

**PINAL COUNTY ENERGY CENTER, LLC PROJECT BELLA GENERATION
 INTERTIE PROJECT
 DOCKET NO. L-21314A-24-0144-00233
 APPLICATION FOR CERTIFICATE OF ENVIRONMENTAL
 COMPATIBILITY**

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PCE-1

Application for Certificate of Environmental
Compatibility (CEC)
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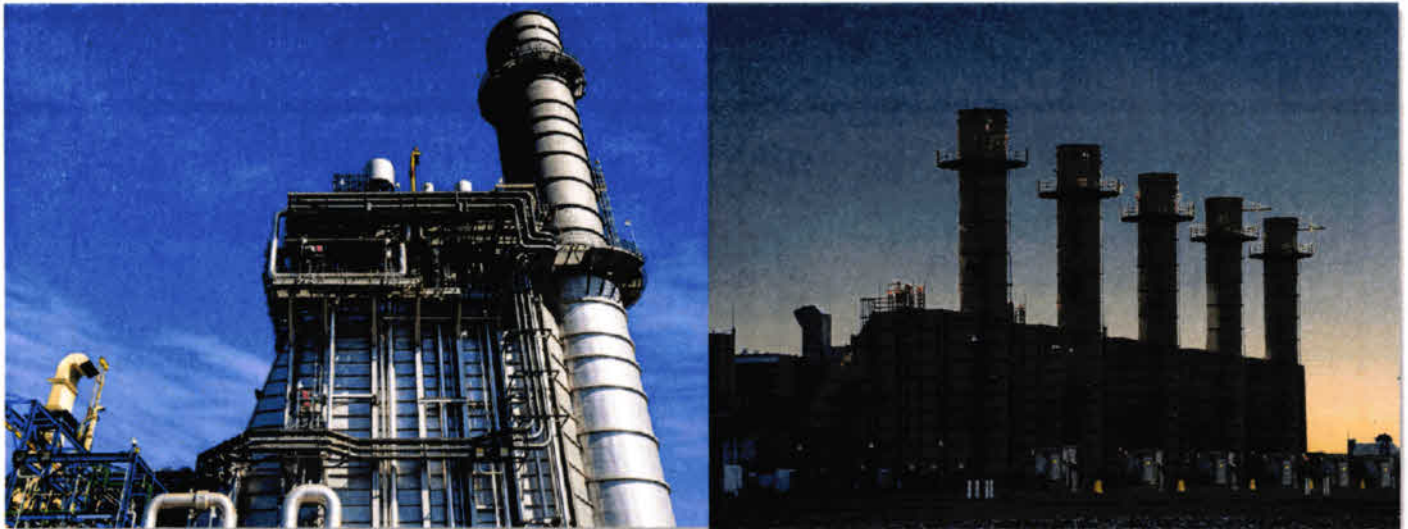
ORIGINAL

ORIGINAL Project Bella

NEW APPLICATION



0000211337



Application for a Certificate of Environmental Compatibility

Prepared for:

Arizona Power Plant and Transmission Line Siting Committee

Prepared by:

Pinal County Energy Center, LLC

Volume 1 of 1

Case No.:

L-21314A-24-0144-00233

Docket No.:

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June 2024

PCE-2

Witness Testimony Summary and Resume of
Mark Thompson

Pinal County Energy Center, LLC

Project Bella

Witness Summary for Mark Thompson

Mr. Thompson is the Managing Partner at Seguro Energy Partners (Seguro) and is the lead developer for Project Bella (Project). He has overseen and directed the filing of the Application for a Certificate of Environmental Compatibility for the Applicant (CEC), Pinal County Energy Center, LLC.

Mr. Thompson's testimony will discuss Seguro's background and the primary purpose and need for the Project, including an overview of the Project's proposed infrastructure and site location. He will also testify concerning Arizona's current electrical supply and demand requirements, as well as the operational characteristics of the Project that will complement Arizona's needs in a manner that promotes sustainability objectives without additional costly infrastructure requirements.

Mr. Thompson will provide an overview of the Project's general permitting requirements and electrical interconnection processes, including the completed System Impact Study from Salt River Project (SRP), as the transmission operator of the 500 kV line at the point of interconnection (POI). He will also provide the narrative for the site tour and/or virtual flyover, as necessary.



MARK D. THOMPSON

PROFILE

Mark has dedicated his career to energy and commodity markets for nearly thirty years, with a keen focus on asset development, valuation and optimization, innovative deal structuring and cost reduction through a disciplined approach for quantifying, embracing and managing risk. Mark currently leads a commercial advisory and management team in the US and Mexico, in which the firm oversees a portfolio of over 3,000 MW of electrical capacity in operation or development and over 8,400 MW / 1.3 bcf / day of fuel supply operations.

In addition to the direct investment and development of electric generation capacity, Mark assists various clients with commercial energy investment strategies within organized markets; development of fuel nomination and supply structures across conventional natural gas and LNG and provides strategic guidance related to dispatch optimization, hedging and compliance with market rules.

Prior to founding Seguro Energy, Mark dedicated his career in the electricity and natural gas industry in the US, particularly focused on energy infrastructure optimization and commodity trading in Texas, the Pacific Northwest and Desert Southwest markets.

AREAS OF EXPERTISE

- Energy Infrastructure Development / Valuation / Acquisition / Divestiture
- Asset Optimization / Contract Management
- Transactional Deal Structuring / Origination / Trading
- Physical Commodity Logistics
- Operational Interface / Efficiency Enhancement
- Project Financing
- Qualitative and Quantitative Analysis Embracing Market and Industry Trends
- Asset Modeling & Forecasting
- Environmental Permitting
- Risk Management / Cost Reduction / Budgeting
- Risk Governance Compliance / Financial Reporting

PROFESSIONAL EXPERIENCE

SEGURO ENERGY PARTNERS

Managing Partner (October 2014 – present)

Energy consulting and generation development business focused on generation efficiencies, asset optimization, economic dispatch, contract negotiation, asset valuation and environmental permitting, including 905 MW development of Project Bella in Pinal County, Arizona.

Asset optimization and valuation of energy infrastructure and long-term contract management for clients, including key advisor in various portfolio acquisitions with successful closing of over 9,300 MW of electric generation.

Functional development of systems and processes for participation, transparency, compliance and settlement within various energy markets.

Lead commercial advisor to CFE Generación related to generation optimization, strategy, systems, operational process and procedures, reporting and corporate governance.

Assist clients with risk minimization strategies, structuring of contracts, valuation of business opportunities, analysis of strategies for competitive processes and investment considerations.

PROFESSIONAL
EXPERIENCE
(cont.)

Implementation of functional activities for the front, middle and back office. Evaluation and development of structured transactions and hedge instruments in various energy markets.

Operational oversight of electric and fuel supply infrastructure, including contract management, including emissions instruments.

Represented the Lenders of Abengoa in the first restructuring of the ownership structure, financing and construction schedule of the IPP Norte III project.

WAYZATA INVESTMENT PARTNERS

Operating Partner (July 2009 – September 2014)

Directed and implemented asset optimization strategies related to economic dispatch, asset management, disciplined commodity hedging, cost reduction, acquisition, expansion and long-term deal structuring related to over 2,600 MW of generation under direct control.

Guadalupe Power Partners – 1,070 MW CCGT in ERCOT
Sundevil Power Holdings (Gila River) – 1,090 MW CCGT in Desert Southwest
California Power Holdings – 94 MW in CAISO;
Mint Farm Energy Center - 280 MW in Pacific Northwest
Castleton Power – 78 MW in NYISO

Profitably managed forward positions and daily economic dispatch during significant price volatility periods. Negotiated long-term gas transportation agreements.

Structured Asset Management and Resource Adequacy contracts and origination of various long-term contracts.

Reduced fixed operational costs and increased net output through efficiency enhancements.

Provided assistance in interconnection and permitting activities as well as lead for due diligence related to acquisition, divestiture and project financing of energy infrastructure.

BG ENERGY (LNG)

Manager, logistics and trading (March 2006 – July 2009)

Assisted in implementation of a disciplined, insight-based risk absorption strategy to compliment BG's LNG infrastructure and positioned BG as one of the top 10 leading energy marketing companies in the Gulf Coast region.

Responsible for daily optimization and operational interface with BG's Lake Charles LNG terminal, transportation agreements and storage assets in the Gulf Coast region. Profitable optimization of over 23 Bcf of gas storage assets and substantial pipeline capacity.

Interface and hedge provider to BG's LNG trading and logistics team to facilitate economical arbitrage in the US, South American and Asian markets.

Adherence to risk management policies and strategy.

PROFESSIONAL
EXPERIENCE
(cont.)

NORTHWESTERN ENERGY

Executive Director of Energy Supply

Responsible for procurement, optimization and resource balancing of Montana and SD systems, including 1,400 MW of electricity and 35 Bcf of natural gas systems.

