-shifting transformers will not be a part of the new high voltage lines.

**Comment Method: Comms/Online**

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 9/20/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Appearance, Location, Support Underground, Historic**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

The power lines through midtown Campbell should be put underground. I 100% support the points made by the underground coalition and neighborhood associations, including Sam Hughes where I live.

I have written the city and TEP directly numerous times on this issue, but apparently there is another form to fill out. Here is my latest message to the city:

I am a resident in the Campbell Ave. study area, and I also live, work, shop, and dine with my family, friends, and colleagues at the UA in the study area.

Campbell Ave by UA and all the way to river is an iconic and historic area and one of the few person-scaled areas in this city. Installing large power poles is not in line with promoting human-scaled small business development and is an eyesore. These should be out underground, and the city should demand forward-thinking development.

By the university, this area a the gateway for many people coming to campus from the east, northeast, and southeast. 3rd st is a major bike boulevard all the way out east. Wildcat sports games all walk and gather through here. Campbell Ave. And Speedway is supposed to be the gateway to the UA and is slated for development with a high-rise building. Campbell Ave North of speedway has newly developed hospital and med school areas. All of these areas are connected and used by many for walking and biking in adjacent neighborhoods of Sam Hughes, Blenman Elm, Catalina Vista, and Jefferson Park. I and many others regularly walk, bike, run, and live right in the areas where the poles will be going. Further north new restaurants open routinely, and new development continues. Many, many locations have outdoor eating facing the street where these massive spikes will go.

One of my running routes is down Helen to country club, and every time I go there, I cringe because I see the massive power poles already installed there on country club. These things are massive, ugly, intimidating, and should be undergrounded, especially in the few historic and iconic locations we have in Tucson. They are not meant for a people-centric designed city.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online**



**Comment Method: Comms/Online**

**Comment Method: Comms/Online****Comment Date** 9/19/2023**Category** Resident in Study Area**Concerns Topics**

Cost, Appearance, Location, Property Value, Support Underground, Historic, Substation

**Heard About** Word of Mouth**Issues/Phone Message/Comments**

I am 100% against using overhead electric poles for this project. The following issues are important to me as a resident of the area in Tucson:

1. An overhead project is in direct conflict with the UA Area Plan (UAP) and Major Streets and Routes Plan (MS&R Plan), both adopted plans governing the development and growth of the Tucson region.

"The UAP [University Area Plan] specifically directs that utility lines be placed underground where possible to mitigate impacts on adjacent uses." ZE Decision dated 5-13-21; see also UAP §6, Policy No.6.

"[U]tilities in the right of way or visible from the street should be placed underground, wherever possible" MS&R Plan at Policy 5 & 6 Guideline 4.

2. Tucson values its distinctive character, vibrant city neighborhoods, and thoughtful growth, as reflected in numerous development codes, ordinances, area and neighborhood plans, and scenic gateway routes such as Kino/Campbell. To allow an unprecedented invasion of the massive overhead lines runs completely against these longstanding values.

3. The presence of residential neighborhoods adjacent to or directly within the proposed route will lead to a loss of property value. TEP cites studies that show the devaluation of private property from overhead lines reaches a minimum of 10% when within 500–1,000 feet of the proposed right-of-way.

4. Quite a few affected neighborhoods within the study area are designated as National Historic Districts, and two neighborhoods are Neighborhood Preservation Zones (NPZs). Citizens worked for years to implement these safeguards to protect the unique historic neighborhoods of Tucson.

5. The cost to TEP to go underground is negligible, estimated to be 2/100th of the most current 11.5% rate increase, or about .20 per month per customer. The ACC could very possibly allow a zero rate increase for such a project, so TEP might have to absorb the expenditure as an ordinary cost to TEP and its shareholders of doing business in Tucson and complying with Tucson ordinances and plans, which were known to TEP when they signed the current franchise contract. The city, U of A, and Banner should help as well. They are huge energy users, and this is to their advantage as much, if not more, than anyone else.

6. Coalitions, neighborhood groups and associations, and individual citizens have invested an immense amount of time, effort, and financial commitment into the goal of ensuring the undergrounding of lines. To dismiss the need to go underground is not acceptable. A collaborative group of stakeholders willing to discuss the issue should be formed.

7. The 2026 renewal of the franchise fee will be difficult to pass if the overhead lines and massive pylons are running through the heart of the city; the public feels betrayed by TEP's unwillingness to consider undergrounding.

8. The proposed Vine substation will be located in a densely populated area, with the hospital nearby, residential neighborhoods on two sides, and Uof A buildings and residences on the other. TEP stated the Vine location as most appropriate due to the need to remain in the "Load Center". What is the radius of the load center, and could the substation be moved to a more industrial area?

9. The issue of undergrounding affects the entire community—residences, businesses, and scenic areas.

**Comment Method: Comms/Online**

Undergrounding will safeguard the city's extraordinary views. Pre-pandemic, in 2018–19, tourists spent \$2.4 billion for the year in the Tucson market. That comes to more than \$5,000 per household.

**Additional Info**

Undergrounding is used in other Arizona cities, such as Phoenix, why not Tucson?

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. With the failure of Proposition 412 earlier this year, the voters of Tucson declined a solution that would have raised the funds to pay for the difference in cost between an overhead and underground transmission line.

There isn't really a radius to the load center, rather it's the center of the area to be served power by that substation. TEP tries to locate substations as close as possible to the center of this service area in order to minimize costs associated with extending higher capacity distribution lines, known as feeders throughout the substations service area. TEP conducted an extensive search of available properties in the area, which is primarily comprised of residential, commercial, and institutional land uses as opposed to industrial. The Vine location was the best site that we could secure with respect to a central location and while it is adjacent to residential on one side, the other three sides are commercial in nature.

While many of APS and SRP "distribution" lines are buried, in all but a few very limited instances, their "transmission" lines are constructed overhead. There is a very big difference between constructing and operating a distribution line underground and constructing and operating a transmission line underground.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 9/19/2023**Category** Resident in Study Area**Concerns Topics****Heard About** Public Meeting, Word of Mouth,  
Other**Issues/Phone Message/Comments**

The major (overarching) issues that concern me are: (1) under pressure from TEP, Tucson is in danger of falling behind cities worldwide who are making informed decisions about infrastructure: and (2) under pressure from TEP, citizens of Tucson are losing faith in our traditional utilities, which further hampers progress. TEP divides to conquer. There is no good faith private/public planning for a better future.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/19/2023**Category** Resident in Study Area, Special Interest Group**Concerns Topics**

Cost, Appearance, Location, Property Value, Support Underground, Historic

**Heard About** Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

1. Tucson's Major Streets and Routes Plan and UA Area plan direct utility lines to be placed underground where possible. On the routes proposed, undergrounding is definitely possible.
2. There is clear evidence that overhead towers and lines, especially of this large size, devalue nearby private property.
3. The cost to TEP of undergrounding is far less than TEP claims; in fact, it is negligible. TEP and its shareholders should be able to absorb this cost. The U of A and Banner Hospital, both huge energy users, could help if necessary.
4. Two National Historic Districts and 2 neighborhoods within the proposed area that are Neighborhood Preservation Zones. These neighborhoods contain a variety of architectural styles that neighbors have worked hard to protect. The project, as proposed, will devalue these neighborhoods.
5. Tucson is prized for its extraordinary mountain views in all directions. Erecting huge, view-blocking towers and lines makes no sense. TEP needs to be a good citizen and build UNDERGROUND in a way that helps ensure Tucson's future as a desirable place to live.

This comment comes from the Sam Hughes Neighborhood Association.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/18/2023**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics**

Appearance, Location, Property Value, Support Underground, Renewable Energy

**Heard About** Project Website, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

Community beautification  
 Neighborhood continuity  
 Holding private corporations to account  
 Under grounding  
 Decarbonization

**Additional Info**

TEP adhering to our undergrounding (regulations) on scenic and gateway corridors but they need to dip into shareholder earnings and also commit to real identifiable decarbonization work

**Requested Info**

I am a resident of Catalina Vista neighborhood and my kids go to school in the Jefferson Park neighborhood.

TEP should underground this project. I oppose dividing neighborhoods, maiming view sheds and hurting property values to further increase an out-of-country corporations quarterly profits.

**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP is planning to provide more than 70 percent of our power from wind and solar resources as part of a cleaner energy portfolio that will reduce carbon emissions 80 percent by 2035. I'd encourage you to view our Integrated Resource Plan, which I believe will answer many of your questions. You can access this at <https://www.tep.com/tep-2020-integrated-resource-plan/>.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/17/2023**Category****Concerns Topics**

Appearance, Renewable Energy

**Heard About****Issues/Phone Message/Comments**

Are you trying to reinstate Tucson's "Ugliest City in America" title? Tucson's beauty is in its skylines, looking onto mountains in all directions. Massive utility poles focus the view of Tucson residents and visitors on TEP's inability to create a 100% renewable future. We do not need poles, we need for every building and road to supply their immediate surroundings with needed energy. I did not respond to your survey because is biased and self-serving. You live here too. If you want poles, put them on the street in front of your house and see how your neighbors react.

**Additional Info****Requested Info****Unable to send response****Response Notes:**

Wrong email provided - undeliverable

**Comment Method: Comms/Online****Comment Date** 9/17/2023**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

I would like to see the lines installed on a street that is already a designated thruway, for example Country Club, not Camilla. I'd also prefer underground even with added expense.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. Camilla is actually located outside of the project study area, so would not even be considered as an option. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.



**Comment Method: Comms/Online**

**Comment Date** 9/16/2023

**Category** Resident in Study Area

**Concerns Topics**

Property Value, Support Underground

**Heard About** Newsletter Mailing, Word of Mouth

**Issues/Phone Message/Comments**

7 - 10 ft. above ground poles would diminish the quality of our lives and our property values. It is appalling that TEP is attempting to squirm around the city mandate for underground utility lines. We, the residents of midtown are vehemently opposed to your newly packaged "midtown reliability project".

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/14/2023**Category** Live/Work near Study Area**Concerns Topics**Location, Property Value, Support  
Underground**Heard About** Project Website, Newsletter Mailing,  
Word of Mouth**Issues/Phone Message/Comments**

The back of my house looks like substation NOW with 3 poles filled with equipment along my property alone, It's unsightly and I dislike it already as is, it was the only thing that almost kept me from buying this property. Now I see that instead of routing it on the known major route, those with higher property values rejected it so you want to send it through the lower income neighborhoods and reduce our property values, when we already deal with the burden of all the traffic from the park and UA facilities with no bike lanes no turn lanes (or even sidewalks in my neighborhood) and constant drag racing and more poles and bigger poles inches from the side of the road to meet the electricity needs of the University and all the new infill the city wants to put in. As the University grows larger and larger the neighborhoods bear more and more of the burden as well. I invest in electricity saving equipment now, I do my part, I shouldn't have to degrade my quality of life for the university of arizona reliability project. By the way -- have you ever seen the size of that electronic scoreboard?

**Additional Info**

The only way I would support this is if you undergrounded the power lines like the east side neighborhoods get. As I know you won't do that I will oppose this project completely.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 9/12/2023

<b><u>Category</u></b>	Resident in Study Area, Business Owner in Study Area, Live/Work near Study Area	<b><u>Concerns Topics</u></b>	Location
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**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

Please only route the transmission lines along major streets, not residential streets.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/11/2023**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

I understand the need to upgrade the local grid to meet present and future power demands. However, I do have an issue with the huge 138kV poles that TEP wants to run through North University and Jefferson Park. It's my opinion that it would be better to run those larger poles along the Campbell corridor rather than through a neighborhood where someone has to live and look at everyday. I would say, please treat this situation as if you lived here.

**Additional Info**

Under grounding is optimal but I understand the cost trade offs. A line that traveled along a main corridor and avoided running through neighborhoods would avoid much of the uproar.

**Requested Info**

The proposed transmission line route.

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/11/2023**Category** Resident in Study Area**Concerns Topics**Appearance, Support Underground,  
Reliability**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Most of Tucson's residents take pride not only in how their city looks and feels, but also, they seek long term stability of our power grid. The issues are more than the negative aesthetics that these massive power poles and lines will have. Importantly, given the major issues of climate change facing us all, such as more frequent and more dangerous storms with the potential of disrupting above ground power lines, burying electrical lines will go far to ensure continuity of power. The solution is not unique; other communities in Arizona have taken the path of burying power lines. While this solution is expensive and it certainly avoids the very visible and ugly power poles and lines, it also is an obvious and long term fix for power stability for the future in these uncertain climate times.

We have voted to put the electrical power lines underground. Do not ignore the will of the voters. The tactic of asking us how big we want the new power poles to be, ignores this basic fact. Please listen to us. We trust that you will be able to find a way to make underground power lines work in Tucson.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

With the failure of Proposition 412 earlier this year, the voters of Tucson declined a solution that would have raised the funds to pay for the difference in cost between an overhead and underground transmission line.

No transmission line routes have been identified at this time. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/11/2023**Category** Resident in Study Area, Business  
Owner in Study Area, Live/Work near  
Study Area**Concerns Topics**Health, Location, Property Value,  
Support Underground, Historic, Safety**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Power lines in historic, inner-city residential neighborhoods must be undergrounded for health and safety concerns and to avoid turning the heart of our city into a slum where longtime low income homeowners lose the equity in their homes which constitutes most of their net worth.

**Additional Info**

Studies have shown that the cost of undergrounding is offset by lower maintenance costs in future years. The European Union requires undergrounding in residential areas.

Studies have shown that there is a higher incidence of childhood cancer in neighborhoods that have high tension power poles that are not undergrounded. We have not only resident children and youth but many schools in Jefferson Park.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/11/2023**Category** Resident in Study Area**Concerns Topics**Location, Support Underground,  
Historic**Heard About** Word of Mouth**Issues/Phone Message/Comments**

It is important that above ground transmission lines are not allowed in or alongside historic areas (as defined by or listed in the National Register of Historic Places, properties or districts, City of Tucson Historic Preservation Zones, City of Tucson Historic Landmarks, or Neighborhood Preservation Zones).

**Additional Info**

Meeting dates - opportunities for input.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/7/2023**Category** Resident in Study Area**Concerns Topics**Appearance, Location, Support  
Underground**Heard About** Word of Mouth**Issues/Phone Message/Comments**

Poles in neighborhood. I hear talk of running poles down Camilla a completely residential area also cutting through the park on the south end of the study area. I think these need to be on arteries only and underground where possible. How ugly do you want to make our beautiful mid-town area. Come up with better solutions.

**Additional Info**

Public input and updates on all plans

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Comms/Online**

**Comment Date** 9/5/2023

**Category** Outside of Study Area

**Concerns Topics** Reliability

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

my home is just outside study area. my power went out 4 times this summer causing lots of stress and financial strain as I had to replace many items of food that was ruined. I am hoping I will not be excluded from this much needed project.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

Looking at your address, you probably won't see direct benefits from the Midtown Reliability Project. That said, it's reasonable to assume that you would see indirect benefits because several of the distribution circuits in nearby neighborhoods will receive their power from the new Vine Substation which means they'll have greater capacity, so in the event of an outage we may be able to reconfigure our system and tie those circuits to yours resulting in a shorter duration outage. Further, while this year usually we experienced some unusually strong monsoon storms near your home, TEP is actively inspecting and replacing old equipment throughout our system in an effort to proactively reinforce our system before failures occur, preventing the outages you experienced this year.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online****Comment Date** 9/1/2023**Category** Resident in Study Area**Concerns Topics**

Health, Support Underground, Safety

**Heard About** Public Meeting**Issues/Phone Message/Comments**

Underground lines --- as a highly sensitive person and for one whose health is at stake, I would like my voice heard. I want underground lines for the health and safety of everyone in the area. The amount of EMF's transmitted is a hazard to the health of the inhabitants in the area. I know you will dispute this. THIS IS TO BE TAKEN SERIOUSLY. Money is not the only factor here. When you meet the needs of TEP at the expense of others, everyone suffers. Please consider this seriously.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/1/2023**Category** Resident in Study Area**Concerns Topics**Location, Property Value, Support  
Underground, Historic**Heard About** Project Website, Public Meeting,  
Word of Mouth**Issues/Phone Message/Comments**

The 100 foot poles are very unacceptable through the city which is why there was a city prohibition for gateway/scenic streets. It is even more inappropriate for any huge poles to enter a historic district. It not only lowers property value but endangers the historic nature of the district. Tucson deserves to preserve its historic buildings and places. TEP needs to underground in mid-town and not enter historic districts. If it means moving the substation by Banner, do so.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/1/2023**Category** Resident in Study Area**Concerns Topics**

Location, Support Underground

**Heard About** Newsletter Mailing, Public Meeting,  
Word of Mouth**Issues/Phone Message/Comments**

We own home in Jefferson Park and having large transmission line poles running through our neighborhood is not safe. We believe and have said from the beginning of this project that these lines should run underground especially through residential areas.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 9/1/2023**Category** Resident in Study Area**Concerns Topics**

Cost, Support Underground

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

All new electric lines need to be put underground. We have enough TEP poles in midtown Tucson!!!

**Additional Info**

TEP needs to take pride in Tucson by NOT just saying so ... BUT by doing so. One BIG way to DO so is by NOT putting up any additional poles and overhead electrical lines BUT by installing all new electrical lines underground. We have too many overhead electrical lines and poles in midtown as it is. The initial cost for installing underground electrical lines will be recouped within 5-7 years whereas the ugly poles/lines will be there for generations. TAKE pride in YOUR city TUCSON Electric Power!!! It should NOT be all about the money.....do the RIGHT thing for the ENTIRE community this time.....put the new electrical line(s) underground!!

**Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online****Comment Date** 8/31/2023**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Historic

**Heard About** Project Website**Issues/Phone Message/Comments**

It is unclear from the map exactly where the line is proposed through midtown. As I understood it, it was planned for Campell, and now it looks like it's being considered for east of Country Club, through a lower income midtown neighborhood (mine) vs through a higher income, historic property neighborhood. We need more information disseminated to the public, Town Hall meetings (via zoom), emails, snail mail, etc., as decisions get closer to being made as to the location. It is important to me that we don't get a huge above-ground powerline shoved into my neighborhood (Doolen/Fruitvale) because we are poorer with fewer loud voices to protest. We already have been infilled to exhaustion, the infrastructure cannot keep up with the overwhelming addition of multi-housing. The idea of adding even more visual pollution is alarming.

**Additional Info**

Any decision that impacts my neighborhood, Doolen/Fruitvale Neighborhood Association, Country Club to Palo Verde, Glenn to Grant. Any town hall meetings or other public meetings where we are invited to give input.

**Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Comms/Online**

**Comment Date** 8/31/2023

**Category** Special Interest Group

**Concerns Topics**

**Heard About** Word of Mouth

**Issues/Phone Message/Comments**

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Thank you for your interest regarding TEP’s proposed Midtown Reliability Project.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 8/31/2023

**Category** Resident in Study Area

**Concerns Topics**

**Heard About** Project Website

**Issues/Phone Message/Comments**

The current above ground infrastructure is not reliable. In central Tucson, this summer, we have over 5 power outages do to rain and wind. The costs to homeowners from these outages are not considered in the TEPs decision to proceed with above ground lines. This project not will the unreliable electrical service from aging above ground infrastructure in central Tucson.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We'd like to encourage you to visit the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown) where you'll find additional information on how the Midtown Reliability Project will help to address reliability in the area. In addition, we'll be holding a public open house on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us and we can further discuss the need for, and benefits of the project. We hope you continue to stay engaged in the project as details of the project become more defined.



**Comment Method: Comms/Online****Comment Date** 8/28/2023**Category** Long time Arizona resident**Concerns Topics**Appearance, Property Value, Support  
Underground, Safety**Heard About** Project Website**Issues/Phone Message/Comments**

Above ground utility lines not only are eyesores but are extremely dangerous during manmade and natural catastrophes, such as fires and heavy storms. In addition, they also diminish the values of nearby residential and commercial properties. Communities that have paid the price upfront of placing all utility transmission lines underground have realized greater safety and property enhancement. I urge TEP to place its proposed transmission line underground.

Thank you.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comms/Online**

**Comment Date** 4/29/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

I live on East Adams and I want to know if the Midtown Reliability Project will affect the area where I live. Please could you call me back? Thank you.

**Additional Info**

**Requested Info**

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**Response Notes:**

**Comment Method: Voicemail/Toll-Free****Comment Date** 4/2/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Hi, I have a question about the Midtown project. I'm specifically looking at the route segment down N Stone Ave. So if you could give me a call, I'd appreciate it. Thanks, bye.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Spoke with them, they own a tire shop south of Grant on Stone. They are concerned with how tight the area is. I ensured them that our engineers can do it. They were wondering if we have a preferred route yet and I let them know that we have 10 route alternatives currently. They asked about public comment and how long we're taking comments. I let them know that they will be included in the CEC application but won't have much influence if submitted after the application has been filed. They asked about the hearing and intervention opportunities. I let them know that TEP will send out a post card when the application is filed and when the hearing will be.

**Comment Method: Voicemail/Toll-Free****Comment Date** 3/18/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I received a notice that you're making some improvements, thank you. I just want you to know I need a call back because I don't have a computer or a cell phone and I can't read your map. Now I don't know if you need to change anything on my route. I use Grant and Glen and Swan and Craycroft, Speedway sometimes to the post office. So please give me a call back and let me know if I'm going to need to change my route in any way. Alright, thank you very much and keep up the good work. Alright, thank you. Bye-bye.

**Additional Info****Requested Info****Response sent****Response Notes:**

They did not have any concerns about the project, they just wanted to understand if construction would affect any of their normal travel to the grocery store and to their doctor. I explained to them that we don't have a route yet, but none of the routes under consideration would affect their travel. They were happy to hear that and had no further questions.

**Comment Method: Voicemail/Toll-Free****Comment Date** 3/15/2024**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

If you could call me back please. I know you're sick of hearing from people about this damn electric coming down 7th street but I just have a question for you because I live at 7th and Tyndall and my fence goes right up to the sidewalk, and then the area between the sidewalk and the street is not very large so I was just wondering if I could schedule a time where you could come out and look at that because I know you're sick of people fighting you guys and I know you have to connect so that's not my issue. I just would like you to come and talk to me if you can. Okay thanks. Bye.

**Additional Info****Requested Info****Response sent****Response Notes:**

They were wondering if TEP knew which side of the street the poles would be placed as well as how large around the poles would be at the base. I shared that we don't know that information yet because we have six different route alternatives under consideration. Once a route is approved, then we'll focus on detailed design. They asked about when the decision for a route would be made. I shared with them that we have an open house next week, but the hearing with the AZ Power Plant and Transmission Line Siting Committee, where a decision would be made, will occur in July.

I told them that in the meeting we had with the Pie Allen neighborhood recently, the idea of a landscape strip within the roadway that incorporated the lines was discussed, but that we would need to work with the City of Tucson on this. They mentioned some artwork at the base of the poles or murals on the poles might make it more appealing.

I told them that we plan to leave some door hangers along 7th Street towards the end of the week. They asked that I give them a call when in the area so we could talk more.

**Comment Method: Voicemail/Toll-Free****Comment Date** 2/22/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I'm calling in regards to the refined segments, Midtown Reliability Project and I don't think that it is the safest and healthiest idea to construct some electric power lines throughout our city. I currently live downtown in Menlo Park next to some high velocity power lines as it is and I can't imagine these running through Tucson. I hope you consider this and I will also send a letter to your e-mail. Thank you.

**Additional Info**

I have also left a message on your phone line.

Tucson would not benefit from more high powered electric towers, running through the city.

Thanks.

**Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We'd like to encourage you to visit the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown) where you'll find information on how the Midtown Reliability Project will help to address upgrades that are needed to maintain reliable service in the area.

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Voicemail/Toll-Free****Comment Date** 2/8/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Hi, I'm calling regarding the meeting tonight at the DoubleTree. I have a question regarding the meeting tonight. Thank you.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

I did speak with them at the meeting last night. They are from Pie Allen neighborhood and just wanted to set up a time for TEP to meet with their neighborhood. I have their contact information and we're working on scheduling the meeting in early March.

**Comment Method: Voicemail/Toll-Free****Comment Date** 2/5/2024**Category****Concerns Topics**Appearance, Location, Support  
Underground, Environment**Heard About****Issues/Phone Message/Comments**

Hello. I think that the power line should go underground and it should not go through any neighborhoods or close to the neighborhood. I'm concerned with the Miles neighborhood. They will go right through our area that is used extensively for recreation and habitat for animals which is from the west side of our neighborhood. So hopefully we will not have an eyesore of huge poles going through a neighborhood. Thank you.

**Additional Info****Requested Info**

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**No response required****Response Notes:**



**Comment Method: Voicemail/Toll-Free****Comment Date** 1/25/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I would like somebody from the project team to give me a call. I'm a landowner and I am now just getting mail about this project and you guys think you're gonna put something on my land? You're gonna have a problem.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

They own a couple of homes along Vine Ave. and 10th St. With the scale of the map on the newsletter, they were concerned that TEP was proposing a line down Vine Avenue in this location, which was different than what was proposed before. I assured them that the orange line on the map represented a segment down Highland Ave where TEP has an existing 46kV line. They asked if TEP would be adding any additional routes as a result of the public meeting in February. I assured them that we would not be, but that we are seeking feedback to pare these possibilities back to finalize routes.

They also commented that they felt TEP and the City of Tucson should coordinate more on plans and that an opportunity was missed while Broadway was tore up. They appreciated the call back and had no further concerns.

**Comment Method: Voicemail/Toll-Free****Comment Date** 1/25/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Yes, I got your flyer. Look, I'm sorry I can't figure out this map and where Prince is. So, I would like a call back. My address is in Prince Court. If you could call me back, thank you very much.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

They wanted help reading the map included with the newsletter. They live north of Prince Road and could not find Prince on the map. I explained to them that Prince Road was north of the area included on the project map, but that they were included in the mailing because we wanted to be sure everyone within 1 mile of our study area was aware of the proposed project.

They didn't have any further project related questions.

**Comment Method: Voicemail/Toll-Free****Comment Date** 1/24/2024**Category****Concerns Topics**

Health, Safety

**Heard About****Issues/Phone Message/Comments**

Hi, I just got the newsletter for the energy grade update in midtown. I don't see any information on health and safety in the newsletter, it's just about engineering. I know you have a public participation thing, I don't know if I'm able to come in person but if you have this somebody that can call me back about why there's no healthy safety information in the newsletter, I appreciate it. Thanks, bye.

**Additional Info****Requested Info****Response sent****Response Notes:**

They were concerned with health effects of the substation. I pointed them to the project website where they could find information on Electric and Magnetic Fields. They are concerned that information is biased and paid for by utilities. I explained that I am not an expert on the health effects, but they can read the information and make up their own mind. They wanted to know why health effects were not mentioned in the newsletter. I explained to them that from our perspective the lines and substation are safe and any EMF generated dissipates by the time it reaches the edge of the right-of-way. They thanked me for calling them back.

**Comment Method: Voicemail/Toll-Free****Comment Date** 1/15/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Hey, I was trying to get a hold of Clark. I'm part of a focus group for some of the neighborhoods for the TEP Midtown Project and I have some questions regarding last week's meeting. Thank you.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thanks for calling to get an update on the Neighborhood Advisory Group meeting last week and learning what you could share with your neighborhood. We'll send out some notes from the meeting today or tomorrow.

Here is a LINK to a presentation posted to the project webpage, a version of which was shared with the Advisory Group, that might be helpful to you and your neighborhood. This includes a summary of the suitability assessment that was conducted resulting in the elimination of many of the previous segments under consideration. The presentation also includes a number of photographic simulations. These simulations all depict the poles as weathering steel, but we plan to do some with different materials so members of the public can compare and contrast and decide for themselves what finish looks better.

Also, on the webpage is an updated Interactive Project Map so you can see in great detail the refined segments that are still under consideration in the siting study.

Please let me know if you have any further questions.

**Comment Method: Voicemail/Toll-Free****Comment Date** 11/6/2023**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

I live on West 31st Street. My suggestion would be coming down 36th Street to I-10 and go up I-10 because you're going to Grant. That'd be the easiest way, nobody's complaining about what you guys are doing. I'm quite sure the residents here in South Tucson won't object to that. Adios.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Voicemail/Toll-Free****Comment Date** 11/4/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Buenos días. Estoy hablando por... necesito información acerca del proyecto que se va llegar power a varios barrios completos. Pero viene en Ingles y me gustaría saber completamente de que se trata esto proyecto, pero en Español. Si fueran tan amables de (inaudible) una llamada con la información por favor (inaudible) agradecer mucho. Muchas gracias, bye bye.

Good morning. I'm calling... I'd like information about the project that will transmit power to various neighborhoods. But it came in English and I'd like to fully understand the project, but in Spanish. If you're able to call with more information I'd appreciate it. Thank you very much, bye bye.

**Additional Info****Requested Info****Response sent****Response Notes:**

I gave them a general overview of the MRP – why it's needed and why customer input is needed.

They expressed interest in attending the open house on November 16th at the Doubletree Hotel, I told them Spanish speaking staff will be available to help them.

They are recently retired and do not know how to use the internet much. We also discussed TEP offers Lifeline discount and payment options that may help them.

They also asked about TEP sending marketing materials to offer free solar panels – I told them I am not aware of any marketing of solar panels for TEP.

To please pay attention to flyers and marketing materials and to call Customer Care when they need to check on information like that.

They are sensitive about sharing personal information due to fraud concerns.

**Comment Method: Voicemail/Toll-Free****Comment Date** 11/4/2023**Category****Concerns Topics**Cost, Support Underground,  
Environment**Heard About****Issues/Phone Message/Comments**

Good afternoon, I see this Midtown Reliability Project and this is a concern for me. I've been to a few places, I've seen things and I'm tired of this. I know the cost is horrendous. I know it's probably out of sight. I want the wires underground. I mean I look out my door, I unfortunately cannot afford to put my wires underground between my house and the pole because of buildings, plants and all sorts of vegetation and the cost that would be but from now on I'd like to see much as possible underground. We have a beautiful valley we live in and I'm tired of wires. Very honestly, very tired of wires. I know this is kind of strange, but I've been to Europe once, all underground. In what we can do, I know of the cost, I know people are going to be upset but I don't want more wires. Thank you, have a good day.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Voicemail/Toll-Free**

**Comment Date** 9/21/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Yes, could I get more information about the public hearing electric? Our business is on 17th St. I just want to find out what time it is, where the location is, just general information. Thank you.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Left a message that the open house would be held tonight at the Doubletree Hotel at Reid Park on Alvernon just south of Broadway between 6:00-8:00pm.



**Comment Method: Voicemail/Toll-Free****Comment Date** 9/18/2023**Category****Concerns Topics**

Location, Support Underground

**Heard About****Issues/Phone Message/Comments**

I live just east of the University in the Sam Hughes neighborhood, and I am adamant about power lines on any of the gateways scenic routes of Tucson to be underground. All power lines we'd like to see underground but certainly those on the scenic entries into this community. Also, it's been that people are advocating in the neighborhood, I didn't know that the TEP is in fact a Canadian company and they're only concerned with profits and profits for their shareholders, and they really don't care about the residents of this community. So, I wanted to let you know that that comment is being widely made and those people are raising funds for litigation. Thank you very much for your attention to this voice message.

**Additional Info****Requested Info****Response sent****Response Notes:**

I acknowledged that we received their comments and appreciated them. They had no further questions. They were however having difficulties ordering an EV charger on TEP's marketplace and I was able to put them in contact with our team that supports the Marketplace to get that issue resolved.

**Comment Method: Voicemail/Toll-Free****Comment Date** 9/14/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I'm a member of the Miles Neighborhood Association and we recently heard that the project has information and presentation about this new scheme that you're trying to do, which seems like it's going back seven years, but our neighborhood association is interested in hearing the presentation or what the heck's going on and we have a meeting in mid to late October.

**Additional Info**

We are the Miles Neighborhood Association and we wonder if you could give us the informational presentation about the Midtown reliability project at our upcoming meeting on the evening of October 19.

Thanks. We know of the public meeting next week, but look forward to a more-direct explanation and ability to ask questions.

**Requested Info****Response sent****Response Notes:**

Set up a meeting on October 19th at 6:00pm with the Miles Neighborhood Association.

**Comment Method: Voicemail/Toll-Free****Comment Date** 9/11/2023**Category****Concerns Topics**

Renewable Energy

**Heard About****Issues/Phone Message/Comments**

I got this pamphlet from you about this project that's going on and it states that you are changing to an additional use of a clean energy source. Does that mean you're going to be putting in things for electric cars and crap like that based on this phony junk science called climate change? Because it is junk science. I want to know what the extreme weather conditions are. That's another part of your propaganda, the propaganda that news, the propaganda people because they're not news, is putting out. What extreme heat? What extreme weather? We're not having any. It's normal, natural functioning of mother earth. So, I want to know what clean energy resources you're putting in it because if it's electric cars, that's garbage. I wouldn't own one of those pieces of junk and I want you to explain what extreme weather conditions. If you take core samples from the south pole, you'll find out there's been all kinds of extreme weather changes and man wasn't even on the earth then. It's natural function. Thanks for letting me vent.

**Additional Info****Requested Info****Response sent****Response Notes:**

Their primary question was if we were going to be putting in a bunch of electric vehicle charging stations as part of the MRP project. I explained to them that was not part of the scope of this project. They then asked if we would be changing meters or anything to the homes? I shared with them that we don't plan to, but depending on where the ultimate route for the transmission line goes, there may be areas where we would need to change a service from overhead to underground which would require a little work at homes/businesses, but that at this point in the project we don't know where the line will go, so its premature to speculate on any of that.

**Comment Method: Voicemail/Toll-Free**

**Comment Date** 9/6/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I live in Midtown. I wanted to ask that the panel to be held at the DoubleTree will have a Zoom link. I don't know if you know this, but COVID is on the rise and we have a lot of senior citizens, including myself, who live in Midtown and so I ask you to send out an e-mail with a Zoom link so that we can be included, too. Thank you.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Left voicemail acknowledging the suggestion for a Zoom link and committing to look into it.

**Comment Method: Voicemail/Toll-Free****Comment Date** 9/6/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I am calling about the project for Midtown. This is for Tucson Electric Power upgrading the Midtown area. I would just like to know, would you also be upgrading old homes, like water heater and electric box? I just want to know what you guys are doing within that area. Thank you.

