ORIGINAL

E000034567

MOYES SELLERS & HENDRICKS

JASON MOYES
1850 N. Central Avenue, Suite 1100 • Phoenix, AZ 85004
(602) 604-2139 jasonmoyes@law-msh.com

March 21, 2024

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

RE: Ninety Day Plan for the Project Bella Thermal Generation and Energy Storage Project
Docket No. E-99999A-23-0016

To Whom It May Concern:

Pursuant to Arizona Revised Statutes (A.R.S.) 40-360.02(B) and (C), Pinal County Energy Center, LLC (an affiliate of Seguro Energy Partners, LLC) hereby submits its Ninety Day Plan for the development of up to 480 MW of natural gas-fired electric generation, comprised of ten (10) GELM6000 PC units in simple cycle configuration and a grid-charged 440 MW x 4-hour battery energy storage system. The operation of the gas turbines and battery energy storage system (collectively referred to as "Project Bella" or "Project") will economically complement the sustainability and reliability objectives of the major load serving entities in the State of Arizona, while minimally impacting the state's environment and ecology.

The information required by A.R.S. §40-360.02(C) is provided as Appendix A to this filing. The gas turbine generation units and the battery energy storage system will be directly interconnected near the southeast portion of the Project to the existing 500 kV Pinal Central to Duke transmission line, which crosses the Project site, as identified in Tab 1 and Tab 2 of Appendix B. The gas turbine generation units will receive clean natural gas fuel from the existing El Paso Natural Gas Pipeline, which also crosses the Project site on the northeast portion of the property, as identified in Tab 2 of Appendix B.

Pinal County Energy Center, LLC plans to file an Application for a Certificate of Environmental Compatibility ("CEC") for the thermal electric generation component of the Project, as required pursuant to A.R.S. §40-360.01 et seq. and Arizona Administrative Code R14-

ACC - Docket Control - Received 3/21/2024 4:16 PM
ACC - Docket Control - Docketed 3/21/2024 4:35 PM

3-201 et seq. **Although not jurisdictional to the CEC, information regarding the Project's battery storage system and short gen-tie are provided in this Plan for informational purposes.** Pinal County Energy Center, LLC reserves the right to update and amend this Plan as it deems appropriate pursuant to A.R.S. §40-360.02(F).

Respectfully yours,

Jason Y. Moyes
Attorney for Pinal County Energy Center, LLC

APPENDIX A

Ninety Day Plan

for the

Project Bella Thermal Generation and Energy Storage Project

40-360.02(C)(1): The size and proposed route of any transmission lines or location of each plant proposed to be constructed.

Project Bella consists of the development of up to 480 MW of natural gas-fired electric generation, comprised of ten (10) GE LM6000 PC units in simple cycle configuration and a grid-charged 440 MW x 4 hour battery energy storage system. Located on over 335 acres in unincorporated Pinal County, Arizona, the Project site utilizes a common, shared interconnection to the 500 kV Duke to Pinal Central transmission line, which crosses the southeast portion of the Project site, as identified in Tab 1 and Tab 2 of Appendix B. The gen-tie interconnecting the Project will be less than 100 yards long.

40-360.02(C)(2): The purpose to be served by each proposed transmission line or plant.

The purpose of the generation and battery energy storage is to provide economical and socially beneficial resource adequacy for Arizona's load serving entities. Project Bella's capacity, energy and ancillary services will help offset coal retirements and reliably accommodate load growth. The interconnection to the existing 500 kV transmission system on the Project site will also provide renewable integration in Arizona while complementing the sustainability objectives of SRP and TEP, among others.

40-360.02(C)(3): The estimated date by which each transmission line or plant will be in operation.

Project Bella anticipates a commercial operation date of somewhere between June 1, 2027 and June 1, 2028 for all of its phases.

40-360.02(C)(4): The average and maximum power output measured in megawatts of each plant to be installed.

The Project's efficient natural gas fired turbines can operate between 20 MW and 480 MW for a period of 2 to 24 hours per day. The average dispatch will be approximately 4 to 6 hours per day.

The battery energy storage system will have the ability to deploy up to 440 MW of capacity for a continuous period of 4 hours.

40-360.02(C)(5): The expected capacity factor for each proposed plant.

The Project's efficient natural gas fired turbines are anticipated to be operated between a 28

and 46% capacity factor. The gas turbine operations will be limited by an enforceable condition in the Project's air permit that restricts total annual natural gas consumption. Thus, the total dispatch will not exceed a 46 percent capacity factor.

The battery energy storage system will continuously charge and discharge to complement intermittent renewable energy and provide load shifting and frequency regulation. The charge and discharge periods for each cycle are typically 4 hours each.

40-360.02(C)(6): The type of fuel to be used for each proposed plant.

The Project's efficient natural gas fired turbines will be supplied clean, combustible natural gas from the El Paso Natural Gas Pipeline, which crosses the property. Typical natural gas consumption will be approximately 20,000 MMBtu with a high consumption of approximately 75,000 MMBtu (and an absolute peak consumption of 112,000 MMBtu / day).

The battery energy storage system will be charged from the grid during periods of high renewable energy generation (solar and wind) or during periods of low demand. Stored energy will be discharged during periods of high demand to ensure proper frequency response and energy supply.