Provided management functions during bankruptcy process, including lead in DIP financing process.

Managed daily operations of the wholesale marketing and logistics with a qualified energy supply staff and related consultants.

Restructured long-term energy supply agreement (\$80 million)

Origination of new, long-term gas-fired and wind resources in long-term PPAs

Filing of Integrated Resource Plan for Montana Default Supply, including asset and portfolio modeling, coordination with stakeholders and testimony with the Montana PSC.

Regulatory and Risk Management Policy compliance

AVISTA CORP.

Forward Markets and Hydro Manager (May 1998 – April 1999)

Responsible for risk quantification and developing risk management parameters related to the regulated system.

Assisted in forward hedging of power and natural gas for surplus / deficit periods for optimization and compliance purposes

Assisted in hydro / resource modeling and optimization, developing a sound, fundamental understanding of the PNW hydro system.

Education

CREIGHTON UNIVERSITY

BSBA in Economics and Finance (May 1993)

PCE-3

Witness Testimony Summary and Resume
of Garen Demirchian

Pinal County Energy Center, LLC

Project Bella

Witness Summary for Garen Demirchian

Mr. Demirchian is President of Power Genesis International and serves as the Project Engineer for the Pinal County Energy Center, known as Project Bella. Mr. Demirchian is responsible for the technical design of the Project.

His testimony will include a discussion of the Project components, including the selection of equipment related to the quick dispatch and efficient conversion of natural gas to electricity. He will describe the Project's low water utilization and state of the art emissions control systems, as well as the placement of the equipment on site to minimize sound and enhance operational efficiency. Mr. Demirchian will also identify those Project attributes related to setbacks, safety design, and compliance with all permits and zoning requirements.



Education

B.S., Mechanical Engineering,
Northeastern University, 1983

Registrations

Professional Engineer: AL, AZ, CA,
CT, DC, FL, GA, HI, MA, MD, ME,
NH, NJ, NM, NV, NY, OH, PA,
PR, TX, WA, WY, VT

Professional Activities

International District Energy
Association (IDEA)

Presentations

IDEA Annual Conference, "The
Benefits of Higher Condenser
Water," 1997

IDEA Campus Energy
Conference, "University of
Massachusetts Central Heating
Plant," 2008

IDEA 21st Annual Campus
Energy Conference, "CHP at
Eastern Maine Medical Center,"
2008

IDEA 24th Annual Campus
Conference, "Yale University
School of Medicine, Innovation
Marks MEP Design for New CHP
Plant," 2011

IDEA Annual Conference, "CHP
in Mining Applications," 2015

The California Combined
Heat and Power Symposium,
"Successful CHP - Making the
Case and Delivering the Project,"
2016

Publications

Demirchian, Garen and Marion,
Michael. "UMass CHP Project:
Campus System a Technical and
Environmental Model," District
Energy, Fourth Quarter 2007

Overview

Garen has over 40 years of experience in all aspects of project development, procurement, engineering and construction for power generation stations, power delivery transmission and distribution, and thermal energy utilities. He is the President of Power Genesis International LLP(PGI), with primary business focus on development, owning and operating power generating plants with wide range of conventional and renewable energy sources including biomass, liquid biofuels, biogas, hydrogen (H₂), MSW, Solar PV, wind and geothermal.

Prior to joining PGI, Garen was the founder and the Managing Partner of the Vanderweil Power Group.

Garen's professional skills and responsibilities included:

- Board Director and Corporate Governance
- Business Leadership, organizational growth and development
- P&L and revenue responsibilities

Work Experience

- **President Power Genesis International, Cambridge, MA
June 2024 – Present**
President of recently formed Power Genesis International LLP
Project Bella Power Generation Station, Penal County AZ:
Responsibilities include technical development, procurement, permitting support, engineering and construction management/oversight for this +/- 925 MW Peaking power generating plant comprised of
 - Ten (10) GE LM6000 Gas Combustion Turbine Generators, operating in Simple Cycle Peaking configuration.
 - Balance of Plant auxiliary system
 - 440 MW/1760 MWh Battery Energy Storage System (BEES)
 - 230 kV and 500 kV switchyards, 500 SRP
 - 500 kV switchyards and SRP interconnection
- **R.G. Vanderweil Engineers LLP, Vanderweil Power Group, Boston, MA
August 2003 – June 2024**
Managing Vanderweil Power Group
Created the Vanderweil Power Group engineering sector over 30 years ago, that is now a national leader in power and utilities engineering and related services for conventional and Renewable Energy sources, resiliency and reliability, CHP plants, Simple Cycle and Combined Cycle power generating stations 5 MW to 500 MW, Microgrid and BESS systems up to 400 MW x 1,600 MWh, T&D 38 kV up to 500 kV and Utility Substation up to 1,200 MVA substations.
- **R.G. Vanderweil Engineers LLC, Boston, MA
January 2001 - August 2003**
President R.G. Vanderweil Engineers LLC Boston
- **R.G. Vanderweil Engineers LLC, Boston, MA
October 1990 – January 2001**
Senior Vice President and Market Sector Leader
- **Northeastern University, Boston, MA
September 1987 – June 1997**
Lecturer College of Engineering Continuing Education Program
- **Sippican Consultants Internation, Cambridge, MA
June 1983 – October 1990**
Principal and Engineering Manager



Demirchian, Garen and Bennett, Bruce. "Power System Grows to Meet Hospital Needs." Energy & Power, August 2007

Demirchian, Garen and Bennett, Bruce. "Eastern Maine Medical Center: Vital Needs." Cogeneration and On-Site Power, January/February 2007

Published paper at IDEA 88th Annual Conference: The Benefits of Higher Condenser Water at Logan International Airport Central Chilled Water Plant

- **New England Nuclear Company, N. Billerica, MA**
January 1980 – June 1983
Proton Linear Accelerator Program, Part-Time research assistant

Related Project Experience

- **Siba Energy Power Generating Station, Boca Chica Dominican Republic**
New 290-MW gas-fired Combined Cycle power plant will support demand for electricity across the island nation while addressing the government's vision for sustainable electrical development. The power plant is comprised of 10xSolar Titan 130 and 2xSolar Titan 250 Combustion Turbine Generators and HRSGs, with 2x45 MW Skoda Condensing Steam Turbine Generators
- **Gemma Power System, Peaking Plant California**
Five(5) GE LM6000 Gas Combustion Turbine Generators in Peaking Simple Cycle configuration located on two sites - three units on the Indigo site in Palm Springs, California, and two units on the Larkspur site in San Diego, California, designed and constructed in 12 months.
- **Rock Springs Generation Station, Cecil County, MD**
Project was comprised of 700 MW with 4xGE 7FA Gas Combustion Turbines in Simple Cycle configuration 345 kV utility interconnection.
- **Genesis Power, McAdams, MS**
Provided Owner's Engineering services for the development of several 640 MW Combined Cycle Plants EPC Bid packages, each comprised of the following:
 - 2xGE Frame 7FA Gas Combustion Turbine Generators
 - 2xHRSGs, each rated for 600,000 pph
 - 1x250 MW Steam Turbine Generator
 - 12,000 Ton of Inlet Air Cooling with Chillers
 - 230 kV Transmission Line and Utility Interconnect
 - 500 kV Grid Interconnection Substation and Switchyard
- **AES/Fluence, Alamitos Battery Energy Storage System, Long Beach, CA**
100 MW/400 MWh BESS provided engineering and detailed design for the electrical, HVAC and Fire Protection systems for this 1000 VDC, 34.5 kV, 100 MW/400 MWh BESS with 230 kV grid interconnection.
- **Confidential Client Battery Energy Storage System, CA**
86 MW/172 MWh BESS, provided engineering and detailed design for the electrical, HVAC and Fire Protection systems for this 1000 VDC, 66 kV, 86 MW/172 MWh BES

PCE-4

Witness Testimony Summary and Resume
of Steven Morgan

Pinal County Energy Center, LLC

Project Bella

Witness Summary for Steve Morgan

Mr. Morgan is a Project Manager and Senior Land Planner at KP Environmental, Inc. (KPE), the environmental consultant retained for Project Bella. He served as the Environmental Manager for this Project.

Mr. Morgan will testify concerning the environmental studies conducted in support of the CEC Application and the impact of Project Bella on existing land uses and existing plans, biological resources, cultural resources, visual resources, and recreational resources. His testimony will include the presentation of photographic simulations of the proposed Project from key observation points surrounding the Project site. He will also assist with the route tour and/or virtual flyover, as needed. Mr. Morgan's testimony will conclude that the Project is environmentally compatible.

Mr. Morgan will also describe the public engagement process as well as the statutory notice requirements, including publication of the notice of hearing, notice to affected jurisdictions, posting of Project signs, and the delivery of the CEC Application to local libraries.