**Additional Info****Requested Info****Response sent****Response Notes:**

They had a question on what we defined as Midtown, which I was able to explain as roughly the boundaries of the project study area. They had a question of what infrastructure we were upgrading, if it was streets, etc. I explained that it was TEP's electrical infrastructure. They wanted to know if that included upgrades of things like her electrical panel and water heater. I explained where the line was drawn between the customer's responsibility and TEP's and that those things were the customer's responsibility. They shared that they were concerned with the height of the overhead service connection to their home which I also explained to them was a customer responsibility.

**Comment Method: Voicemail/Toll-Free****Comment Date** 9/3/2023**Category****Concerns Topics**

Renewable Energy

**Heard About****Issues/Phone Message/Comments**

It seems that Tucson Electric Power wants to see lower credit for consumers putting in solar energy. What if we put solar panels around the University and all the parking structures to provide their own electricity? Isn't that what we want, is more power and less cost? Please consider this.

**Additional Info****Requested Info****Response sent****Response Notes:**

They were confused about the study area boundary and why it didn't follow street boundaries but cut through neighborhoods. I explained this was because we wanted to make it clear that the adjacent major street was included in the study area. We discussed how the electrical distribution transmission system and distribution system works and the limitations on the system today. We discussed how those limitations will be solved through the Midtown Reliability Project allowing expanded used of solar panels throughout the study area.

**Comment Method: Voicemail/Toll-Free****Comment Date** 4/30/2024**Category****Concerns Topics**

Support Underground

**Heard About****Issues/Phone Message/Comments**

I am adamantly proposed to ruining our neighborhoods with industrial poles going through the residential portions of the city. Other cities that are destination resorts do not do that.

I urge you to examine the work of the Underground Coalition who have demonstrated that undergrounding is not an outrageous expense.

<https://undergroundarizona.org/what-does-it-cost-8>

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**

**Comment Date** 4/28/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Please include this letter in the public comments regarding TEP's Midtown Reliability Project

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Would you be able to send the document as a PDF? I'm unable to view the .pages attachment through any format. If you could please resend, I will add the comments to the record.

Thank you!



**Comment Method: Email****Comment Date** 4/18/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

What is the diameter of the poles? I just don't see how you can fit poles down N Stone Ave and maintain compliance. The buildings but up against the sidewalks. Are you planning to put the pole against the building? Are you going to take out a lane to extend the sidewalk. I doesn't seem like a feasible route to me and would have a significant impact on the local businesses.

**Additional Info****Requested Info****Response sent****Response Notes:**

The typical pole diameter is between 2-3 feet at the base, but can be larger when the line changes direction. In locations where buildings are very close to the roadway, like the example you've shown in the aerial image, the line would span these with poles located in less narrow areas on either side and in some cases would require the line bounce from one side of the street to the other.

I appreciate you voicing your concerns and acknowledge this is a challenging route, but feasible.

Regardless of what route is ultimately selected, TEP would work with local businesses and residents to minimize impacts.

**Comment Method: Email**

**Comment Date** 4/17/2024

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thank you Clark for addressing all of my thoughts and comments. I will look forward to being present for the hearing in July. Will you let me know when that is as soon as you hear? I will mark it on my calendar!

I would love to hear the arguments for the rust colored poles and hope to meet those people at this meeting expressing their views and reasoning.

As always, your voice of calm and reason are most appreciated on this most contentious and heartfelt issue.

**Additional Info****Requested Info****Response sent****Response Notes:**

The ACC hearing is tentatively scheduled for July 8th through the 19th. This information was shared at the last public open house on March 28th and a postcard will be mailed when the application has been filed and the dates are confirmed.

Please let me know if there is anything else we can help with.

**Comment Method: Email**

**Comment Date** 4/17/2024

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thank you for your response. I represent 2208 N Stone Ave, LLC with offices at 11701 Bee Caves Rd, ste 215, Austin, TX 78738 that owns the property at 2200 and 2208 N Stone Ave, Tucson, AZ 85705. A tenant, TireUp LLC, operates the property.

My additional concern is the impact to ADA compliance of the sidewalks along N Stone Ave if Alternative Route C or Alternative Route 6 were selected given that the sidewalks are narrow and congested.

**Additional Info****Requested Info****Response sent****Response Notes:**

I'm going to jump in on this one. While its possible that a sidewalk may need to be moved in order to accommodate a specific pole location, TEP is committed to ensuring that if that is the case, a fully compliant ADA sidewalk connection would be installed as part of our work.

Please don't hesitate to reach out with further questions.

**Comment Method: Email****Comment Date** 4/11/2024**Category****Concerns Topics**

Appearance

**Heard About****Issues/Phone Message/Comments**

Thank you for the links Clark. They illustrate more than ever the need for the use of galvanized poles over the rust ones. They also show the dramatic impact that I am already seeing on our streets currently with the continued replacement of poles currently happening. To say the least, the number of poles replacing existing poles is nearly double what is there now!

I appreciate your time in getting this information to me. Now I need to know who I need to contact concerning the materials being considered for use or what I need to do to change the course of using these rust poles. I have been accruing photos to illustrate my case but I also think that my case would be easier illustrated by changing these existing renderings to show galvanized poles instead of the rust. Please put me in touch with the person who will be deciding the materials. The change might even help the perception the public has of these upcoming drastic and defacing additions to our streets and neighborhoods.

**Additional Info****Requested Info****Response sent****Response Notes:**

Good morning. You've made it very clear what your preference is for a pole material finish. We'll include all of your communications in the project record which will be submitted with our application to the Corporation Commission. Once we file the application for a Certificate of Environmental Compatibility (CEC) an official docket will be opened where you can file further comment, direct to the ACC, if you wish and include the collection of photos you have. In addition, you can provide public comment at the line siting hearing that is expected to be in July.

All of these comments will influence the recommendation of the AZ Power Plant and Transmission Line Siting Committee, and ultimately the decision of the Corporation Commission who will authorize the construction of the line with a specified material finish.

As I mentioned before. While you have a strong preference against use of weathering steel, I have heard similar strong preference exactly opposite of yours for the use of weathering steel. Because the preference for pole finishes is so distinct and often a result of different settings, backdrops, and yes, personal preference. As a company, rather than propose a one size fits all solution, we will proposed flexibility in the CEC on pole finish that allows us to work with each neighborhood through which the line route passes to determine what finish works best for them and their neighborhood.

I appreciate you continued involvement and thoughts.

**Comment Method: Email**

**Comment Date** 4/10/2024

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Has this been considered here at TEP?

Explore this gift article from The New York Times. You can read it for free without a subscription.

The U.S. Urgently Needs a Bigger Grid. Here's a Fast Solution.

A rarely used technique to upgrade old power lines could play a big role in fixing one of the largest obstacles facing clean energy, two reports found.

[https://www.nytimes.com/2024/04/09/climate/electric-grid-more-power.html?unlocked\\_article\\_code=1.jU0.wDX7.R3MzcBPWOGCq&smid=em-share](https://www.nytimes.com/2024/04/09/climate/electric-grid-more-power.html?unlocked_article_code=1.jU0.wDX7.R3MzcBPWOGCq&smid=em-share)

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thanks for reaching out. Yes, these advanced conductors are something that TEP is considering using on several projects in order to increase line ratings on existing transmission lines. One difference on this project, apart from the need for capacity increases to the area, is the need to address aging equipment. That includes the wood poles that support the existing 46kV lines. So even if TEP were to reconductor with an advanced conductor, the existing structures would still need to be replaced. That said, we are looking to see if by using one of these advanced conductors, which do not sag as much when the line is heavily loaded, could result in the use of shorter structures while still maintaining longer spans in between structures.

I hope you continue to stay engaged with the project.

**Comment Method: Email****Comment Date** 4/9/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

What schools are adjacent to the existing 138kv transmission lines that are associated with the Tucson substation?

I am wanting to see them and take pictures to share with the communities for the 3 schools Miles, Ha: San, Mansfeld) adjacent to the proposed Route 3 between Broadway and 7th Street. Highland Free school is a little less than a block away from the proposed Route at 16th and Highland.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thanks for reaching out. I'm happy to provide the information requested. When you say Tucson Substation, I assume you mean TEP's substation of that name located at the intersection of 11th Avenue and 4th Street. There are several lines that come into that substation, but I'll list the schools with lines immediately adjacent. I got my information on schools from the City of Tucson GIS database and I have not field verified these.

DeMoss Petrie-Tucson 138kV Line

DAVIS BILINGUAL ELEMENTARY MAGNET SCHOOL (500 W SAINT MARYS RD)

Tucson-Irvington 138kV line

DAVIS BILINGUAL ELEMENTARY MAGNET SCHOOL (500 W SAINT MARYS RD)

ARIZONA STATE UNIVERSITY SCHOOL OF SOCIAL WORK (340 N COMMERCE PARK LP)

CARRINGTON COLLEGE (201 N BONITA AV., Ste 101)

LA PALOMA ACADEMY-SOUTH CAMPUS (5660 S 12TH AV)

DREXEL ELEMENTARY SCHOOL (801 E DREXEL RD)

OCOTILLO LEARNING CENTER (5702 S CAMPBELL AV)

Del Cerro-Tucson 138kV Line

DAVIS BILINGUAL ELEMENTARY MAGNET SCHOOL (500 W SAINT MARYS RD)

Please let me know if you need anything else.

**Comment Method: Email**

**Comment Method: Email****Comment Date** 4/6/2024**Category****Concerns Topics**Cost, Location, Property Value,  
Support Underground, Substation**Heard About****Issues/Phone Message/Comments**

My husband and I bought our house on the northwest corner of Vine and Seneca in 2009 and turned into our forever home. We never thought we would consider moving. The TEP Midtown Reliability project has made us reconsidering staying in our forever home.

Overhead transmission lines of this height and circumference should never be put in any residential neighborhood. It does not matter if the neighborhood is low income or not, a disadvantaged community or not, a historic district or not, primarily rentals or owner-occupied homes. NEVER!

Cost should not be an issue. The costs to underground transmission lines will always be lower than the loss of property values that homeowners will suffer as homes are generally a person's largest asset.

None of the proposed routes from the proposed Vine substation to DeMoss-Petrie should be considered as they will go through some residential neighborhoods. If the proposed Vine substation is not moved, all overhead transmission lines should go south down Vine through the University of Arizona to Speedway or east to Cherry and south to Speedway. Length of a proposed route should not impact the route chosen.

Although we believe that TEP should comply with the University Area Plan, the Major Streets and Routes Plan and all City, State and Federal rules and regulations, overhead transmission lines should not go through ANY residential neighborhoods and are more appropriate on major streets and routes, in industrial and commercial areas, or on the University of Arizona, and Banner properties.

TEP shareholders and owners would never allow poles of this magnitude in their neighborhoods so they should NOT allow them in anyone's neighborhoods. TEP should financially subsidize the cost of undergrounding lines through all residential neighborhoods. The company's shareholders and owners are reaping the rewards of lucrative profits from their investment in TEP.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 last year, those efforts came to a stop.



**Comment Method: Email**

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

TEP conducted a very thorough review of alternative substation sites before purchasing the site on Vine Avenue. After an exhaustive search, followed by reaching out to property owners, the Vine location was the only site within the "load center" that was of a sufficient size and was available to purchase. In the past year, TEP conducted another search to see if any new properties had become available within the "load center" that would be suitable. Ultimately, the Vine location was deemed the only viable site.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**

**Comment Method: Email****Comment Date** 4/3/2024**Category****Concerns Topics**Appearance, Location, Historic,  
Environment**Heard About****Issues/Phone Message/Comments**

I'd like to provide some feedback here, please.

I also appreciate all of the opportunities TEP is providing for feedback and public comments, especially those working and residing in impacted neighborhoods.

## Positives:

DeMoss-Petrie and Vine

- Grant Ave
- Speedway Blvd
- Euclid
- Oracle/AZ-77

Kino and Vine

- South Campbell Ave/Martin
- Barraza-Aviation Parkway
- Euclid\*
- Speedway Blvd
- 36th Street
- Oracle/AZ-77

## Concerns:

DeMoss-Petrie and Vine

- Campbell due to proximity to residential properties, proximity to historic properties and districts, impacts on views and total environment (especially of the University)
- Some concern of impacts to low income neighborhoods in the Grant/Speedway and Oracle/AZ-77 areas.

Kino and Vine

- Campbell due to proximity to residential properties, proximity to historic properties and districts, impacts on views and total environment (especially of the University)
- 6th/Euclid Area due to proximity to University
- Plummer/Broadway, Plummer/Tucson, through the Tucson/6th/Speedway Himmel Park area due to proximity to residential properties and parks, proximity to historic properties and districts, impacts on views, impacts on the total environment (especially local retail i.e. Sam Hughes Shopping/Floras Market, possible new high-end grocery store at Plumer and Broadway, Sunshine Mile retail renovations), very narrow streets to begin with already.
- Some concern of impacts to low income neighborhoods in the Speedway, Oracle/AZ-77, and South Campbell Ave areas.

**Comment Method: Email**

Please let me know if you have any questions.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 4/1/2024**Category****Concerns Topics**Location, Support Underground,  
Historic**Heard About****Issues/Phone Message/Comments**

I firmly request that TEP follow the guidelines of the City Ordinance that oppose overhead lines on scenic byways (Campbell Avenue). Honor the UA Area Plan by not placing overhead lines in the UA area plan. Further do not place overhead lines in or near residences and honor historic neighborhoods.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

Responded to 3/31/2024 comment

**Comment Method: Email**

**Comment Method: Email****Comment Date** 3/31/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I live in the area affected by the proposed Midtown Reliability Project and would like to suggest an alternative approach to accomplish the project's goals. If advanced ACCC (Aluminum Conductor Composite Core) cables were used to replace existing ACSR (Aluminum Conductor Steel Reinforced) cables, then it might be possible to avoid new power transmission infrastructure.

For background, there are two manufacturers of ACCC cable (referred to as "A triple C" in the trades) - CTC Global and 3M. CTC states that ACCC has twice the capacity of ACSR. I assume that they mean ACCC has twice the ampacity for an equivalent size ACSR conductor at an equal given transmission voltage. This would mean that an existing ACSR cable could be replaced with an ACCC cable of 1/2 the size to transmit the same power. Or, an ACCC cable of the same size as the ACSR cable it replaced could transmit twice the power.

ACCC cable has been used by other power companies to transmit more power without installing new transmission infrastructure. Replacing one existing conductor with two ACCC conductors of the same size would allow the second conductor to provide power to the new substation. Or, replacing an existing conductor with the same size ACCC conductors would mean that additional capacity would be available for power delivery to the new substation. If the new ACCC conductors remained at 46 kv, then 3 of those conductors could be connected at the new substation and stepped up to 138 kv. This configuration would not put any additional weight on existing power poles (ACCC is actually 10-20% lighter than equivalent ACSR.) I don't know if 138 kv power must be transmitted on high pylons, which is why I mention 46 kv transmission with step up 138 kv at the sub station.

Please review the videos below to get more technical information. It appears that Nevada Energy and American Electric Power have been using ACCC long enough to have confidence in its capabilities, especially for avoiding new infrastructure. This process is being described as "reconductoring." The price of ACCC is 3X that of ACSR but I suspect that it would be cheaper and faster than a new power transmission infrastructure project.

<https://www.youtube.com/watch?v=5545T-Kb4AI>

<https://ctcglobal.com/>

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for sharing your thoughts. I am familiar with ACCC conductor and TEP is considering its use on several projects in order to increase line ratings on existing transmission lines. I don't want to dismiss any idea out of hand, but apart from the need for capacity increases to the area, the Midtown Reliability Project is also needed to address aging equipment. That includes the wood poles that support the existing 46kV lines. So even if TEP were to reconductor with ACCC, the existing structures would still need to be replaced and the 46kV standard replacement pole is the same as the standard 138kV pole.

**Comment Method: Email**

I'll pass your thoughts along to both our transmission planning engineers and our civil engineers to get their thoughts.



**Comment Method: Email****Comment Date** 3/30/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Here's what's being kicked around now - I suspect your team will be hearing it soon if they haven't already:

I am suggesting the use of ACCC (Aluminum Conductor Composite Core) instead of traditional ACSR (Aluminum Conductor Steel Reinforced)) power cables. The manufacturer of ACCC lists "Double the capacity of existing transmission lines without structural modifications to deliver more power." as their chief advantage. All options for power transmission lines use bundled aluminum wires but the center "core" of the cable is the difference. Traditional ACSR cables use a steel core for reinforcement of the cable, while newer ACCC cables (called "A triple C" in the trades) uses a composite core. I will send off a more detailed email to the project manager to see if we can get a response on using this ACCC cable as an alternative to tall pylons. ACCC costs about 3X as much as ACSR cable, but I doubt that it would approach the cost of the proposed new infrastructure. This may be completely inappropriate for the application considered in this project, but since other power companies are using this approach (Nevada Energy, American Electric Power) I think TEP should seriously research this option before dismissing it.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Email**

**Comment Date** 3/29/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Yes, definitely Park, not Mountain. Sorry & thanks.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

I followed up with the project manager responsible for the work on Grant Road. The City has never made mention of a need to place infrastructure underground due to the University Area Plan, or any other reason.

**Comment Method: Email**

**Comment Date** 3/29/2024

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Oh dear Clark, I didn't realize there was another TEP Open House this week!

My husband didn't know anything about it either, but perhaps that information was in the folder you provided each member of the committee at that last meeting. I would have loved to have seen the comparison of pole finishes presented this week. (I have taken a number of additional photos of comparisons to present when a forum is created again.)

Considering the number of poles that would have been in place in 2002 and today are vastly different I do question a decision made at that time reflecting what we are now aware of as a result of their decision.

I am happy to make a presentation before the board when the time comes for a decision. I do not think the poles that were put up in my neighborhood down Tucson Blvd were and along Ft. Lowell were ever presented to those neighborhoods before placement. We were never notified, though there was a small survey floated to a couple neighbors asking if they liked wood or metal poles. That is hardly a representation of a neighborhood and I never got that survey as a TEP client. It makes me feel that the public is NOT consulted on those public roads which affect all of us on a daily basis. They are not considered Gateway Corridors so the question of burying lines along them could never be debated. Thank goodness we do have several roads that are designated thusly and have been protected so far.

Thank you kindly for your answers to my questions. A 20 year old decision that affects the quality of life of every resident in this city needs to be revisited. I am happy to help where I can.

Thanks again for responding and your help.

**Additional Info****Requested Info****Response sent****Response Notes:**

I'm sorry you missed last week's open house.

All the materials we shared can be viewed on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). More specifically, the visual simulations of different material types are posted there as well. You can find the visual simulations directly, by following this link. Note, not all the visual simulations show different finish types, but a number do so that you can compare and contrast.

Let me know if I can provide anything else, or if you have further input.

**Comment Method: Email****Comment Date** 3/29/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thank you for clarifying last night at the Open House that the proposed Route 3 was inaccurate on the interactive map on the TEP Midtown Reliability website. Your last email stated that the proposed route would go from Highland to 7th street west to Euclid, however I was notifying the neighbors on 8th street and Santa Rita personally, plus the RHNA via email, of the proposed route based on the maps published by TEP.

That being said, I will communicate the correction and share the feedback that was mentioned last night as a continued option for community input. How long will TEP and the Line Siting Committee be accepting feedback through this link?

Thank you for your time and outreach to the community on these possible routes.

**Additional Info****Requested Info****Response sent****Response Notes:**

I saw you at the open house, but wasn't able to say hi. Thank you for coming out and for all the time you've dedicated to finding a routing solution for this project. I sincerely apologize for creating conflicting materials/messaging on the specific route. We'll get that corrected on the webpage. As that small change is in your neighborhood, I really appreciate your help in communicating that correction. I know it's a small change on paper, but a potentially major change for those affected in the neighborhood. The reason for the change was simply to straighten the line out, avoiding the need for more poles, especially more of the larger 90 degree turning structures.

TEP will continue to accept feedback that will be included in our application through about middle of May, when we'll print and file our application. That said, we'll continue to accept feedback after that and can file it as an addendum. Further, once the application is filed with the Arizona Corporation Commission, a docket will be created and comments can be filed directly.

Any feedback to influence TEP's selection of a preferred route would be appreciated ASAP (by end of next week).

**Comment Method: Email**

**Comment Date** 3/29/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Ok, thanks. The poles on Mountain are part of the same line, it just turns south for three poles south of grant. Thanks. Hope the open house went well.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Could you possibly be talking about Park, as opposed to Mountain? The 46kV line continues down Park, but we don't have a 46kV or distribution line down Mountain. The first pole south of Grant on Park was installed September 2016. The next two were installed March 2020.

**Comment Method: Email**

**Comment Date** 3/28/2024

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Unfortunately I am ill and will not be able to attend tonight. I have provided my input on the survey. I look forward to hearing what routes are chosen and the mitigations TEP will take to minimize the impact on the neighborhoods and the city. Will you be providing updates to the group going forward?

Thanks Clark. You have been a pleasure to work with and I know this process is hard and will continue to be so.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

I hope you're feeling better now. Thank you for submitting your input on the survey form. I plan to keep the Group.io chat open through the middle of April, but then will shut it down so that we can incorporate those thoughts into the CEC Application. That said, I would be happy to provide email updates to the Neighborhood Advisory Group if that would be of interest/helpful.

I'll reciprocate your statement. It has been a pleasure to work with you too. I really appreciate your perspective and thoughts, they have had an impact on the process.

**Comment Method: Email****Comment Date** 3/28/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

A few questions regarding the 16 power poles that are on the south side of Grant Rd, between Stone Ave. and Mountain Ave., and then the 3 on the east side of Mountain, south of Grant. They are recent additions to the streetscape, but are within the boundaries covered by the University Area Plan. When was the CEC for these poles issued? Was there a line siting committee hearing for these? If so, when, and was there a special zoning examiner decision related to this utility line and the UAP, stating why the lines were not required to be underground "where possible"?

**Additional Info****Requested Info****Response sent****Response Notes:**

Thanks for the questions. Sorry for the slow response, yesterday was a bit busy getting everything in order for the project open house.

The poles on the south side of Grant between Stone and Mountain were mostly installed in September 2016, with a few in March 2019.

For the poles east of Mountain and south of Grant, you'll have to give me some more specifics on there exact location.

No CEC was issued for these poles. They are 46kV poles, so while they look the same as the 138kV poles, a CEC is not required to construct them. To the best of my knowledge there was never a review nor decision by the Zoning Examiner prior to the placement of these poles. But I'll need to follow-up with the Project Manager to confirm.

**Comment Method: Email**

**Comment Date** 3/25/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Will there be a zoom link for the public open house scheduled for March 28, 2024 at 7:00 p.m. for this project?

If so, could I please have someone send it to me or will it be posted to your website the day before?

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

The public open house will not be streamed via Zoom, but all materials presented and discussed will be posted to the project website soon after.

Please let me know if you have any further questions.



**Comment Method: Email**

**Comment Method: Email****Comment Date** 3/24/2024**Category****Concerns Topics**

Appearance

**Heard About****Issues/Phone Message/Comments**

Thank you so much for taking the time to look into this issue. Your explanation and information were appreciated and read with much care. No apologies were necessary as to the length of time getting back to me. I have witnessed how much time you have spent each evening you have met with neighborhood representatives and know that you have a regular work week that must be quite extensive as well.

As pole color decisions were made 22 years ago, when changing from wood to metal, I wonder about the composition of the TEP committee assembled to discuss the changes at that time, before the wooden poles began to be replaced. I don't know if the committee was local, based in Arizona, or at a corporate location so cannot evaluate why they made the decision for weathering steel (more appropriate for use in Canada or environments other than deserts).

Having witnessed the replaced poles here in Tucson, as they become more and more numerous, I am struck by how distractingly visible they are. That heavy rust color looks nothing like a wooden pole color and doesn't begin to blend in with our pale, desert landscape. I feel that whatever decision was made 22 years ago should be revised for our present environment and, in particular, our Tucson location.

I completely refute the validity of the first two of the four conditions that you listed.

- Aesthetics of galvanized vs. weathering steel – initially installed as replacement poles in line with wood poles. The weathering steel blended better than the galvanized poles. (it does NOT, at least not in Tucson)
- Maintenance – painted poles and galvanized poles (when damaged) require some level of maintenance. Weathering steel requires none and provides excellent protection against corrosion. (The weathering steel poles that I have seen almost always have a painted bottom 6 feet of orange for some reason, poorly attempting to match the pole color, meaning that they DO require maintenance)

Aesthetics may have been part of the original consideration but that was 22 years ago, and I would like to know who was on the committee to evaluate this decision, what criteria, studies or proof was provided and qualification did the person presenting this information have. Has TEP re-evaluated this decision recently or based their decision on input from the community? Are the poles already purchased based on this 2002 decision that is now defacing our neighborhoods and traffic corridors? (I say that angrily because aesthetics are important in the long run and I don't believe that aesthetics are an honest consideration for TEP.)

I am not holding you responsible for corporate decision making on the part of TEP because I realize that you are just the liaison between the neighborhoods and TEP, and I am grateful for your calm voice and spirit in the face of difficult decisions. If nothing else, I am just hoping for a bit of humanity and honesty in telling this city what it is really going to look like when all is said and done. It is heartbreaking to me to see the defacement of roads and neighborhoods where these necessary but overpowering and over scaled poles will soon be fencing us in, and until it is done, no one will recognize or realize what that awful feeling when in their presence is caused by. The galvanized poles would make the effect less egregious and overwhelming. How can I make them the choice for your upcoming projects?

**Additional Info****Requested Info**

**Comment Method: Email**

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**Response sent****Response Notes:**

To answer your question about the composition of the committee in 2002 who made the recommendation to use the weathering steel poles. This was a local decision made based on the recommendation of a cross section of TEP employees following thorough research. TEP was not purchased by Fortis until 2014, 12 years after this decision was made.

I will pass along your sentiment, and rationale, that TEP reconsider the decision to use weathering steel as the standard for poles.

Once a final route for the transmission line has been approved, TEP is committed to work with any neighborhood through which the route passes, to determine the pole finish for their neighborhood. This commitment is in response to comments like yours and others with differing opinions on what looks best. So rather than a one size fits all solution, we'll work with those most affected on the solution that works best for them.

Also, at our public open house later this week, we'll have photo simulations which show the proposed line with three different pole finishes, weathering steel, galvanized, and painted steel. We hope this will help you, others, and even to TEP to get a better sense of what the poles will look like and determine which pole finish will be most suitable.

**Comment Method: Email**

**Comment Date** 3/20/2024

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

The ACC says that TEP is supposed to be hosting old hearing transcripts for the public but the Irvington-to-Kino website was taken down: <https://www.tep.com/irvington-to-kino/>

Can you link me to the transcripts or have whoever handles this email them to me please?

They're not in the ACC docket because the utility hosts them. It's an odd arrangement as the docket would be much simpler and more efficient for everyone.

**Additional Info****Requested Info****Response sent****Response Notes:**

We only maintain those project webpages, which include the transcripts while the CEC is active. Once a project is constructed and in-service, we take the project page.

That said, the transcripts are public record and available from the ACC through docket L-00000C-18-0103-00178, by request. That said, I'm more than happy to provide the transcripts so you don't have to go through that process. Please see attached the transcripts from each of the 3 days of hearing on the project.

**Comment Method: Email****Comment Date** 3/18/2024**Category****Concerns Topics**

Appearance, Support Underground

**Heard About****Issues/Phone Message/Comments**

This need for more power is because of the University's Tech Site south of town. The University and TEP need to BURY these lines. There is no reason the public should have more huge poles disrupting the views of Tucson. This is not to increase the reliability for midtown residents, unless just supplying so much power to the tech site decreases our power.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We'd like to encourage you to visit the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown) where you'll find additional information on how the Midtown Reliability Project will help to address reliability in the area. In addition, we'll be holding a public open house on March 28th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us and we can further discuss the need for, and benefits of the project. We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Email****Comment Date** 3/18/2024**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

I favor using the Grant Road Corridor all the way to the east because it follows a major east-west street corridor that already has transmission lines along it.

I do not favor what looks like the Stone Avenue Corridor going to the south from Grant Ave. There are currently no large transmission lines along this route and it would impact the Stone Ave. improvement project that is slated to begin soon.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**

**Comment Method: Email****Comment Date** 3/18/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I completely forgot about the last meeting for the TEP Advisory group on the 29th. I apologize for not being there. I will be at the next open house on the 28th. When is the next advisory meeting?

Thank you for the email with the link to the form for feedback.

I do have a question for you if you could answer for me. Why was the option of a possible route on Aviation/ along the railroad eliminated?

I appreciate your time.

**Additional Info****Requested Info****Response sent****Response Notes:**

Sorry about the slow response. I took a couple of days off and have been trying to catch up ever since. We did miss you at the last advisory group meeting. One thing that I'd like to make sure you are aware of, that was discussed at the meeting, as it affects your neighborhood. Our plan had always been to use the alleyway between 6th and 7th Streets, rebuilding in place of the existing 46kV line if that section were used as part of the approved route. As we've moved into identifying route alternatives and done some preliminary engineering, it was found that the buildings that have been constructed since the 46kV line are so close that we cannot safely build and operate the 138kV line through the alleyway. As a result, Alternative Route 3 shifted this section just south to 7th Street. This is a minor change on paper, but potentially significant to anyone along 7th Street. To make sure all affected are aware, we plan to leave door hangers notifying of this specific change on Wednesday of next week. If you'd like us to speak with your neighborhood directly about this, we would be happy to do so.

To answer your question in short. The segments along Aviation, between Campbell and Euclid, were eliminated following the Compatibility Analysis because there were one or more routes that accomplished the same east/west objective with less compatibility concerns.

To answer with a little more detail, as part of the compatibility analysis, subject matter experts evaluated each refined segment for the following:

1. Impact on low-income and/or disadvantaged communities.
2. Cost of transmission line construction, including relocation/undergrounding of distribution lines.
3. Sensitive plant and wildlife species and/or habitat within the transmission line corridor.
4. Residential properties adjacent to transmission lines.
5. A - Historic properties and districts adjacent to transmission lines.
6. Impact on views near transmission lines.
7. Impact on the total environment
8. Noise



**Comment Method: Email**

9. Communication Signal
10. Interference
11. Existing development plans
12. Engineering feasibility and challenges
13. ROW Acquisition
14. Compliance with applicable ordinances, master plans and regulations
15. Health and safety impacts
16. Transit Impacts (Pedestrian, Public Transit, Traffic)
17. Use of existing utility corridors
18. Impact on native lands
19. Public/Stakeholder Feedback

For most of the factors evaluated, a transmission line would be very compatible along Aviation in this area. The factors that received less favorable evaluation included: use of existing utility corridors, visual impacts, and right-of-way acquisition. Although aviation is a major road corridor, there are no existing overhead utilities along Aviation today. Visual impacts were assessed based on change from the existing condition. Since there were no overhead utilities there now, this was evaluated as a greater change, so a greater impact. As for right-of-way acquisition, Aviation is within ADOT right-of-way. TEP would be required to secure new rights to be located here, whereas TEP has existing rights to be located on all City of Tucson roads as part of an agreement with the City.

Aviation between Euclid and Stone is still being considered as part of Alternative Routes 5 and 6.

Please let me know if you have further questions or comments. And please do let me know if you or others in your neighborhood would like to discuss the change to 7th Street.

**Comment Method: Email****Comment Date** 3/16/2024**Category****Concerns Topics**

Appearance

**Heard About****Issues/Phone Message/Comments**

I own property two blocks north of Grant Rd, but I'm done with being a NIMBY in this case. I was originally concerned about health effects from electromagnetic fields, and that's why I voted for greater height for the towers. I'm not an expert, but I'm willing to think the distance from the ground will take care of that. I have a new thought that perhaps others have brought up:

I think you should choose a route that considers prior efforts and expenditures by the City and local institutions to make our streets more attractive, as well as what visitors to our city will see after they arrive at the airport. These features would include: murals, mosaics, sculptures, and well maintained, flower producing median plantings. So, for example, Grant Road is, by and large, not beautified, while parts of Campbell Avenue definitely are, and Campbell is much used by folks coming from the airport to the UofA and UMC. Why ruin what's been beautified? In short, the attractiveness of the city should be a factor you consider if you haven't already.

Thank you for your diligence in giving the community a voice in this decision; from the looks of it, I'm guessing the community is still fighting it. It would be good if a way forward could be found.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these route alternatives with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 3/14/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I hope you might be able to clarify some confusion that is being thrown around by the burial folks.

Is it accurate that TEP has represented that the cost of conductor cable alone for a 138kV buried project, is actually more expensive than the entire project cost of a similarly routed overhead transmission project?

Also, is it accurate that if TEP were to propose an entirely underground transmission line project, that it would not need to have a line siting committee hearing, because the LSC "does not have jurisdiction over underground transmission lines?"

Finally, can you tell me the conductor cable size needed for 138kV overhead lines, and what is required for 138kV buried lines?

**Additional Info****Requested Info****Response sent****Response Notes:**

In answer to your questions:

The last material estimate we got for the underground conductor/cable was in 2022. At that time, it cost \$195/linear foot. In order to meet the required line ratings, two cables would be needed for each phase, so six total cables running the length of the line. I'll let you do the math. For comparison, estimates to construct the project overhead for an approximate 9-mile long route were just under \$19 million for engineering, right-of-way, materials, and construction. We're working on updating these overhead cost estimates and will include them in the application for a Certificate of Environmental Compatibility (CEC) that TEP files with the ACC.

In order to construct a transmission line in Arizona, a CEC is required. According to ARS 40-360, a transmission line "means five or more new structures that span more than one mile in length as measured from the first structure outside of the substation, switchyard or generating site to which the line connects to the fifth structure and that are erected above ground..." While an underground line would serve a transmission function, it would not fall under the definition of a transmission line. So, in my non-legal opinion, would not require a CEC to construct.

TEP's standard overhead conductor is 954 ACSR, one conductor/phase. For underground, Sargent & Lundy has specified 6000 kcmil XLPE cable, two cables/phase. This is the largest XLPE cable made at present.

Let me know if further questions arise.

**Comment Method: Email****Comment Date** 3/14/2024**Category****Concerns Topics**

Support Underground

**Heard About****Issues/Phone Message/Comments**

Put this underground, out of sight when it gets to midtown.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 3/13/2024**Category****Concerns Topics**

Appearance, Location, Property Value, Support Underground, Historic

**Heard About****Issues/Phone Message/Comments**

I have lived near the University of Arizona (1 block east of Campbell) for over 30 years and I strongly oppose the enormous, ugly and dangerous lines being proposed along Campbell.