40-360.02(C)(7): The plans for any new facilities shall include a power flow and stability analysis report showing the effect on the current Arizona electric transmission system.

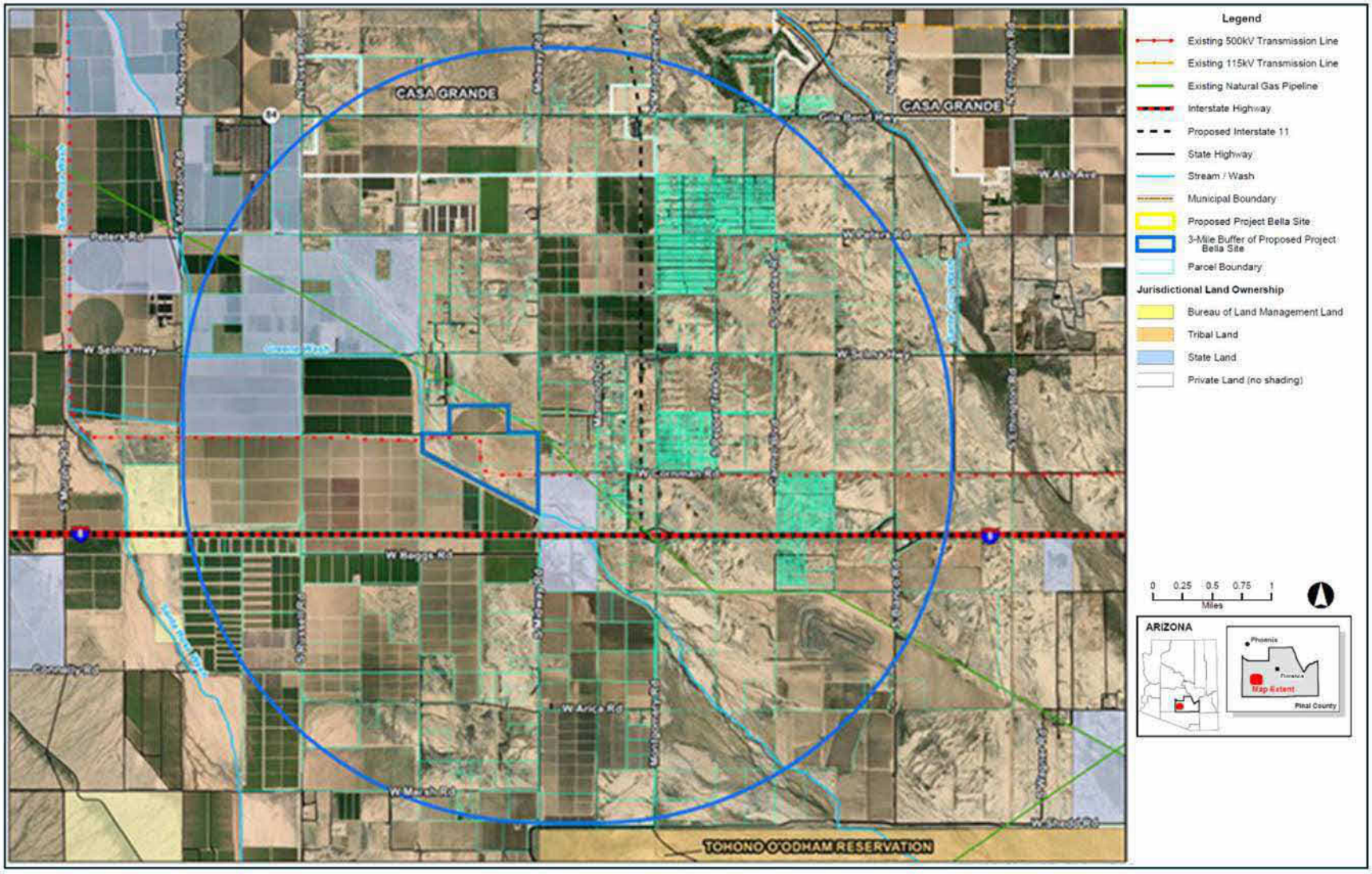
Transmission owners shall provide the technical reports, analysis or basis for projects that are included for serving customer load growth in their service territories.

The interconnection request for Project Bella was filed with SRP (the operator of the 500 kV Pinal Central to Duke transmission line) in May 2023 and was accepted into the queue in August 2023 under queue identification PV-PC Q32. Project Bella's PV-PC Q32 project is participating in the transition cluster. As part of this cluster process a thorough System Impact Study (SIS) is being performed. To ensure that the integrity and reliability of the transmission system is maintained, and to protect the interests of utility customers, the scope of the study includes power flow contingency, post-transient stability, transient stability, and short circuit analyses.

The final System Impact Study will be completed in August 2024. We do not anticipate any detrimental impacts caused by the interconnection of the Project. A redacted draft of the SIS report is expected to be available from SRP sometime in May 2024 and will be provided to Commission Staff as soon as possible.

APPENDIX B

Project Bella Site Location and Proximity to Transmission and Natural Gas Pipeline (Tab 1)



Project Bella Site Location and Proximity to Transmission and Natural Gas Pipeline (Tab 2)