PROJECT MANAGER

SUMMARY

EDUCATION

- **B.S. Environmental Conservation and Sustainability**

University of New Hampshire

- **M.S. Environmental Science and Policy**

Johns Hopkins University

EXPERIENCE

10 Years

SPECIALTIES

- Project Management
- Environmental Impact Assessment
- Regulatory Permitting
- Land Use Planning
- Utility-Scale Energy Project Development
- Construction Compliance

Mr. Morgan is a Project Manager that provides a variety of services to electric utilities and energy developers. Mr. Morgan facilitates the environmental and regulatory permitting processes for utility-scale energy developers and major electric utilities in the Western United States. He has extensive experience coordinating diverse stakeholders and driving projects from conception through construction. Mr. Morgan specializes in navigating complex regulatory frameworks, mitigating project risks, and supporting compliance through the project life cycle.

Mr. Morgan has provided permitting and planning services to support to over 1 GW of energy generating project capacity currently in operation and an additional 1 GW currently in development or construction. He has also supported a wide range of transmission projects, from Gen-Ties to regional-scale transmission lines.

He has led environmental assessments, public participation programs, land use planning and zoning efforts, and regulatory permit approvals. He has obtained federal, state, and local approvals for a variety of projects. For these projects, he has served in the capacities of technical lead, technical writer, editor, project coordinator, and project manager. The following provides a list of key projects for which Mr. Morgan has provided Project Management, project planning, land use analysis, public involvement and/or environmental analysis:

Select Energy Project Experience:

- Sun Streams 4 Solar and Storage Project, Longroad Energy (AZ)
- Sun Streams Expansion Solar and Gen-Tie Project, Longroad Energy (AZ)
- Sun Pond Solar Project, Longroad Energy (AZ)
- Sun Basin Solar and Storage Project, Longroad Energy (AZ)
- Serrano Solar and Gen-Tie Project, Longroad Energy (AZ)
- Southwest Crossroads Solar and Storage, Longroad Energy (AZ)
- Grand Verde Solar and Storage Project, Apex Clean Energy (AZ)
- High-Tech Interconnect Project, SRP (AZ)
- Corrective Transmission Maintenance Program —SDG&E (CA)
- Transmission Wood-to-Steel Program (multiple lines) – SDG&E (CA)
- South Bay Substation Relocation – SDG&E (CA)
- Round Mountain 500 kV Dynamic Reactive Support, LS Power (CA)
- Gates 500 kV Dynamic Reactive Support, LS Power (CA)
- Clines Corners Wind Project, Orion Renewables, Pattern Energy (NM)
- Sylmar Ground Return System, LADWP (CA)
- Panoche Valley Solar Project, PV² Energy, Con Edison (CA)

PCE-5

Witness Testimony Summary and Resume
of James Westbrook

Pinal County Energy Center, LLC

Project Bella

Witness Summary for James Westbrook

Mr. Westbrook is the President of BlueScape Environmental (BlueScape), the consulting firm retained for the air quality management of Project Bella. BlueScape has overseen the permitting process required by the Pinal County Air Quality Control District (PCAQCD), Arizona Department of Environmental Quality (ADEQ), and the United States Environmental Protection Agency (EPA).

Mr. Westbrook's testimony will include a discussion of the extensive air dispersion modeling and air quality studies performed for the Project. He will describe the mandated state and federal air permitting processes and outcomes, as well as the operational conditions associated with those permits. In addition, Mr. Westbrook will describe the monitoring instrumentation and emissions controls systems associated with Project Bella and provide testimony concerning the human health and exposure assessment impacts of Project Bella.



BLUESCAPE
ENVIRONMENTAL

James A. Westbrook

President
Principal Air Quality Scientist

Expertise

Air Quality Permitting & Compliance
Litigation Support
Strategic Business and Project Management
Mitigation Programs
Greenhouse Gas Management
Air Dispersion Modeling
CEQA Air Quality Impact Analysis
Chemical Spill Risk Management
Health Risk Assessment
Air Emissions Inventories
Emissions Credit Banking

Industry Focus

Power Generation
Refineries and Chemical Plants
Oil and Gas Production
LNG Facilities
Aggregate and Asphalt Production
Coating Operations
Pharmaceuticals
Building Materials Manufacturing
Aerospace Industry
Metal Plating Operations
General Manufacturing
Land Development
Data Centers

Education

MS, Environmental Science, Indiana Univ.
BS, Atmospheric Sciences, UCLA

Certifications

Certified Consulting Meteorologist (CCM)
Certified Permitting Professional (CPP)

Associations / Memberships

Air and Waste Management Association
American Meteorological Society
Association of Environmental Professionals
Industrial Coalition of Orange Co
Industrial Environmental Association
Solid Waste Association of North America

Company Background

BlueScape
Kleinfelder
ENVIRON Corporation

Summary of Experience

In 1997, James A. Westbrook, founded BlueScape Environmental (BlueScape) to help businesses achieve practical, cost-effective air quality compliance solutions. Since then, he has independently grown BlueScape by way of exceptional skills in strategic business planning, marketing, and project management. BlueScape currently serves businesses with annual revenues in excess of one billion dollars, including power generation and manufacturing companies, developers and consulting firms.

Mr. Westbrook helps clients to obtain air permits and achieve strategic business goals by drawing upon his expert skills in regulatory analysis & negotiation, air emissions calculations, greenhouse gas emissions management, dispersion modeling, and human health risk and exposure assessment. Mr. Westbrook serves as an expert witness in litigation cases involving air emissions estimates, dispersion modeling, and health risk assessment. To provide superior customer service, he has assembled a team of engineers and scientists with a wide range of experience and knowledge with industrial equipment, emission control technologies, computer emissions and dispersion modeling tools, and agency contacts throughout the U.S.

Mr. Westbrook actively speaks to industry trade groups regarding air quality compliance issues. He is the co-instructor for the only publicly available training course on the Hotspots Analysis and Reporting Program (HARP) risk assessment software. His work background includes experience obtained at Kleinfelder in Pleasanton, CA, ENVIRON Corporation in Emeryville, CA, and Parsons Engineering-Science in Pasadena, California.

His formal education includes an M.S. in Environmental Science from Indiana University, Bloomington and a B.S. in Atmospheric Sciences from UCLA. He is a Certified Consulting Meteorologist (CCM) and is recognized as a Certified Permitting Professional (CPP) by the South Coast Air Quality Management District. Mr. Westbrook is listed as a CEQA Consultant for Air Quality by the County of San Diego, Planning Department.

PCE-6

Witness Testimony Summary and Resume
of Nathan Miller

Pinal County Energy Center, LLC

Project Bella

Witness Summary for Nathan Miller

Mr. Miller is Vice President of Groundwater Modeling Services for Matrix New World Engineering (Matrix). Matrix is the hydrology engineering firm retained for water resource planning for Project Bella.

Mr. Miller will provide testimony on the projected groundwater consumption impacts on the surrounding aquifer and the existing groundwater rights associated with the Project site as they relate to the Pinal Active Management Area (AMA). He will discuss the existing agricultural uses on the site and surrounding areas, compared with the Project's expected water usage over its multi-phase development. Mr. Miller will also generally explain long-term storage credits (LTSCs), the Groundwater Savings Facility (GSF) operated by the Maricopa Stanfield Irrigation and Drainage District (MSIDD), and the Project's commitment to offset and mitigate any incremental increase in water usage associated with Project Bella.

Nathan E. Miller

Vice President, Groundwater Modeling Services

Education: B.S., 1997 Hydrology *Magna Cum Laude*, University of Arizona – Tucson

Years in Profession: 26 **Years with Firm:** 25

Experience: Mr. Miller is Vice President, Groundwater Modeling Services for Matrix New World Engineering (Matrix). He is a highly regarded hydrologist with recognized expertise in groundwater flow modeling. He uses models to address water resources challenges and facilitate scientific-based informed decisions. He helps Arizona municipalities and water providers plan and manage their water resources portfolios. Mr. Miller leads the Matrix Arizona Team, a long-established, locally renowned provider of hydrogeologic and engineering consulting services. Matrix's Arizona Team of 30+ professionals assists public and private clients with groundwater resources and contaminant remediation projects throughout Arizona and the Southwest.

Under Mr. Miller's direction, Matrix's Modeling Team constructs and applies groundwater flow and contaminant transport models that serve as the cornerstone of Matrix's Arizona water resources and environmental remediation projects. Mr. Miller helps the Matrix Modeling Team solve increasingly complex modeling challenges. Mr. Miller's computer skills allow him to take full advantage of available tools, and his skill set is continually adapting to the latest technologies. He has advanced proficiency in using the various versions of the U.S. Geological Survey MODFLOW groundwater modeling software and the library of packages available such as the streamflow routing package for stream-aquifer interactions. He has experience with a wide range of software tools used for processing model input and output data. This includes several tools he developed to increase data processing efficiency with seamless integration to Geographic Information Systems (GIS). He is well-versed in application of PEST parameter estimation software and its related utility software, and regularly applies these skills for model calibration and uncertainty analyses. Mr. Miller's ability to find the most efficient way to handle the task at hand provides added value to nearly every project.