As you know this route is the first exposure arriving visitors have to our city (via airport) and having it lined with huge power poles will undoubtedly have a negative impact on both our tourism and our economy. It will also damage property values and negatively affect historic neighborhoods that bring such charm to Tucson. I understand that TEP is owned by a Canadian company that cares little about the history of Tucson so this letter will probably mean little to the reader. It does, however, mean a great deal to those of us forced to live under these enormous power poles. Please consider what it would be like if you had to do the same.

I urge you to do the right thing and either reroute or place these lines underground!!

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

Using input from midtown residents and other stakeholders, TEP has identified 10 draft alternative routes for a new overhead transmission line. These alternatives remain under consideration for inclusion in TEP's application for a certificate of environmental compatibility.

You'll be able to find all the latest information, as well as the potential routes on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on March 28th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Email**

**Comment Method: Email****Comment Date** 3/12/2024**Category****Concerns Topics**

Appearance, Location, Property Value, Support Underground, Historic

**Heard About****Issues/Phone Message/Comments**

Just driving down Grant Rd. and stung those hideous power lines makes me ill. Kleindale between Country Club and Dodge is horrible.

I have lived in Jefferson Park for over 40 yrs. My family is the original owners of our house. It is a historic neighborhood many in midtown your power lines and poles would destroy like Grant Rd. and Kleindale.

Historic neighborhoods in the midtown area give character and a unique beauty to Tucson. Destroying our neighborhood, the quality of life in midtown Tucson, not to mention the value of our homes to make additional profit instead of investing in our community makes no sense.

I find the continuation of meeting after meeting is to wear down our voices of those living in the neighborhoods you wish to cannibalize for your business profits. You will destroy our walkways, our view, and mostly destroy our historic homes.

You can run lines underground or route the power poles through commercial areas and leave our neighborhoods alone.

Tired of TEPs games.

**Additional Info****Requested Info****Response sent****Response Notes:**

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Using input from midtown residents and other stakeholders, TEP has identified 10 draft alternative routes for a new overhead transmission line. These alternatives remain under consideration for inclusion in TEP's application for a certificate of environmental compatibility.

You'll be able to find all the latest information, as well as the potential routes on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

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The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

**Comment Method: Email**

We hope you continue to stay engaged in the project as details of the project become more defined.



**Comment Method: Email****Comment Date** 3/12/2024**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

WHY do you keep eliminating routes along already-industrial corridors like Aviation Pkwy & I-10?

If there's a good reason (I imagine there must be), surely someone has written (or can write) a quick form-letter blurb you can copy and paste?

**Additional Info****Requested Info****Response sent****Response Notes:**

The alternative routes under consideration are the result of an extensive siting study.

The study began by identifying a study area within which possible route would be considered. The study area was heavily influenced by the substations that need to be connected by the proposed transmission line. In this case, the DeMoss Petrie Substation (I-10 and Grant) needs to connect to the proposed Vine Substation (close to Banner UMC), which needs to connect to the Kino Substation (Kino Pkwy and 36th St).

We then looked at opportunities (good places to put a transmission line such as industrial corridors like you mentioned) and constraints (elements that would make it challenging to construct and operate a transmission line). Any opportunity that was identified was reviewed at a high level through an engineering lens. If a line could be built there, it was considered a preliminary route segment. Route segments along I-10 and Aviation were identified.

From here, we started paring down these segments based on different criteria, some of which was identified by members of the public. During the suitability assessment, most of the route segments were eliminated along I-10 and some were eliminated along Aviation. During the compatibility analysis, some additional segments were eliminated along Aviation. This does not mean they were flawed routes, but when evaluated using the criteria developed by both TEP and the public, these segments were less suitable for a transmission line than similar routes. In other words, they did not represent the values we understood to be important to the community.

The alternative routes proposed do include elements of both Aviation and I-10. Alternative Routes 5 and 6 both parallel Aviation between Euclid and Stone. And Alternative Routes A-D all parallel I-10 going into the DeMoss Petrie Substation from Grant.

If you are interested to learn more, the interactive project map, found on the project webpage, provides a high-level overview for the elimination of different route segments throughout the siting study.

Thank you for your interest in the project and we hope that you'll join us at the project open house on March 28th.

**Comment Method: Email**

**Comment Method: Email****Comment Date** 3/12/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I very much appreciate your taking the time to respond. I just wish you would provide the specific reasons that more of the Aviation/I-10 corridor was chosen to be eliminated after weighing the various factors. I do understand that numerous factors are considered, but often there are 1 or 2 that make the largest difference, which might even be communicated in even fewer words/effort (I also understand that condensing a lot of data into a few sentences outlining the most important factors isn't always easy).

I hope that's something that you or a member of your team can work on. Obviously a lot of time and effort is being spent on gathering input, but reporting on specifically why that input has resulted in routes being eliminated is every bit as important. Thank you for your response and continued efforts.

**Additional Info****Requested Info****Response sent****Response Notes:**

Sorry for the slow response. I took a few days off and have been trying to catch up ever since.

Let me try to be more specific in my answer.

One stretch along I-10, between Grant and Speedway was considered as a preliminary segment in the first phase of the siting study. This segment was then subject to a suitability assessment, where we researched and created spatial models for the following:

## 1. Biological Resources

- Highly suitable, no critical habitat for threatened and/or endangered species; no riparian habitat

## 2. Noise and Communication

- Moderately suitable, some proximity to sensitive receptors

## 3. Total Environment

- Highly suitable, not a lot of environmental sensitivities

## 4. Existing and Future Residential

- Highly suitable, passes adjacent to, but not through any existing or planned residential areas

## 5. Historic Properties and Neighborhoods

- Highly suitable, no properties listed, or eligible for listing on the national register or historic places in the vicinity; no designated historic districts/neighborhoods

## 6. Impact on Native Lands

- Unsuitable, passes through property owned by the Pascau Yaqui

## 7. Impact on Low-income and/or Disadvantaged Communities

- Highly suitable, does not pass through an area with greater poverty levels than the county as a whole

Based on the results of the suitability assessment alone for this segment along I-10, it would appear to be a fairly good route for consideration, with the only unsuitable factor being the crossing of native lands. However, this segment

**Comment Method: Email**

would need to be combined with others to form a complete route between either the DeMoss Petrie substation (Grant and I-10) and the proposed Vine substation (just west of Banner UMC); or the proposed Vine substation and the Kino substation (Kino Pkwy and 36th St). When reviewed in this greater context use of this I-10 segment resulted in use of connecting segments that were of lower suitability, and generally much longer routes. For this reason it was eliminated.

Moving on to the segments along Aviation.

For segments east of Campbell, these were eliminated following the suitability assessment for almost identical reasons just explained for the I-10 segment. The route looked fairly suitable, but other connecting routes were less suitable and were eliminated, resulting in a stranded segment that was then eliminated.

For segments between Campbell and Euclid, these were eliminated during the fourth phase of the siting study as a result of the Compatibility Analysis. As part of this analysis, subject matter experts evaluated each refined segment for the following:

1. Impact on low-income and/or disadvantaged communities.
2. Cost of transmission line construction, including relocation/undergrounding of distribution lines.
3. Sensitive plant and wildlife species and/or habitat within the transmission line corridor.
4. Residential properties adjacent to transmission lines.
5. A - Historic properties and districts adjacent to transmission lines.
6. Impact on views near transmission lines.
7. Impact on the total environment
8. Noise
9. Communication Signal
10. Interference
11. Existing development plans
12. Engineering feasibility and challenges
13. ROW Acquisition
14. Compliance with applicable ordinances, master plans and regulations
15. Health and safety impacts
16. Transit Impacts (Pedestrian, Public Transit, Traffic)
17. Use of existing utility corridors
18. Impact on native lands
19. Public/Stakeholder Feedback

For most of the factors evaluated, a transmission line would be very compatible along Aviation in this area. The factors that received less favorable evaluation included: use of existing utility corridors, visual impacts, and right-of-way acquisition. Although aviation is a major road corridor, there are no existing overhead utilities along Aviation today. Visual impacts were assessed based on change from the existing condition. Since there were no overhead utilities there now, this was evaluated as a greater change, so a greater impact. As for right-of-way acquisition, Aviation is within ADOT right-of-way. TEP would be required to secure new rights to be located here, whereas TEP has existing rights to be located on all City of Tucson roads as part of an agreement with the City.

All that said, these segments along Aviation were eliminated because there were one or more routes that accomplished the same east/west objective with less compatibility concerns.

Lastly, Aviation between Euclid and Stone is still being considered as part of Alternative Routes 5 and 6.

**Comment Method: Email**

I'm sure that was a longer response than you were hoping for, but I hope it provides the insight into the decision-making process you were after.

**Comment Method: Email**

**Comment Date** 3/11/2024

**Category**

**Concerns Topics**

Appearance

**Heard About**

**Issues/Phone Message/Comments**

My wife and I have been in this house for 40 years now.

We understand that there will be 75-foot monopoles placed on the south side of 7th Street by TEP.

We look at the long-term and what is best for the greatest number of people, so we are not against what is necessary to upgrade the grid. However, we are strongly in favor of placing these poles in a median of some kind in the middle of the street. First, it is a very wide street. Much wider than most neighborhood streets. Second, rusted patina finish would not look bad in this location (on a median). Third, our lots are already fairly small, and to take land on the south side of the street, where we have trees planted and a side-walk, would be a major disruption of the land area we do have.

If you have any questions feel free to call me or email us.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Thank you for providing your thoughts. We will add these to our project record and take them into consideration on any recommendations that are made.

I would just like to clarify one thing. There is no certainty that these poles will be placed along 7th Street. This is one of six alternative routes under consideration for the proposed transmission line. We'll have a public hearing in July of this year where the Arizona Power Plant and Transmission Line Siting Committee will review each of the proposed routes and approve the route they determine to be most "environmentally compatible."

I hope you'll stay engaged with the project. You'll be able to find more information, include the latest updates on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 3/8/2024**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

Thank you, Clark. Looking forward to this working out!

Some examples of a possible median/barrier designs for the could be the medians on Speedway east of Swan near McKinley. These are much larger medians, of course, given the size of Speedway, but they have eucalyptus trees with street lights interspersed.

Also, are the large poles on the south side of Speedway heading east between Swan and Pantano the same poles we would have on E 7th?

**Additional Info****Requested Info****Response sent****Response Notes:**

We have a number of different pole types on Speedway between Swan and Pantano. I'm assuming you are referring to the largest of these poles near Speedway/Pantano. Assuming that, the answer to your question is both yes and no. Those are 138kV poles which is what we are proposing, but those poles are an older design which has a much larger footprint. A good example of what we would be proposing is on 36th Street between Kino and Park.

Have a great weekend!

**Comment Method: Email****Comment Date** 3/7/2024**Category****Concerns Topics**

Do not Support Underground

**Heard About****Issues/Phone Message/Comments**

I wanted to share with you a response to a totally unrelated project we're working on. This response is related to the MRP and we received permission to share with you, asking that it be considered among all the other comments already received. I reassured them that this is exactly how TEP has been considering all input. Here is the comment:

Currently, I'm concerned that the City Council is over-protecting "historic" neighborhoods in TEP's long, line-siting request for the new central transmission line. We need to facilitate, not block, that process. The line should be installed above ground. I'm against all Tucsonans paying for undergrounding to protect a few families' property values — while other family and business property values are further devalued because they're considered less worthy. (redacted) should work with the Tucson Council to significantly narrow the privileged entryway and historic neighborhoods it is protecting, and equitably distribute "unwanted" buildout throughout the City's neighborhoods and Wards. Right now, it's NIMBY based on whoever has money and legal counsel to fight development. Meanwhile, I live in one of the privileged neighborhoods and my property values and sight lines would not be negatively affected—I think a few of my neighbors have misrepresented the number of us who want to block the DeMoss-Petrie line. Many of us want to get the line going, because it is essential in the transition to renewable energy.

**Additional Info****Requested Info**

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**No response required****Response Notes:**



**Comment Method: Email**

**Comment Method: Email****Comment Date** 3/7/2024**Category****Concerns Topics**

Appearance, Location

**Heard About****Issues/Phone Message/Comments**

I'm the person who sat to your right and asked a litany of questions at the Pie Allen Neighborhood Association meeting on 3/6/24. Thank you for graciously taking my questions and comments.

Given the group's collective comments expressed during the meeting, I wanted to follow up with a few requests:

- Please consider/prioritize placing any new poles on E 7th Street on street corners or in a natural divider in the middle of the street (as you mentioned) instead of along current walking paths/sidewalks. Both Tucson High and UA students use these paths daily, and they run flush with homes' lots, as you are likely aware. Plus, E 7th is wide for a residential street, so a natural divider may be feasibly possible. It would also provide an opportunity to control traffic flow in that area, and may even benefit school drop off for Tucson High (E 7th is on the drop off route during the school year). — This aligns with one of TEP's own criterion for Midtown Reliability related to minimizing pole placement in densely-populated areas.
- Please provide Pie Allen with an estimate of how many poles will officially be placed on E 7th. I didn't hear an answer to this question during your presentation, and that's likely because you don't know yet, which is fair. When you do know, it would be nice to have that information.
- Please consider painting these poles to align with the aesthetic of the homes in that area. One idea is to use a rusted finish (similar to the rusted galvanized steel fences and public art pieces you see throughout the neighborhood—examples can be found at the corner of Tyndall and E 6th, the northwest and southeast corners of Tyndall and E 7th, and on the west side of the wash facing Euclid between E 7th and E 9th) — this also aligns with one of TEP's stated criterion regarding minding historic neighborhoods. If this option is not possible, what are the painting/finishing options for the poles?
- Please inform homeowners or tenants of pole/line construction at least 60 days prior to construction. We have a lot of renters and students in the area, as you likely heard, and they likely don't read the mailers or newsletters you referenced (or they weren't in town when you sent them following the passage of prop 412). Plus, the property owners/managers are likely not going to inform tenants with enough notice. That said, these folks would benefit from TEP outreach by canvassing/flyering or in-person door-knocking. I know that's a big ask, but it's worth doing, especially if you haven't communicated with property owners (developers, property managers) who are not occupying their properties.
- If you cannot help answer/accommodate these questions, please direct me to TEP staff who can, and I'm happy to direct my questions there.

**Additional Info****Requested Info****Response sent****Response Notes:**

I really appreciated your litany of questions and comments last night. And thank you for providing this additional

**Comment Method: Email**

summary of your thoughts and requests.

Just a quick response on each of these in the order you've presented them:

1. Noted and we'll do our best to incorporate this request in the final design of the line, and we'll work with the City to see if this is an area where they would be open to repurposing some of the roadway.
2. I just sent a map to Marlene with this information, but I'll attach it here as well. These locations are by no means to be considered final, but are what we have currently based on high-level preliminary engineering design.
3. Noted, TEP's standard is the self-weathering or rusted steel finish. We're committed to working with each neighborhood through which the approved alignment passes on the pole finish that works best for their neighborhood. So if the alignment passes through Pie Allen, we would work with you all to decide what finish you prefer.
4. Great suggestion and this is certainly something we can do. Also, pertaining to your thoughts on canvassing the residents along 7th Street to ensure they are aware of the changes from alley to 7th Street, that was a great suggestion and we're mulling over how we might implement this or a version of it.

**Comment Method: Email**

**Comment Method: Email**

**Comment Date** 3/2/2024

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

3 things:

FIRST

BRAVO!BRAVO! Big time and then some for yourself and all other TEP employees making the "TEP Advisory Group" meetings and "Open House" events possible. Earl and I were more than impressed with the time and effort put forth. All questions and concerns were addressed with respect and intelligence. This, along with, the open and more than cordial welcoming environment were more than wonderful! A more than impressive corporate landscape for which we, and the Tucson community, are most fortunate. And, most certainly. We will share much of the information acquired during the "TEP Advisory Group" meetings and "Open House" events with our South Park Neighborhood Association (SPNA). Thank you for yourself and all other TEP employees again, many times over and then some!

SECOND

The Energy Savers Tips booklet is wonderful! How could we purchase/acquire 10 or more copies? This is the sort of thing we readily share with our South Park Neighborhood Association (SPNA) residents. And, I am more than sure, the South Park Neighborhood Association residents would appreciate and more than welcome this Energy Savers Tips booklet. Please advise how we may acquire additional copies of the Energy Savers Tips booklet.

THIRD

The "freebie" TEP bag of goodies distributed at the conclusion of the final TEP Advisory Group meeting was more than appreciated ... and enjoyed. However have we lived without (for so many years!) the wind powered pen!? What a treasure!

The very best "goodie" has to be the solar powered multi tasking calculator! Earl's computer lifetime began so many years ago with room sized computers, strips of paper read outs, and punch cards on to cabinet sized computers, then desk top computers, and now a handy dandy multi tasking solar powered calculator less than 6 inches long! What fun! Upon returning home, we "test drove" this calculator for quite a bit of time! More than impressed with its capabilities!

Very much of a good time activity to close out our TEP evening.

Again, so many thanks and such good thoughts as regards these recent TEP experiences. And with this thank you, we send our best regards for continued success and great happiness in all that you are about ...

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you so much the kind words. What a great way to start off the week. It has been an absolute pleasure to work

**Comment Method: Email**

with you over the past several months and I hope we have opportunities to cross paths in the future.

As far as the Energy Savers Tips booklet, we would be happy to get you a stack of these that you can share with your neighborhood. I've copied Teresa Bravo on this email as she is the one who gathered that information, along with the goodie bags, and will be able to get you more of those.

**Comment Method: Email**

**Comment Date** 2/28/2024

**Category**

**Concerns Topics**

Location, Historic

**Heard About**

**Issues/Phone Message/Comments**

I'm currently serving as president of the West University Neighborhood Association. TEP failed to contact us regarding this advisory group. We were overlooked in 2019 as well.

The Euclid route would put poles in the front yards of our neighborhood's historic homes. We would very much like to be a part of this ongoing process.

I have asked a WUNA board member to serve as representative, and ask that he be included in tomorrow's meeting. I have cc'd him in this email.

Thank you for your understanding. We're looking forward to tomorrow.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Thank you for reaching out. I sincerely apologize that we were not able to get your neighborhood engaged earlier, but I can assure you that we did not overlook you. We'll gladly welcome them to the advisory group meeting tomorrow and look forward to further input from your neighborhood.

I've included Teresa Bravo on this email who represents our local government affairs and helps with reaching out to the neighborhoods. Beyond the advisory group, if you'd like us to attend an upcoming neighborhood meeting to listen to neighborhood concerns and answer questions, we would be more than happy to do that.

In case you don't have it already, we'll be meeting from 6-8pm tomorrow night at the Dunbar Pavilion (325 W 2nd St, Tucson, AZ 85705), we'll be meeting in the Dining Hall.

**Comment Method: Email****Comment Date** 2/27/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

As to two, it looks to me like Irvington is connected to Vail 230 through at least 4 different pathways and it is further connected to DMP 230 through another 2-3 pathways. Why does a 8th or 9th 138kV connection between Irvington and the 230 backbone make such a big difference? We will also ask these questions of a licensed transmission engineer. And, if your 138kV steel monopoles are above hurricane proof and replacing something much less sturdy, it would seem the risk of many segments going down at once is much smaller than it was prior and likely within tolerance and will still greatly improve your SAIDI scores.

Our solution does not preclude such further connections. We want to discern what is sufficient vs a "nice to have." We prioritize capacity increases over marginal redundancy that has layers of legal conflicts that will not resolve quickly. We're actually trying to help TEP because we believe you're on a third dead end path.

I called it a backup feed because TEP has referred to it as redundancy.

**Additional Info****Requested Info****No response required****Response Notes:**



**Comment Method: Email**

**Comment Method: Email****Comment Date** 2/26/2024**Category****Concerns Topics**

Cost, Support Underground

**Heard About****Issues/Phone Message/Comments**

I have three quick questions:

1. It seems to me that you're primarily making an argument for increased capacity. Can you explain why a 138kV single feed from DMP to Vine does not accomplish that increase in capacity for the area?
2. It's difficult to follow your explanation with regard to other projects. I see the Vail to DMP to Tortolita 230kV connection in your 10 Year Plan. Why does that not solve the problem of bringing power North and reducing strain on Irvington, which is already connected to DMP and Vail via 138kV links? Why is that not good enough for Irvington?
3. As to half measures, if this is as urgent as you claim it is, why doesn't it make sense to break it into pieces to get capacity to Vine done more quickly while you pursue your legal battles against various undergrounding requirements for your backup feed?

I don't know how information flows in TEP, but undergrounding is the most climate change resilient solution available according to industry data and analysis, some of which I have attached. The total cost of ownership can be close to and sometimes less than overhead depending on the situation. It seems to me TEP has focused on aesthetic arguments instead of resiliency to its own detriment -- even possibly missing out on federal funding opportunities. John may have more questions.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for the additional feedback.

In response to your first question/comment: we would not agree that we are primarily making an argument for increased capacity. Our communications with stakeholders throughout the public education and outreach process for this project have emphasized the importance of the looped design for resiliency and reliability. A single 138-kV feed from DMP to Vine would increase our capacity to deliver energy to central Tucson, but it would not provide the benefits we will realize through a looped design for customers both in central Tucson and throughout the city.

In response to your second question/comment: The additional DMP-Irvington 138-kV link that will be created through the Midtown Reliability Project also will accommodate increased energy flows from north to south, helping us deliver additional energy that will be carried to DMP through the new 230kV tie to the Tortolita substation. Without that link, we would not be able to fully utilize that additional capacity for the benefit of all TEP customers, and those other lines would be at greater risk of overload during periods of peak energy use.

In response to your third question/comment: we are targeting completion of the full Midtown Reliability Project in 2027 so that we might begin to realize these reliability benefits at a pace that aligns with our customers' increasing energy needs. Also, it's not accurate to describe any part of the project as a "backup feed," as the entire project will be

**Comment Method: Email**

utilized consistently to support continued reliability throughout the city.

I will forward the additional information you've provided to the project team for consideration. Thank you.

**Comment Method: Email****Comment Date** 2/17/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thanks for the added information. What is not clear is whether the yellow dashed line is a possible path.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

With the exception of the stretch just north of Speedway along Mountain Avenue, the yellow dashed line was carried forward in the siting study as a possible path. The stretch along Mountain was eliminated from consideration following field review which identified engineering challenges with respect to identifying suitable pole locations.

**Comment Method: Email****Comment Date** 2/16/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

WHAT DOES THE YELLOW DASHED PATH MEAN BY OPTIMAL PATH CONSTRAINED SEGMENTS?

**Additional Info****Requested Info****Response sent****Response Notes:**

During the first phase of the siting process which took place last year, we identified constraints. These constraints were areas that presented some sort of an obstacle to constructing and operating a transmission line. For the yellow dashed path, we restricted the suitability model so that it could not identify a path that crossed through an area of "constraint". So that path would be the next best path, given your priorities, if we could not overcome whatever challenges was presented in the various areas of constraint.

I hope my answer makes sense. If not, please let me know.

**Comment Method: Email**

**Comment Method: Email****Comment Date** 2/15/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Because Tucson's response to the TEP lawsuit v. the BOA so heavily weighs on the contention that TEP should not have relied on City staff statements that 138kV transmission lines could pass along Campbell, but should have gone to the Zoning Administrator and asked for an official determination, maybe TEP should do the same related to the University Area Plan? There is the statement on page 30:

"6. Wherever possible, place utility and service equipment underground or in other visually screened locations."

That "policy" is a subset of the "Goal" set forth in Section 6 of the UAP:

"SECTION 6: PUBLIC SERVICES: Goal: Ensure an adequate supply of high quality public services to meet the current and projected needs of University Area residents and businesses."

To me, the policy is meant to serve the goal, but it could actually be in conflict with it, if the trouble of undergrounding "wherever possible" actually thwarts the delivery of high-quality electrical service.

Importantly, there is no definition of what "wherever possible" means. It seems logical that among the items that make something possible or impossible would be ACC guidelines, cost, inconvenience, existence of caliche or other subsurface obstacles to burying lines... but the UAP is unclear about the meaning.

Perhaps TEP should ask for a ZA determination now.

Below is something I just wrote to my Ward 5 office. I highlighted for you the question I think TEP should ask.

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Dear Ward 5:

I wonder if you could answer a couple of questions that the attached e-mail and "proposal" raise, and see if Roi Lusk or the Zoning Examiner might be able to address contentions brought up at the bottom of page 1 of the "proposal"?

This is a proposal from the self-described "underground coalition," which opposes TEP's proposed Midtown Reliability Project.

First, in the email from Dan Dempsey, he states that this proposal "has support from the City." I wonder if Ward 5 supports this, or if it was ever considered by Mayor & City Council, or perhaps you can clarify what part of the "City" supports eliminating half of TEP's Midtown Reliability Project to pay for a half-mile of burying lines through the Jefferson neighborhood?

Secondly, the questions for Roi Lusk, or the Zoning Administer:

At the bottom of page 1 of this "proposal" and footnote 1, there is a contention that the University Area Plan requires power lines in the area to be placed underground "wherever possible," and that this would be required for this project.

**Comment Method: Email**

My reading of the May 2021 ZA decision letter (May 13, 2021) related to the Vine Substation, was that the special exemption was denied simply because the application was premature. There were too many unknowns, and the ZA wrote:

“At the present time, and on this record, the Zoning Examiner cannot determine whether the proposed special exception land use complies with Plan Tucson and the University Area Plan, or whether the proposed special exception would adversely affect the surrounding neighborhoods.”

Does the City, the City Attorney, or the Zoning Administrator have a position on whether new overhead electrical transmission lines through the University Area would conflict with the University Area Plan, or on the limits of the phrase “wherever possible” as found in Sec. 6., item 6 (page 30) of the UAP? What criteria would be used to determine where it would be possible versus impossible?

The City Attorney’s office, in its defense against TEP’s latest lawsuit v. the Board of Adjustment makes a strenuous argument that TEP is to blame for incorrectly assuming that overhead lines could be placed along a gateway corridor, and it should have asked for an official Zoning Administrator’s determination about the issue. As this is now becoming a similar problem with respect to the University Area Plan, could we get an official determination about whether or not overhead transmission lines can be placed in the University Area, and where or how or what criteria determine where “wherever possible” is?

There is a lot of effort being spent by volunteer neighborhood representatives trying to advise TEP on a route selection, and much effort is being wasted trying to guess what the real answer is.

Thanks very much.

**Additional Info****Requested Info****No response required****Response Notes:**



**Comment Method: Email**

**Comment Date** 2/12/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Hello I am the new president of Pueblo Gardens Neighborhood Association.

We would be happy to attend a meeting.

Place and time?

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Thank you for reaching out and providing updated contact information. I'm copying Teresa Bravo on this response. Teresa is TEP's Government Relations representative and can work with you to schedule a time for us to meet with you and/or your neighborhood.

We do have a Neighborhood Advisory Group meeting scheduled for February 29th from 6:00-8:00pm at the Dunbar Dining Hall (325 W 2nd St, Tucson, AZ 85705). We would love to have you or your designated neighborhood representative attend. We plan to review alternative routes for the proposed transmission line that will loop the new Kino Substation, located near your neighborhood (36th and Kino Pkwy) to TEP's DeMoss Petrie Substation, located near I-10 and Grant.

**Comment Method: Email****Comment Date** 2/12/2024**Category****Concerns Topics**Location, Do not Support  
Underground**Heard About****Issues/Phone Message/Comments**

I am the former president of Pueblo Gardens and would like to know whether member of the Association attended this meeting? I had tried to get someone to attend at the last several meetings when I was in office, due to the fact I was unable because I am ill.

I understand that Pueblo Gardens is one of the spots being considered for underground TEP wiring, and I personally don't want to see that happening, but since I am no longer a representative, someone needs to be there. Am I correct? Members of the new Board have been cc'd and I hope your information will allow the new board to be advised. Thank you for your time.

**Additional Info****Requested Info****Response sent****Response Notes:**

I sincerely apologize for my response. I just re-read what I wrote and realized that I read Pueblo Gardens, but registered Garden District.

So yes, Pueblo Gardens is very much within the project study area. We are not considering an underground transmission line, all options under consideration are for a line to be constructed overhead.

I can't say if anyone from your neighborhood was in attendance at the open house last week, because nobody signed in stating they were from Pueblo Gardens. But they could have been.

We do have a Neighborhood Advisory Group meeting coming up on February 29th and we would love to have a representative from Pueblo Gardens in attendance. Additionally, we would be happy to meet with your neighborhood at your convenience to go over the project details. Please let me know if that would be of interest to you.

I hope your health improves.

**Comment Method: Email****Comment Date** 2/8/2024**Category****Concerns Topics**

Location, Support Underground

**Heard About****Issues/Phone Message/Comments**

1. I understand that there's what is said publicly versus what is discussed behind closed doors. I really hope that you guys take a closer look at the statutory law and case law regarding specific plans. You're walking into an expensive mess as big as the gateway ordinance mess and we're trying to help you avoid it.

So specific plans can be land use regulations. Case law says whether or not something in a specific plan is an enforceable regulation is up to M&C. M&C isn't going to go your way on that. The pressure will be too great.

TEP touched the wire with the special exception zoning process for Vine but that's not the only place TEP will touch the wire. Specific plans are enforceable anywhere TEP wants to use the right-of-way in the plan area -- there are no exceptions.

The ACC approving a route does not resolve that issue. Indeed, that is the very controversy that was decided against APS in APS vs. Town of Paradise Valley in 1980. All of these undergrounding laws were drafted after that decision and probably because of it. Maybe TEP thinks it can get a different outcome but that's not a cost efficient business strategy. The Town of Paradise Valley, and every other municipality (politically blue, red, and purple) is going to fight that and, should TEP win, get new legislation/constitutional amendments passed that address whatever technicality TEP relies on.

2. Game it out and seriously think about the Halfway Solution. On your present course, TEP may end up spending \$30+ million to connect Kino to Vine and another \$10 million in a decade of uphill legal battles with the City -- that end in the same place. Yes, a loop adds resiliency but at what cost? What's the marginal gain in resiliency compared to radial 138kV? If it's really not that much because 138kV is reliable, build the radials and see how they perform. I would bet good money that they'll prove to be sufficiently resilient and a significant upgrade over the current system. Your upper quartile SAIDI score will increase, especially as you replace 4kV with 14kV in these areas.

There, I just saved you \$40 million! And you can frame it as "Tucson, we listened."... Like I've said, I am happy to game it out with you guys in good faith. I just want to arrive at a win-win solution that allows us all to move on with our lives.

**Additional Info****Requested Info****Response sent****Response Notes:**

As always, thanks for sharing your thoughts.

Great seeing you at the meeting last night.

**Comment Method: Email****Comment Date** 2/8/2024**Category****Concerns Topics**

Do not Support Underground

**Heard About****Issues/Phone Message/Comments**

I was digging a little to explore what population density pencils out for undergrounding, given its prevalence in Europe:

Germany has an average population density of about 240 people per square kilometer. The USA has an average population density of 36 people per square kilometer.

Seems relevant given the limited will and ability to fund the project here.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thanks for the research and bit of information Meredith. Very helpful.

**Comment Method: Email**

**Comment Method: Email****Comment Date** 2/4/2024**Category****Concerns Topics**Location, Property Value, Support  
Underground, Historic, Reliability**Heard About****Issues/Phone Message/Comments**

We're building consensus around a "Halfway Solution" to sidestep many of the issues that have slowed down and will continue to slow down the Midtown Reliability Project.

You're already familiar with the broad contours but attached is something more specific for your and your team's review (it's only a few pages).

We have already and will continue to run it past experts and we believe this can be a genuine win-win by limiting TEP's legal costs and getting the Midtown Reliability Project completed on a far quicker schedule than TEP's current path.

We welcome any and all feedback.

**Additional Info****I. TEP's Current Proposal**

To keep it brief, TEP intends to build the new Vine substation and create an overhead 138 kV loop by connecting it to DeMoss Petrie (Connection 1) and to Kino (Connection 2). The purpose of the loop is to provide redundancy. Once the 138kV system is built, TEP claims that it will remove the 46kV substations and lines.

**II. Our Proposal: the Halfway Solution**

We propose that TEP only undertake the DeMoss Petrie to Vine section of the proposed project (Connection 1). The Vine to Kino section (Connection 2) is not required for any technical reason for the project to attain its principal goal to upgrade the delivery of electricity to the new Vine substation. Constructing Connection 2 overhead directly conflicts both legally and politically with longstanding local land use regulations, prized community goals, neighborhood interests, and the financial value of numerous private properties along the route. Given these many conflicts, for what might be a very marginal gain in redundancy at best, the expense to construct Connection 2 is a deal of highly questionable value for ratepayers' pocketbooks.

**A. Technical Necessity**

1. Upgrading the System. Connection 1 provides the 138kV upgrade (3x upgrade from 46kV to 138kV) for the Vine substation and the entire area that TEP desires. Connection 2 is unnecessary in achieving that goal.

2. Increased Reliability. Connection 1 will use steel poles that substantially increase reliability compared to the wooden poles of the existing 46kV system. As TEP has said, the steel poles in the 138kV system have not been felled by a storm or vehicular accident in the last decade, which is as far back as TEP looked. And, as TEP has said, the 138kV system "almost never" goes down while the 46kV system goes down every monsoon season. Thus, Connection 1 will bring a substantial increase in reliability compared to the status quo.

3. Unnecessary Redundancy. The redundancy provided by Connection 2 is of very slight additional value to the system's reliability, if that. For one thing, if Connection 1 is extremely unlikely to go down, as TEP has said, the need for redundancy is itself minimal, perhaps approaching zero. Secondly, if a catastrophe does occur of such great magnitude that it is able to knock out parts of the 138kV system (i.e., beyond anything we have seen for at least the past decade), it will likely have also already knocked out large sections of the 4-14kV distribution system, causing widespread

**Comment Method: Email**

outages whether or not there is transmission-level redundancy.

3. Historical Background. For the past century, Tucson has not had redundancy in its substation connections. The system has historically been a radial, spoke and wheel system, with power flowing in one direction. The absence of redundancy has not proved to be an overriding problem to our lives or the City's development. As it concerns reliability, the design of the 138kV system already substantially improves upon the primary problems of felled wooden 46kV poles.

**B. Conflicts with City Land Use Regulations**

1. Precedent. Statutory and case law have established that utility projects subject to approval by the ACC must be in conformance with ordinances, regulations, and general plans of municipalities, including those requiring undergrounding. Connection 2, in particular, comes into conflict with a number of these municipal regulations, which TEP is trying to legally overcome through costly and time-consuming litigation that runs against longstanding precedents. The Halfway Solution would enable TEP to avoid this effort and expense as well as the negative public image that the project, if constructed overhead against municipal regulations, will surely arouse.

2. Ordinances. Connection 2 covers an area subject to scenic and gateway ordinances that require the undergrounding of new transmission lines. Connection 2 also contains several areas subject to historic zoning ordinances that limit the types of structures that can be built. TEP is currently attempting to get around these ordinances on various technicalities, but its likelihood of success appears to be low.

3. Specific Plans. Portions of Connection 1 and Connection 2 are subject to "specific plans" (a legal term encompassing the City's area and neighborhood plans) that call for the undergrounding of new electrical infrastructure (Section 6, Policy 6 of the University Area Plan in this instance). The Zoning Examiner already determined that the routes TEP originally proposed were not in conformance with the City's specific plans. In addition, the Mayor and Council unanimously directed the City Attorney to enforce compliance with the City's plans. The Vine substation as currently proposed will require a rezoning. Rezoning requires conformance with the undergrounding requirements of the University Area Plan.

**C. Conclusion**

The Halfway Solution provides a way for TEP to meet its major goal for the Kino to DeMoss-Petrie project without any of the costly conflicts and negative effects the project would otherwise inflict on both TEP and the community. It is a win-win. Now, that's not to say that the remaining Connection 2 has no conflicts. A small portion of Connection 2 is also subject to the University Area Plan, which would require undergrounding transmission lines through the Jefferson Park neighborhood. However, TEP should be able to substitute the money it would save from not constructing Connection 1 to cover undergrounding the substantially smaller portion of Connection 2 (about one-half mile) that would be needed to be in full compliance with the City's land use regulations.

**Requested Info**

A.R.S. 40-360.06(D). "Any certificate granted by the committee shall be conditioned on compliance by the applicant with all applicable ordinances, master plans and regulations of the state, a county or an incorporated city or town."; APS v. Town of Paradise Valley (1980). The Arizona Supreme Court said (p 451), "[the existence of alternative funding mechanisms]...does not prevent the Town from mandating the undergrounding at utility expense."; "...local governments can prescribe undergrounding within their boundaries."

A.R.S. 9-461.08(B): "Specific Plans may ... include: (1) Regulations determining the location of buildings and other

**Comment Method: Email**

improvements with respect to existing rights-of-way, floodplains and public facilities. (2) Regulations of the use of land, buildings and structures, the height and bulk of buildings and structures and the open spaces around buildings and structures.”

Mayor & Council Special Meeting September 1, 2021, Item 3. Bullet 2(a): “...The route’s incompatibility with existing plans of the City...”; Bullet 3: “...the City’s position is that this route – or any proposed preferred or alternate route – cannot be considered for approval unless TEP complies with all City requirements...”

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**In preparation*****Response Notes:***



**Comment Method: Email**

**Comment Method: Email****Comment Date** 2/1/2024**Category****Concerns Topics**Cost, Appearance, Support  
Underground, Safety, Renewable  
Energy, Reliability**Heard About****Issues/Phone Message/Comments**

There is no doubt that Tucson's aging electrical grid needs updating for sustainability and efficiency. Upgrades could include thousands of miles of new transmission lines to accommodate the addition of renewable energy.

Fires may have been caused by trees toppling onto its power lines mostly instigated by our high temperatures, winds, dry weather, and dry vegetation near transmission lines.

There is a better solution instead of blackouts.

Buried utilities, encasing high-voltage transmission lines in underground in electrical conduit, will protect dry vegetation from errant sparks and helps minimize disruptions to the economy, public health, and safety.

Buried utilities have also been used in city light upgrade projects in which cities also get the advantages of a cleaner look and a keener architectural appeal with no overhead power lines.

Buried utilities are used in new cities which preserves the architectural appeal, provides a professional ambiance, and will make Tucson less of a third world looking city.

Buried utilities promotes a pleasant city to look at, adds timeless charm, an inviting atmosphere, and fosters a more enjoyable city to live in. Landscape helps define mood and is often one of the first things a buyer or visitor sees upon arrival.

There is a better solution instead of blackouts.

I am a proponent and advocate for underground transmission line burial. I understand the costs and a few of the downsides to burial however, the preservation and beautification of our city will be a huge advantage. There is little doubt that another upgrade will be decades in the future and costs will escalate substantially.

In conclusion, let's do this 'Midtown Reliability Project' upgrade by burying our electrical transmission lines, NOW.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP is planning to provide more than 70 percent of our power from wind and solar resources as part of a cleaner energy portfolio that will reduce carbon emissions 80 percent by 2035. I'd encourage you to view our Integrated Resource Plan, which you can access this at <https://www.tep.com/tep-2020-integrated-resource-plan/>.

**Comment Method: Email**

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line. With the defeat of Proposition 412 earlier this year, those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**

**Comment Date** 2/1/2024

**Category**

**Concerns Topics**

Appearance, Support Underground

**Heard About**

**Issues/Phone Message/Comments**

I live in Sam Hughes neighborhood. I want all utilities buried. Anything other than that is an eyesore.

**Additional Info**

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Email**

**Comment Method: Email****Comment Date** 1/30/2024**Category****Concerns Topics**

Location, Support Underground

**Heard About****Issues/Phone Message/Comments**

We appreciate the opportunity we had to meet and explore options related to the Midtown Reliability Project. Concerns continue to be voiced, largely in the midtown area. We are working together trying to come up with a solution that will ease concerns without compromising the integrity of the project.

To that end, we note that the Midtown Reliability Project has narrowed route choices and will be exploring options while trying to determine some workable alternatives.

One that has been presented to us would eliminate the transmission line from Kino to Vine, and install a 138kV connection from DeMoss Petrie to Vine. The argument is that two lines, while somewhat desirable for back-up, are not really needed as 138kV transmission lines are very reliable. This would eliminate the controversy about undergrounding along the scenic route or putting the north-south line through neighborhoods. If TEP elected to eliminate the Kino to Vine segment, please explain the impact on the need for the 138kV poles (replacing the 46kV) along that portion of the route, and without triangulating that portion how would residents be impacted in the unlikely event of an outage along that segment.

The line from DeMoss Petrie to Vine would largely be along Grant Rd, which is not a problem. The segment through Jefferson Park neighborhood would need to be undergrounded. Or, alternatively, south on Campbell for a short stretch, reducing the length needed to go through either the University or neighborhood to reach Vine, should be looked at as well. Please keep in mind though that the Campbell segment is still subject to the gateway undergrounding requirements. A special exception could be applied for along that route. The two of us cannot guarantee the outcome of that process.

It is our hope that this alternative be given consideration. We look forward to hearing from you.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your letter, and for your continued engagement in discussions about TEP's proposed Midtown Reliability Project. We appreciate that your proposal reflects input from residents of areas you represent on the Tucson City Council, many of whom also have provided feedback to our project team. All of the comments we receive will help guide our development of a project that is critically needed to support long term electric reliability in central Tucson.

Much of the value this project will provide derives from its design, which will complete a 138-kilovolt (kV) loop around central Tucson by linking our 138-kV DeMoss Petrie (DMP) and Kino Substations to the proposed Vine substation. This design provides much greater reliability and resiliency than would the single, radial 138-kV connection you have proposed, as each substation will be served by separate feeds that allow continued service when one feed is interrupted. While your letter suggests such failures are unlikely, TEP's experience in providing safe, reliable electric service has taught us otherwise. Even the strongest, best-built facilities are subject to failure for multiple reasons,

**Comment Method: Email**

including external damage, equipment failure, extreme weather, intrusions by animals, and faults caused by trees, tarps or other objects that cross power lines. That's why redundancy is at the heart of resiliency. It provides capacity to accommodate multiple contingencies that could compromise the reliability of a service that supports not just quality of life but life itself in our hot, desert climate.

The looped system we've designed will benefit more than just the areas surrounding the new Vine substation. The Kino Substation near South Kino Boulevard and East 36th Street was designed to be powered through 138-kV links to both the Vine and Irvington substations. The modification you've proposed would leave that recently built substation isolated on a single radial feed, significantly reducing the resiliency of facilities serving an area that includes many neighborhoods and a fast-growing cluster of businesses. We believe these residents and businesses deserve the same level of reliability and climate resiliency as those living in other areas served through looped 138-kV facilities.

While we cannot modify the project as you have proposed, we will note your preference for a link to the DeMoss Petrie substation along Grant Road and your suggestion that a special exception could be used to extend that line south along North Campbell Avenue toward the Kino substation. We would welcome additional feedback regarding other aspects of the project, including the necessary link between the Vine and Kino substations. While you have made clear that you would prefer that line not be built, we would nonetheless value your continued input and guidance as elected representatives of the areas that would be served by this project.

**Comment Method: Email**

**Comment Date** 1/29/2024

**Category**

**Concerns Topics**

Location

**Heard About**

**Issues/Phone Message/Comments**

I am trying to understand the scope of your Midtown Reliability Project. I handle Public Affairs for Union Pacific Railroad in Arizona. If there are any plans to install any utility underneath any Union Pacific Railroad property- each location needs to have a permit and goes through a process to apply for permission to be either alongside or cross active freight lines.

Please advise on the nature of the project in Tucson.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Thanks for reaching out. We're still in the line siting phase of the Midtown Reliability Project. In short the component of the project Union Pacific would likely be interested in is the proposed 138kV transmission line. We need to build a new overhead transmission line through central Tucson from our existing Kino Substation, located at 36th St and Kino Pkwy, to a new substation near Campbell Ave and Grant Rd, and then to our existing DeMoss Petrie Substation near Grant Rd and I-10. While we don't have a route identified yet, every single one of the routes under study will at least cross the railroad. We are studying a route through the corridor that is the railroad and Aviation Pkwy (AZ 210) with the greatest potential to impact any railroad operations.

You can learn more on our project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

I would love to set up a few minutes to discuss in a little more detail the project and any concerns or questions you may have.

Do you have any availability in the next couple of weeks?



**Comment Method: Email****Comment Date** 1/29/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thank you for the info. If you can (as much as possible) avoid UP- that would be great but I realize may not be possible. There is an incredible amount of lead time needed before these projects get approved. We get about 3000 utility agreements each year and they can vary in complexity and scope.

We also don't publicly share information since much of it is proprietary. I will share this information with our department that handles utility type agreements and see if once you are further along- there is an opportunity to meet virtually to make sure folks understand the process of permitting these future sites.

**Additional Info****Requested Info****Response sent****Response Notes:**

Understood, and I really appreciate the advice. By early March we expect to have defined route options and by late Summer we expect to have an approved route. We'll plan to touch base with you at each of those points and when appropriate would really appreciate a virtual meeting to discuss any agreements that may ultimately be needed.

**Comment Method: Email****Comment Date** 1/26/2024**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

I am guessing you would have less pushback on your proposed 138kV line routing if you went from Kino pw to aviation, aviation to I10, I10 to Grant. If the map you provided in the pamphlet is remotely to scale, the increased distance is 12% and likely a lot less traumatic on your customers. You might be able to use the 9% rate increase to pay for it.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on February 8th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Email****Comment Date** 1/24/2024**Category****Concerns Topics**

Appearance, Location

**Heard About****Issues/Phone Message/Comments**

I'd like to submit some comments about the project and won't be able to attend the open house. According to a mailing I received , this is a good email to use to make comments.

I live and work in Midtown. I live a bit east of the directly impacted area , but I travel in the area a lot will need to see it. And I know quite a few people that live in the area, especially nor of campus.

I reviewed the route segments and believe that order to reduce the visual impact on residential areas the new transmission line (Kino to Vine) should go down main arterials and industrial areas, where possible. Preferable, it would; also mostly avoid the U of A campus. From the map, it's a bit difficult to determine which areas are more industrial, specially down south. The simplest way sure seems like going up Kino Parkway to either Rt 210 and up the east die of campus to the vine substation or up Kino to Campbell. I would personally prefer not having to see the line all the way up Campbell, but it's already a fairly built up area. Alternatively If there's a way to route along mostly commercial areas, in order to reduce some visual impact along Campbell or First (north of Rt 210), that would be optimal.

As for connecting the Vine and DeMoss Petrie substations. I would recommend getting up to Grant somehow and then cutting over. It might even be possible to have the two new line run over the same routes north of the University. (Assuming that is technically feasible). It could even save a bit of money.

Also, if you do end up using segment 108 for some reason (although I didn't recommend it), you could piggy back on the improvements planned for Grant between Tucson and Campbell.

I hope my comments are clear. My main point is to try to limit it to main arterials and industrial areas.

Please let me know if you have any questions.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 1/24/2024**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

In my opinion, you should eliminate from consideration Kino Parkway, Campbell Avenue north of Arroyo Chico, Euclid Avenue, and Speedway Boulevard. All of these are entryways into the city of Tucson and should not be defaced with high voltage lines. Doing so would cut into Tucson's touristic appeal and would cost the city future revenue

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the specific routing preference provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 1/24/2024**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I live within the Catalina Vista neighborhood and am very excited for the Midtown Reliability Project. My home and my immediate neighbors' homes lost power a few times after these past summer's storms, and I fully appreciate the power upgrades that are needed. The boundaries and segments look great to me. I am happy to continue participating in whatever capacity is helpful from the residents affected.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 1/24/2024**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

I don't understand how the best route isn't the most direct route, up Aviation and then I-10. 2 major reasons why (and I can't think of a single reason not to). Obviously shorter is cheaper, and that's a major consideration to ratepayers. But on top of that it's already the kind of corridor you would expect to find tall poles. You're going to have fewer residents upset about tall poles in their neighborhood if they're the type to have accepted living in a place that already has traffic and noise. And of course there's a larger percentage of industrial landowners along that route (and fewer landowners in total, given that industrial lot sizes are much larger), so many fewer ratepayers to complain.

If there's a reason that's not your leading route, please take the time to respond, or use your PR department to make more clear why. Among the routes listed in your latest flyer, Aviation then north on Stone then west on Grant would be the best. But not anywhere near as good as simply aviation and I-10.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. At this stage, only segments based upon constructability have been identified within the study area in which potential routes will be considered. You'll be able to find all the latest information, as well as the segments in the "Interactive Map" link, on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on February 8th from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Email**

**Comment Date** 1/21/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

I found 100+ pieces of your recent public mailers in the trash at my small housing complex.

The addresses seem to all be for 85705 zip code on east and west Grant Rd., Jacinto, Alturas, Los Altos, Stone, Fontana, Geronimo, Estrella...

This is the informational mailer announcing the February 2024 public events.

These mailers were dumped between Thursday morning Jan. 18 and Sunday Jan. 21.

I found them in the trash can that is sitting on the sidewalk in front of the complex this morning. Pictured in the attached image are only the handful of mailers that I was able to easily grab. More remain in the trash can.

Perhaps coincidentally, the trash can sits where the postal carrier parks on the east side of Stone Ave. to deliver mail to our complex.

I plan to take these to the postmaster at the postal station that is in charge of the neighborhood. I think it may be over on Silverbell.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Thank you for bringing this to our attention!

We'll look into this as well.

**Comment Method: Email**

**Comment Date** 1/18/2024

**Category**

**Concerns Topics**

Substation

**Heard About**

**Issues/Phone Message/Comments**

A couple things occurred to me following the Neighborhood Advisory Group meeting last Thursday evening and the upsetting news that, as of now, the location of the Vine Substation remains as proposed:

1. You mentioned that the U of A is not interested in selling any land near the southern sub-station. A question - is there any land owned by the U of A that would be realistically suitable for a large substation other than the Vine location?
2. Where, within TEP service area, are there 138kV pylons and overhead lines running right down a residential street(s) between homes?

On another note, there is so much illness in our area at the moment, that I am hoping TEP could find a way to present February 8's meeting to the public via Zoom or virtually as well as offering it in person. Obviously, the Open House portion would be in person only, but the subsequent presentation and question and answer could be offered in both formats.

Look forward to hearing back from you.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

In answer to your first question. The parcel of land on the south side of the university that would have been suitable for the substation, currently a parking lot was located just west of Warren between 6th and 7th Streets. However, the University was not interested in selling this land to TEP.

To answer your second question, attached is a map that shows where TEP has 138kV transmission lines today that run through or adjacent to residential areas.

And finally, in response to your request to make the open house a hybrid in-person/virtual meeting. Notices of the open house are in the mail already, so we won't be able to change what is currently planned. That said, I would be more than happy to share what will be shared at the open house and have a virtual Q&A on either February 6th or 7th with Jefferson Park if that would work for you. Please let me know and we can work out the details.

I hope you have a great weekend!



**Comment Method: Email****Comment Date** 1/17/2024**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

As per your request to resubmit a comment on the Midtown Reliability Project, the University of Arizona backs the 138-kV transmission line along the Euclid Route as it uses existing line space with the least amount of disruption to existing infrastructure.

I have added the Open House to my calendar for February 8th.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Email**

**Comment Method: Email**

**Comment Date** 1/10/2024

**Category****Concerns Topics**

Appearance

**Heard About****Issues/Phone Message/Comments**

As it continues to become apparent to me, TEP will never (honestly) consider burying their electrical lines under any circumstances, no matter the protests, pleas and honest discussions.

Any replacement poles that will (and have been going up), without notice or visible/audible protest, have been the hideous, humongous, deep rust-colored metal poles. I am certain that you have large quantities of these already in stock since your overall planning for future projects has long be underway. I would like to know how the decision to use such a material evolved. The galvanized material has been around a very long time and the decision to replace it with this rust colored material is a mistake of environmental proportions. The rust-colored ones that have had to be repainted at the base (graffiti, damage, poor quality?) look worse than anyone might have envisioned. The decision to use them needs to be seriously reconsidered. Use your rust colored poles in another part of Arizona but not here in Tucson.

I have noticed that the several galvanized poles that litter the streets here and there seem to be less visible or intrusive on the vision or senses. I would like to, therefore, recommend that the poles to be used in this assault to our skyline, streets and neighborhoods be of the galvanized material instead of the deeply intrusive rust color, to lessen the impact on our views of the skies and mountains, the claustrophobic feel driving down streets lined with said poles, (especially given the tremendously overreaching versions you are presently planning), and to lessen the visual impact on large swaths of pole-lined streets.

I look forward to your addressing this suggestion as part of future planning meetings within your company and with the community at large.

**Additional Info****Requested Info****Response sent****Response Notes:**

I apologize for how long it has taken to provide a response. I needed to do some research to understand the history behind the decision to move to the weathering steel poles. I've had the answer since late January, but just haven't had a chance to write and send a response to you.

In early 2002 an internal TEP committee assembled to discuss a change from wood poles, as a standard, to steel poles. As part of that discussion, steel finish was considered. The two finishes that were primarily discussed were galvanized and weathering steel. After several meetings to discuss pros and cons, including discussions with manufacturers and other utilities, the decision was made in mid-2002 to transition to the use of weathering steel poles as a standard. Considerations behind this decision included:

- Aesthetics of galvanized vs. weathering steel – initially installed as replacement poles in line with wood poles. The weathering steel blended better than the galvanized poles.
- Maintenance – painted poles and galvanized poles (when damaged) require some level of maintenance. Weathering steel requires none and provides excellent protection against corrosion.

**Comment Method: Email**

- Cost – while initial pole cost was considered, it was not a factor in the decision as the cost difference between weathering steel and galvanized steel was negligible.
- Safety – this was not a consideration between weathering steel and galvanized steel, but a consideration between continued use of wood, or transitioning to the use of steel poles for worker safety under energized conditions.

Now you have the background on the decision. As it turns out, aesthetics were one of two major considerations in the choice to make weathering steel the standard pole material.

As we've met with many neighborhoods, elected officials, and agencies over the past several months we've learned of many different preferences for pole material. Some prefer the weathering steel, others galvanized, while others prefer painted poles. We know we can't please everyone, but we have learned that preference in many cases has to do with the local area and the surrounding aesthetic. There may be some areas where one finish over the other would be more appropriate.

As a result, based on the ultimate route approved by the Arizona Corporation Commission, TEP is committed to work with the City and neighborhoods through which the line will pass, so they can provide their voice on pole finish for their specific neighborhood. We won't make this a one size fits all solution.

Further, to address the issue of graffiti. We really can't prevent graffiti from occurring, but TEP is exploring the use of an anti-graffiti coating that would allow us to simply wash the graffiti from the poles when it occurs rather than painting over the top.

Please let me know if you have further comment or questions. Again, I sincerely apologize for how long it has taken to respond.

**Comment Method: Email**

**Comment Date** 1/10/2024

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Happy New Year.

Want to see if we could meet and discuss the latest refined segments?

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for the time this AM. Per our phone conversation, I want to confirm that the UA preferred route for the 138-kV transmission line is as UA has previously stated: along the Euclid line route where existing TEP poles are currently placed. Is this accurate? If so, please take a few minutes to submit this statement and any other comments you have directly to this email address:.

Alternately, you can complete this form: Midtown Reliability Project ([jotform.com](https://jotform.com)).

Again, my apologies if this ask is repetitive, and/or redundant or if I was previously unclear regarding how we are receiving information from stakeholders. The MRP is a complete restart for this much needed transmission line; and we are requesting all interested parties/customers to participate via written comments through the above noted channels.

Also, I have confirmed that our next Open House is 2/8/24 at the DoubleTree at Reid Park (SAME hotel as prior Open Houses). Our start time will be 5:30PM. We will have further discussion on opportunities and constraints related to the maps we have released; more Q&A; and another presentation from our Transmission team.

Finally, all of the information received to date, including past presentations, videos, etc. is up on the TEP website Project Page here: [Midtown Reliability Project – Tucson Electric Power \(tep.com\)](https://www.tep.com).

I hope this helps and I look forward to our next meeting.

**Comment Method: Email**

**Comment Date** 1/10/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Can you clarify if the constraints that were collected in prior group and public settings are included in this assessment in some way, or just the weighted criteria?

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

We ran the GIS analysis of the suitability models with all preliminary segments as an option. We then ran the same analysis, but limited the model by excluding any of the preliminary segments where a constraint was identified. We did include the identified routes from both of these methods in the "Draft Refined Segments", but I can show you the independent results of each at the Advisory Group meeting tomorrow.

**Comment Method: Email**

**Comment Method: Email****Comment Date** 12/30/2023**Category****Concerns Topics**

Appearance, Location, Renewable Energy, Environment

**Heard About****Issues/Phone Message/Comments**

I am a resident of Tucson, AZ (Arroyo Chico neighborhood). I'm writing to provide feedback and suggestions regarding the TEP Midtown Reliability Project in Tucson, AZ.

The top 3 priorities are:

1) Avoids or is banned from certain zonings, building away from residential areas. Building should be restricted to commercial, industrial, mixed use, arterial & secondary streets that lack residential units. If residential zoning interferes, build next to and not through the residential areas.

2) Is a multi use infrastructure project beyond electrical infrastructure. Other multi use projects could include environmental/energy resiliency (solar, water, energy storage, built shade) and transportation (extended streetcar line or "BART/Muni style" powered by electric transmission facilities).

3) Looks nice and is an investment. Even if it avoids residential areas, any above ground or other visible built structures should look nice and have some artistic creativity. There should also be adequate planning for required maintenance, unscheduled maintenance, and other infrastructure investments - especially if it impacts residential areas and neighboring communities.

The top 3 location suggestions are:

- 1) I-10/along the railroad
- 2) Grant & 1st
- 3) Speedway & 1st

The top 3 locations to avoid are:

- 1) Arroyo Chico wash/any washes or streets within the Arroyo Chico Neighborhood. Please do not put a huge substation in Arroyo Chico next to the 210.
- 2) Any area already featuring environmental benefits (i.e washes, parks, greenways, etc).
- 3) Any area that would require significant widening of the roadways or seizure of private residential property.

Thank you for asking for suggestions and feedback. Please let me know if you have any questions.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We have noted the routing preferences provided and will take that into consideration as we begin to evaluate these preliminary segments with respect to evaluation criteria informed by public comment.



**Comment Method: Email**

TEP is planning to provide more than 70 percent of our power from wind and solar resources as part of a cleaner energy portfolio that will reduce carbon emissions 80 percent by 2035. I'd encourage you to view our Integrated Resource Plan, which you can access this at <https://www.tep.com/tep-2020-integrated-resource-plan/>.

As a result of a number of comments citing the environmental sensitivities of Arroyo Chico and its importance to the community, the arroyo will be classified as a constraint in our siting study.

Regarding the proposed substation, it will be located on a parcel of land that TEP purchased just west of the Banner University Medical Center on Vine Avenue, just south of Lester Street. TEP conducted a very thorough review of alternative substation sites before purchasing the site on Vine Avenue. After an exhaustive search, followed by reaching out to property owners, the Vine location was the only site within the "load center" that was of a sufficient size and was available to purchase. The Vine location was actually near the northern edge of the "load center" that would meet the project need. If the substation site were located further north/east/west, it would result in a different project and would not allow TEP to retire the eight 46kV substations that have been discussed and to complete the subsequent improvements to the distribution system. In the past year, TEP conducted another search to see if any new properties had become available within the "load center" that would be suitable. Ultimately, the Vine location was deemed the only viable site.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**

**Comment Date** 12/27/2023

**Category**

**Concerns Topics**

Location, Historic, Environment

**Heard About**

**Issues/Phone Message/Comments**

Thank you for your prompt response. I am pleased to see my feedback will be part of the project record for the Arizona Corporation Commission (ACC).

I would also like to highlight that other areas have already been removed from consideration in the project. This sets a precedent and I believe similar consideration should be given to our area given its historic status and the unique ecosystem. How often are areas removed from consideration?

I am grateful for the opportunity to contribute to this dialogue. Thank you again for your attention to community concerns. I look forward to seeing how the project adapts and aligns with the needs and priorities of our neighborhood.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

In response to your question about how often areas are removed from consideration, TEP is following a simple but comprehensive planning and siting approach, involving five separate phases, to identify transmission line routes. During three of these phases, some sort of analysis will occur resulting in the elimination of route segments under consideration.

During Phase 1, that analysis was based on constructability, can a transmission line be constructed in a specific alignment?

During Phase 3, which is the current phase of the project, we are conducting a suitability assessment. The suitability assessment includes use of GIS (Geographic Information System) to model data for biological resources, overall environmental resources, existing/future residential land uses, historic properties and neighborhoods, noise and communication, native lands, and low-income and/or disadvantaged communities. The feedback provided by you and others regarding the biological and historic concerns in the Arroyo Chico area will be incorporated in these data models. These models are then combined and used to identify the path of highest suitability between the substations. Routes, found to be of lower suitability in comparison will be eliminated from consideration.

During Phase 4, a compatibility analysis will be conducted to further evaluate and refine the possible routes and identify segments that are most compatibility with respect to the evaluation criteria developed in part through public and stakeholder input. This will be the final opportunity to eliminate route segments and will result in identifying a preferred route and possibly alternative routes for the transmission line. These routes would then be included in an application to the Arizona Corporation Commission (ACC) for a Certificate of Environmental Compatibility (CEC) where a single route would be approved for construction, or alternatively the project would be denied.

Please let me know if you have any further questions.

**Comment Method: Email**

**Comment Date** 12/20/2023

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Is it TEP's position that the City cannot require the undergrounding of any electrical lines, no matter the voltage?

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

No. TEP's position is that the Gateway Corridor Zone ordinances do not apply to the Midtown Reliability Project.

**Comment Method: Email****Comment Date** 12/20/2023**Category****Concerns Topics**

Cost, Location, Support Underground

**Heard About****Issues/Phone Message/Comments**

Like with the gateway three years ago and Prop 412, I think TEP is badly misreading the politics. I also think TEP is making a mistake from a business perspective.

Given technological trends, having a good relationship with the City is central to TEP's long-term financial health. Any TEP success in the courts requires antagonizing and undermining the City, which is not an inconsequential thing.

Speaking solely for myself and not on behalf of anyone else, I would simply connect DMP to Vine and underground through Jefferson Park as cost effectively as possible. The UAP requires undergrounding in Jefferson Park and 40 year old case law unequivocally says a City can require undergrounding at the utility's expense.

To get the courts to overturn a 40 year old precedent is an uphill battle, and winning is unlikely to be the victory TEP thinks it is. APS and SRP undoubtedly would love for TEP to be the one to stick its neck out. I just don't think this is worth risking one's head over.

I am happy to game this out with your team in good faith should you desire. My goal is to get this resolved and move on. I don't think spending millions more fighting is wise for TEP for many different reasons beyond the risk of loss.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thanks for providing your thoughts Dan. I'll share these with our internal team to consider. I appreciate your offer to further explore this line of thinking and will let you know if there is a desire to do so.

**Comment Method: Email****Comment Date** 12/13/2023**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

Could you please tell me if there are any constraints noted by TEP for route 442? Your interactive map shows none but I'm not sure if it is fully up-to-date.

Thank you for your help!

**Additional Info****Requested Info****Response sent****Response Notes:**

A member of our Neighborhood Advisory Group let us know about the City's plans to close down a lane of traffic along Winsett and to build a multi-use path. We've noted these plans to be considered in the evaluation of the preliminary segments.

The interactive map has not been updated to reflect additional constraints raised at the open house in November or since. We are working on getting that updated.

Please let us know if you have any further questions.

**Comment Method: Email****Comment Date** 12/6/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thanks! When you say current standard, does that mean prior standards were to insulate? Whose standard is that? The states?

We're trying to understand the effects of a downed transmission line given recent events around the country and the prediction of worsening weather.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

No, we just used different wire sizes in the past with varying electric ratings for ampacity, etc. We have never used insulated wire for overhead 46kV lines. This is typically referred to as "tree wire" and is most often used in areas with a lot of vegetation and it is challenging to keep trees from growing into the lines.

**Comment Method: Email****Comment Date** 12/6/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Have the dates and locations for the final two public open houses been set? Neighbors have been asking.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

The next open house will be on February 8th from 6:00-8:00pm at the Doubletree Reid Park. The following date has not yet been determined.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**

**Comment Date** 12/6/2023

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Thanks! Is there like a utility operator body that gives recommendations on best practices that you guys follow? Or anything like that which I can read?

If all of this infrastructure is bare wire, it seems possible that standards may change in that regard soon? Especially in population centers.

Or maybe they won't. Hence, I'd like to read the discussions. It seems like we're still in the early innings of insurers, underwriters, regulators, etc. requiring more robust and less risky infrastructure.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

TEP has its own distribution and transmission standards that we have developed to meet the specific operating environment of our area. These standards meet or exceed those outlined by the NESC (National Electrical Safety Code) and IEEE (Institute of Electrical and Electronics Engineers), which provide industry standards/best practices.

I hope this helps.



**Comment Method: Email****Comment Date** 12/5/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Is the current 46kV system bare wire?

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

TEP's 46kV system has been built over many years, with different standards for wire sizes, etc, so it's hard to provide a single answer. But if I understand the gist of your question correctly, you are asking if the current standard for our overhead 46kV system is bare wire, which I interpret as "non-insulated" wire. And the answer is yes. We use a 954 ACSR conductor as a standard, which is the same standard wire we use for our overhead 138kV system. ACSR stands for "Aluminum Conductor Steel Reinforced. So the aluminum is on the outside and that is where the electricity flows and in the center of the conductor are steel strands that provide strength. There is no insulation on the outside of this conductor.

**Comment Method: Email**

**Comment Method: Email****Comment Date** 12/4/2023**Category****Concerns Topics**

Location, Historic

**Heard About****Issues/Phone Message/Comments**

On behalf of the Director of Planning & Development Services for the City of Tucson, please see our feedback below.

1. Specific plans of the city within the study area
  - o Area Plans:
    - o Alvernon-Broadway
    - o Arroyo Chico
    - o Grant-Alvernon
    - o Greater South Park
    - o University
  - o Neighborhood Plans:
    - o Blenman Vista
    - o Broadmoor-Broadway
    - o Miles
    - o Jefferson Park
    - o Old Pueblo South
    - o Sam Hughes
    - o West University
    - o Western Hills/Pueblo-Sunland Gardens
2. Specific private development plans the city is aware of within the study area
  - o Suggest reviewing Map Tucson layer with permit data – can view major projects/development underway
3. Applicable ordinances we should be aware of
  - o Applicable Overlay Zones:
    - o Airport Environs Zone
    - o Gateway Corridor Zone – Kino, Campbell, Broadway, Oracle
    - o Grant Road Improvement District
    - o Historic Preservation Zone – Armory Park, Barrio Historico, El Presidio, West University
    - o Infill Incentive District
    - o Major Streets and Routes Plan
    - o Neighborhood Preservation Zone – West University, Jefferson Park
    - o Rio Nuevo Area
4. Areas of concern/conflict
  - o Major areas of concern – Gateway Corridor Zone, Historic Preservation Zones, Neighborhood Preservation Zones
5. Opportunities the city may see for the transmission line, possibly in combination with furthering some of the City's goals and objectives
6. Members of the public or groups the City is aware of that we should reach out to
  - o Potential contacts/outreach:

**Comment Method: Email**

- o All neighborhood associations
- o Metropolitan Pima Alliance
- o Southern Arizona Homebuilders Alliance
- o Tucson Association of Realtors
- o Tucson Chamber of Commerce
- o Tucson Young Professionals
- o Ward Offices – Ward 1, 2, 5, 6

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Great, thank you for the feedback. I've copied Clark Bryner, Manager of our siting efforts, for his information, as well. We'll reach out if we have any further questions. Thanks again.

**Comment Method: Email****Comment Date** 11/20/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I wasn't able to attend the Open House and meeting on Thursday evening, but I believe you were going to have the load center radius for us, or share a bit more how it is determined.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

As I mentioned at the meeting last week, in 2018 and 2019 TEP conducted a very thorough review of 10 alternative substation sites before purchasing the site on Vine Avenue. After an exhaustive search for available parcels within a mile of the load center, the Vine location was the only site within the load center radius that was of a sufficient size and was available to purchase. The Vine location is on the northern edge of the load center radius that would meet the project need.

We reviewed the alternative sites (parcel behind Fry's and southeast corner of Grant and Campbell) that were mentioned at the meeting with the distribution engineers to see if these sites could possibly be alternatives.

These locations are beyond of the northern boundary of the load center radius. If the substation site were located further north/east/west, it would result in a different project and would not allow TEP to retire the eight 46kV substations that have been discussed and to complete the subsequent improvements to the distribution system.