Mr. Miller is recognized as a key hydrologist and modeler who represents stakeholders working to address water resources challenges in Arizona. He regularly represents clients before the Arizona Department of Water Resources (ADWR) and the Arizona Department of Environmental Quality (ADEQ) and manages the successful completion of permits issued by these agencies. He has conducted numerous hydrologic studies and aquifer impact analyses in support of Assured and Adequate Water Supply determinations. He has completed many well spacing and impact investigations to support siting and permitting of production wells and recovery wells. He has also prepared many aquifer recharge impact analyses, applications for Underground Storage Facilities (USF), and hydrology studies for Aquifer Protection Permits (APP). Mr. Miller's experience with these programs provides a solid understanding of the regulatory framework for groundwater resources issues in Arizona, and the policies and procedures used by ADWR and ADEQ. Mr. Miller combines in-depth knowledge of these regulatory programs with exceptional technical modeling skills providing a unique and valuable skill set to clients.

Representative Projects: *Assured Water Supply (AWS) Studies / Hydrogeologic Investigations*

- Groundwater modeler and primary hydrologist supporting the Pinal AMA Groundwater Task Force to propose changes to AWS baseline groundwater model scenario
- Groundwater modeler and hydrologist supporting multiple stakeholders affected by the release of the ADWR Phoenix AMA AWS model in June 2023 and the subsequent pause on new AWS determinations
- Assured water supply investigation, Rio Rico on the Santa Cruz River, Arizona
- Groundwater Supply Study, Intel Corporation's Dobson Road Facility, Chandler, AZ
- AAWS applications for multiple master planned communities, Buckeye, AZ
- Hydrologic Study in support of APP, Balterra Wastewater Treatment Plant, Maricopa County, AZ
- Water resource permitting and well siting analysis, Marbella Ranch, Maricopa County, AZ
- Water resources investigation, Lake Pleasant Heights and Saddleback Heights, Peoria, AZ
- Hydrologic Study and Modification of PAD – Arizona Water Company's Superstition and Pinal Valley Water Systems, Maricopa and Pinal Counties, AZ
- DAWS Modification, Town of Florence, AZ
- Hydrologic Report and AAWS – Iota Violet LLC and Rodeo Road LLC, Casa Grande, Pinal County, AZ
- Hydrogeologic investigations documenting the groundwater resources available in support of numerous applications under the ADWR Assured Water Supply Program.

- Client representation and preparation of successful applications for CAWS, AAWS, DAWS, and PADs for proposed development throughout AMAs in Arizona
- Hydrogeology study in support of amended APP and USF permits, Prescott Airport Water Reclamation Facility, Yavapai County, AZ
- Navajo Nation and Hopi Tribe Indian Water Rights Settlement Agreement, northeastern Arizona

Computer Modeling / Database Management

- Reconstructed and recalibrated an existing numerical groundwater flow model for an alluvial basin in Arizona to assess optimal well distribution and estimate total recoverable volume
- Conducted a hydrogeologic study including construction and calibration of a new 3-dimensional, 7-layer groundwater flow model of the Upper Big Chino Subbasin in support of the City of Prescott's acquisition of the Big Chino Water Ranch and withdrawal of groundwater, Yavapai County, AZ
- Development of a new Assured Water Supply (AWS) model scenario of the ADWR Tucson AMA Model
- Modification and focused recalibration of USGS Northern AZ Groundwater Flow Model (NARGFM) for the City of Flagstaff's Red Gap Ranch and the Navajo Nations' Leupp wellfields to assess stream flow depletion for Environmental Assessment under NEPA, Winslow-Holbrook, AZ
- Simulations of Agua Fria River baseflow impacts using the ADWR Prescott AMA Model modified to simulate an alternative conceptual model of surface water flows from multiple contributing watersheds
- Groundwater flow and contaminant transport model development and predictive simulations to compare various remedial options – PGA-North Superfund Site, Maricopa County, AZ
- Numerical groundwater model development and calibration integrating the Salt River Valley Model with the Lower Hassayampa Sub-basin Model – West Salt River Basin Study (USBR), Maricopa County, AZ
- Groundwater model development and calibration in support of an Analysis of Water Adequacy for State Trust Lands – McMullen Valley Basin, AZ
- Numerous model simulations of the ADWR Salt River Valley (SRV) AWS Baseline Scenario including a major reconstruction of the scenario in support of new AWS applications in 2018
- Development and calibration of a numerical groundwater flow model of the Harquahala Irrigation Non-expansion Area to assess future aquifer conditions with proposed transportation of water out of the basin
- Development and calibration of a new three-layer groundwater flow model of the Eloy and Maricopa Stanfield Sub-basins of the Pinal AMA, and a portion of the East Salt River Valley Sub-basin of the Phoenix AMA, Pinal County, AZ
- Groundwater flow modeling in support of multiple projects located in the Maricopa Stanfield and Eloy Sub-basins of the Pinal Active Management Area, Pinal County, AZ

Managed Aquifer Recharge Studies / Permitting

- Hydrogeologic studies including DIA analysis in support of APPs for several effluent recharge projects in AZ
- Preparation of hydrogeologic studies including area of impact, discharge impact area, and mounding impact analysis models for groundwater recharge projects throughout Arizona
- Permitting for Underground Storage Facility (USF), Groundwater Savings Facilities (GSF), Water Storage Permits (WSP), and Aquifer Protection Permits (APP) for recharge projects throughout Arizona
- USF Permitting and Hydrogeologic Support for APP, Tartesso WRF, City of Buckeye, AZ
- Evaluate potential cause(s) of alert level exceedances in a monitor well at a recharge facility, Chandler, AZ
- Hydrogeologic study to support APP for Town of Florence Wastewater Reclamation Facility (WRF), Pinal County, AZ
- Hydrogeologic study to support Merrill Ranch Water Reclamation Facility APP, Town of Florence, Pinal County, AZ
- Oracle Ridge Mine APP Significant Amendment Application, Santa Catalina Mountains, Pima County, AZ
- Hydrogeologic study in support of APP/monitor well installation, Tribute WRF, Sierra Vista, Cochise Cnty, AZ

Aquifer Recharge / Dewatering Projects

- Modeling of aquifer drawdown response to dewatering wells for selection of optimal well spacing and total number of wells for several projects in the Phoenix Metro area
- Preparation of hydrogeologic studies including area of impact, discharge impact area, and mounding impact analysis models for groundwater recharge projects throughout Arizona
- Submittal of applications for USF permits for several aquifer recharge sites in Arizona
- Vadose zone well installation & testing, City of Peoria's Butler Water Reclamation Facility, Maricopa Cnty, AZ
- Recharge permit modifications, Chandler Water Reclamation Campus, City of Chandler, AZ

- Recharge permit capacity for Tumbleweed, Ocotillo, and Chandler Heights Recharge Projects, Chandler, AZ
- Assessment of potential basin recharge capacity for two proposed sites based on field data including analysis of infiltrometer test data and borehole logs
- Analysis of dewatering system design, City of Phoenix 91st Avenue WWTP, Maricopa County, AZ
- Studies to determine dewatering requirements during sewer line construction in Buckeye, and Laveen, AZ

Well Construction / Well Siting / Well Impact Studies

- Preparation of numerous permits to drill and operate wells in Arizona, including analyzing the projected impact to existing registered wells when necessary
- Well construction management, field data collection, and aquifer testing of high-capacity production wells and monitor wells in the Phoenix Active Management Area
- Well design based on review of existing hydrogeologic data and interpretation of lithologic logs, geophysical logs, and zonal water quality of pilot boreholes
- Spinner logging and data analysis of multiple municipal production wells for the City of Chandler, AZ
- West Salt River Valley well siting study for industrial water use, Maricopa County, AZ
- Identify source(s) of elevated nitrate and rehabilitation options for a water supply well, Pinal County, AZ
- Well Siting Study, Arizona Water Company Pinal Valley System, Pinal County, AZ

Professional Certifications / Affiliations:

- ◆ OSHA 10-Hour Construction Safety & Health certified
- ◆ Arizona Hydrological Society – Corporate Board President 2023-2024
- ◆ Arizona Hydrological Society – Corporate Board 2022

PCE-7

Witness Testimony Summary and Resume
of Brad Sohm

Pinal County Energy Center, LLC

Project Bella

Witness Summary for Brad Sohm

Mr. Sohm is a Professional Engineer and Senior Noise Specialist for SWCA Environmental Consultants (SWCA). The Applicant has retained SWCA to provide noise analysis and sound engineering for Project Bella.