In the past year, TEP conducted another search to see if any new properties had become available within the load center radius that would be suitable. Ultimately, the Vine location was deemed the only viable site.

The load center is the geographic center of the electrical system that serves residential, commercial, industrial, and institutional users. This is determined by modeling current and projected electric load growth that will require electrical service.

Let us know if you have any other questions.

**Comment Method: Email****Comment Date** 11/17/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thank you for responding. I would rather not have to spend my time monitoring this and taking time outside of work going to these events. How can I register my Permanent opposition? You are getting paid to wear us down I am not getting paid to defend the value and visuals and safety of my property the biggest investment I will ever make?

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Email**

**Comment Date** 11/17/2023

**Category**

**Concerns Topics**

Appearance

**Heard About**

**Issues/Phone Message/Comments**

Attached is the proposal from two creative community members that I spoke with you about last night. We appreciate your consideration and encouragement of finding creative solutions that the community and TEP can “live with” while upgrading TEPs capability and reliability for now and the future.

These ideas are from Debra Bowles and Nancy Stromp. I have copied them in the event you have further questions. This is not a PVNA official proposal but it is from active, creative and concerned citizens and we wanted to make sure you had the chance to see it.

Happy Thanksgiving Clark. We appreciate your willingness to think outside the box.

**Additional Info**

We shared this creative idea with Councilman Steve Kozachik and here is his response.

"You could float it past the complete streets coordinating committee - there's a DTM representative there. My honest feeling though is that there's no way we'll be turning Country Club or other arterials into one-way or no cars for any of the segments w/in midtown. The traffic counts are just too high for that."

I'm thinking, the concept might be able to be applied elsewhere or trigger other ideas.

**Requested Info**

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**Response sent**

**Response Notes:**

Great “out of the box” concept proposal. Thank you for sharing! As I mentioned at the open house last night, we’ll be meeting with the City of Tucson Transportation/Mobility and Planning Staff in the coming weeks. We’ll share your concept to see if there is any interest from the City.

**Comment Method: Email**

**Comment Date** 11/17/2023

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Thank you so much for your message below. Unfortunately an emergency prevented me to attend last night's meeting, but I would be very grateful to hear/read the outcome of the discussions concerning the project.

Should you have some material about this, please feel free to send it to me.

Thanking you again in advance for your cooperation.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

All the materials presented at the open house are now posted on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). Should you have any specific questions about any of these materials, we would be happy to set up a phone call to discuss.



**Comment Method: Email****Comment Date** 11/16/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

So in spite of the people expressing no desire to pay more in bills and being unable to see the need, (because this Canadian outfit is a "corporation" and therefore gets to go by such rules), the discount some people rely on to barely scrape by while everything else is priced higher and higher is now over half canceled out.

I am sorry I am not a particularly well person and wasn't able to make the event to hear about why this was so necessary to provide service as needed. I am also sorry that because I haven't heard this carefully crafted reasoning I do not see the problem with the service here being so large that the already huge amount of money you all must rake in wasn't enough.

It's confusing why people from Canada are charging us for basic needs here in Arizona in the first place. But I suppose it doesn't matter whether I understand or not, as you will obviously do as you please regardless. That's how this world is right? So now the space heaters that were my only source of heat in my uninsulated home will reach the point of being entirely unaffordable before I turn them on. I was barely able last winter with or without the discount that's now worth less than the increase. Summer will be even more lean, too. Can't even afford to fix my ancient swamp cooler.

So thank you for that. I'm sure you'll also need more money to run your new buildings and contraptions, though our service will be exactly the same- just more expensive without a low income discount to keep up. Thanks. I hope you all enjoy your vacations and gas guzzling vehicles when outside your comfortable climate controlled homes.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We'd like to encourage you to visit the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown) where you'll find additional information on how the Midtown Reliability Project will help to address reliability in the area. We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Email****Comment Date** 11/12/2023**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

I am a resident of the Sam Hughes neighborhood. We understand the need for the upgraded power supply. Hopefully the larger power poles that were previously being mentioned as going through this neighborhood are no longer being considered. Sam Hughes is such a unique neighborhood, it is the gateway to the University. It seems that there is more pedestrian foot traffic through this neighborhood than any other neighborhood in Tucson. Although reliable power is essential to the community it shouldn't be at the expense of a vibrant community that serves as a benefit to the whole of Tucson.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held this Thursday, November 16th from 6:00-8:00pm at the Doubletree Reid Park.. We hope you can join us.

**Comment Method: Email****Comment Date** 11/12/2023**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

Not that I think you will respond, but here goes ...

Why oh why isn't this "reliability" project running right through the University of Arizona campus? It seems with the new university construction – south of Speedway on the main campus and all the new buildings and infrastructure on the Research/Medical/Sciences Campus north of Speedway, the U of A needs to be participating actively. They are going to benefit from this project the most. There's all sorts of infrastructure already in place above and below ground (a family member has worked in those tunnels, so you can't deny it). It's time for the UA to STEP UP.

Also, it is true that TEP has negotiated a 20-year deal with UA so the University's electric rates won't increase for TWENTY YEARS???

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

To answer your first question, no proposed routes for the transmission line have been identified yet. Preliminary segments, the first step in getting to routes will be shared in the coming days. Please check the interactive map on the project webpage [www.tep.com/midtown](http://www.tep.com/midtown) for those this week.

Regarding your second question, yes that is accurate. And it's no secret. Please take a look at the seventh paragraph of this 2019 press release. Our clean energy partnership with the University of Arizona is designed to help the UA reach its sustainability goals. According to the agreement, which required review and approval by the Arizona Corporation Commission and the Arizona Board of Regents, TEP provides 100 percent clean energy to the UA's main campus. Importantly, per the terms of the agreement, costs for the UA can go up or down based on market conditions. There is no stipulation that guarantees UA rates won't increase for 20 years.

We hope you continue to stay engaged in the project as details of the project become more defined.

**Comment Method: Email**

**Comment Date** 11/10/2023

**Category**

**Concerns Topics**

Location

**Heard About**

**Issues/Phone Message/Comments**

Despite what the city council says I think the line should be all above ground and should follow Kino and Campbell north to Grant and then west on Grant to the other substation.

I live just N of Ft Lowell and just W of Campbell.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 11/9/2023**Category****Concerns Topics**

Support Underground

**Heard About****Issues/Phone Message/Comments**

Start listening to the Tucson community!

We want the option of UNDERGROUND lines for the Midtown Reliability Project

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The ACC has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead, we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 11/9/2023**Category****Concerns Topics**Cost, Location, Support Underground,  
Historic**Heard About****Issues/Phone Message/Comments**

I am sorry, but I have looked at the money that TEP has and it seems more than enough to underground what you should underground, esp in the center of the city and in historic neighborhoods.

I am not buying the idea that TEP does not have the money to underground the new lines, or at least part of them.

Thanks for your reply..

Have a good day.

**Additional Info****Requested Info****No response required****Response Notes:**

**Comment Method: Email****Comment Date** 11/7/2023**Category****Concerns Topics**

Appearance, Location, Property Value

**Heard About****Issues/Phone Message/Comments**

I have been concerned for several months about the above project and would like to comment on the details contained in your Energy Grid Update Flyer.

Even though I had filled-in your August survey indicating my personal preferences, I still would like to make my little voice heard on the following fact:

I own/live in a 3 story building at the Corner of 6th & Campbell (Sam Hugues at the Corner). One of the best attributes of this building is the incredible view from the balconies on the whole western-facing façade.

However, if I understand correctly, the project in question is to run poles along Campbell right in front of our building. A series of tall poles and spans of wires would completely destroy the views and have a great impact on the property value.

I would appreciate if this feedback would be taken into consideration and if something can be re-done to protect our "corner building".

I will definitely attend the 16th November meeting and hope to be able to have a discussion with one of your team.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). We look forward to seeing you at the public open house on November 16th from 6:00-8:00pm at the Doubletree Reid Park.

**Comment Method: Email**



**Comment Method: Email****Comment Date** 11/7/2023**Category****Concerns Topics**

Renewable Energy, Substation

**Heard About****Issues/Phone Message/Comments**

Thank you. The benefits of the project to the community are more apparent to me now. The agency briefing ppt. was particularly helpful.

I have two new questions.

1. We are not within the area currently served by Winnie substation. Our house sits at the junction of areas served by two substations, one at Sparkman and one at Hedrick. Do you mean to say that the area north of Winnie service area and south of Ft. Lowell is susceptible to being shifted into the service area of the Vine substation?
2. To what degree are approved future renewable energy supply projects driving the project need?

I also have several recommendations for your communications team (not for responding to me individually, but for project communications in general):

1. Continue responding to individuals like myself who appreciate facts. I had missed the dropdown that had the agency briefing but you brought it to my attention this way.
2. Benefits from the removal of substations and line south of the project area could be explained or shown better. It seems like a big deal to me.....but it's not on the GIS even.
3. Provide more convincing evidence that energy demands from commercial (outside of UA-Banner complex) and residential has gone up or will go up. Showing is better than telling.
4. Explain the benefits of loops—anything besides redundancy?
5. Provide more info on website regarding the difference between Vine and the old substation designs. I don't know what benefit the gas-insulated type provides, but I am sure there are benefits. I would guess there may be security concerns with the old substation designs.
6. Provide cost comparison referenced in briefing.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for the great feedback on how TEP might better communicate with the public in general on this project. I have passed those comments along to our Communications folks, and will also try to do a better job myself of making those points.

As far as answers to your new questions:

1. Yes, it is possible that the area would normally be served by the Vine Substation in the future. It all depends on how the distribution circuits are reconfigured following the construction of the new 138kV Substation and the retirement of the older 46kV substations. TEP does not currently have plans to retire the 46kV Sparkman or Hedrick substations, but we may look for ways to remove some of the customer load from those substations and place it on the 138kV system which has much more capacity.
2. Most large future renewable energy projects will occur in rural areas where space is available. These projects would

**Comment Method: Email**

utilize TEP's existing extra high voltage system, other available transmission, or new lines to bring that energy into the metro area for consumption. This project is really for local use, but would have the benefit of bringing more energy, be that from a renewable resource or otherwise, into the Midtown area. The project need is not driven by renewable energy, but is really driven by capacity constraints on the existing 46kV system and the need to address the aging 46kV system throughout the project area.

Again, I hope these answers are helpful. Feel free to continue to reach out with any other questions you may have.

**Comment Method: Email****Comment Date** 11/7/2023**Category****Concerns Topics**

Do not Support Underground

**Heard About****Issues/Phone Message/Comments**

You've covered my concern about unnecessary undergrounding. I hope the Tucson City Council will accept the ACC's ruling and amend the City Code or provide an exception for this new line.

Some residents in Blenman Elm have specific concerns about siting the line. Undergrounding was my only concern, so I don't feel comfortable representing my neighborhood on the advisory committee. I hope you and Teresa find a good representative and that the process is a win/win for everyone.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Email**

**Comment Method: Email****Comment Date** 11/7/2023**Category****Concerns Topics**Cost, Appearance, Location, Support  
Underground, Historic**Heard About****Issues/Phone Message/Comments**

I have a few general comments and a few specific comments.

## General

1. Are all the criteria weighted the same for the evaluation ranking ? If not, what is the relative weighting ? What happens if a specific criteria has no impact on a proposed segment; how is that accounted for in the summation?
2. In developing the criteria, was analysis done to see whether there is "self-cancelling" or "self-fulfilling" between or among the criteria ?
3. Are the qualified experts who will assist with the criteria evaluations (land use planner, archaeologist, biologist, environmental resource, etc), are they TEP employees? Outside consultants ? Have they been involved with the project previously ? Will the answers be the same as previous renditions ?
4. Why isn't there an "opportunity" to route the transmission line thru the U of A campus? As one the major users and impetus of this project, one would think they would like to see a direct and cost effective routing.
5. I believe TEP is making a big error in not pursuing undergrounding this project and future projects. I know this adds significant cost but shows TEP is a partner with the city in improving visual aspects of your significant engagement and impact to Tucson.
6. See number 5 again.

## Specific criteria

- 2 Construction costs - should include a criteria for undergrounding costs (or, see my last item)
  - 4 Residential property - If I read this correctly, there is no evaluation of routes along where multi-family or apartments are located? Or is it the opposite in that routes will be focused away from single family residential areas and focus on multi-family & apartments areas? Why one over the other?
  - 5 Historic areas - not sure why these areas have more sway than non-historic areas ?
  - 6 Impact on views - Is visual blight a key determinate for this criteria? It is for me.
  - 11 Compliance with ordinances, regulations - is this where Gateway corridors come into the evaluation?
  - 14 Use of existing corridors - I like this approach for the criteria. But does your evaluation consider using an existing corridor to install new poles and then retrofitting the existing lines onto the new poles as a method to reduce overall pole count ?
- XX - why not add a new criteria that would evaluate the extra cost for undergrounding the new transmission line. It is going to be the main issue in the end.

**Comment Method: Email**

## Overall Question

What is TEP's intent on how to portray the neighborhood advisory sessions when, so far, 10% of the affected neighborhoods had representatives at the first meeting? If that

See ya'll Thursday.

PS...the Sunday newspaper article noted a concerned comment (not by TEP) that there will be 110' poles. Is that accurate as that height pole was not in the package at last meeting.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your thoughtful review and comments. I've tried to answer your questions in red within your original beneath where you've posed each question.

We'll plan to discuss your comments on the criteria with the group tomorrow evening.

Lastly, I just want to address your comment on undergrounding. I certainly hear what you are saying, so I don't want you to think that myself or TEP is ignoring you or other members of the community who feel similar. TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The Arizona Corporation Commission has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line. Instead we've started fresh with a new overhead line siting process to identify the least obtrusive route possible.

Thanks again for taking the time to consider the draft evaluation criteria and to provide your thoughts.

I look forward to seeing you tomorrow evening.

- For the suitability analysis, TEP will develop models for each specific criteria. Each model will show gradients from high suitability to low suitability. Composite models will then be created, where we'll combine all the criteria into a single model. TEP will create multiple versions of these composite models based on different priorities. This is where weighting comes into play. Typically, we'll create an Environmentally Preferred Model, where criteria reflect environmental concerns are given greater weight. We'll also create a Balanced Model, a Public Preferred Model, and a Construction and Maintenance Preferred Model. If a specific criteria does not apply to a proposed segment, it is just given a 0 sum value so it has no influence negative or positive on the final result.

- We certainly tried to identify the criteria in a way that would provide a fair representation, and are trying to avoid anything that would appear as if we were "gaming" the results. If you see anything you are concerned about, I would love to discuss and possibly change it.

- The qualified experts are a mix of internal TEP employees and consultants. For the technical aspects they are generally TEP, for Environmental generally consultants. Some were involved with the project previously, but about

**Comment Method: Email**

75% are new to the project like myself. While some evaluations have some subjectivity, many are data driven so if the criteria is the same, I would expect the same answer. That said, our approach and method is not identical to what was used for the Kino-DMP project. I'm as eager as anyone to learn the outcome, but I don't know what that will be right now.

- This is something we're asking for feedback on at this stage of the project. The opportunities we're showing currently are not the only opportunities. They represent the high level opportunities. If you, or others, know of an opportunity through the U of A campus or anywhere else, we would love for you to share that and then we can explore it to determine if it is feasible.

- As we discussed, TEP has invited all neighborhoods to participate, but we can't force anyone. I look at the Neighborhood Advisory Group as a sounding board of the community as a whole. It allows TEP to get feedback and make changes to the project with a smaller group of individuals so that when it goes to the public as a whole, hopefully what is presented is more in line with the community's values.

- I'm not sure where they got there information from for the article. I know the Kino-DMP project stated that TEP would use poles up to 110' tall, so I'm assuming that was the source. Similarly, we may have a couple of poles that are that tall on the current project in areas where we're crossing an overpass or something. However, those taller poles are the exception not the rule.

**Comment Method: Email**



**Comment Method: Email****Comment Date** 11/6/2023**Category****Concerns Topics**

Cost, Renewable Energy, Do not Support Underground

**Heard About****Issues/Phone Message/Comments**

I urge you to create an advisory group for the Midtown Reliability Project that is representative of all TEP customers. The neighborhoods in Central Tucson should, of course, weigh in on the specific route for the line. But, all TEP customers should have a say whether or not to underground portions of the line at a huge differential cost to all of us, while only a few would benefit.

If TEP is only advised by neighborhood representatives throughout the line siting process, you will only hear a selfish, NIMBY perspective. I live in Blenman Elm and am against unnecessary undergrounding as are many others, as shown by our defeat of Prop 412. We are as deserving of an advisory voice as any neighborhood representative selected for his or her advocacy for undergrounding.

Delay in installing new transmission lines is a key factor in delaying the rapid transition to renewable energy, which is long overdue. I urge you to move this project ahead quickly, with above-ground installation of the line in the least obtrusive way possible.

In this case, ARS 48-620 should supersede Tucson's code that requires undergrounding under certain conditions with no reference re how to pay for it. Please cite ARS 48-620 and invite any neighborhood to pay for undergrounding its own portion of the line. A 5 or 10-year tariff on neighborhood residents' electricity bills could be used for this purpose.

If every neighborhood had to vote on optional undergrounding, you would find absolutely none willing to pay for it. Having the City pay the differential cost of undergrounding is not the answer. It's all our money, whether as TEP customers or City taxpayers. All Tucsonans need to decide whether to spend our money on undergrounding or something much more important to all of us.

Please consider all Tucsonans' perspectives when the undergrounding decision is being made.

Thank you for considering this request.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for reaching out and providing your thoughts. While TEP, the City, and others put a lot of time and effort into exploring a path to finance the additional costs to underground a portion of this transmission line, with the defeat of Proposition 412 earlier this year those efforts came to a stop.

The Arizona Corporation Commission has stated (Decision 79140) that incurring the additional costs to underground a transmission line for purposes other than safety and reliability is inappropriate. As a result of the defeat of Prop 412 and the ACC's policy, TEP is not considering an underground transmission line and has started fresh, a new overhead line siting process to identify, as you've stated, the "least obtrusive" route possible.

**Comment Method: Email**

Blenman Elm is in the heart of the project study area. We would love to have a representative from the neighborhood on the Advisory Group. Teresa Bravo (copied) has been coordinating with your neighborhood's board to identify a designee. If you are interested, I would urge you to contact the board. We're meeting again this Thursday evening.

**Comment Method: Email**

**Comment Method: Email**

**Comment Date** 11/6/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Hi All, Please accept the attached document (identical to that pasted inline below) as response for the proposed evaluation criteria 5. for the MRP in advance of this Thursday's meeting.

Thanks for providing the proposed evaluation criteria for our review.

I am writing to request removal of Evaluation Criterion 5., regarding historic properties or districts adjacent to the transmission line. This is a fundamentally unfair criterion that undermines the worthy intentions of Evaluation Criterion 1.

Using "historic properties and neighborhoods" as a criterion for favored treatment is implicitly biased and should be removed. (I am not speaking to the archaeological site assessment for historic and pre-historic sites, only the favoritism toward city, state, and federally designated places described in the "Detailed Description" section of Criterion 5.)

Even historic preservation professionals (including all those in Arizona's State Historic Preservation Office) acknowledge that the way historic properties and neighborhoods have been identified and registered is fundamentally unfair. The 2023 Arizona Historical Preservation Conference was held in Tucson Oct. 25-27, where a major theme was how to confront the problem that historic designations historically only protect "white people stuff."

A common example given to illustrate the inequity is that Thomas Jefferson's Monticello home has been protected with historic designation, while the property's slave quarters were not.

In downtown Tucson, an analog example is that historically anglo sections of downtown (The Presidio and the Mansions of Main Ave.) were protected and now stand as a Historic Preservation Zone, while the so-called "slums" of the Hispanic section of downtown were razed to install the Tucson Community Center. Even the remnant of that demolished historic barrio, known as "Barrio Viejo," became almost exclusively owned by wealthy white people, then categorized as a City of Tucson Historic Preservation Zone.

It is important that TEP has recognized that, historically, large utility projects have been jammed through disadvantaged communities. It is great that the company is accounting for this and trying to take a fair and inclusive approach to route selection.

Unfortunately, special consideration for historic properties and neighborhoods undermines this attempt at equitable transmission line placement. It gives preference to the over-advantaged neighborhoods that have had the extra time, money, and organization required to achieve "historic" status.

Becoming recognized as a historic district or property is a time-consuming process that requires a significant investment of resources and buy-in from a majority of community members. But the designation does not mean that one district in the city center is necessarily more unique or deserving of preservation compared to another across the street.

Today, almost any community in which 51% of structures were built prior to 1973 can receive historic designation. Jefferson Park recently announced that it has become Tucson's 31st historic district. The neighborhood reported that it raised \$38,000 to pay for the required inventory study and application to achieve this designation.

**Comment Method: Email**

These resource-investment requirements have historically been an impediment to inclusion of disadvantaged communities. Besides lacking the luxury of free time to organize and assist with the years-long application process and the finances to enlist consultants to make application, disadvantaged – often minority – communities lack the third important requisite for historic designation: Trust.

Historic Preservation requires the assent of district residents. They must foresee that the rules and responsibilities imposed by government bodies will be reasonable and provide a community benefit. Disadvantaged communities and oppressed populations are commonly suspicious of the power structures who would impose special zoning restrictions on their neighborhoods. They also commonly see historic designation as a detriment that will drive gentrification, inflate housing costs, displace residents and ultimately break up communities.

Currently there are applications in the works for state and national register historic designation for the perennially disadvantaged neighborhoods of Mission Gardens and Barrio San Antonio. These applications are being funded by outside groups. While these are fledgling efforts by those in the historic preservation community to remedy historical inequity, it will be decades before the built-in preservation prejudices of the past are overcome.

For TEP to choose officially-designated historic areas and avoid them when locating transmission lines is to further amplify the effects of historically unfair public policies.

In addition, so long as TEP and other infrastructure projects offer legacy favoritism to historic districts, you provide a perverse incentive for neighborhoods to apply for historic designation just to keep projects out of their yards. In at least two recent cases, applicants described, discussed, and promoted that a primary benefit of historic designation is to thwart public infrastructure projects in and around their neighborhoods. This was done openly by the Rincon Heights Historic District around 2013 in an effort to stop the expansion of Broadway Boulevard, then again by the Sunshine Mile Historic District as a means to prevent Kino to DeMoss Petrie 138 kV lines from being installed along the previously-selected DMP Route 1A. Neighborhoods now know that evaluation criteria favoring historic districts are likely to be used. Thus, populations of means use historic designation as a tactic to repel transmission lines.

Finally, there are so many historic properties, neighborhoods, and districts in the Midtown Reliability Project Area, that it forms a veritable blockade to project completion. Please consider this GIS map of Tucson's historic places:

[https://www.tucsonaz.gov/files/sharedassets/public/v/1/city-services/planning-development-services/historic-preservation/documents/22x34\\_nrhds\\_zones\\_index\\_011122.pdf](https://www.tucsonaz.gov/files/sharedassets/public/v/1/city-services/planning-development-services/historic-preservation/documents/22x34_nrhds_zones_index_011122.pdf)

Evaluating every possible proposed route for one that would have the highest score for avoidance of historic properties will require an incredibly complex algorithm, with a weighted scoring rubric for each different type of property (individually listed, contributing, non-contributing, eligible, ineligible, district, neighborhood, preservation zone, national, state, or city-designated), that the evaluation would need to come down to a per-square-foot measurement of adjacency to historic resources weighted by resource type. It seems impossible to properly evaluate the impacts based on the vague Suitability Assessment and Compatibility Analysis described for Criterion 5.

Given these challenges, and the fact that historical designations have not been equitably awarded in the past. It is best that Criterion 5 be abandoned.

Thank you very much.

**Additional Info****Requested Info**

**Comment Method: Email**REQUESTED INPUT

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**Response sent*****Response Notes:***

Thank you for the detailed and thoughtful response. You make a compelling argument. Before we remove Criteria 5 outright, or modify it, I'd like to discuss your thoughts with the Advisory Group on Thursday evening.

Arizona Revised Statute 40-360.06 provides factors that must be considered by the Arizona Power Plant and Transmission Line Siting Committee when making a decision to approve or deny an application for a Certificate of Environmental Compatibility. Amongst those factors are historic properties (#5). That is why we typically consider this as a siting criteria. That said, the statute does not explicitly require that TEP consider historic properties at this stage of siting.

**Comment Method: Email**

**Comment Method: Email**

**Comment Date** 10/31/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

It might be useful to collect some numbers associated with the 46kV transmission lines so that they would be available for some possible future discussions.

In particular, those numbers might be useful for supporting a statement such as “The idea of running above-ground transmission lines through midtown Tucson residential neighborhoods is not a new idea. Many miles of above-ground 46kV transmission lines currently exist in residential neighborhoods in the TEP Midtown Tucson Reliability Project study area and they have existed in those residential neighborhoods for decades.”

The following numbers would be useful:

- (1). The total number of miles of 46kV transmission lines in the TEP study area.
- (2). An estimate of the total number of miles of 46kV transmission lines in the TEP study area that run through residential areas.
- (3). The total number of miles of 46kV transmission lines that are expected to be retired along with the eight specified 46kV substations when the Midtown Reliability Project is complete.
- (4). The total number of miles of 138kV transmission lines that would be installed if the shortest possible route was selected.
- (5). The total number of miles of 138kV transmission lines that would be installed if a worst case route was selected.

It might also be useful to subdivide the list of 62 neighborhoods in the TEP study area into two separate lists. One list would contain the names of neighborhoods that have 46kV transmission lines in and/or along the border of the respective neighborhood. The other list would contain the names of neighborhoods that do not have transmission lines in and/or along the border of the respective neighborhood.

It might also be useful to create a list of the names of the neighborhoods that currently have 138kV transmission lines in and/or along the border of the respective neighborhood. The South Park Neighborhood is one such neighborhood.

If you are able to determine this information, please let us know the resulting data.

**Additional Info****Requested Info****Response sent****Response Notes:**

I apologize for the incredibly slow response to your inquiries. I've included in red below, answers to each of your questions. I've also attached a file that contains the lists requested.



**Comment Method: Email**

Thank you asking these thoughtful questions, I had not looked at the current picture in this light before and seeing the answers to you questions is very insightful. I'm copying Joe Barrios and Adriana Mariñez on my response. Joe oversees our communications and I think your thoughts will be insightful to him as well.

Please let me know if you have any additional questions or thoughts.

- 40 miles of overhead 46kV in the Midtown Reliability Project study area today.

- 29 miles of overhead 46kV located within or immediately adjacent to residential areas within the Midtown Reliability Project study area today.

- 18 miles of overhead 46kV lines would be removed once the Midtown Reliability Project is complete.

- This is a little presumptive at this stage in the process, but the straight line distance from the DMP Substation, to the proposed Vine Substation, to the Kino Substation is a little over 6 miles. Based on the former Kino-DMP project, the shortest actual route was just over 7 miles.

- Again, a little presumptive at this point, but the longest route identified in the former Kino-DMP project was just over 8 miles.

**Comment Method: Email**

**Comment Date** 10/30/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Recently I have become involved with the local electrical company, Tucson Electric Power (TEP), in addressing local/Tucson energy needs and resources. The meetings with TEP have been most interesting (Understatement!) and productive, i.e. establishing TEP/Consumer communications in terms of questions, concerns, and future prospects.

The meetings with TEP are public meetings. The next Tucson TEP meeting will be November 16 from 6:00 - 8:00 at the Randolph Park Doubletree Inn. I encourage all and every Tucson resident to attend these important meetings ... First to learn about what TEP is doing in terms of energy and, then, to voice questions and concerns regarding TEP prospects and policies regarding public energy.

And, with so many changes and challenges regarding public energy, these TEP public meetings are ever so important. Tucson residents, "MARK YOUR CALENDARS!!!" for Thursday, November 16 evening from 6:00 - 8:00 PM at the Randolph Park Doubletree Inn.

In preparation for the TEP November 16 meeting, the following New York Times feature may be of interest:

Energy Dept. Pours Billions Into Power Grids but Warns It's Not Enough: America's electric grids may need to expand by two-thirds by 2035 to handle future growth in clean energy, the agency said. The nation isn't on track.

<https://www.nytimes.com/2023/10/30/climate/energy-department-electric-grid.html?smid=em-share>

Again, The New York Times delivers ...

**Additional Info****Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Email**

**Comment Method: Email****Comment Date** 10/29/2023**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

How very much we enjoyed and appreciated the TEP Midtown Reliability Project Advisory Group meeting of Wednesday, October 25. The information was most welcome and much appreciated. Thank you for taking the time to answer questions and address concerns.

During the presentation, you said that TEP has been replacing older 46kV transmission line poles with newer metal poles that are similar in appearance and height to the proposed 138kV transmission line poles.

Based on that statement, it seems reasonable to consider street segments that are currently used for 46kV transmission line poles as opportunities for use with 138kV transmission line poles. That is, the appearance of the new transmission lines and transmission line poles would not differ significantly from what is currently there or planned to be there as TEP continues to replace 46kV transmission line poles.

The presentation slide “The Retirement of Aging Assets” shows eight 46kV substations that may be retired and the transmission lines that connect them. It would be useful to know if there are other 46kV substations and/or associated transmission lines that are located in or near the study area.

If there are additional transmission lines that are not shown on that slide, they may be located in additional street segments that represent opportunities for placement of 138kV transmission lines and poles. Looking at Google maps, it appears as though there is an existing substation at the Southeast corner of West 4th Street and North 11th Avenue. It also appears as though there is a substation Northeast of the intersection of East Speedway Boulevard and North Country Club Road.

Again we do appreciate TEP Advisory Group meetings. And, most assuredly we welcome whatever information you might provide addressing our concerns and comments.

**Additional Info****Requested Info****Response sent****Response Notes:**

You're welcome, and thank you, we very much appreciate your participation in the advisory group. Thank you for providing these additional thoughts. You are absolutely correct, TEP's "Tucson Substation" is located at West 4th Street and North 11th Avenue and TEP's "Country Club Substation" is located at East Speedway Boulevard and North Country Club Road. Both of these substations will remain in-service once the Midtown Reliability Project is complete. But there is no reason that the sub transmission lines serving them cannot be seen as opportunities to site the new 138kV transmission line.

In addition to the two substations you pointed out, there is another, TEP's "Hedrick Substation" located at East Hedrick Drive and North Wilson Avenue.

I'll be sure the 46kV sub-transmission lines serving these substations are shown as opportunities and we'll explore

**Comment Method: Email**

their feasibility for use as a 138kV transmission path. These will be reflected on the maps we discuss at our next advisory group meeting on 11/9.

**Comment Method: Email****Comment Date** 10/26/2023**Category****Concerns Topics**

Cost, Support Underground

**Heard About****Issues/Phone Message/Comments**

I don't think the ACC Policy Statement helps TEP very much here, if at all.

40-360.06(D) says: "Any certificate granted by the committee shall be conditioned on compliance by the applicant with all applicable ordinances, master plans and regulations of the state, a county or an incorporated city or town, except that the committee may grant a certificate notwithstanding any such ordinance, master plan or regulation, exclusive of franchises, if the committee finds as a fact that compliance with such ordinance, master plan or regulation is unreasonably restrictive and compliance therewith is not feasible in view of technology available." Emphasis Added.

Sargent & Lundy wrote that undergrounding is technologically feasible. These ordinances are not new and do not restrict TEP from running a transmission line. The argument that the City told TEP the ordinances did not apply here is not one I would waste money on. It's highly unlikely to succeed.

As someone that dealt with the C suite at energy companies at least as big as UNS while an investment banking analyst and worked on very large development projects in NYC while advising the NYU administration, I genuinely don't understand TEP's strategy.

The cost to ratepayers is something like 10c a month on a \$100 electric bill to comply with the community's plans as expressed in its ordinances and otherwise. These ordinances aren't new. TEP tried to override or get this funded by other means. At a certain point, you have to just pivot to doing what the community wants and pass those costs to ratepayers. Nobody can claim TEP didn't try but if this is genuinely an urgent issue, then it needs to quit messing around.

As far as I know, Chandler had no similar ordinances so TEP is in a much worse negotiating position. Yet, despite this, TEP seems to be demanding far more compromise than SRP achieved. Trying to outright defeat/ignore the community's ordinances is a very dangerous long-term game from a business standpoint. Goodwill is a hard thing to get back.

If you want to pursue real compromise with the neighborhoods, the City and the UA, I am game to do so. The current FA does earmark fees toward undergrounding, which means you just need a City Council vote. But to get that, you need community support behind a plan that the community actually supports.

**Additional Info****Requested Info****No response required****Response Notes:**

**Comment Method: Email**

**Comment Method: Email****Comment Date** 10/26/2023**Category****Concerns Topics**

Cost, Appearance, Location, Historic, Safety, Reliability, Environment

**Heard About****Issues/Phone Message/Comments**

Criteria refinements and thoughts:

1. Balanced distribution of low income communities (% tracts that are below x% AMI on proposed route is less than xx%). With current federal/supreme court shifts, I would be cautious about race/ethnicity-based considerations, although it appears native lands need to be called out per state statute.
2. Increase reliability from current
3. Cost of transmission and distribution line construction (the substation, etc. is a fixed cost independent of the siting and not needed unless proposing to move it)
4. Maximize line that is NOT in R1, 2 or minimize construction in single family residential zoning (% line in R1 and R2 minimized – not sure what grant corridors and Euclid corridor are, for example, but consider where there will be commercial and density)
5. Road width and road easement width are over xx', etc. (e.g., Grant widening creates opportunity, while Country Club is too narrow already with really small area between sidewalk and street, and width of street).
  - a. Or is road width more about Safety: consider the distance and speed on route, and maximize the physical proximity to the bike path or roadway (accidents and damage) together with minimizing speed on the roadway.
6. Impact on views seems vague – it's midtown. Maybe have a measure more related to existing poles/wires, where average height and density of existing poles and heights compared to proposed number and height average for the route – and that this % isn't increased by more than x%?
7. Minimize R1 and R2 percentages along length of proposed siting (x% of route is non R1/R2 of total length)
8. Minimize historic properties or neighborhoods along length of proposed siting (% of total length)
9. Reduce overall infrastructure visible to residents (# poles, % of distribution lines that can be buried relative to current).
  - a. Maximize distribution and comms line length that can be undergrounded under transmission line (%)
  - b. Reduction in number of existing poles of given heights
10. Minimize number of turning poles needed along pedestrian routes (big poles impede sidewalk?)
11. Safety:
  - a. consider pole placements that reduce impact on visibility from side streets for pedestrians, bikes, and cars crossing



**Comment Method: Email**

- b. ADA compliance (I notice on country club poles are in the sidewalk right of way. This shouldn't be happening.)
12. Transit impacts: no idea what impact on public transit in future could be – plans for transit corridors for example (trolley tracks or light rail);
13. Environmental impacts – not sure how to measure – poles on the sidewalk easement disrupts tree planting or other shade options. Massive steel is a major environmental lifecycle cost – what is the return for carbon footprint? What are the options for reducing that through innovation in engineering poles. I keep thinking TEP has some community “gifts” that should come along with this project for good will – a tree planted per pole put up; shade along walkways for every new pole or mile of line sited; sale of the substation properties for affordable housing or gift them to the city for affordable housing development to their new non-profit; setaside from project for procuring more greenway for pedestrians in City, etc.

## Opportunities

- Could pole design somehow become more than simply functional structures for holding wires. Tucson is home to the company responsible for palm tree and fir comms towers (that's not a complement), but could the poles serve other functions like shade or ...

## Constraints

- Do not leverage greenways or parks for new infrastructure
- Do not put in new poles if existing poles can be leveraged or replaced, even if with taller poles
- Sam hughes will continue to resist anything, which isn't necessarily reasonable, but the west end along with university is a relevant constraint, as it serves as open land for many walkers moving across Campbell to campus

**Additional Info****Requested Info****Response sent****Response Notes:**

I really appreciate your thoughts on this Meredith! I'll incorporate these into a draft of more detailed criteria that we'll distribute to the advisory group early next week.

**Comment Method: Email**

**Comment Date** 10/20/2023

**Category**

**Concerns Topics**

Historic

**Heard About**

**Issues/Phone Message/Comments**

Just to clarify, when I said there are degrees of historic, below is what I was referring to.

Historic Preservation Zone (HPZ) is the most strict. Indeed, you cannot even change a light without approval from a board. West University is one of the only HPZs. NPZs are substantially less strict.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Thanks for clarifying Dan, and thanks for providing the information on the underground projects. Seeing those projects, I think the disconnect on the underground is a how transmission is defined.

APS and SRP both have 69kV systems as their local “transmission” systems, with 230kV and 500kV providing the backbone to their systems. The 69kV systems are more similar to TEP’s 46kV system. TEP’s local transmission system operates at 138kV, with 345kV and 500kV providing the backbone to our system.

As an industry standard, transmission is typically classified as anything over 100kV. Legally for the state of Arizona, transmission is anything 115kV or greater (A.R.S. 40-360 (10)). So while APS and SRP might classify 69kV as transmission, by definition it is not classified as transmission in Arizona and does not require a Certificate of Environmental Compatibility to construct and the same rigor of review the Midtown Reliability Project is undergoing.

Just wanted to provide that clarification so you understood why I was confused when you said there were multiple recent cases of underground transmission in the state. So yes, you are correct, there have been a number of recent 69kV lines buried. TEP even has some 46kV lines buried – as a high level estimate we use \$4M/ mile for underground 46kV, so in line with the costs you saw from SRP and APS. However, there is a big jump in the cost when you get to the actual transmission voltages > 100kV, and unless the information APS and SRP provided me is wrong, there is less than 10 miles of > 100kV transmission buried in the state today.

**Comment Method: Email****Comment Date** 10/20/2023**Category****Concerns Topics**

Cost

**Heard About****Issues/Phone Message/Comments**

Copy. And I wasn't focused so much on the voltages as much as the method and cost of construction. The 69kV project plans had basically identical construction methods as Sargent and Lundy's document. A trench is a trench and conduit is conduit. Those costs don't have a lot of variance. They all use vaults and have redundant conduit/conductors. The conductor size obviously has variance. Hence the Chandler project is a useful upper bound given its larger size.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Email**

**Comment Date** 10/18/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

As a stakeholder, will the U of A again be able to request (and receive) changes to the preliminary route plans that are outside of, or not adjacent to, its designated Campus Planning Boundary?

<https://pdc.arizona.edu/realestate/boundary.html>

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for the question. Like residents, property owners and all other stakeholders, the U of A will have the opportunity to submit preferences regarding the inclusion and exclusion of preliminary routes and other comments throughout the planning and siting process.

No single stakeholder is given special privilege over another, and all are encouraged to provide comments on potential routes throughout the process. That is how we'll be able to develop a routing solution that is most in line with the goals and values of the community.

If a route or routes are located on property under a single large landowner and that landowner has preference for a specific location across their land over another location on their land, TEP would defer to their preference if possible.

I was not involved in previous outreach efforts for this project so I would appreciate hearing more from you about the request you describe and how it relates, or does not relate, to the Campus Planning Boundary. Please let me know if you would like to discuss further. Thanks again for your interest in the project.

**Comment Method: Email**

**Comment Date** 10/10/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thank you, Clark!

You write, "TEP put out a Request for Information to a number of consultants who could provide the services we were requesting."

Could you please send me a detailed list of "... the services we were requesting" in TEP's "Request for Information"

(I assume you/TEP really meant the best practices phrasing: Request for Proposals, but it doesn't really matter).

As always, thank you in advance for bearing with me and helping me understand your employer's behavior!

**Additional Info****Requested Info****Response sent****Response Notes:**

We followed a less formal process than a typical "Request for Proposal" process which is fairly strict and, at least for TEP, used for higher dollar scopes.

Below are the services requested, the survey was not specifically included but review was completed under the first sub-bullet listed.

- Assist in designing overall public/stakeholder strategic outreach plan and related messaging for approval of a Certificate of Environmental Compatibility, with expected hearing Q2 2024.
- Facilitate up to three in-person project open houses and strategic outreach plans (July, October, January 2024), this would include:
  - Review and comment on all outreach materials (newsletters, postcards, presentations, informational boards)
  - Design the overall layout and format of the open houses, community working group meetings, and stakeholder meetings to facilitate productive dialogue and comment.
  - Attend and act as 3rd party facilitator at the open houses and manage any potential conflict.

**Comment Method: Email****Comment Date** 10/7/2023**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

After talking to a couple of engineers I have more comments. First, they all say underground is a bad idea. :-). Given that, are you looking at alleys where you already have lines? And would you be able to move those existing lines to the new poles, so the total number of poles declines? And I am curious about the pole foundations - large concrete pillars or fully underground? Of course I want them to take up as little space as possible.

Thank you. No need to reply as I am sure you are thinking about these issues already.

**Additional Info****Requested Info****No response required****Response Notes:**

**Comment Method: Email**

**Comment Date** 10/5/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I don't understand something: From what you and Gordley Group (a "local" marketing/promo operation) have presented, it all looks like a TEP infomercial.

Could you please explain and describe in detail the TEP/Unisource decision making process to pick Gordley Group. Thank you in advance.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

TEP put out a Request for Information to a number of consultants who could provide the services we were requesting. TEP received responses from two different firms along with proposals for how they would perform the requested work, along with cost estimates. TEP's internal project team discussed the different approaches, together with the costs, and made a decision to hire Gordley because we felt their proposal and expertise best fit the needs of the project.

**Comment Method: Email**



**Comment Method: Email****Comment Date** 10/3/2023**Category****Concerns Topics**

Cost, Appearance, Location, Property Value, Support Underground, Historic, Substation

**Heard About****Issues/Phone Message/Comments**

Please find attached a letter outlining our concerns regarding the newly named Midtown Reliability Project. Not only will the project, if allowed to proceed overhead, adversely impact the center of the city, but Jefferson Park will be by far the most affected by the intended location of the Vine Substation and lines coming into and exiting our neighborhood.

Thank you for your attention to and consideration of this serious matter.

**Additional Info**

With the recent re-introduction of the 138 kV transmission line project, now named the TEP Midtown Reliability Project, the problem of overhead lines and massive poles has once again become one of our area's most critical matters. It is a serious and ongoing challenge for the center of the city, especially for our neighborhood. With the proposed Vine Substation remaining in approximately the same location (one block closer), lines coming into and exiting the facility could go right through Jefferson Park. We cannot emphasize enough the devastating effect this impending decision will have on our neighborhood.

Jefferson Park is a historic district and one of only two Neighborhood Preservation Zones (NPZ) in Tucson. Its residences, schools, health care facilities, churches, and contributing historic structures must be preserved. 138 kV poles and overhead lines run counter to all the efforts to preserve this unique part of Tucson. If these lines are permitted to be above-grounded through our community, it will greatly affect the quality of life, damage the historic integrity, the property values, and the viewshed.

It is simply inconceivable that lines and enormous poles will be allowed to pass above ground through a residential neighborhood and historic district, just a few feet from homes, churches, and a nursing home/rehabilitation facility. Jefferson Park should not be expected to shoulder the enormous burden of ensuring that the U of A, UAMC-Banner, and other neighborhoods enjoy upgraded, reliable electric service.

The neighborhood has been actively involved with this TEP issue since it was first introduced to the public in September 2019. We are members of the Undergrounding Coalition, which is comprised of eleven neighborhoods and three other organizations, representing some 25,000 citizens. As a group, we remain committed to ensuring that these lines are not placed overhead through the core of the city.

We expect TEP to 1. Follow the letter and intent of the plans in the study area. Several plans govern the city: Tucson's general plan (Plan Tucson) and the Major Streets and Routes Plan (MS&R Plan). Additionally, many neighborhoods, including ours, are incorporated in the University Area Plan (UAP), which "specifically directs that utility lines be placed underground where possible to mitigate impacts on adjacent uses" (ZE Decision dated 5-13-21; see also UAP at Policy No. 6). At the recent public meeting on September 21, 2023, when asked about following the UAP, a TEP spokesperson replied that he could not describe how TEP would follow the Plan because there's not yet an official route. However, if the substation remains in the same location, lines will come in and out of the area covered by the UAP. 2. Move the substation to a more industrialized area, and then distribution lines could be placed underground at a fraction of the cost to provide power to neighborhoods. 3. Financially subsidize the cost of undergrounding lines through the heart of the city. The company's shareholders are certainly reaping the rewards of lucrative profits from their investment in TEP. 4. Collaborate with the U of A, who will be one of the greatest beneficiaries of the project, to be more actively involved in finding solutions. Potentially, they could contribute property for the substation in a more industrialized

**Comment Method: Email**

area of campus.

Jefferson Park steadfastly opposes any consideration of running overhead lines and massive poles through our neighborhood. They should not be placed in any residential neighborhood, and the substation should certainly be moved to a more suitable location. Undergrounding is the only consideration for the transmission lines in the heart of the city, thereby protecting the Tucson we want now and in the future. Thank you.

**Requested Info****Response sent****Response Notes:**

Thank you for submitting your letter on behalf of the Jefferson Park Neighborhood Association. I just wanted to acknowledge that we are in receipt of your comments and concerns and they will be considered as we progress with siting/permitting of the project.

I look forward to meeting with you and your neighborhood in November and am grateful to you for the time you have dedicated to this project over the past several years.

**Comment Method: Email****Comment Date** 10/2/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Why is TEP doing all this reliability project meeting and public education push without waiting for the decision from the Board of Adjustment?

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

These new facilities are urgently needed to maintain reliable service for customers. Some transformers providing service in our study area are more than 50 years old and other pieces of equipment are even older. Residents are currently reliant on equipment rated as being in 'poor' or 'very poor' condition, creating a greater risk of low voltage and outages. Additionally, peak energy demands have nearly reached the capacity of the existing system. We hope to have the project in operation by the summer of 2027.

As we've said publicly since restarting our outreach to residents and others this summer, all options are on the table. The Board of Adjustment's decision addresses overhead utilities in Gateway Corridors. However, we feel it's prudent to continue with our outreach and research as we try to find the most promising route options, which may include overhead construction outside of Gateway Corridors.

I hope this information is helpful.

**Comment Method: Email****Comment Date** 9/29/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Do you have a map of the 138kV system, or even just all of the transmission and distribution systems in the region? There are so many documents that it's quicker for me to ask.

Then, why is the redundancy in this loop required? Does the current, smaller system have this redundancy?

**Additional Info****Requested Info****Response sent****Response Notes:**

TEP does not typically share full system maps. However, I can point you to a couple of public documents where you can find system information:

2023 – Ten Year Plan  
12th Biennial Transmission Assessment

As a standard, TEP loops it's 138kV transmission system wherever possible for reliability purposes. The 46kV sub-transmission system operates as a radial system, meaning it has a single source which is less reliable than a looped system.

**Comment Method: Email**

**Comment Date** 9/26/2023

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Can you explain to me why a one-mile outward mailing from the proposed TEP/Unisource Midtown Reliability Project was selected by your amazing and totally competent TEP team. Look, one mile seems ad hoc, arbitrary, gtm. Why not a half mile, a quarter mile, three miles etc, like working through the integers? Rationale? I still don't understand your method, its basis. Please explain.

Thanks for continued communication,

I look forward to hearing back from you.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

You are right, we could have selected any number of distances for our targeted notification. We used one mile around the study area because we wanted to be sure residents/businesses within the vicinity of the area where the transmission line might be sited were explicitly made aware of the proposal, and were not solely reliant on other means of finding out (i.e., news, newspaper, social media, etc). We have used a notification area like this on past projects and received favorable comments from the AZ Power Plant and Transmission Line Siting Committee during public hearings regarding efforts to reach out and engage members of the public.

We appreciate your continued engagement in the project.

**Comment Method: Email****Comment Date** 9/26/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

One additional point I would like added to the record is:

This redundant loop benefits TEP's entire customer base, not just the immediate area. If the transmission line were severed without the loop, electricity would stop flowing crosstown. With the loop, if the transmission line is severed anywhere within the loop, electricity would keep flowing to all of TEP's customers. Thus, this project is for the benefit of TEP's entire customer base and not just midtown Tucson.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Email****Comment Date** 9/24/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Will you be following the same process as last time, where major stakeholders like the U of A and the City of Tucson have substantial input into the direction of the project and options for it before it is taken to the local community? If so, is this process underway already? If not already started, when will that happen?

Also, where do neighborhood associations fit in this process? It seems like last time it was also after much of the planning had been done with major stakeholders.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We will be following a process where we seek out preliminary feedback from a smaller group of stakeholders before we share with the full community. The intent of this is not to give any group an outsized influence on the project, rather to gain an understanding of concerns and work through challenges in smaller groups. The U of A and City of Tucson are just two of these stakeholders. Each of the neighborhood associations are also stakeholders. We are forming a Neighborhood Advisory Group comprised of a single representative from each neighborhood within the project study area. This group will meet approximately 1 month in advance of any full community outreach, simultaneous to that meeting, we will hold a separate briefing with the non-residential stakeholders. As we move into the phase of the project where we'll be identifying opportunities and constraints for a transmission line route, we plan to meet with these groups beginning mid-late October.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**



**Comment Method: Email****Comment Date** 9/24/2023**Category****Concerns Topics**Appearance, Support Underground,  
Historic**Heard About****Issues/Phone Message/Comments**

Thank you for the invitation to join the recent TEP Midtown Reliability Project (MRP) Open House. In response to TEP's request for public input, the Tucson-Pima County Historical Commission (TPCHC) unanimously passed a motion to submit comment on the MRP and its potential adverse effects on historic resources in the City of Tucson, and City of South Tucson.

The TPCHC has no comment on whether certain proposed routes of the 138kv transmission lines comply with local ordinances and guidelines related to the University of Arizona Area Plan, and the Tucson Major Streets and Routes Plan, as well as the clearly stated 2021 decision of the City of Tucson Zoning Administrator. Similarly, without site plans, we cannot comment specifically on whether certain routes through, or adjacent to National Register Historic Districts and City Historic Preservation Zones, or other potentially historic/cultural resources would comply with Secretary of the Interior Standards, or would meet Federal criteria of an "adverse effect" as outlined in 36 CFR Section 800.5 (a) (2) (v). However, the TPCHC can, and must comment generally, when a large-scale eyesore is proposed to run through the heart of one of the most historically beautiful cities in the United States, especially when an obvious and proven alternative to overhead power lines exists. Our opinion is simple and is based upon the spirit of the National Historic Preservation Act (NHPA) of 1966, signed into law by President Lyndon B. Johnson. The NHPA not only encouraged historic preservation, it implicitly sought to allow the general public to enjoy a free and clear view of our nation's historic resources.

We strongly encourage TEP to continue exploring ways to underground the MRP. We urge TEP to consider strategies employed by other municipalities such as Paradise Valley, Anaheim, San Diego, and many others, outlined in "Reclaiming Visual Stewardship in Tucson, Arizona: Is it Possible?" by Ellen Barth Alster, Senior Landscape Architect, [former] Pima County Department of Transportation, available from the United States Forest Service. <https://www.fs.usda.gov/research/treesearch/57557>

Virtually any aboveground installation route through the MRP Study Area will have unacceptable and practically irreversible adverse visual effects on several or many cherished historic / cultural resources, including, but not limited to:

- Armory Park Historic Preservation Zone
- Barrio Anita National Historic District
- Barrio Blue Moon
- Barrio El Hoyo National Historic District
- Barrio El Membrillo National Historic District
- Barrio Kroeger Lane
- Barrio Libre National Historic District
- Barrio San Antonio
- Barrio Santa Rosa National Historic District
- Blenman Elm National Historic District
- Broadmoor National Historic District
- Catalina Vista National Historic District
- Colonia Solana National Historic District
- Downtown Tucson National Historic District

**Comment Method: Email**

El Encanto National Historic District  
El Paso and Southwestern National Historic District (pending)  
Fourth Avenue National Historic District  
Iron Horse National Historic District  
Jefferson Park National Historic District  
John Spring National Historic District  
Menlo Park National Historic District  
Miracle Mile National Historic District  
numerous potentially historic and cultural resources in the City of South Tucson  
Pasqua Yaqui lands  
Pie Allen National Historic District  
Rincon Heights National Historic District  
Sam Hughes National Historic District  
Sunshine Mile National Historic District  
TCC National Historic Landscape  
The 1948 Pueblo Gardens neighborhood, Quincy Jones, architect  
The Benedictine Sanctuary  
The Manning House  
U of A Campus National Historic District  
Warehouse National Historic District  
West University Historic Preservation Zone

In closing, we strongly recommend that TEP's immediate goal should be to underground the MRP transmission lines, respecting and maintaining Tucson's distinctive historic visual charm. Undergrounding is the only way to avoid marring the carefully preserved integrity of Tucson's rare historic visual landscapes. Remember it is Tucson's unique sense of place that has attracted tourists, new residents, filmmakers, and other businesses to our picturesque city for generations.

Please do not hesitate to reach out to me if you have any questions about this comment letter.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We will consider your input as we move forward with the project.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**

**Comment Date** 9/23/2023

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Could you please me whether the survey (postal and email) was designed by a contractor or was the survey (postal and email) designed in-house, by TEP employees. Or some hybrid.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

The survey was designed and prepared in-house by TEP employees.

Please let us know if you have any further questions.

**Comment Method: Email**

**Comment Date** 9/22/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thanks for the twon hall meeting at the Double Tree on September 21, 2023.

I have two questions that were not dress at the meeting.

1. What is the time frame for the project and which location will the project begin?
2. Our building is located within a block of the substation on the corner of Norris and 20th St.

There is a 46kV pole located in the middle of our driveway ingress/egress area.

Will this pole be removed as part of the project? We will wait for its removal.

If it is not schedule for removal, we will need to press forward with a request for its relocation. We spoke with a TEP area engineer who told us the pole can be repositioned.

**Additional Info****Requested Info****Response sent****Response Notes:**

Following all approvals, the transmission line and substation are expected to begin construction in 2026 with a project in-service date of May 2027. Distribution upgrades and retirement of 46kV assets would follow over the next 10 years. Construction sequencing has not been determined at this time.

Making an assumption that the attached image is the pole you are referring to, it is actually not a 46kV pole, but a distribution pole. I would not expect this pole to be removed as part of the Midtown Reliability Project.

I will add your additional comments to the project record provided to the ACC.

Please let me know if you have any additional questions.

**Comment Method: Email****Comment Date** 9/22/2023**Category** Resident in Study Area, Business Owner in Study Area**Concerns Topics** Appearance, Support Underground**Heard About** Project Website, Newsletter Mailing, Public Meeting**Issues/Phone Message/Comments**

Improve aesthetics and beauty of our pueblo as other cities have done by using underground technics for new installations. It is about time our city stops looking like a bunch of toothpicks. We have looked like a third world country for too long.

**Additional Info**

Lets get started and don't stall any longer.

**Requested Info**

A project time frame

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

Because these upgrades are urgently needed to maintain reliable service, TEP plans to complete construction of the transmission line and substation by the summer of 2027.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 9/22/2023**Category****Concerns Topics**

Cost, Support Underground

**Heard About****Issues/Phone Message/Comments**

I get why TEP proposed that taxpayers take on TEP's costs for complying with the law via Prop 412 but there's nothing in the law that requires taxpayers or any other outside party to pay for undergrounding.

To get outside funding, like say in a new Franchise Agreement or from the UA/state/Feds, TEP has to be smarter about its efforts. Prop 412 should have been drafted in a much less divisive way and with smarter timing. Again, look at the City of Chandler, Intel, and SRP transmission undergrounding project for a good example of how to get parties to the table.

I believe TEP can get some outside money but it hasn't pursued a good strategy to do so yet. Pretending this project is not primarily for the UA is a strategic error as it lets the UA free-ride. You have to get everyone to the table. If the UA doesn't want transmission lines through campus (like on say Cherry), it should be receiving the same ultimatums as the neighborhoods. Failing to accurately identify the primary beneficiaries only harms your ability to get outside funding. TEP may end up eating all of this cost simply because of repeated bad strategies.

Let's come up with a good strategy.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your additional comments. We will add these to the project record provided to the ACC.

**Comment Method: Email****Comment Date** 9/21/2023**Category****Concerns Topics**Appearance, Location, Support  
Underground, Reliability**Heard About****Issues/Phone Message/Comments**

I am writing to express my strong support for placing power lines underground, especially along Tucson's Gateway Route. Nothing will make Tucson less attractive than the enormous ugly power poles being proposed. Remember, the Gateway Route is the first introduction many get to our beautiful city, the University, the mountain skyline, sunsets, historic neighborhood, etc.

Many cities (including Phoenix) have reached agreements with their service providers to keep their cities beautiful by burying the lines. In addition, our monsoons frequently cause downed lines that leave people without services, cause costly repairs and overtime pay, etc. underground lines do not have these costs.

I would hope TEP would see the value, both in costs and in customer appreciation, by placing lines underground.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered.

While many of APS and SRP "distribution" lines are buried, in all but a few very limited instances, their "transmission" lines are constructed overhead. There is a very big difference between constructing and operating a distribution line underground and constructing and operating a transmission line underground.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held tonight, September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Email**



**Comment Method: Email****Comment Date** 9/21/2023**Category****Concerns Topics**

Cost, Support Underground

**Heard About****Issues/Phone Message/Comments**

The ACC is supposed to make line siting decisions according to the nine factors under 40-360.06. All of the factors favor undergrounding on the community's preferred and most direct route, which is Campbell Ave (or through the UA campus).

TEP relies on factor eight to argue that undergrounding is cost prohibitive. Factor eight says:

8. The estimated cost of the facilities and site as proposed by the applicant and the estimated cost of the facilities and site as recommended by the committee, recognizing that any significant increase in costs represents a potential increase in the cost of electric energy to the customers or the applicant.

The community, through its ordinances, has already established that undergrounding is its preference and the law. Thus, the community accepted that there may be higher costs for electric energy.

This begs the question of what those higher costs would actually be for TEP or ratepayers. Under the law, TEP is required to capitalize the cost of its projects over their useful life. In the most recent calculation, TEP must capitalize transmission assets at 1.69% per year.

Thus, a \$20 million cost differential must be expensed at \$340,000 per year for ~59 years. TEP collects about \$1 billion per year from ratepayers currently (this will only grow over 59 years). Therefore, capitalizing this asset equates to 0.034% of TEP's ratepayer collections per year. If your average bill is \$100 per month, it will cost you less than 3.4c per month (much less in reality because of differential rates for residential vs commercial).

This is not a significant cost to either TEP or ratepayers but it doesn't actually matter. The City of Tucson passed the undergrounding requirements decades ago and already accepted that any cost differential was worth it. If the community disagrees, it can change the democratically elected council members and the law.

It is my view that none of the nine line siting factors favor going above ground through the densest and most vertically growing area of Tucson. And, it's not even close.

There are multiple additional arguments that layer onto this base argument, such as: 1) TEP's cost estimates are inflated relative to recent comparables across the state; 2) private property damage claims must be accounted for according to TEP's own studies; 3) the UA as the primary beneficiary should be contributing to the project in exchange for avoiding a transmission line through campus; and many more.

I continue to believe that if TEP wants to avoid costs, it should propose a clean Franchise Agreement that increases the rate from 2.25% to 2.75% and leave it to city leaders to help with cost. This is what Chandler did. It worked. TEP needs to stop overcomplicating everything and wasting money.

AND, I still believe a shared Boring Company tunnel is your cheapest option and the simplest, "sexy" solution for getting outside funding from the Feds.

**Additional Info**

**Comment Method: Email****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

With the failure of Proposition 412 earlier this year, the voters of Tucson declined a solution that would have raised the funds to pay for the difference in cost between an overhead and underground transmission line.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 9/21/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thanks for holding tonight's open house.

It would be great if you would record the meeting and post on YouTube and/or your website for those of us who can't attend large indoor gatherings--and people with kids and other responsibilities.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for the suggestion. We appreciate that everyone has different circumstances and some won't allow them to attend tonight's meeting. However, for a number of reasons, we won't be filming the meeting tonight. That said, we've extended an offer to all of the neighborhood associations in the project study area to come and meet with them in one of their regular meetings. I'm not sure which neighborhood you are in, but maybe encourage your President to accept that offer. Additionally, we'd be happy to have a conversation with you individually to educate you on the project and to discuss any questions and concerns you might have.

Please let me know if you'd like to chat and we can schedule a call that works for your schedule.

**Comment Method: Email****Comment Date** 9/21/2023**Category** Resident in Study Area**Concerns Topics****Heard About****Issues/Phone Message/Comments**

Thank you for your response to my comments. Will you be sharing the program materials after tonight's meeting on the project web site? I'd like to learn more about the project plans.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

The PowerPoint presentation that will be displayed at tonight's meeting will be uploaded to the project website following the meeting.

Please let me know if you have any further questions and we'd be happy to discuss.

**Comment Method: Email****Comment Date** 9/21/2023**Category****Concerns Topics**Health, Location, Property Value,  
Support Underground**Heard About****Issues/Phone Message/Comments**

As residents of the Palo Verde neighborhood with a house on Camilla Blvd, we would like to express our STRONG OPPOSITION to installing TEP high-voltage power poles in our neighborhood.

It's not right to make modifications to a neighborhood that negatively affect property values and may pose health concerns without the consent of the people who live there, and we must insist that any additional power grid be installed underground.

Please do not proceed with this project without unanimous consent from the citizens who reside in these areas.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. Camilla is actually located outside of the project study area, so would not even be considered as an option.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held tonight, September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Email****Comment Date** 9/20/2023**Category****Concerns Topics**

Cost, Support Underground, Reliability

**Heard About****Issues/Phone Message/Comments**

I appreciate the need to upgrade the transmission network and am in favor of doing so.

I am opposed to the continued use of above ground powerlines and STRONGLY SUPPORT underground lines. Other communities have successfully placed their lines underground and have thus made their communities much more attractive and safer.

Undergrounding is well worth the cost and is the only acceptable solution for me.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**

**Comment Date** 9/20/2023

**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I already asked you a specific question and a request:

"Could you please tell me, at whatever level of detail, the qualifications of the TEP employees who designed, prepared and approved the survey. I would like to know relevant education and actual experience with proper survey research by those persons, if any. In general. "

Your response was "Multiple team member played a role ... "

Thing is, you and your employer chose to not answer my specific question.

In addition, you reference "Gordley" ("...our consultant.") as a reviewer. But say nothing further.

Could you please provide me with the serious professional technical qualifications of "reviewer" Gordley. This includes formal education, training, actual experience etc. I don't need to see actual transcripts or resumes.

As always, thank you in advance for your helpfulness and expected prompt/timely response!

**Additional Info****Requested Info****Response sent****Response Notes:**

TEP employees who participated in the development of the survey have training and experience in environmental and land use planning, geography, communications, and analytics.

The survey was not intended to be a statistically valid survey with defined margins of error. Rather, we wanted to use this as a tool for gaining a better understanding about the opinions and preferences of customers and other stakeholders in the project study area on some specific topics. We're very appreciative of everyone who participated and we have received thousands of responses. That feedback will help inform our development process.

Regarding "Gordley", the Gordley Group is a well respected, local consulting firm that specializes in public outreach and marketing. You can learn more about them on their website: [gordleygroup.com](http://gordleygroup.com).

Are you planning to attend our meeting on Thursday? I look forward to seeing you there!

**Comment Method: Email**



**Comment Method: Email****Comment Date** 9/20/2023**Category****Concerns Topics**

Cost, Renewable Energy, Reliability

**Heard About****Issues/Phone Message/Comments**

Thank you for this opportunity to provide comments and questions for the Open House on the Midtown Reliability Project September 21, 2023.

Questions for TEP regarding the proposed Midtown Reliability Project

The people of Greater Tucson, by all accounts, support a smarter and more energy productive electric distribution grid; system reliability in the face of hotter and extreme weather events; and replacement of climate-changing fossil fuel use with clean renewable sources. As we electrify more and more energy uses including mobility, heat pumps, and cooking, the demand for an affordable Twenty-first Century electric generation and delivery system is increasing.

City of Tucson voters defeated TEP's May 2023 Prop 412 election 55%-45% because its 25-year plan to provide electric services was unconvincing. The Pima County Planning & Zoning Commission denied TEP its June 2023 request to convert its current voltage substations to a voltage capacity three times higher because TEP was unwilling to negotiate its plans with community stakeholders.

Before TEP and the Arizona Corporation Commission decide what they determine is in the best interest of ratepayers and private utility investors, concerned Tucsonans want to know the answers to important questions which have not yet been addressed in TEP presentations. With 2024 elections approaching, the emerging climate crisis is rising to become a key issue along with the cost of living. Candidates who best address these related issues are likely to be successful. And when the public is faced with big spending projects like TEP's Midtown Reliability Project (MRP) and the Regional Transportation Authority's 25-year RTA Next Plan, these issues will take on a much bigger role in public discourse. So simply put, these questions we want answered reflect the growing interests of the greater community which our institutions and utilities should serve.

Here are our questions for TEP's Midtown Reliability Project:

1. Need for tripling transmission capacity

The overarching question which the MRP raises is whether this tripling of energy transmission capacity in Central Tucson is actually necessary. Have all other options been identified and evaluated? Doesn't tripling the capacity of transmission lines suggest TEP plans to continue to acquire the bulk of its power from distant, often out-of-state sources? With transmission line energy losses and ratepayer charges for transmission increasing, wouldn't more local energy sourcing lower overall costs? Does TEP's estimate for needed capacity expansion take into account industry established estimates for improved energy efficiency in our economy? And importantly, how much reduction of that proposed capacity could be achieved by more support for distributed generation and storage including newly developing microgrid design? Very specifically, how much of the estimated peak power demand could be accommodated with local storage?

2. Reliability

While system reliability is a top level ratepayer concern, the question remains whether TEP's plans will yield the most reliable electric grid given the threats of extreme climate, possible attacks on utility infrastructure, and the whims of

**Comment Method: Email**

foreign investors who own TEP. Would TEP please quantify how the MRP would improve reliability including assumptions and how that determination is calculated?

Wouldn't a system more invested in distributed energy resources with microgrids be more reliable? Wouldn't the combination of utility scale and community solar generation with local substation storage increase reliability and reduce vulnerability to our climate challenges? Redundancy is a design solution for reliability, so why wouldn't a community of microgrids accomplish the same or better result as tripling the voltage capacity of the transmission system?

Ratepayers who can afford to pay for private reliability are already purchasing home energy storage solutions. But encouraging private battery storage systems doesn't make sense when TEP can buy storage much less expensively and use it much more efficiently than its customers. There is a shortage of battery-making resources expected to last for years if not decades. Isn't tying those resources up in seldom-used private systems a social mistake?

**3. Value Proposition to ratepayers**

Nowhere in TEP's MRP proposal is there presentation of what the project will cost and how will it impact value delivered to ratepayers. Would TEP please reveal how much these estimated project costs will reduce or increase ratepayer costs and charges including rates for delivered kilowatt hours of electricity? Wouldn't local-regional generation of electricity via rooftop and utility scale solar and substation energy storage be much less expensive and contentious, provide other benefits such as local job creation and tax revenues as well as improve reliability? Very specifically, what are the relative costs of the new transmission line and substation compared with local storage? The National Renewable Energy Lab for example, estimates that TEP could buy 30 MW of storage for \$42 million. Wouldn't this produce the same results as high transmission investments with less cost and more efficiency?

**4. Prospects for introducing competition in Tucson with Community Choice Energy**

The timely retirement of TEP's toxic assets of coal and gas electricity generators is a key stumbling block to decarbonizing our local energy grid. Can't TEP stop using fossil fuels to generate electricity much more quickly by opening the grid to third-party providers of solar energy and encouraging rooftop generation from its ratepayers? The MRP doesn't appear to do this.

The most promising solution for rapid decarbonization is for jurisdictions to implement what is called Community Choice Energy whereby ratepayers can choose the source of energy (preferably renewable) delivered by the utility. A stranded asset fee is determined and assessed on ratepayers so the utility can retire its no longer needed stranded plant and equipment.

**5. Other funding options**

Why isn't TEP taking more advantage of federal funding available for grid upgrades? Does it have anything to do with how the ACC calculates the base rates TEP can charge customers? Can TEP acquire new federal IRA/EPA funds to pay for lower cost to operate/maintain solar/substation energy storage microgrids; use the cost reductions to pay off stranded assets; and then reduce the rates? Power purchase agreements (PPA) for solar with storage have been established by other electric utilities featuring rates as low as 3 cents per kilowatt-hour.

**6. University of Arizona and Banner Medical Center**

The University of Arizona and Banner are both immensely important institutions which we all greatly benefit from. And we do support both the University and the Medical Center committing to decarbonizing their extensive operations. But

**Comment Method: Email**

this energy source switching by these two institutions should not block other promising options. The solution of building a higher voltage transmission system in Central Tucson would preclude other less intensive and lower cost options such as local generation and storage. And without under-grounding, such a transmission line will face widespread opposition.