Mr. Sohm's testimony will explain the noise impact analysis performed for all operational conditions of Project Bella. He will describe the extensive coordination with equipment manufacturers and the Project Engineer to implement effective noise reduction design parameters for the Project. Mr. Sohm will also present testimony regarding existing Pinal County noise ordinances and current zoning requirements.

Mr. Sohm will discuss the comparative projected noise levels and distance to residential areas of Project Bella to existing generating plants in the area utilizing the same or similar technologies.

BRAD SOHM, P.E., SENIOR NOISE SPECIALIST

Mr. Sohm is a Chemical Engineer and specializes in noise impact analysis, air quality compliance and permitting, health and safety, environmental site investigations, environmental remediation, and National Environmental Policy Act (NEPA) impact assessments.

He has extensive experience with performing noise surveys and the quantification of noise impacts for California Environmental Quality Act (CEQA), Federal Energy Regulatory Commission (FERC), and Federal Highway Administration, NEPA impact assessments, as well as for compliance with state and local noise requirements. He also has extensive experience with state and county air quality permitting programs and compliance, including CEQA regulations, preparing non-Title V, Title V, and Prevention of Significant Deterioration (PSD) permits; completing technical review and data assessment of permitting air pollution control technologies to identify current best available control technology (BACT) and lowest achievable emissions rate (LAER) requirements for fuel-fired emission units; assisting with facility air permit audits to identify potential permit revisions/modifications; and other non-compliance issues. He has prepared and managed a wide range of air quality permitting and noise impact analyses for ethanol plants, refineries, various manufacturing facilities, slag recovery facilities, oil and gas projects, recycling facilities, and electric utilities, for a wide range of industrial, military, and utility clients throughout the country.

YEARS OF EXPERIENCE

21

EXPERTISE

- Noise impact analysis
- Air quality permitting and compliance
- Health and safety
- Environmental site investigations
- Environmental remediation
- Soil, groundwater, and asbestos sampling
- Subcontractor oversight
- Phase I Sight ESA
- SPCC site inspection

EDUCATION

B.S., Chemical Engineering, option Environmental Engineering; University of Arizona, Tucson, Arizona; 2002

REGISTRATIONS / CERTIFICATIONS

Professional Engineer, Arizona No. 58554; 2014; Texas No. 119997; 2015; Professional Engineer, New Mexico No. 23408; 2016

TRAINING

- EPA Method 9 Visible Emissions Training "Smoke School", Arizona Department of Environmental Quality/Arizona State University; 2013
- AHERA Building Inspector Refresher, Environmental Protection Agency/The Asbestos Institute; 2008
- 40-hour Hazardous Materials Worker Training (HAZWOPER), OSHA; 2003; 8-hour refresher; 2010

SELECTED PROJECT EXPERIENCE

Sawtooth Gen-tie Project; Pinal County, Arizona; EDF Renewables. SWCA supported Salt River Project with the public outreach and environmental analysis in support of an application for Certificate of Environmental Compatibility for this proposed natural gas fired power plant in Coolidge, Arizona. SWCA completed land use, biological, cultural/archaeological, visual, and noise resource analyses for this highly controversial project, and provided expert witness testimony before the Arizona Power Plant and Transmission Line Siting Committee, which led to the approval of this project by the Arizona Corporation Commission. Role: Senior Noise Specialist.

Coolidge Expansion CEC; Pinal County, Arizona; Salt River Project (SRP). SWCA provided planning and permitting support for a new 230kV transmission line gen-tie to connect a proposed solar and battery energy storage system (BESS) in the Pinal County area. Services include siting and alternatives analysis support for the noise analysis (Exhibit I) and hearing support. Role: Noise Specialist.

Estrella Substation Project and Paso Robles Area Reinforcement Project; San Luis Obispo County, California; Pacific Gas and Electric Company (PG&E). SWCA is providing planning and permitting support for a new 230 kV substation and greenfield 70 kV power line in the Paso Robles area. Services include siting and alternatives analysis support for the substation; cultural, biological, and paleontological surveys for both project components; preparation of a PEA; and discretionary environmental permitting support. Role: Air Quality and Noise Specialist.

Suncrest Dynamic Reactive Power Support Project; San Diego County, California; Confidential Client. SWCA is providing planning and permitting support for a dynamic reactive power support facility and associated 230 kV transmission line near Alpine, CA. Services include routing and siting support; alternatives analysis; cultural, biological, and paleontological surveys; preparation of a Proponent's Environmental Assessment (PEA); and discretionary environmental permitting

support. The application for Certificate of Public Convenience and Necessary was filed in summer 2015 and the PEA was deemed complete in December 2015 (Application No. A.15-08-027) *Role: Air Quality and Noise Specialist.*

TUUSSO Energy Kittitas County Solar, Kittitas County, WA; TUUSSO Energy, LLC. SWCA was selected by TUUSSO Energy LLC (TUUSSO) to initially prepare seven Critical Issues Analyses (CIAs) for potential commercial solar project developments in Kittitas County, Washington. Each solar project would generate up to 5 megawatts (MW) and would be located on 39- to 50-acre parcels of agricultural lands. SWCA is continuing to provide additional services, including conducting fast turn-around natural resources fieldwork and evaluations, wetland delineations, archaeological fieldwork and assessments, Phase 1 ESAs, visual simulations, air quality and noise calculations, and preparation of permit applications. *Role: Task Manager and Noise Specialist. Served as technical lead preparing the noise impact analysis for the different solar projects evaluated.*

Northern Arizona Proposed Withdrawal Environmental Impact Statement; Coconino and Mohave Counties, Arizona; U.S. Bureau of Land Management. SWCA was the primary contractor to the BLM and four federal cooperating agencies (U.S. Forest Service, National Park Service, U.S. Fish and Wildlife Service, and U.S. Geological Survey) to determine the potential impact of a 20-year withdrawal of approximately 1 million acres of federal lands from new mineral exploration and mining near Grand Canyon National Park. As a land withdrawal, a key component of the project is the potential land use in the absence of the withdrawal. The EIS process attracted widespread national and international interest, with nearly 400,000 individual comment submittals received during the scoping and public comment periods. *Role: Air Quality Specialist. Responsible for the preparation of the Air Quality, Climate Change, and Noise sections of the EIS.*

Northern Colorado Regional Airport Project; Dibble Engineering; Larimer County, Colorado. SWCA provided air quality and noise impact analysis in support of preparation of a Categorical Exclusion (CatEx) Determination for planned improvement projects at the Northern Colorado Regional Airport located in Larimer County, Colorado. The impact assessment was performed in accordance with the requirements of Federal Aviation Administration (FAA) Environmental Orders 1050.1F and 5050.4B and the Desk Reference for Airports Actions. *Role: Air Quality and Noise Specialist Task Manager. Responsible for the review of the air quality assessment and noise analysis.*

Camino Solar Environmental Support; Aurora Solar, LLC; Kern County, California. SWCA was retained to support NEPA and California Environmental Quality Act (CEQA) compliance for a 44-megawatt (MW) solar photovoltaic project located on a mix of private and Bureau of Land Management lands. SWCA services include planning, comprehensive environmental technical studies, and permitting support. The EIR/Environmental Assessment (EA) was approved in May 2020. SWCA is currently completing preconstruction permitting and reporting requirements, including translocation of Joshua trees, development of a project-specific Habitat Restoration and Revegetation Plan, and a Bird and Bat Conservation Strategy. *Role: Air Quality and Noise Specialist. Responsible for technical support and review of the Air Quality and Noise sections of the EIR.*

SCE Fort Irwin Reliability Project Environmental Assessment; Southern California Edison Company; San Bernardino County, California. SWCA is providing support for this transmission line improvement project located on lands administered by the BLM and Department of Defense as well as private land owners. Services include the development of the BLM Plan of Development (POD), preparation of the Environmental Assessment (EA), and biological, jurisdictional waters, cultural, and paleontological technical studies, and reports to support the EA, POD, and environmental permits. *Role: Air Quality and Noise Specialist. Responsible for technical support and review of the Air Quality and Noise sections of the PEA.*

Cardinal-Hickory Creek Transmission Line Project Environmental Impact Statement; Confidential Client; La Crosse, Multiple Counties, Multiple States. SWCA is served as a 3rd party contractor for a USDA Rural Utilities Service (RUS) EIS for a proposed 345-kV transmission line that was approximately 125 miles long and span portions of Iowa and Wisconsin. SWCA was responsible for assisting RUS and its Cooperating Agencies with all aspects of NEPA compliance and was also supporting RUS with aspects of tribal consultation, compliance with NHPA Section 106, and ESA Section 7 interagency consultation. Both the U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers are Cooperating Agencies for the project. The proposed project crossed the Upper Mississippi River National Fish and Wildlife Refuge, which triggered additional site-specific analysis required for USFWS and USACE permit reviews. *Role: Air Quality and Noise Specialist. Responsible for technical support and review of the Air Quality and Noise sections of the EIS.*

PCE-8

Witness Presentation
Slides

LEFT

Project Bella

Docket No: L-21314A-24-0144
Case No: 0233

Project Bella

Docket No: L-21314A-24-0144
Case No: 0233

Project Bella Witnesses

Mark Thompson

Stephen Morgan

Garen Demirchian

James Westbrook

Nathan Miller

Brad Sohm

Project Bella Witnesses

Mark Thompson

Stephen Morgan

Garen Demirchian

James Westbrook

Nathan Miller

Brad Sohm

Project Bella Witnesses

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Brad Sohm

Project Bella Witnesses

Mark Thompson

Stephen Morgan

Garen Demirchian

James Westbrook

Nathan Miller

Brad Sohm

Seguro Energy Partners

Introduction

Seguro Energy Partners

Provides Asset Management and Energy Management Services for over 3,000 MW of Operating Electrical Generation and Fuel Supply Management Services for 8,400 MW of Gas-fired Generation, Consuming approximately 1.3 Bcf / day.

Services and Primary Commercial Activities Include:

- Energy Infrastructure Development / Valuation / Acquisition
- Asset Optimization / Contract Management
- Transactional Deal Structuring / Origination / Trading
- Physical Commodity Logistics /Operational Interface / Efficiency Enhancement.
- Qualitative and Quantitative Analysis Embracing Market and Industry Trends / Asset Modeling & Forecasting.
- Risk Management / Cost Reduction / Budgeting
- Risk Governance Compliance / Financial Reporting

Project Description

Project Description

- Thermal: Cazador del Sol, consists of ten (10) GE LM6000 natural gas turbines, each with a capacity of 48 MW and a total project capacity of 480 MW. Each of the ten stacks will be approximately 65 feet in height and approximately 10.5 feet in diameter, which is less than half the height of the existing 140-foot-high transmission towers which intersect the Project site. Assuming NTP (notice to proceed), the projected Commercial Operation Date is between Spring 2027 and Spring 2028.
- BESS: Atrapa Soles, designed specifically for the SW conditions, will consist of a total 440 MW AC of grid-charged battery energy storage with liquid cooled cabinets and self-contained fire suppression systems. The quick deployment of charge and discharge to and from the grid can provide essential load shifting, renewable integration, frequency regulation and peak energy supply to compliment local reliability. Assuming NTP, the projected Commercial Operation Date is Spring - Fall 2027.
 - Federally Enforceable EPA Title V Air Permit: Final – Issued by PCAQCD June 2024
 - System Impact Study – Electrical Interconnection – Completed July 2024
 - Pinal County Major Amendment for Zoning – Filed May 2024
 - Project Attributes: Sound, Visual, Environmental, Water, Traffic, Wildlife, Infrastructure and Fire Safety are all primary considerations in the development of the Project.

Project Description

- The Project resides within an envelope of approximately 158 acres of the approximate 350-acre property, thus sufficient setbacks are designed in the site plan. The proposed equipment on the site is intentionally configured to minimize visual, sound and environmental impacts.
- The thermal facility will consist of ten General Electric (GE) LM6000 natural gas turbines with a total installed capacity of approximately 480 MW.
- The highly reliable aeroderivative units are designed for quick start, ramping, and efficient heat rate. The quick ramping capability allows grid dispatch to first utilize available renewable energy, thus minimizing the reliance on fossil fuels and providing the lowest net emission energy supply available.
- In addition to complementing renewable resources, the gas turbines provide resource adequacy capacity for reliability and grid support attributes that enhance local reliability, such as regulation, voltage support, non-spinning reserves, and automatic generation control (AGC).

Project Description

- Project Bella is identified in the Transitional System Impact Study as Project: PV-PC Q32. As identified, the Project will add a 928 MW Natural Gas and Battery Energy Storage System with the POI as a direct tie to the existing 500 kV transmission line between Duke and Pinal Central substations, which cross the Project Bella site on the existing 140-foot towers. Thus, there is no generation-tie or new towers to accommodate the interconnection. No new right of ways or public crossings are required to accommodate the interconnection.
- The SRP Transitional Cluster System Impact Study ("TSIS") found that the Project "..will not impact the reliability of the interconnection transmission system with the recommended upgrades."
- The utilization of this existing path by Project Bella does not cause any reliability concerns and upgrade costs are relatively low which will benefit existing and future ratepayers as Arizona continues its rapid electrical demand growth and retirement of large, aging thermal energy resources.

Resource Adequacy Technology Selection

- The GE LM6000 turbine technology was selected based on three factors: reliability, flexibility, and proven operational performance.
- The LM6000 turbines are a proven technology to provide this immediate need for resource adequacy and renewable energy integration. In addition, the quick start and operational flexibility of these smaller, efficient gas turbines advances sustainability objectives of lower water consumption and lower carbon emissions.
- Specifically, the Project is designed to operate only during periods necessary to meet electrical demand, balance variable renewable energy supply, and provide reliability attributes.
- The Project will be operated as a peaking facility, and as such, will run to help meet Arizona's peak demand at the hottest times of the year, or when needed to smooth out the variability of renewable resources. During periods of high demand or unforeseen outages from larger thermal resources, the Project could also be called upon in unexpected longer durations.

Resource Adequacy Technology Selection

- The Atrapa Soles BESS will conform to all operative safety standards for energy storage technology. Atrapes Soles will utilize e-Storage Solbank (Gen 3v) equipment which are designed and built to meet the latest fire and safety codes in North America. Atrapa Soles will coordinate with e-Storage for safe disposal (recycling) at the equipment's end of life.
- The Project is designed with standalone fire safety, including a looped fire suppression system, sufficient incident response fire water supply, emergency fire pump to maintain power in the event of an electrical outage at the site, and fire suppression and safety areas throughout the Project.
- The fire and safety system will be designed pursuant to the Hazard Mitigation Analysis process flow provided by Hiller specifically for Project Bella, encompassing all relevant fire and safety codes. Hiller will be the lead responsible professional in completing the Hazard Mitigation Analysis for NFPA 855 compliance. The Hazard Mitigation Analysis will include the following:
 - NFPA 855 –Site Level Compliance Design --- site level.
 - Compliance with UL 9540 once site is completed.
 - Compliance with International Fire Code, National Electric Safety Code, National Electric Code, International Building, Plumbing and Mechanical Code.
 - Compliance with IEEE 2800 testing standards once they are defined.

Resource Adequacy Technology Selection

- The safety and process flow documentation will be shared with the AHJ and will include, but not be limited to a) First Responder Plan (for Construction, Commissioning and Operations); b) Environmental Impact Assessments; c) Emergency Operating Procedures; d) On file Design Documentation; e) O&M Manuals; f) Standard Operating Procedures and g) Risk Analysis including UL9540A, NFPA 68, NFPA 69, and NFPA 551 conformance.
- Prior to commercial operations, the Project will have a fully completed Pre-Incident Planning and Training process filed with the AHJ. The pre-Incident planning and training shall include review of ESS Codes and the development of an on-site Safety Working Group prior to commencement of site design documents. The Pre-Incident Plan shall include guidance from a) NFPA 1620 Standard for Pre-Incident Planning; b) Energy Storage Association Corporate Responsibility Initiative Emergency Response Plan; and c) the Hazard Mitigation Analysis.
- The Pre-Incident Planning process and annual reviews shall be held with the Fire Marshal and a representative from the local fire department to discuss the site design and Standard Operation Procedures for an incident. The Incident Planning shall be documented, updated (no less than annually) and available for neighborhood community review and explanation. In addition to the annual reviews, the Project shall cause annual on-site training on incident response via a minimum of four (4) two-hour sessions, which include a) Maintenance and Incident Response personnel; and b) community First Responders.
- In addition to the fire safety equipment and plans, the Project will have a clearly defined Emergency Response Plan (“ERP”). The ERP will cover fire response, storms (earthquake, haboob), vandalism, cyber security, site security and active shooter events. The ERP will provide clear guidance on access to first responder personnel and medical facilities in the unlikely event that such services are needed.

Land Ownership

- Project facilities are on privately owned land in unincorporated Pinal County.
- The Project resides within an envelope of approximately 158 acres of the approximate 350-acre property, thus sufficient setbacks are designed in the site plan.
- The Project has direct access to the existing 140-foot-high towers carrying the Pinal Central to Duke 500 kV line and WAPA's 230 kV transmission line, both of which maintain an easement across the property. Therefore, tie-in to the 500 kV switchyard will occur without the need to cross any public roads or other properties.
- The property also already maintains an easement for the EPNG pipeline, from which the Project will accept natural gas for operations. The EPNG pipeline maintains adequate capacity to deliver sufficient quantities and pressure for sustainable operation of the Project.
- No additional rights-of-way or public infrastructure are required from the public.