Furthermore, whatever the power requirements of the UofA and Banner are, it is difficult to believe they do not have the financial resources to pay for them without imposing those costs on TEP's entire rate-paying base. Can't UofA and Banner pay for their decarbonizing costs themselves? Also, doesn't UofA and Banner already have their own backup generators?

Thank you for your consideration.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your interest in the Midtown Reliability Project, and for your concern about how best to meet the growing energy needs of our community, now and in the future.

Our customers count on us for reliable service every day. Considering recent severe weather and higher temperatures, we agree our community must move toward investing in cleaner, more resilient energy resources.

For the residents, small businesses and other customers of central Tucson, the Midtown Reliability Project represents the most reliable, cost-effective option for meeting those challenges while addressing the urgent needs of our local energy grid. TEP must balance cost, reliability, environmental impact, risk and other factors when making crucial resource decisions about a system that serves about 445,000 customers year-round throughout the metropolitan area.

Before we respond to your questions below, I invite you and other concerned Tucsonans to visit our project website at [tep.com/midtown](http://tep.com/midtown). We recently invited more than 100,000 midtown residents and other stakeholders to visit the site and attend an open house because we want our customers to understand the urgent need and important benefits of this project.

The need for capacity, reliability and consideration of cost

As described in our project communications, the need for new facilities and additional energy capacity in central Tucson is clear.

Some transformers providing service in our study area are more than 50 years old and other pieces of equipment are even older. Residents are currently reliant on equipment rated as being in 'poor' or 'very poor' condition, creating a greater risk of low voltage and outages. These components, which interconnect to customers' homes and business, are integral to the operation of our grid and daily life in our community.

Additionally, peak energy demands have nearly reached the capacity of the existing system, reducing electric reliability and leading to the possibility of longer power outages on some circuits. TEP set new peak demand records in 2020 and 2021.

**Comment Method: Email**

With the project, aging 4-kV facilities will be replaced with new 13.8-kV distribution lines, poles, transformers and switchgear. New transmission facilities will provide redundancy and greater flexibility to restore service more quickly in the event of a power outage. Greater capacity will help avoid voltage and other issues that can damage customer-owned equipment. New facilities would be more resilient and more secure.

That's why we hope to have the project in operation by the summer of 2027 - about four years after our initial proposed in-service date. Instead of simple one-for-one replacement of aging equipment serving customers today, new higher-capacity systems will provide greater flexibility and reliability now and in the future.

At an estimated cost of about \$52 million for the overhead transmission line and the proposed Vine Substation, the project would add approximately 75 cents to the average monthly bills of typical residential customers once incorporated into new rates. Building just two miles of the line underground would roughly double that impact. The additional cost of installing about 5.5 miles of the transmission line underground within Gateway Corridor Zones would add an estimated \$80 million to the cost of the project.

The alternative – simply replacing the existing 46kV system components over the course of about 15 years – would have a similar initial bill impact but with higher long-term maintenance costs and without providing the additional capacity needed to continue serving customers.

The distribution improvements following construction of the new transmission facilities would increase the capacity of our distribution system as well, which would accommodate more rooftop solar installations, home battery storage systems and electric vehicles.

We agree with your assessment that TEP can procure and manage resources more efficiently and cost-effectively than privately-owned systems through economies of scale. Through our integrated resource planning process, we continually evaluate new technologies and search for reliable resource options that serve the needs of our customers.

The locations of these resources will vary as practical. For example, our Oso Grande Wind Farm was sited in southeast New Mexico because of the location's strong wind resources, which are far more productive than those in Arizona. Wind energy resources are particularly useful overnight and at other times when solar resources produce little or no energy.

However, our largest solar resource, the 100-megawatt (MW) Wilmot Energy Center, is located just south of the Tucson International Airport. TEP also just announced plans to build a 200-MW battery energy storage system within our service territory in southeast Tucson. The system will be especially useful in the summer when it's charged with low-cost and abundant solar energy during the day before deploying energy in the evening when customer usage is highest.

Energy from increasingly cleaner resources like these would be delivered to customers' homes and businesses with the Midtown Reliability Project.

Greater flexibility, more options for customers

We anticipate that participation in energy efficiency and demand-side management programs will continue to grow. In fact, we're counting on it.

This summer, more than 6,900 residential customers participated in TEP's new Smart Rewards program to show how smart thermostats can be a powerful tool for energy management and greater sustainability. By agreeing to brief

**Comment Method: Email**

thermostat adjustments of up to 4 degrees during peak electric demand periods, participants helped save enough energy to power the equivalent of about 2,300 homes. We appreciate the cooperation of participating customers, especially during the third hottest summer on record.

We also support solar customers every day, providing service at night and when their own systems aren't generating enough to serve their energy needs. About 45,000 homes and businesses – approximately 10 percent of our customers – have their own rooftop systems. TEP had a record year in 2022, interconnecting with more than 7,500 customers who installed their own systems. However, less than 1,000 customers have installed their own battery systems. Although customers already have the option of investing in their own distributed generation and storage systems, investment in such systems is not suitable for all customers due to cost and other factors.

Distribution upgrades described in the Midtown Reliability Project will only serve to accommodate more opportunities like these by providing greater reliability and flexibility for customers to participate in new, energy-saving programs.

TEP and others in our industry widely support federal measures that support building a cleaner, stronger, smarter energy grid, including those available through the Inflation Reduction Act (IRA). We anticipate the IRA could have a positive impact in future system investments, potentially lowering the cost of participating in renewable and other grid management projects, and we continue to explore funding opportunities.

While microgrids and other localized energy resources offer an intriguing option for managing distribution-level intermittency, they have not yet demonstrated the ability to provide reliable, 24-hour service to the hundreds of thousands of customers that rely on us every day.

Microgrids would still require monitoring, management and other support from our local energy grid. They require significant investment and continued maintenance while remaining susceptible to weather damage and equipment failure. Local substations may be ill-equipped to house energy storage systems. TEP would not be supportive of resource options and rate designs that shift costs to low-income and other disadvantaged customers. Operating a grid – even a small one – comes with risk.

Based on our evaluation, microgrid systems alone can't compensate for increases in customer energy demands. Customers have participated in our energy efficiency programs and initiatives for more than a decade because they help lower energy usage and monthly bills. Billed energy usage has remained flat in recent years. Peak energy demand, however, has continued to increase.

Our next Integrated Resource Plan (IRP) is scheduled to be filed on Nov. 1, 2023. We anticipate that it will identify a balanced, flexible resource plan as the best way to meet our community's energy needs and sustainability goals. The plan was developed in consultation with a Resource Planning Advisory Council that discussed what our local energy grid should look like in the future. Members include residential and business customers, environmental and low-income advocates, representatives from local governments and educational institutions, and solar installers.

Even as TEP works to achieve sustainability goals for our community, reliable transmission and distribution lines will be necessary to import and deliver electric service affordably to customers where they need it – in their homes and businesses in the densely populated Midtown area.

Thank you for your comments, questions and engagement with the project.

**Comment Method: Email****Comment Date** 9/19/2023**Category** Resident in Study Area**Concerns Topics**

Location

**Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

Thank you for that clarification. The description of the study area says it ends at Country Club, but the map line seems to run on Camilla, so I was confused. Major street versus a residential at street, even with the attendant construction hassles, is still my preference.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Email****Comment Date** 9/18/2023**Category****Concerns Topics**Health, Cost, Appearance, Location,  
Property Value, Support  
Underground, Historic**Heard About****Issues/Phone Message/Comments**

Over head power lines should not be allowed:

- 1) In residential neighborhoods at all. Several of the neighbors impacted by this project are historic. Property values will drop if large, overhead lines run through them,
- 2) new power lines are to be undergrounded to comply with the University Area Plan and the Major Streets and Routes plan,
- 3) The new powers lines should comply with Gateway Route to enhance and maintain the beauty of Tucson,
- 4) Costs to underground lines are small and future repairs are minimized as wind will not damage them,
- 5) Tucson residents have spent a great deal of time to have these lines undergrounded and should not be dismissed,
- 6) the proposed Vine substation should be relocated so residential neighborhoods are not impacted. The substation and lines are a health concern for residential neighborhoods.

Underground all new TEP power lines!

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Email****Comment Date** 9/17/2023**Category****Concerns Topics**Health, Location, Property Value,  
Support Underground**Heard About****Issues/Phone Message/Comments**

As residents of the Palo Verde neighborhood with a house on Camilla Blvd, we would like to express our STRONG OPPOSITION to installing TEP high-voltage power poles in our neighborhood.

It's not right to make modifications to a neighborhood that negatively affect property values and may pose health concerns without the consent of the people who live there, and we must insist that any additional power grid be installed underground.

Please do not proceed with this project without unanimous consent from the citizens who reside in these areas.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time, only a study area in which potential routes will be considered. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.



**Comment Method: Email****Comment Date** 9/16/2023**Category****Concerns Topics**

Location

**Heard About****Issues/Phone Message/Comments**

I shouldn't have to be doing this at all, it should be a mile away from this neighborhood. I do not enjoy wasting my free time on these political games. Pitting neighborhoods against each other seems like a rather low thing to do.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Email****Comment Date** 9/15/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I hope your day is going well. I read an article about a global project called the Earthshot prize. I was thinking maybe your Midtown Reliability Project might be able to submit its information, when the plans are completed, for a chance to receive \$1.2m in funding.

Earthshot Prize 2022 Winners: Five Winners Announced

"Five annual winners from 15 finalists, will each receive \$1.2m in funding. The inaugural Earthshot prize awards ceremony was held in October 2021 at Alexandra Palace in the UK."

Link - <https://carboncredits.com/earthshot-prize-2022-five-winners-announced/>?

THE EARTHSHOT PRIZE

"THE EARTHSHOT PRIZE WAS DESIGNED TO FIND AND GROW THE SOLUTIONS THAT WILL REPAIR OUR PLANET THIS DECADE."

Link - <https://earthshotprize.org/>

MEET OUR WINNERS AND FINALISTS

"From inspiring leaders, passionate activists and brilliant innovators to forward-thinking cities and countries making a real difference, learn about our extraordinary group of innovators from 2021 and 2022."

Link - <https://earthshotprize.org/>

Thank you for all that you do and have a grand weekend.

**Additional Info****Requested Info****Response sent****Response Notes:**

This is very interesting. I appreciate you feel the project could be worthy of such recognition. This is certainly something to keep in mind, but we don't want to get ahead of ourselves either. Right now, we'd like to focus on finding a solution that meets the energy and reliability needs of the community, is designed to be environmentally compatible, the community can support, and can be approved by the Arizona Corporation Commission. Once we have all that, we'll have a project that can be built. At that point, I'd love to be able to share the experience with others and see if it merited such recognition.

**Comment Method: Email****Comment Date** 9/15/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Could you please tell me, at whatever level of detail, the qualifications of the TEP employees who designed, prepared and approved the survey. I would like to know relevant education and actual experience with proper survey research by those persons, if any. In general. I am not interested in connecting transcripts, resumes and the like to specific TEP/Unisource employees.

**Additional Info****Requested Info****Response sent****Response Notes:**

Multiple team members played a role in development of the survey, and it was reviewed by our consultant, Gordley. If you have specific questions about the project or the design and intent of the survey, we'd be happy to provide a response.

**Comment Method: Email**

**Comment Date** 9/12/2023

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Thank you for the reply to my email. I am on cloud 9 because the idea will be discussed with engineers. Below is the best I can do with an illustration of the idea. I used PowerPoint so the icons are limited. I will follow the website for updates. Thank you so much for making my day! Have a wonderful day.

**Additional Info**

**Requested Info**

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**Response sent**

**Response Notes:**

Thank you for the excellent illustration!

**Comment Method: Email****Comment Date** 9/11/2023**Category****Concerns Topics**

Cost, Location, Support Underground

**Heard About****Issues/Phone Message/Comments**

Imagine my surprise when I went to fill out the online comment form for the now named "midtown reliability project" and what I found was nothing but restrictions and limitations. First, in choosing what the top priorities for the project should be, the choices were limited to two. I did add a third which was: "Insure those who benefit from the project - residential and commercial customers, University of Arizona, Banner Health - pay their fair share of the cost. But the second question on choosing pole height and materials offered no options, like undergrounding. I chose not to answer the question and the survey wouldn't let me proceed. So this is my comment: TEP should either organize an improvement district to underground the line with the cost equally split between TEP customers, UA, and Banner, or an above ground route between 6th Street and Elm Street should run along Cherry Avenue. Thank you.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 9/11/2023**Category****Concerns Topics**Appearance, Location, Support  
Underground**Heard About****Issues/Phone Message/Comments**

Please please please..... don't keep going back to the drawing board!!!! We care about our city and how it looks!

NO ONE wants humongous piles marching up and down Campbell... a true gateway from airport into the city including UofA!!!

Underground please!!!!

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 9/11/2023**Category****Concerns Topics**

Historic

**Heard About****Issues/Phone Message/Comments**

I want to make another suggestion not specific to pole design. Since part of the area to be covered is well populated with Hispanics, I suggest all of your public fliers and literature about the Midtown Project be printed in both English and Spanish.

As one somewhat familiar with urban planning issues I also suggest the poles in historic areas be sensitive to the historic nature of some areas in the planned area. For such pole designs, TEP might look at poles used in historic preservation areas in other parts of the US...A pole design sensitive to historic areas might make acceptance easier in these locations.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your suggestions. We are certainly open to creative pole designs and are actively looking into different possibilities.

We have a Spanish language web page available at <https://www.tep.com/proyecto-de-confiabilidad-del-centro-de-la-ciudad/>. In addition, at the upcoming Public Open House on September 21st from 6:00-8:00pm at the Doubletree Reid Park, we will have an interpreter for the presentation and Q&A, along with several staff members fluent in Spanish to assist any Spanish speakers present.

**Comment Method: Email****Comment Date** 9/11/2023**Category****Concerns Topics**

Support Underground

**Heard About****Issues/Phone Message/Comments**

Thank you for the information, which, honestly, has been slanted to give the impression that the undergrounding of both transmission and distribution lines presents an enormous obstacle.

However, please note that both transmission AND distribution lines are placed underground in MANY cities. And many of those cities use FAR more electric power than does Tucson. Think of New York, Los Angeles, Chicago, Houston, Phoenix, and many other U.S. cities, as well as numerous major cities around the world whose electric transmission and distribution lines are safely buried underground.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your additional comment, we will include this in the project record provided to the ACC.



**Comment Method: Email****Comment Date** 9/11/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

Umm, okay. Thank you for response. I'm going to zig-zag a bit and ask another question: Please tell me whether the Midtown Reliability Project mailing (postal and email) was sent to all TEP Ratepayers here, there and everywhere? I realize this might not be a simple binary (yes or no) response. Could you please describe and explain the ways a response would not be binary in this situation.

Thank you in advance and thank you for adhering to the promise in the various mailings to answer questions via email.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thanks for the additional questions. The email was sent to all TEP customers within 1 mile of the project study area, for whom TEP has an email address. The newsletter was sent to all TEP customers within 1 mile of the project study area.

**Comment Method: Email****Comment Date** 9/9/2023**Category****Concerns Topics**

Location, Support Underground

**Heard About****Issues/Phone Message/Comments**

I do not want our neighborhood to turn into an industrial zone. I am adamantly opposed to poles going through the center of the city.

Other destination cities do not have this kind of blight.

The should be underground.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

No transmission line routes have been identified at this time. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 9/8/2023**Category****Concerns Topics**

Location, Support Underground

**Heard About****Issues/Phone Message/Comments**

TEP = Tucson Eyesore People.

Get real. Trying to put above ground poles through central Tucson, well, you're trying to be a bunch of modern Corporate Visigoths ! Fortis, do they tolerate such crap in Canada ?

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at <http://www.tep.com/midtown>.

**Comment Method: Email****Comment Date** 9/7/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I have one quick question. The brochure sent in the mail said that 8 old substations would be removed, to be replaced by 1 main new substation. Where will that be located? I know that the route has not been finalized yet, but has the substation location been decided?

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

To answer your question, while you are correct we do not have any proposed transmission line routes at this time, we do know the location of the proposed substation. It will be located on a parcel of land that TEP purchased just west of the Banner University Medical Center on Vine Avenue, just south of Lester Street.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 9/5/2023**Category****Concerns Topics**

Support Underground

**Heard About****Issues/Phone Message/Comments**

Is a long-term resident of Sam Hughes one block east of Campbell, my family is absolutely opposed to having above the ground. TEP polls. That is unacceptable when these can be buried underground. I dare say the people who want this approved or not living in the neighborhood where they will be. Do the right thing and have these buried

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at <http://www.tep.com/midtown>.

**Comment Method: Email****Comment Date** 9/5/2023**Category****Concerns Topics**Appearance, Property Value, Support  
Underground, Safety**Heard About****Issues/Phone Message/Comments**

Why do you keep ignoring the will of the residents of Tucson? The overwhelming majority of Tucson's residents care about how our city looks and feels. PLEASE recognize the simple fact that we the people do not want to see any new tall power poles making our city uglier, more dangerous, and less livable. In addition, such poles would reduce our property values, which is also of great importance to us.

We want to be treated fairly and with the same respect and consideration as people enjoy in Phoenix, Scottsdale, Tempe, and other cities in Arizona where power transmission lines are buried underground. We know it's a more expensive solution than ugly power poles and lines would be, but the results, both in aesthetics and in safety, would certainly be worth the added expense.

So please stop pestering Tucson residents with ludicrous questions about how big we would like new power poles to be. It's very frustrating to have to deal with your company, TEP, that refuses to listen to what the people you serve truly want. In a nutshell, we want UNDERGROUND power lines, NOT ugly and dangerous power poles and lines. Please listen, and accept that simple fact.

Once you accept that simple fact, we trust that you will be able to find a way to make underground power lines work in Tucson.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

While many of APS and SRP's "distribution" lines are buried, in all but a few very limited instances, their "transmission" lines are constructed overhead. There is a very big difference between constructing and operating a distribution line underground and constructing and operating a transmission line underground.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown). In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us and perhaps we can discuss in a little more detail.

**Comment Method: Email****Comment Date** 9/5/2023**Category****Concerns Topics**

Support Underground

**Heard About****Issues/Phone Message/Comments**

I hope all is going well with you and everyone at TEP. I read the article in Steve K's Newsletter, Date: 09/05/2023, TEP Public Open House and I saw the Midtown Reliability Project video. It is all very impressive. I hope you can get the necessary upgrades needed for the future power demands. Some have suggested underground utilities and it has been said it would be very costly. I would like to suggest an idea that might help with getting underground utilities.

The idea is to place huge pipes in all the washes. The pipes would be so large one could ride golf carts in them when maintenance is required. Then install the various utilities near the top of the pipes. When it rains the water will flow at the bottom of the pipes while the utilities are safely at the top of the pipes. To take the idea one step further the bottom of the pipes could have screens on either side so the water could flow down and be directed to reservoirs. The golf carts would ride on the solid pipe between the screens.

The pipes could be fancy with monitoring technology so one can see everything that is going on from the office or cell phone. To take the idea one step further the ground above the washes and pipes could be filled in and used for various activities. Such as bike paths on one side and walking paths on the other side. In the middle, between the two paths, could be dog parks, community gardens with pumps to get the rainwater from the reservoir dedicated for that section and the overflow water would continue down its path to the other reservoirs, play grounds, or just green space for relaxing or yoga classes.

I wish you much success in your pursuits and thank you for all that you do.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

I like the out of the box thinking and will raise it with our engineers. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 9/5/2023**Category****Concerns Topics**Appearance, Support Underground,  
Safety**Heard About****Issues/Phone Message/Comments**

I completed the midtown reliability survey but wanted to follow up with additional comments. I am a resident of the Sam Hughes neighborhood.

I was surprised and saddened that the survey only listed above ground lines as the options for running these new transmission lines. It is clear to me and to many residents of midtown that the only acceptable alternative is to run these new transmission lines underground. Please add my voice to those calling for these lines to all be run underground.

We moved to Tucson from Charlottesville, VA, a couple years ago, and they had recently finished a similar project -- all of which they ran in underground tunnels/chases. While it may be more expensive in the short term, in the long term, this solution will have a lasting impact on Tucson.

It will have a huge impact on the beautification of the area. Above ground transmission lines are an eyesore; Tucson already has too many, and we do not need to add more. It will make our grid more resilient, unaffected by high winds and monsoons, as well as safer because there will be no risk of downed power lines. It will also make the city more attractive to business investments in the city as well as to future residents.

Please make the right choice with this project and invest in the future of Tucson by running these transmission lines underground.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).



**Comment Method: Email****Comment Date** 9/5/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

After looking on the MRP webpage's map, we'd like to know whether our industrial complex is included in the Study Area.

The easternmost part of the Country Club Industrial Park LLC is not included in the Study Area on the map.

Am I right in assuming that any tenant or the owner of Country Club Industrial Park is included in the Study Area?

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

Yes, at least part of the Country Club Industrial Park is included in the study area. That said, the intention of drawing the study area boundary east of Country Club Road and not directly down the road was to make it clear that Country Club Road itself was included in the study area and not because we thought there might be an opportunity through parcels east of the road. I hope that provides the clarity you are seeking. We also hope you'll continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 9/4/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

I haven't seen any activity related to this project yet

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

While a lot of work was done around the previous Kino-DMP Transmission Line Project, we are beginning fresh, and are only in the initial planning phases of the Midtown Reliability Project. We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at <http://www.tep.com/midtown>. In addition, a public open house will be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park. We hope you can join us.

**Comment Method: Email****Comment Date** 9/4/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

In your postal mailing to me and in your digital (email) mailing to me do not provide the identities and titles of the persons employed by TEP on this project. Could please provide me, in a timely and professional manner (as in, email) that information. Thank you in advance.

**Additional Info****Requested Info**

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**Response sent****Response Notes:**

Thank you for your interest in TEP's proposed Midtown Reliability Project. Our project team is quite extensive, but I am the Program Manager with responsibility for all transmission line siting activities by TEP, including the transmission line included as part of the Midtown Reliability Project. If you would like to meet me and other members of the project team, I would encourage you to attend the upcoming public open house to be held on September 21st from 6:00-8:00pm at the Doubletree Reid Park.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email**

**Comment Method: Email****Comment Date** 9/4/2023**Category****Concerns Topics**

Renewable Energy

**Heard About****Issues/Phone Message/Comments**

So well done!! (in response to other commenter)

Even though I am not in the study area, on the assumption what happens there will become a blueprint for service Tucson-wide, I offer the following observations and suggestions.

TEP's use of fossil fuels and scarce water supplies to generate electricity at higher than necessary financial and environmental costs is costing it the good will it has acquired for decades. Until 2021, the panels I used to generate electricity (more than my house uses on a yearly basis) were all furnished through TEP's Sunshare program. TEP appeared to be embracing rather than resisting technological change. But roughly around 2007 TEP dismantled Sunshare and began passive then active resistance to customer and third-party generated electricity. This resistance has now escalated to a 'war on solar', detrimental to the long-term viability of TEP and the community it serves.

TEP's own data shows an urgent need to add more renewable energy as quickly as possible. Its Energy Tracker shows a gap between the supply of climate-friendly electricity and the demand for power. Until that gap is closed TEP should be concentrating on how to incorporate all the power its customers and third-party providers can furnish rather than discouraging sources from which TEP cannot realize power generation and transmission revenues.

TEP could provide utility-scale distributed storage for its customers' electricity at roughly 1/4th the cost they could provide it for themselves. And TEP could make much better use of that storage than its customers, given current states of grid reliability.

Local generation and storage of electricity has to be much more reliable as well as less expensive than generating that electricity and transmitting it a thousand miles, even if it is a penny or two cheaper than solar. But how could even wind be less expensive than the free electricity provided by your customers' rooftop solar?

When the gap between the demand for and supply of climate-friendly power is closed or even before, my guess is your rooftop solar customers will have no problem paying you for storing their electricity and the cost of sending it to and retrieving it from that storage. With distributed storage in place, TEP could implement a microgrid / community of microgrids architecture that would be much more reliable than depending on power generated hundreds of miles from its end use.

I am sure I am not the only one for whom these questions have arisen. It would be helpful to have answers before your September 21 public meeting.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

It looks like you had the same questions as someone else, so I'll provide the same response.

**Comment Method: Email**

TEP is planning to provide more than 70 percent of our power from wind and solar resources as part of a cleaner energy portfolio that will reduce carbon emissions 80 percent by 2035. I'd encourage you to view our web page for our Integrated Resource Plan, which I believe will answer many of your question. You can access this web page at <https://www.tep.com/tep-2020-integrated-resource-plan/>.

**Comment Method: Email**

**Comment Method: Email****Comment Date** 9/4/2023**Category****Concerns Topics**

Renewable Energy

**Heard About****Issues/Phone Message/Comments**

Even though I am not in the study area, on the assumption what happens there will become a blueprint for service Tucson-wide, I offer the following observations and suggestions.

TEP's use of fossil fuels and scarce water supplies to generate electricity at higher than necessary financial and environmental costs is costing it the good will it has acquired for decades. Until 2021, the panels I used to generate electricity (more than my house uses on a yearly basis) were all furnished through TEP's Sunshare program. TEP appeared to be embracing rather than resisting technological change. But roughly around 2007 TEP dismantled Sunshare and began passive then active resistance to customer and third-party generated electricity. This resistance has now escalated to a 'war on solar', detrimental to the long-term viability of TEP and the community it serves.

TEP's own data shows an urgent need to add more renewable energy as quickly as possible. Its Energy Tracker shows a gap between the supply of climate-friendly electricity and the demand for power. Until that gap is closed TEP should be concentrating on how to incorporate all the power its customers and third-party providers can furnish rather than discouraging sources from which TEP cannot realize power generation and transmission revenues.

TEP could provide utility-scale distributed storage for its customers' electricity at roughly 1/4th the cost they could provide it for themselves. And TEP could make much better use of that storage than its customers, given current states of grid reliability.

Local generation and storage of electricity has to be much more reliable as well as less expensive than generating that electricity and transmitting it a thousand miles, even if it is a penny or two cheaper than solar. But how could even wind be less expensive than the free electricity provided by your customers' rooftop solar?

When the gap between the demand for and supply of climate-friendly power is closed or even before, my guess is your rooftop solar customers will have no problem paying you for storing their electricity and the cost of sending it to and retrieving it from that storage. With distributed storage in place, TEP could implement a microgrid / community of microgrids architecture that would be much more reliable than depending on power generated hundreds of miles from its end use.

I am sure I am not the only one for whom these questions have arisen. It would be helpful to have answers before your September 21 public meeting.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

TEP is planning to provide more than 70 percent of our power from wind and solar resources as part of a cleaner energy portfolio that will reduce carbon emissions 80 percent by 2035. I'd encourage you to view our web page for our Integrated Resource Plan, which I believe will answer many of your question. You can access this web page at <https://www.tep.com/tep-2020-integrated-resource-plan/>.



**Comment Method: Email**

**Comment Method: Email****Comment Date** 9/2/2023**Category****Concerns Topics**

Appearance, Support Underground

**Heard About****Issues/Phone Message/Comments**

I like how you list the "benefits" of the project, but not the downside.

Those lines need to be buried. Otherwise, those gargantuan lines/poles will be an eyesore that won't be changed for decades. And that's a very big downside.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Email****Comment Date** 8/31/2023**Category****Concerns Topics**

Historic

**Heard About****Issues/Phone Message/Comments**

Tucson is not the only city in the country with historic areas. Midtown Tucson has many historic buildings, structures and areas that I know TEP does not want to interrupt or offend. I recommend TEP perform additional research regarding how power distribution is handled in Historic Williamsburg, San Antonio, Santa Fe, Boston and other historic areas in the U.S. and arrive at additional options for blending in with the historic designs of yesteryear.

**Additional Info****Requested Info****Response sent****Response Notes:**

Thank you for your feedback regarding TEP's proposed Midtown Reliability Project. We appreciate your comment and suggestion and will include them in the project record provided to the Arizona Corporation Commission (ACC).

We will look into that and see what we can learn.

**Comment Method: Email****Comment Date** 2/28/2024**Category****Concerns Topics**

Cost, Location

**Heard About****Issues/Phone Message/Comments**

Verbal comment at Agency Briefing.

**Additional Info****Requested Info****Response sent****Response Notes:**

We really appreciate your attendance and participation in yesterday's agency briefing for the Midtown Reliability Project. In that meeting I had committed to getting you a couple of items:

- Shapefile of the proposed draft alternative routes
- Underground transmission cost estimate report

I have attached the alternative routes as individual KMZ files for use in Google Earth, as well as a zipped shapefile that contains all the route alternatives in a single file. I'll caveat that no engineering has been completed on these routes, so the lines do not represent the planned centerline of the transmission line, rather a concept of the transmission line in that general road corridor.

I've also attached a PDF file of the underground transmission cost estimate/report that TEP request Sargent & Lundy to complete in 2022. This report was more relevant to the effort to update the franchise agreement with the City of Tucson to pay the cost differential to underground a portion of the proposed Kino to DMP transmission line, but it includes some information on the technical aspects of installing and maintaining an underground transmission line. Since you were more interested in the installation and operation of an underground transmission line, I've found a report prepared by the Wisconsin Public Service Commission to be very helpful in that regard. That report can be accessed at <https://psc.wi.gov/Documents/Brochures/Under%20Ground%20Transmission.pdf>

I trust this information will make it to you, but sometimes email security has issues with zip files, so if you would confirm receipt of this information it would be appreciated.

Please don't hesitate to reach out if you have any questions or feedback.

**Comment Method: Other**

**Comment Date** 1/21/2024

**Category**

**Concerns Topics**

Location

**Heard About**

**Issues/Phone Message/Comments**

I can't drive after dark but I highlighted my choice. Straight, most direct rt!

**Additional Info**

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Letter****Comment Date** 12/12/2023**Category****Concerns Topics**Location, Renewable Energy,  
Substation, Environment**Heard About****Issues/Phone Message/Comments**

Dear Tucson Electric Power,

I would like to comment on the TEP Midtown Reliability project that you are currently planning. Here are some items I hope you will consider as you move forward with the project.

1. New Updated Sub-Stations: Yes, these are necessary to keep up with demand and to harden our electric grid. Yes, it will have to be in someone's "backyard." There is currently a sub-station located at the northwest corner of E. Hedrick Street and N. Wilson Avenue. Would it be possible to upgrade this sub-station to meet the demands you have outlined rather than create an entirely new one?

2. Routing Power Transmission Lines Along Alta Vista Street: The map shows these lines could be routed along the 2800 - 2500 block of E. Alta Vista Street or along E. Glenn Street. Have you looked at this section of Alta Vista? It is narrow (was at one time an alley), is all residential, and space is limited. Please, do not route along E. Alta Vista Street. Treat Avenue or Glenn Street would be more appropriate, but not Alta Vista.

3. Alternative to Bringing in Power from Out-of-State: A recent article in the February 2023 edition of High Country News indicated that we have tremendous capacity for generating electricity locally by utilizing the rooftops and parking lots at Big Box Stores. If all 21,363 Big Box Stores in the Western U.S. utilized their roofs and parking lots for solar energy, then 31,035,098 megawatt-hours of electricity would be produced (information courtesy of IEEE Journal of Photovoltaics in March 2022). It would eliminate the need to create large photovoltaic fields that disturb the natural areas along with the plant and animal life in those ecosystems. Has TEP even considered a project like this in the Tucson area as a way to eliminate the expense and concern of constructing large scale transmission lines? If not, please do consider this option.

Though I could not attend the November 16, 2023, meeting in person, please know I am interested and concerned. Thank you for the opportunity to provide comments and I hope some careful listening, common sense, and concern for the Earth and for people, not just profits, will be your priority in this project. I look forward to hearing the results of the November 16, 2023 meeting.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Letter****Comment Date** 11/10/2023**Category****Concerns Topics****Heard About****Issues/Phone Message/Comments**

This letter is in regard to the midtown project. On this street that I live on, the TEP poles are crooked, split, cracked, and there are lines hanging that aren't connected to anything. Not only all that, but it looks messy and unsafe. The TEP pole closest to where I live is actually cracked all the way up. Also the meters at this property are antiquated. I hope improvements are made here.

**Additional Info****Requested Info**

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**No response required****Response Notes:**

**Comment Method: Letter****Comment Date** 9/17/2023**Category****Concerns Topics**Health, Appearance, Location,  
Environment**Heard About****Issues/Phone Message/Comments**

Where to begin. Needless to say we in Palo Verde Neighborhood were startled and appalled to learn there was even ANY consideration of placing TEP poles IN our neighborhood down Camilla. The first we heard of it - it was already an option !!

Never mind that many of us have lived on Camilla for a quarter of a century and more - we would NEVER have bought here had their been worrisome power lines so near to our residence. I, like many of my neighbors on Camilla, am outraged that anyone would have even proposed such a thing - with the possibility of DNA damage and other such consequence from living next to an Electromagnetic field.

We residence of the neighborhood are used to see poles down the pubic street to the west - Country Club. People in Blenman Elm bought knowing there were poles running down Country Club. We bought knowing we were a block away from such power lines.

Such installations would be ugly, on a street we've worked hard to beautify with mesquite trees (which also cool our pavement by providing shade, and hope for birds). No one asked us if we would agree to such a consideration for an intrusion by the electric company (that bills us from out-of-state ... not even keeping jobs in Tucson!).

PLEASE please, listen to those of us most affected - DO NOT run power lines, or install huge ugly power poles in our neighborhood. Stick to the main streets of Tucson ...

Most worried and disappointed to learn of this consideration.

**Additional Info****Requested Info**

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**No response required****Response Notes:**



**Comment Method: Letter**

**Comment Date** 3/28/2024

**Category**

**Concerns Topics**

Appearance, Safety

**Heard About**

**Issues/Phone Message/Comments**

**Additional Info**

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area

**Concerns Topics**

Property Value, Support Underground

**Heard About** Newsletter Mailing, Word of Mouth,  
Other

**Issues/Phone Message/Comments**

This project needs to seriously considered undergrounding options & the "Halfway Solution". It needs like a lot of knowledgeable people have researched many options & I don't think TEP is willing to consider anything other than what they have always done.

**Additional Info**

This project will likely devalue our neighborhood & the Tucson community - shame on you!