Project Need and Benefits

Project Need

- The Project is critical to meet near-term peak capacity and integrate renewables, while maintaining electric system reliability. The DSW reserve margin has decreased significantly. Specifically, the Project is designed to provide resource adequacy reserves as a capacity-based resource capable of quick deployment of energy and associated energy products that will enable the grid to first utilize available renewable energy.
- The non-jurisdiction BESS will charge during excess periods of renewable energy and low electricity demand. During periods of high electricity demand, the gas turbines and the BESS will both be dispatched to quickly and efficiently provide electricity, regulation, and ancillary services to support the reliability of the grid.

Project Need

- The Southwest grid is undergoing a significant resource transition, with over 8,149 MW of baseload coal resources retiring during the period 2019–2032 to a more sustainable energy portfolio at a time in which load-growth is at historical levels.
- The retirement of these end-of-life coal facilities cannot be reliably completed in a medium to high-growth environment that Arizona is experiencing without new resource adequacy generators. To date, energy has been replaced with intermittent renewables.
- Project Bella represents a near-term development project, which can be fully commercially operational by mid-2028 and directly contribute to reliability reserves as well as sustainability, low-carbon energy supply transformation by providing a cost-effective, reliable electric capacity and ancillary services resource, while embracing priority dispatch and utilization of low-carbon renewable energy.

Project Need

- Renewables have experienced strong growth in recent years as the region aims to decarbonize. Since 2015, the region has grown from 2.3 GW of solar, wind and batteries to nearly **9 GW**.
- Thermal resources account for 58% of the capacity mix, although coal has significantly declined in recent years. The natural gas fleet currently accounts for about 46% of total capacity in the region.
- Peak demand has consistently been on the rise in the DSW. In July 2023, the region set an all-time peak demand record, reaching **26.5 GW** in July 2023.
- Reserve margins in the DSW have grown increasingly tight over the past several years. In 2015, the region boasted a 32.5% reserve margin. In 2023, margins were significantly tighter at **9.4%** as the region set its all-time peak demand record.
- DSW is a summer-peaking region.

Project Benefits

- The purpose of Project Bella is to provide resource adequacy capacity via quick response, dispatchable natural gas-fired electrical generation turbines to first maximize renewable energy available on the grid, prior to deployment.
- The ability to deploy the resource adequacy and related energy product attributes (frequency, regulations, non-spinning reserves) into the 500 kilovolt (kV) system without additional, costly infrastructure, strategically positions Project Bella as a superior resource to compliment long-term sustainability objectives.
- Project Bella will also be a key contributor to numerous sustainability goals including reduced water consumption in electricity generation and decarbonization of the grid by providing essential resource adequacy capacity and reliability, thus enabling acceleration of the retirement of the end-of-life coal-fired power generation assets.

Environmental Analysis

Overview and Results of Studies

Environmental Analysis

Overview and Results of Studies

Land Use

Ownership, Jurisdiction and Land Use

Jurisdiction

- Project located on Private Land
- Pinal County Jurisdiction
- No Federal Nexus
 - No NEPA Required

Land Use Summary

- The Applicant is currently undergoing a Major Comprehensive Plan Amendment (CPA) from Pinal County, changing the designation from Moderate Low Density Residential to General Public Facilities/Services
- Currently used for agricultural operations
- With the CPA, the designated future land use would be consistent with the proposed use for electric generation facilities

Land Use Summary

- The Applicant is currently undergoing a Major Comprehensive Plan Amendment (CPA) from Pinal County, changing the designation from Moderate Low Density Residential to General Public Facilities/Services
- Currently used for agricultural operations
- With the CPA, the designated future land use would be consistent with the proposed use for electric generation facilities

Zoning

- The Applicant is currently undergoing a Rezone of the property from General Rural (GR) to Industrial (I-3) to accommodate the development of the Project
- With the Rezone, the Project will be consistent with Pinal County's Zoning Ordinance

Project Approvals

- CPA and Zone change from Pinal County?

Air Quality and Water Resources

Analysis of Air Quality and Water Resources

Air Quality Application Process Summary

Air Quality Maximum Allowed Annual Emissions

Water Resources Summary

- Figure 3 identifies the average reported groundwater pumping from 2018 - 2022 for wells within 3 miles of the proposed site. In 2022, over 22,390 ac-ft of groundwater was pulled from the ground.
- The size of the symbols reflects the average pumping of each well. A net increase of pumping of 196 ac-ft/yr would reflect a minimal increase with respect to the quantity of reported pumping for other wells in the area.

Water Resources Summary

- The Pinal Active Management Area (AMA) model demonstrates that the aquifer supports demands for future approved Assured Water Supply (AWS) determinations plus continued agricultural pumping for areas with AWS determinations. **Figure 1** identifies the results of that simulation at the end of the 100-year predictive model period. The simulated depth to water at the end of the 100-year period is 850 feet at the proposed Seguro property.
- The depth to the bottom of the aquifer is over 3,000 feet below land surface based on the model data, indicating a remaining saturated thickness of 2,150 feet at the end of the 100-year simulation.

Biological Resources

Analysis of Biological Wealth and Biological Resources

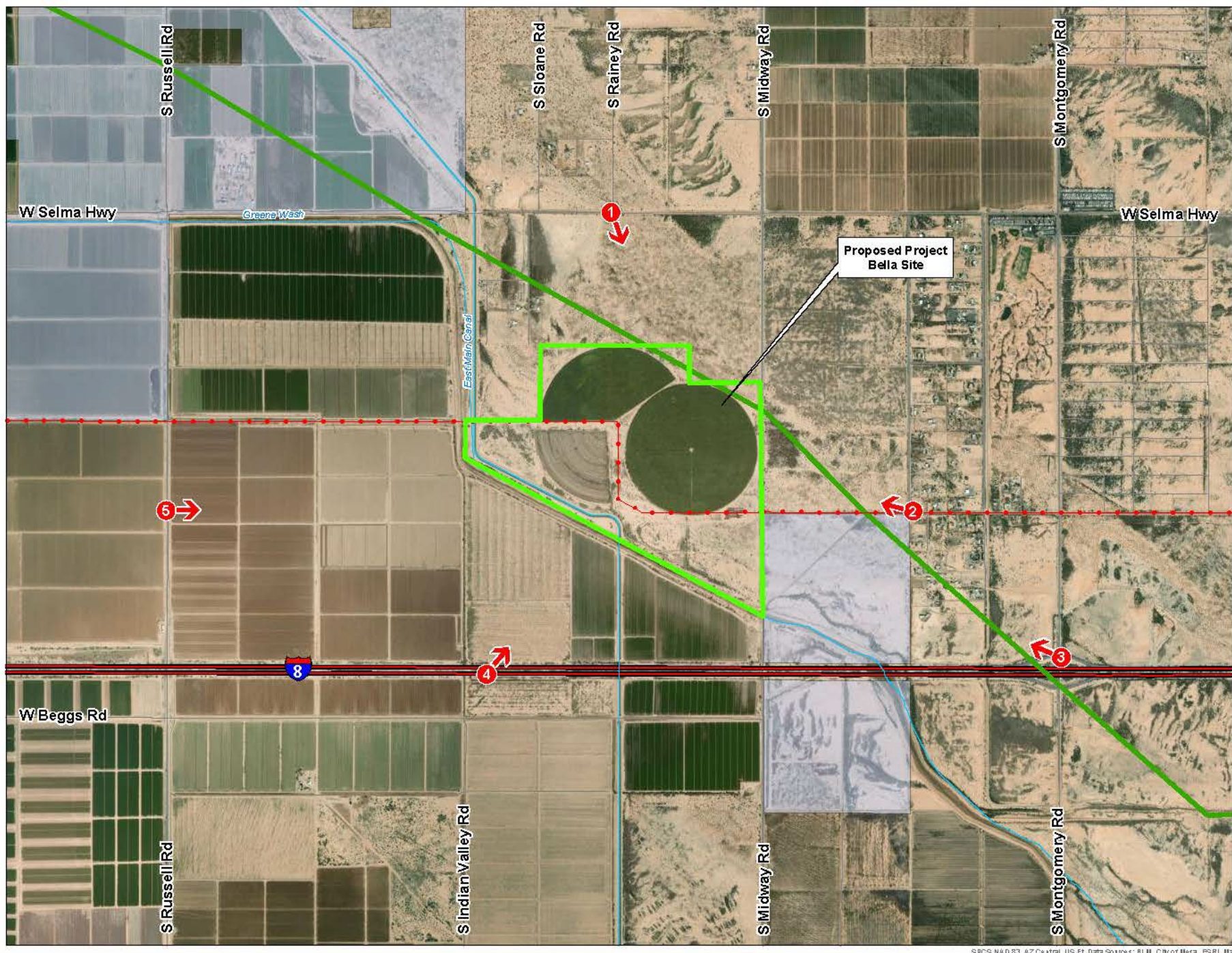
Biological Resources

Analysis of Biological Wealth and Biological Resources

Visual Resources

Visual Impacts and Simulations

- Legend**
- Visual Resources**
- Key Observation Point (KOP) Location and Direction
- Project Bella Components**
- Proposed Project Bella Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - Road
 - Stream / Wash
- Jurisdictional Land Ownership**
- State Land