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

**Additional Info**

**Requested Info**

---

**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area

**Concerns Topics**

**Heard About** Newsletter Mailing, Public Meeting

**Issues/Phone Message/Comments**

Sidewalks need to stay open! And not be obstructed by poles

**Additional Info**

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form****Comment Date** 3/28/2024**Category** Resident in Study Area, Live/Work near Study Area, Special Interest Group**Concerns Topics** Location, Environment**Heard About** Other**Issues/Phone Message/Comments**

Pueblo Gardens has at least 4 grids. We need this taken care of because of all the blackouts brownouts, loss of appliances and is only getting worse because the 4 neighborhoods have been sharing with the Tucson marketplace.

On Martin instead of placing poles on the east side. Place them on the west because solar lights have been recently installed and homes are on the east side. This would be more feasible for the area.

**Additional Info**

I hope the PTB listen to the majority of the public. Just because we are the poor section of Tucson, our voices can and have become loudest when needed.

Really would like to see this run up Kino because it would be less interference with the environment. I am pleased you are no longer considering down Campbell at 36th.

**Requested Info**

I would like to be kept updated regarding this project and where it is going.

**No response required****Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area

**Concerns Topics**

Health, Support Underground

**Heard About**

**Issues/Phone Message/Comments**

Strongly prefer this be place UNDERGROUND! I believe elec wires impact peoples health, potentially causing cancer.

**Additional Info**

**Requested Info**

---

**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area, Live/Work near Study Area

**Concerns Topics** Cost, Support Underground

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

Would like the UofA & Banner to put forth the funds for underground construction

**Additional Info**

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

**Additional Info**

You might decrease objections if you offered to completely repave and improve curbs and sidewalks in all areas affected

**Requested Info**

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**No response required**

**Response Notes:**



**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area

**Concerns Topics**

Appearance, Location, Property Value, Historic, Safety

**Heard About** Newsletter Mailing, Word of Mouth

**Issues/Phone Message/Comments**

Noise, safety, eye sore, preserving historic residential neighborhoods, decreasing property values

**Additional Info**

Poles should be placed in industrial, commercial areas only, not in area that make Tucson what it is

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area, Live/Work near Study Area

**Concerns Topics** Appearance, Support Underground, Historic

**Heard About** Newsletter Mailing, Public Meeting, Other

**Issues/Phone Message/Comments**

Oppose any utility above ground

Impacting scenic routes and historic neighborhoods

**Additional Info**

I will make a substantial contribution to plaintiffs + attorneys opposing project

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

**Additional Info**

**Requested Info**

---

**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area

**Concerns Topics**

**Heard About** Other

**Issues/Phone Message/Comments**

Please consider using ACCC (aluminum conductor composite core) to "reconductorize" current power poles to increase voltage to the new substation, avoiding new large pylons. ACCC carries more electrical power, has less resistance and sag, etc.

**Additional Info**

Please watch youtube video: <https://www.youtube.com/watch?v=vkpdvcgquv8>

I talked with Don at the open house

**Requested Info**

TEP plans for ACCC use in the future

Perhaps run lower than 138kV ACCC lines and step up to 138kV at the new substation

---

**No response required**

**Response Notes:**

**Comment Method: Comment Form****Comment Date** 3/28/2024**Category** Resident in Study Area, Other Interested Party**Concerns Topics****Heard About** Newsletter Mailing**Issues/Phone Message/Comments**

All my issues as a resident are already addressed

**Additional Info**

No

**Requested Info**

Unrelated: my nonprofit would like to invite a TEP employee to be part of our Board or of our large volunteer group.

**Response sent****Response Notes:**

I received the comment form you submitted at the Midtown Reliability Project open house the other day. Thank you for your participation.

This response is related to your request to invite a TEP employee to be a part of the board form The Homing Project. TEP is always looking for opportunities to be engaged and support our community. I've copied Wendy Erica Werden and Tara Barrera on this response. They lead up these efforts. I'll leave any follow-up in their capable hands regarding your request.

**Comment Method: Comment Form****Comment Date** 3/28/2024**Category** Resident in Study Area, Live/Work near Study Area**Concerns Topics** Health, Appearance, Support Underground, Historic**Heard About** Public Meeting**Issues/Phone Message/Comments**

Overground lines are unsightly and vulnerable to our increasingly volatile weather. 30,000 people were without power last summer for days in killer heat.

**Additional Info**

Undergrounding lines is the most responsible thing to do. It will protect the public from outages due to weather + protect our fragile Historic District + neighborhoods from uglification. Route 3 is particularly awful in this regard.

**Requested Info**

Transmission lines must be undergrounded from now on when electricity is out in dangerous weather it is a public health risk. Once can be an act of god. After that it's negligence.

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**No response required****Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area

**Concerns Topics**

Support Underground

**Heard About**

**Issues/Phone Message/Comments**

Truth. The claim that voters rejected undergrounding is false. The ballot measure was a climate mitigation measure. It was opposed by the Pima Cty Rep. party because it raised rates to mitigate climate. It was opposed by Democrats b/c it did far little re climate. To claim it was a referendum on undergrounding is a lie.

**Additional Info**

The peer reviewed literature shows that overhead lines will impose condemnation costs of >\$17m per mile from 36th to Grant. This more expensive than undergrounding. See Der Roriers 2002, Sim Dent 2005, Bolten 1993, Kielisch 2009 and many many more.

**Requested Info**

Why the octnal cost of undergrounding 230kV lines in Chandler + Phoenix is much less than the estimated cost to do the same in Tucson.

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**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category**

**Concerns Topics**

Property Value

**Heard About**

**Issues/Phone Message/Comments**

**Additional Info**

**Requested Info**

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**No response required**

**Response Notes:**



**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area, Live/Work near Study Area

**Concerns Topics** Support Underground, Environment

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

Putting as many distribution + transmission lines as possible UNDERGROUND is the best solution for this endeavor IN THE LONG RUN - cost included. Environmental impact needs to be mitigated immediately

**Additional Info**

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form****Comment Date** 3/28/2024**Category** Resident in Study Area**Concerns Topics**Appearance, Support Underground,  
Historic**Heard About****Issues/Phone Message/Comments****Additional Info**

I think there is a LOT of merit and potential in the "Halfway Solution" put forward by Daniel Dempsey and John E. Schwarz. It is very sensible. Seriously consider this option.

**Requested Info**

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**No response required****Response Notes:**

**Comment Method: Comment Form****Comment Date** 3/28/2024**Category** Resident in Study Area**Concerns Topics**Location, Property Value, Support  
Underground, Safety**Heard About** Other**Issues/Phone Message/Comments**

Please do NOT put the route on residential streets!!! They are highly "trafficed", especially Highland Ave, and the population density is too great to have transmission lines there. Also having them for long term exposure to noise, emissions, etc. is not safe for neighborhood members. Use major streets, such as Campbell, Euclid, Grant, etc.

**Additional Info**

If you choose residential streets (Highland, Vine or Norton) they must be underground in those segments. Using industrial areas and major roadways is the only option for our service dominant economy in Tucson.

**Requested Info**

The property value of our homes will be impacted greater than the impact on commercial properties. Please be cognizant of that as you decide. We are stakeholders too!

**No response required****Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category** Resident in Study Area

**Concerns Topics**

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

I strongly support this project. We need a better electricity grid to beat climate change. You have my support.

**Additional Info**

Please build it as safely, reliably & affordable as you can.

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form****Comment Date** 3/28/2024**Category** Resident in Study Area, Business Owner in Study Area**Concerns Topics** Appearance, Property Value**Heard About** Newsletter Mailing, Public Meeting, Word of Mouth**Issues/Phone Message/Comments**

The transmission towers are incredibly unsightly. To install these along our major avenues through Tucson is a shame. While most cities are working to improve the look of the major avenues, these degrade

**Additional Info**

Our properties are being devalued while Banner hospital and the research campus will be the major beneficiary of these horrid towers. Yet we with the devalued properties will be paying for it! It is time for TEP to stop using us to make their millions

**Requested Info**

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**No response required****Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category**

**Concerns Topics**

Appearance, Support Underground

**Heard About**

**Issues/Phone Message/Comments**

**Additional Info**

**Requested Info**

---

**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

**Additional Info**

**Requested Info**

---

**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 3/28/2024

**Category**

**Concerns Topics**

Cost, Support Underground

**Heard About**

**Issues/Phone Message/Comments**

**Additional Info**

**Requested Info**

---

**No response required**

**Response Notes:**



**Comment Method: Comment Form****Comment Date** 2/8/2024**Category** Resident in Study Area**Concerns Topics****Heard About** Project Website, Public Meeting,  
Word of Mouth**Issues/Phone Message/Comments**

Me gustaria que pudieran eliminar todas las instalaciones mas viejas. Pero que la compania no solo lo sugiera, sino que tambien colaborara con la mano de obra y de ser posible el material o parte del mismo.

I would like you to eliminate all the older installations. But for the company not only to suggest it, but also collaborate with labor and, if possible, the material part of it.

**Additional Info**

No solamente la sugerencia, sino tambien que la company no quitara del renglon hasta que el Proyecto iniciado fuera termindao de perdido iniciado.

Not only the suggestion, but also that the company not remove the line until the project that had been started was finished.

**Requested Info**

Cualquier novedad que estuviera al alcance del usuario.

Any news made available to the customer.

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**No response required****Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 2/8/2024

<b><u>Category</u></b>	Resident in Study Area, Business Owner in Study Area, Live/Work near Study Area	<b><u>Concerns Topics</u></b>	Location
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**Heard About**

**Issues/Phone Message/Comments**

Link 39 is overlaid on my rental properties accumulated over 48 years (110 in total). My livelihood and future estate will be greatly impacted by this route.

**Additional Info**

**Requested Info**

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**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 2/8/2024

**Category** Resident in Study Area

**Concerns Topics**

Appearance, Location

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

Aesthetically pleasing as possible. This has to be done.

**Additional Info**

Campbell makes sense for the transmission lines - it's wider  
Vine location makes sense. It is hidden behind UAHS

**Requested Info**

Maybe for aesthetic purposes, a compromise would be to paint the transmission poles a light green or blue so they stand out less and blend into the surroundings a bit

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**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 2/8/2024

**Category** Resident in Study Area

**Concerns Topics**

Appearance, Property Value, Safety

**Heard About** Newsletter Mailing, Word of Mouth

**Issues/Phone Message/Comments**

-Neighborhood beauty  
-Tucson character  
-Safety  
Time will make this look worse, ugly!  
Who profits from lower home values?

**Additional Info**

**Requested Info**

---

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 2/8/2024

**Category** Resident in Study Area

**Concerns Topics**

Support Underground, Safety

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

1st: We did NOT vote down undergrounding; we voted against an entire package that would have locked us in for 25 years.

2nd: UNDERGROUND UNDERGROUND UNDERGROUND. TEP should be planning to underground all lines eventually.

**Additional Info**

Think about elderly populations who might not survive a few hours without power during 100+ degree summer temps. Global warming may mean more powerful storms & hotter summer temps. Underground is a safety issue.

**Requested Info**

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**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 2/8/2024

**Category** Resident in Study Area

**Concerns Topics**

Appearance

**Heard About**

**Issues/Phone Message/Comments**

Pole color - consider using color that was used for Rillito River transmission line in the 1960s. Rust color is obtrusive and ugly.

**Additional Info**

**Requested Info**

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**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 2/8/2024

**Category** Resident in Study Area

**Concerns Topics**

Appearance, Location, Support  
Underground, Historic

**Heard About** Newsletter Mailing

**Issues/Phone Message/Comments**

Giant ugly pylons have desecrated West Grant Road. They have no place in residential neighborhoods and certainly not on residential streets like Cherry.

**Additional Info**

TEP lines should be undergrounded. The Underground Coalition has determined this will be cost-effective and preserve our residential and historic neighborhoods.

**Requested Info**

UA and Banner should be generating their own power and solar and should have been doing this for decades.

---

**Response Notes:**

**Comment Method: Comment Form****Comment Date** 2/8/2024**Category** Resident in Study Area, Business  
Owner in Study Area**Concerns Topics** Appearance, Property Value, Support  
Underground**Heard About****Issues/Phone Message/Comments**

Aesthetics are important. Tucson's beauty and history need to be treasured and valued. These were not treasured and valued on Grant and the result is TERRIBLE! So ugly! Do better! Put the lines underground! It is as simple as that. Do the right thing and undergrounding is the right thing to do.

**Additional Info**

Big poles one block from my house will degrade and lower my property value - all to provide lots of \$\$ for TEP's shareholders. This is not fair at all. Yet the TEP shareholders just make a little bit less \$\$ to put the lines underground. It is totally feasible and it is what Tucson wants, that is clear. Again - undergrounding is the right course of action. NOT as for distribution, but for transmission.

**Requested Info**

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**Response Notes:**



**Comment Method: Comment Form****Comment Date** 2/8/2024**Category****Concerns Topics**

Cost

**Heard About** Word of Mouth**Issues/Phone Message/Comments****Additional Info****Requested Info**

Can you please provide a figure regarding the profit margin TEP is looking to make from this project, especially as it relates to the cost of construction and maintenance? The more specific the numbers, the better.

**Response sent****Response Notes:**

We appreciate your attendance at the open house last week for the Midtown Reliability Project. We received your comment, or request for additional information. You asked:

Can you please prove a figure regarding the profit margin TEP is looking to make from this project, especially as it relates to the cost of construction and maintenance? The more specific the numbers, the better.

To answer your question, TEP determined the need for this project after considering customers' growing energy requirements, capacity constraints and the need to maintain or replace aging equipment. Profit margins were not a consideration.

As described during our open house Q and A session, the rates our customers pay are based on the costs of providing their service. Doing so requires ongoing maintenance and upgrades to approximately 5,100 miles of transmission and distribution lines, more than 4,300 cable-miles of underground distribution lines, nearly 100,000 power poles and transmission structures and more than 120 substations. TEP has invested nearly \$1.8 billion since 2018 to upgrade and reinforce our system and facilities.

Rates must be reviewed and approved in a public process before the Arizona Corporation Commission. If you're interested to learn more about our recently approved rates, you can find more information at [tep.com/2023-rates](http://tep.com/2023-rates).

We hope you'll continue to stay engaged as this important project progresses and route alternatives are identified.

**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category** Resident in Study Area, Live/Work  
near Study Area

**Concerns Topics**

Cost, Location

**Heard About** Newsletter Mailing, Other

**Issues/Phone Message/Comments**

Cost, do all tax payers pay or just the people in the corridor? People on a fix income have enough problems paying bills. Keep the poles out of all parks. And no, not put poles in a cemetery that is extremely disrespectful.

**Additional Info****Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category** Resident in Study Area

**Concerns Topics**

Appearance, Support Underground,  
Safety

**Heard About** Other

**Issues/Phone Message/Comments**

Consideration of extreme weather contingencies expected due to global warming, and considerations for traffic safety for above ground, traffic adjacent structures. I favor undergrounding for the above and other reasons such as aesthetic erosion.

**Additional Info****Requested Info**

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**Unable to send  
response**

**Response Notes:**

No contact information provided

**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category** Resident in Study Area

**Concerns Topics**

Appearance, Support Underground

**Heard About** Newsletter Mailing, Other

**Issues/Phone Message/Comments**

Beauty is #1. Gigantic, industrial scale power poles have no place in central Tucson. Uglifying Tucson any further will only make TEP customers hate TEP for generations to come.

**Additional Info**

Undergrounding electric power lines is the ONLY viable solution that is acceptable. Yes, it's a more expensive solution, but it will pay off in the long run.

**Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category** Resident in Study Area, Business  
Owner in Study Area

**Concerns Topics** Cost, Support Underground

**Heard About****Issues/Phone Message/Comments**

No overhead lines - do underground

As the useful life will be very long, so will the return of investment - the shareholders should participate in capital cost.

Not disturb the community with large overhead power lines.

**Additional Info**

How will U of A and Banner benefit and how will they participate in costs.

Send a cross section of underground power line segment.

**Requested Info**

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**Response sent****Response Notes:**

Thank you for your attendance at the open house on November 16th for the Midtown Reliability Project. We received the written comment you provided, including your request for a cross section of underground power line equipment. In response, I've included a cross-section that was developed as part of a study TEP commissioned with Sargent & Lundy in order to understand the costs and other factors associated with construction of a transmission line underground.

**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category** Resident in Study Area

**Concerns Topics**

Location, Support Underground,  
Safety, Substation

**Heard About** Other

**Issues/Phone Message/Comments**

Population density and the safety concerns of 138k transition lines going through neighborhoods with 13k and 12k people per sq mi, West University and Rincon Heights respectively.

**Additional Info**

Rather than going due north from Kino to Vine, put the substation at Grant, just south of Country Club and have the transition lines go east west on Grant and bury lines from that substation south to Kino

**Requested Info**

Highschool wash is a riparian area and a flood "basin" and cannot be considered as a possible route.

---

**No response required****Response Notes:**

**Comment Method: Comment Form****Comment Date** 11/16/2023**Category** Resident in Study Area**Concerns Topics**

Appearance, Location, Property Value, Historic

**Heard About** Project Website, Newsletter Mailing, Public Meeting, Word of Mouth, Other**Issues/Phone Message/Comments**

Visuals are so important. The city of Tucson has been making progress as a prime travel destination. It would be terrible to have such terrible huge ugly, industrial-looking power poles alongside scenic corridors and historic neighborhoods. I'm also very concerned about reduced property values of homes along potential routes.

**Additional Info**

I appreciate your hard work on this project. Please continue your work to find a way to keep any new poles from scenic and historic areas.

**Requested Info****No response required****Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category** Resident in Study Area, Business Owner in Study Area, Special Interest Group

**Concerns Topics** Location, Historic, Safety

**Heard About** Newsletter Mailing, Word of Mouth

**Issues/Phone Message/Comments**

Historic preservation is advanced through mechanisms such as National Register Historic Districts, city zoning, county/state property tax breaks for owner-occupants. All of these mechanisms depend on maintaining the historic streetscape. Overhead lines are deeply problematic in historic neighborhoods, because they change the streetscape.

**Additional Info**

Safety concerns must be addressed publicly. No one wants Tucson to become the next Lahaina. We saw powerpoles - including metal poles - snap in the July 20 hailstorm.

**Requested Info**

Safety features/mechanisms

---

**No response required****Response Notes:**



**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category**

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Placement of poles. I simply want to commend you for the presentation at the open house. The visual boards and progression of them allowed me to understand the project easily. Thank you!

**Additional Info**

**Requested Info**

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**Unable to send  
response**

**Response Notes:**

No contact information provided

**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category** Resident in Study Area, Live/Work  
near Study Area

**Concerns Topics**

Location

**Heard About** Newsletter Mailing, Word of Mouth

**Issues/Phone Message/Comments**

Would like to see line go north from Kino substation on west side of Martin (328) to Silverlake and Willets, behind Cherrybell Post Office then across UP railroad. Example segments 329-325-330-338-340-364-362-343. Try to keep line in areas that are already industrial/commercial.

**Additional Info****Requested Info**

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**No response required**

**Response Notes:**

**Comment Method: Comment Form****Comment Date** 11/16/2023**Category** Live/Work near Study Area**Concerns Topics**Appearance, Location, Support  
Underground, Historic**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

1. Impact of 75 ft towers on residential and historic properties
2. Continued degradation of character of our city
3. Lack of maintenance and responsiveness of TEP with regard to aging and capacity of correct impact with towers
4. TEP refusal to use major routes (where 75 ft towers would not be allowed by our ordinances) and intimidating residences with dangerous 75 ft towers
5. Do not use local streets - only arterial streets are appropriate for such intrusive heights and voltages

**Additional Info**

I live off Mt. Ave where transmission lines were upgraded about a decade ago. Fewer poles and underground distribution lines. TEP does not respond to graffiti removal and removal is done by residents.

**Requested Info**

1. Creating a public electric utility that puts need above project
2. Coocation of wireless infrastructure on new poles/lines
3. Location of towers on UAZ campus and Banner properties

**Response sent****Response Notes:**

Thank you for your attendance at the open house on November 16th for the Midtown Reliability Project. We received the written comment you provided and very much appreciate you sharing your thoughts.

In your comment letter you requested some additional information on several topics, which I will address.

1. Creating a public electric utility that puts need above profit.

TEP strives to be an exceptional energy provider that positively impacts the lives of our customers and communities. We do that in part by doing the right thing and develop efficient solutions to meet the energy needs of the community. That said, I don't have any information on creating a public electric utility but I understand this is something that the City of Tucson is exploring so you might reach out to your local Ward office for an update and additional information.

2. Colocation of wireless infrastructure on new poles/lines.

While not common on transmission poles, there are instances where wireless infrastructure is collocated with a transmission pole on TEP's system. Any proposal would be evaluated on a case by case basis and would be subject to all permitting requirements of that wireless infrastructure.

3. Location of towers on UAZ campus and Banner properties.

Since we're in the early stages of siting the transmission line, we don't where these locations would be, or even if there will be poles located on campus or Banner properties.

**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category** Resident in Study Area

**Concerns Topics**

Cost, Support Underground, Safety

**Heard About** Word of Mouth

**Issues/Phone Message/Comments**

Tucson Electric must underground the wires, not string them on those hideous pylons as on West Grant. And why are Banner and UA not using solar when their roots to reduce their demand for TEP power?

**Additional Info**

The cost of undergrounding would be offset by saving on the type of lawsuits currently facing. Electric utilities in California and Hawaii where downed power lines destroyed both property and human lives.

**Requested Info**

I would like to know whether any lawsuits have resulted from the prolonged power outage after the big hailstorm last summer, when tens of thousands went without power for days in killer heat.

**Response sent****Response Notes:**

Thank you for your attendance at the open house on November 16th for the Midtown Reliability Project. We received the written comment you provided, including your request for information on any lawsuits that resulted from power outages that occurred this past summer following the big hailstorm.

In short, no lawsuits occurred following that major storm. TEP, and other utilities are not liable for Acts of God. The Midtown Reliability Project will replace older wood 46kV poles with new steel 138kV poles. While wood poles can fail, as witnessed this past summer, TEP has never had a steel 138kV pole fail during a violent storm. The Midtown Reliability Project will result in fewer and shorter power outages to homes and businesses.

**Comment Method: Comment Form**

**Comment Date** 11/16/2023

**Category** Resident in Study Area, Special Interest Group

**Concerns Topics** Renewable Energy

**Heard About** Word of Mouth

**Issues/Phone Message/Comments**

I am interested in solar municipal micro grids and 100% renewable energy. How can TEP support this goal for the fossil free future?

**Additional Info**

As president of the American Renewable Energy Institute, AREDAY.net, I would like to offer my voice and support for energy conservation and innovation. I am open to advising on technology and policy, community, sustainability and resilience.

**Requested Info**

Community solar and battery

---

**Response sent****Response Notes:**

Thank you for your attendance at the open house on November 16th for the Midtown Reliability Project. We received the written comment you provided, including your request for additional information on community solar and batteries.

The best resource I can point you to on TEP's plans for community scale solar and batteries is the 2023 Integrated Resource Plan that was recently published. That plan, along with additional Clean Energy information is all available at [www.tep.com](http://www.tep.com) under the "Clean Energy" tab.

**Comment Method: Comment Form****Comment Date** 9/21/2023**Category** Resident in Study Area**Concerns Topics**

Support Underground, Historic

**Heard About** Newsletter Mailing, Word of Mouth**Issues/Phone Message/Comments**

First and foremost is my desire to see the undergrounding of TEP's Reliability Project through mid-town.

**Additional Info**

The overhead project is in direct conflict with the UA Area Plan and major streets and routes plan. On top of that individuals here invested millions of dollars to preserve this historic heart of the city. In addition, individual citizens have worked for years to protect the historic neighborhoods in the planning area by creating Neighborhood Preservation Zones.

**Requested Info**

---

**No response required****Response Notes:**

**Comment Method: Comment Form**

**Comment Date** 9/21/2023

**Category** Resident in Study Area

**Concerns Topics**

Location, Support Underground,  
Substation

**Heard About**

**Issues/Phone Message/Comments**

I'm concerned about lines and substations being pushed through neighborhoods, especially Jefferson Park to Vine substation. Please stick to major roads.

**Additional Info**

I'd rather see you go down Campbell rather than go into neighborhoods. Maybe UofA can bury the lines in route to Vine substation?

**Requested Info**

Potential routes conversations, specifically in Jefferson Park Neighborhood (even though I live in Sam Hughes), also pictures of what it might look like.

---

**Response sent**

**Response Notes:**

Thank you for your feedback at the Open House regarding TEP's proposed Midtown Reliability Project. We appreciate your comments and will include them in the project record provided to the Arizona Corporation Commission (ACC).

Once we get some routes, we'll develop photo simulations of what the proposal might look like. In the meantime, if you'd like to see an example, if you look west of Kino Parkway on 36th Street, the poles on the south side are 138kV poles. If you look on the north side of the road, you'll see some older 46kV poles so that you can compare the two.

We hope you continue to stay engaged in the project as details of the project become more defined. You'll be able to find all the latest information on the project webpage at [www.tep.com/midtown](http://www.tep.com/midtown).

**Comment Method: Comment Form**

**Comment Date** 9/21/2023

**Category** Resident in Study Area, Live/Work  
near Study Area, Special Interest  
Group

**Concerns Topics**

**Heard About**

**Issues/Phone Message/Comments**

Please contact Arroyo Chico Neighborhood Association.

**Additional Info**

**Requested Info**

---

**Response sent**

**Response Notes:**



**Comment Method: Comment Form**

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# **Application for a Certificate of Environmental Compatibility**

## **Midtown Reliability Project**

### **Exhibit J-14**

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# EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

## Tucson, AZ

the User Specified Area  
Population: 81,278  
Area in square miles: 17.19

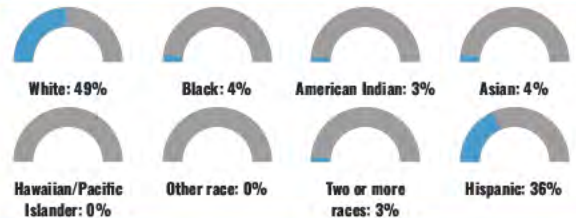
A3 Landscape



### COMMUNITY INFORMATION



### BREAKDOWN BY RACE



### BREAKDOWN BY AGE



### LIMITED ENGLISH SPEAKING BREAKDOWN



### LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	71%
Spanish	22%
Russian, Polish, or Other Slavic	1%
Other Indo-European	1%
Chinese (including Mandarin, Cantonese)	1%
Other Asian and Pacific Island	1%
Arabic	1%
Other and Unspecified	1%
Total Non English	29%

Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

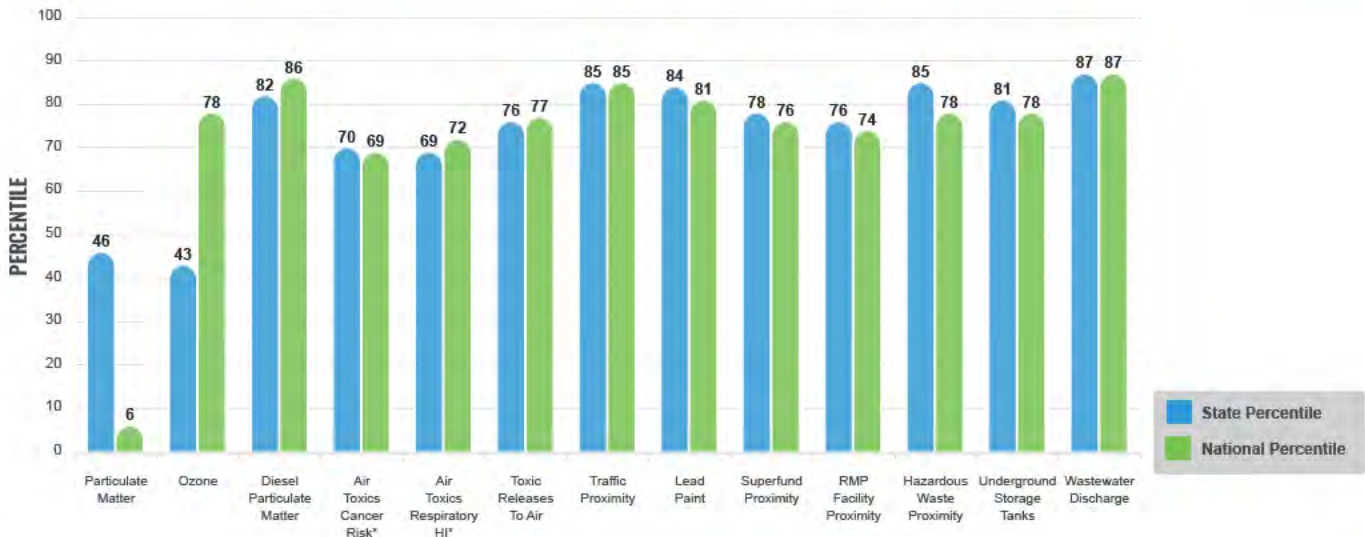
# Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

## EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.

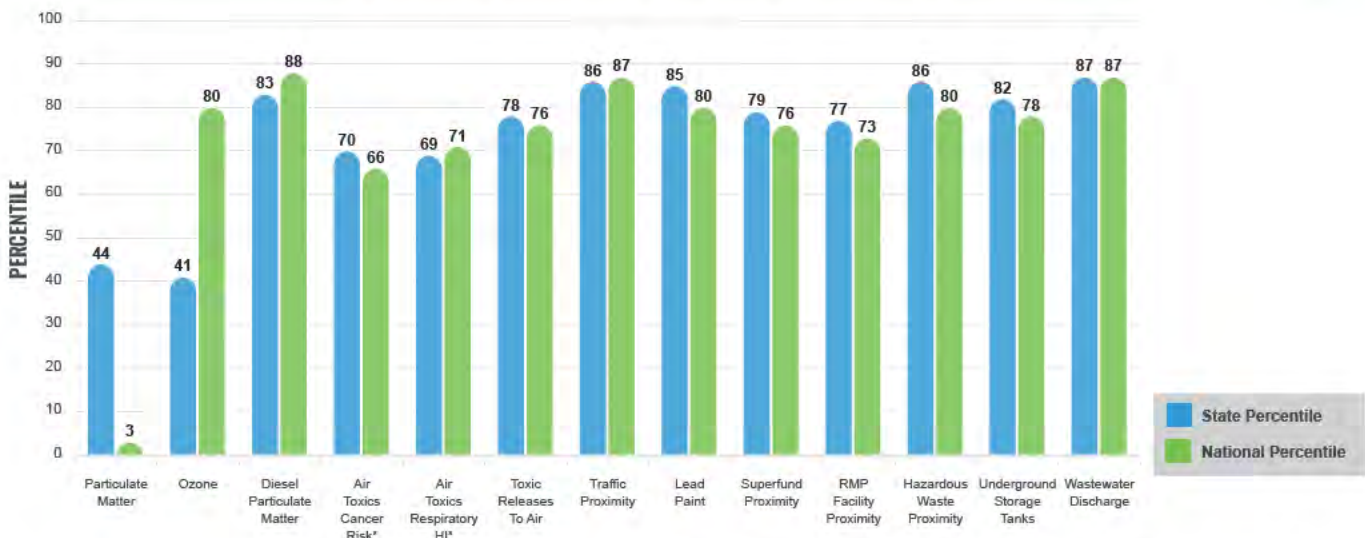
### EJ INDEXES FOR THE SELECTED LOCATION



## SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent less than high school education, percent unemployed, and low life expectancy with a single environmental indicator.

### SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for the User Specified Area

# EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
<b>POLLUTION AND SOURCES</b>					
Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	4.63	5.87	23	8.08	2
Ozone (ppb)	62.3	66.1	23	61.6	58
Diesel Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	0.418	0.278	78	0.261	85
Air Toxics Cancer Risk* (lifetime risk per million)	25	25	13	25	5
Air Toxics Respiratory HI*	0.31	0.31	30	0.31	31
Toxic Releases to Air	730	2,800	61	4,600	53
Traffic Proximity (daily traffic count/distance to road)	360	190	87	210	86
Lead Paint (% Pre-1960 Housing)	0.44	0.089	93	0.3	69
Superfund Proximity (site count/km distance)	0.07	0.077	65	0.13	54
RMP Facility Proximity (facility count/km distance)	0.34	0.38	76	0.43	70
Hazardous Waste Proximity (facility count/km distance)	1.5	0.71	87	1.9	68
Underground Storage Tanks (count/km <sup>2</sup> )	3.5	1.7	85	3.9	70
Wastewater Discharge (toxicity-weighted concentration/m distance)	20	5.8	97	22	97
<b>SOCIOECONOMIC INDICATORS</b>					
Demographic Index	52%	38%	73	35%	76
Supplemental Demographic Index	19%	14%	74	14%	76
People of Color	51%	44%	63	39%	66
Low Income	54%	32%	82	31%	84
Unemployment Rate	7%	6%	71	6%	72
Limited English Speaking Households	5%	4%	75	5%	75
Less Than High School Education	12%	12%	65	12%	65
Under Age 5	4%	5%	40	6%	38
Over Age 64	12%	20%	41	17%	33
Low Life Expectancy	18%	19%	26	20%	31

\* Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

## Sites reporting to EPA within defined area:

Superfund .....	0
Hazardous Waste, Treatment, Storage, and Disposal Facilities .....	2
Water Dischargers .....	45
Air Pollution .....	8
Brownfields .....	86
Toxic Release Inventory .....	7

## Other community features within defined area:

Schools .....	42
Hospitals .....	6
Places of Worship .....	64

## Other environmental data:

Air Non-attainment .....	No
Impaired Waters .....	No

Selected location contains American Indian Reservation Lands* .....	No
Selected location contains a "Justice40 (CEJST)" disadvantaged community .....	Yes
Selected location contains an EPA IRA disadvantaged community .....	Yes

Report for the User Specified Area

# EJScreen Environmental and Socioeconomic Indicators Data

## HEALTH INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	18%	19%	26	20%	31
Heart Disease	4.7	6	33	6.1	21
Asthma	12.2	10.6	92	10	92
Cancer	3.9	6.1	16	6.1	9
Persons with Disabilities	14.2%	13.9%	60	13.4%	60

## CLIMATE INDICATORS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	2%	6%	48	12%	20
Wildfire Risk	12%	48%	45	14%	82

## CRITICAL SERVICE GAPS

INDICATOR	VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	17%	13%	71	14%	66
Lack of Health Insurance	12%	10%	65	9%	75
Housing Burden	Yes	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Report for the User Specified Area