0 500 1,000 1,500
Feet

PROJECT bella

PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

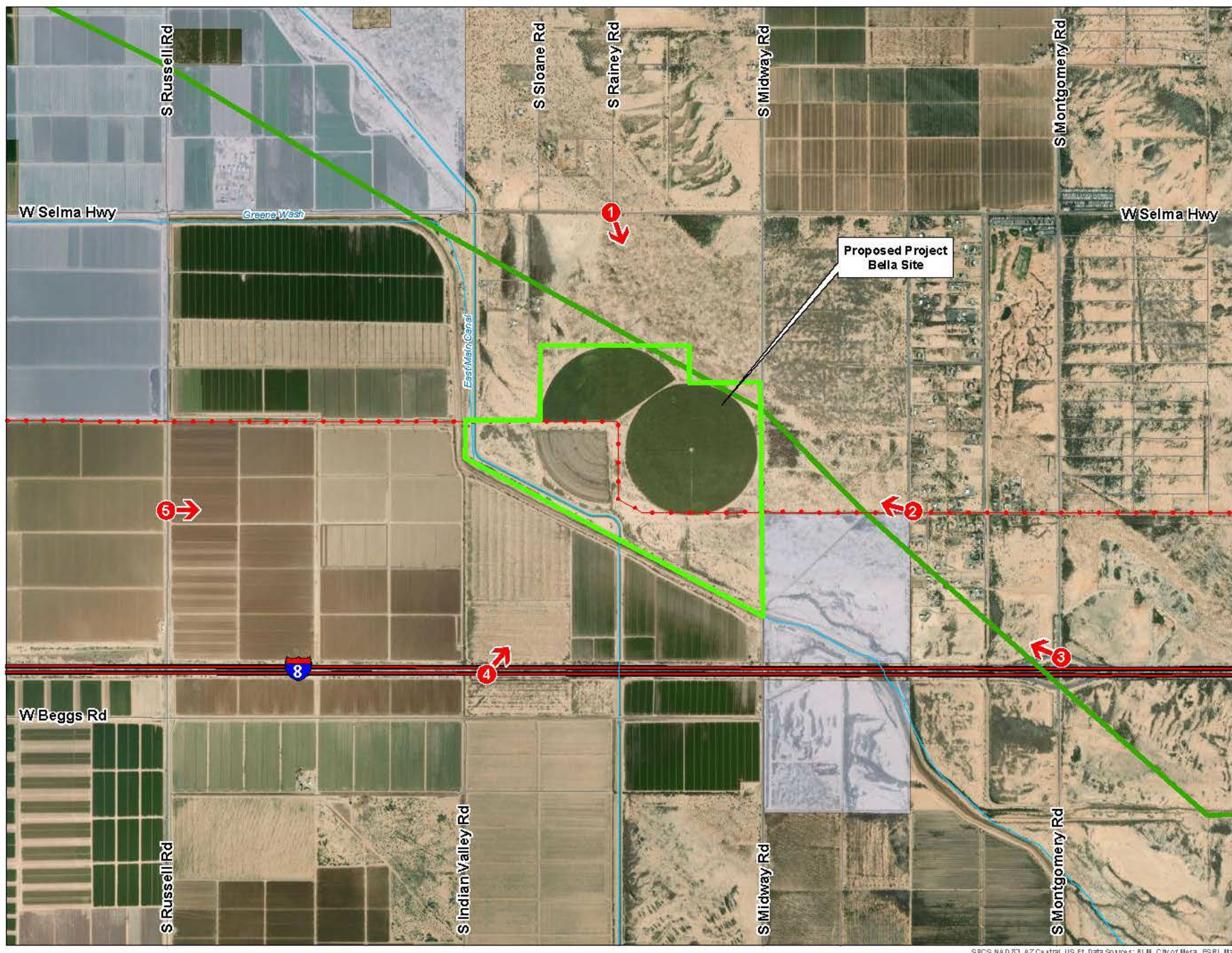
Map Extent: Pinal County, AZ

Date: 6.13.24 Author: dkum

SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., SRP, Town of Gilbert, Town of Queen Creek, USGS.



- Legend**
- Visual Resources**
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Feet

PROJECT bella

PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

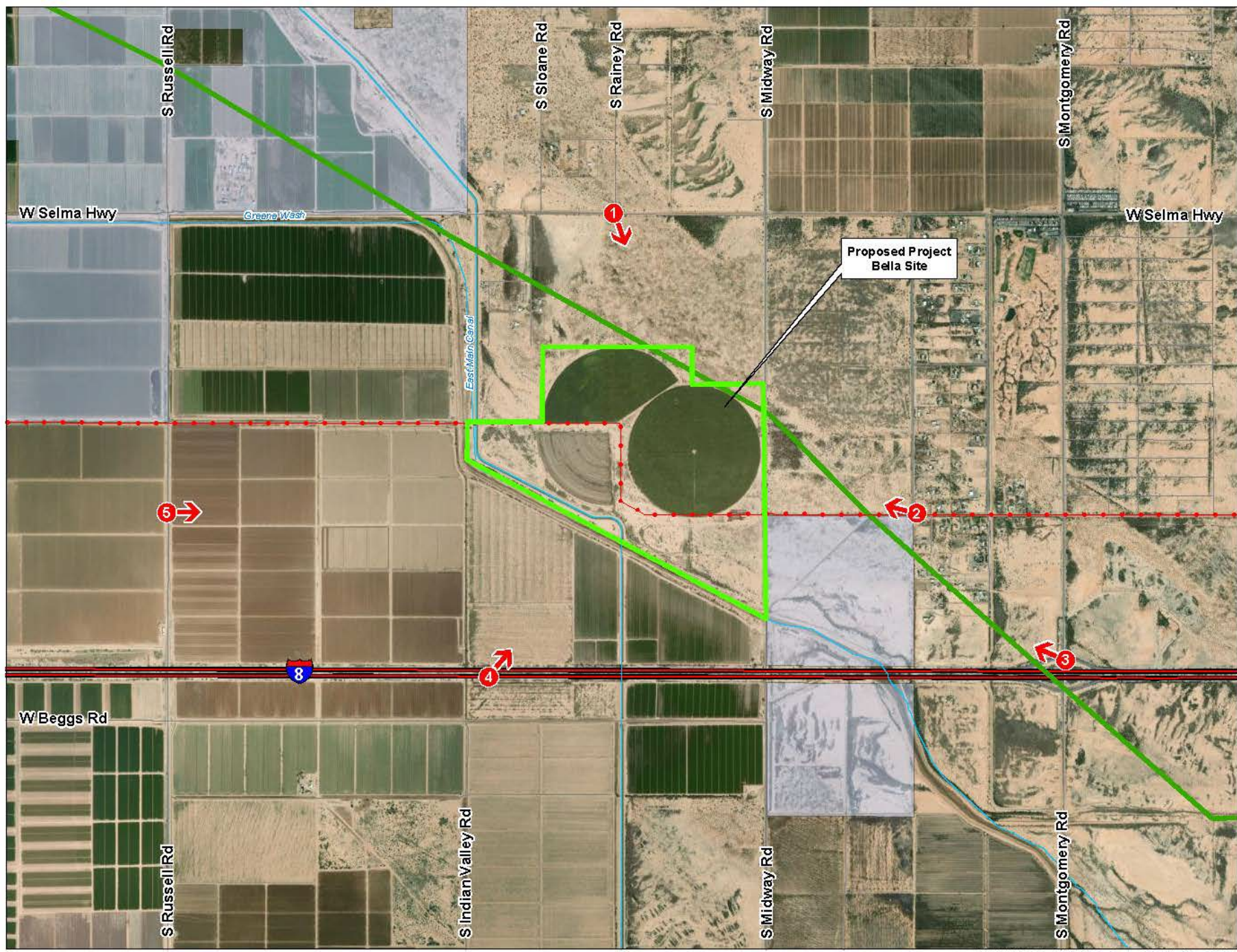
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- Legend**
- Visual Resources**
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- Project Bella Components**
- Proposed Project Bella Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
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- Jurisdictional Land Ownership**
- State Land



0 500 1,000 1,500
Feet

PROJECT bella

PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

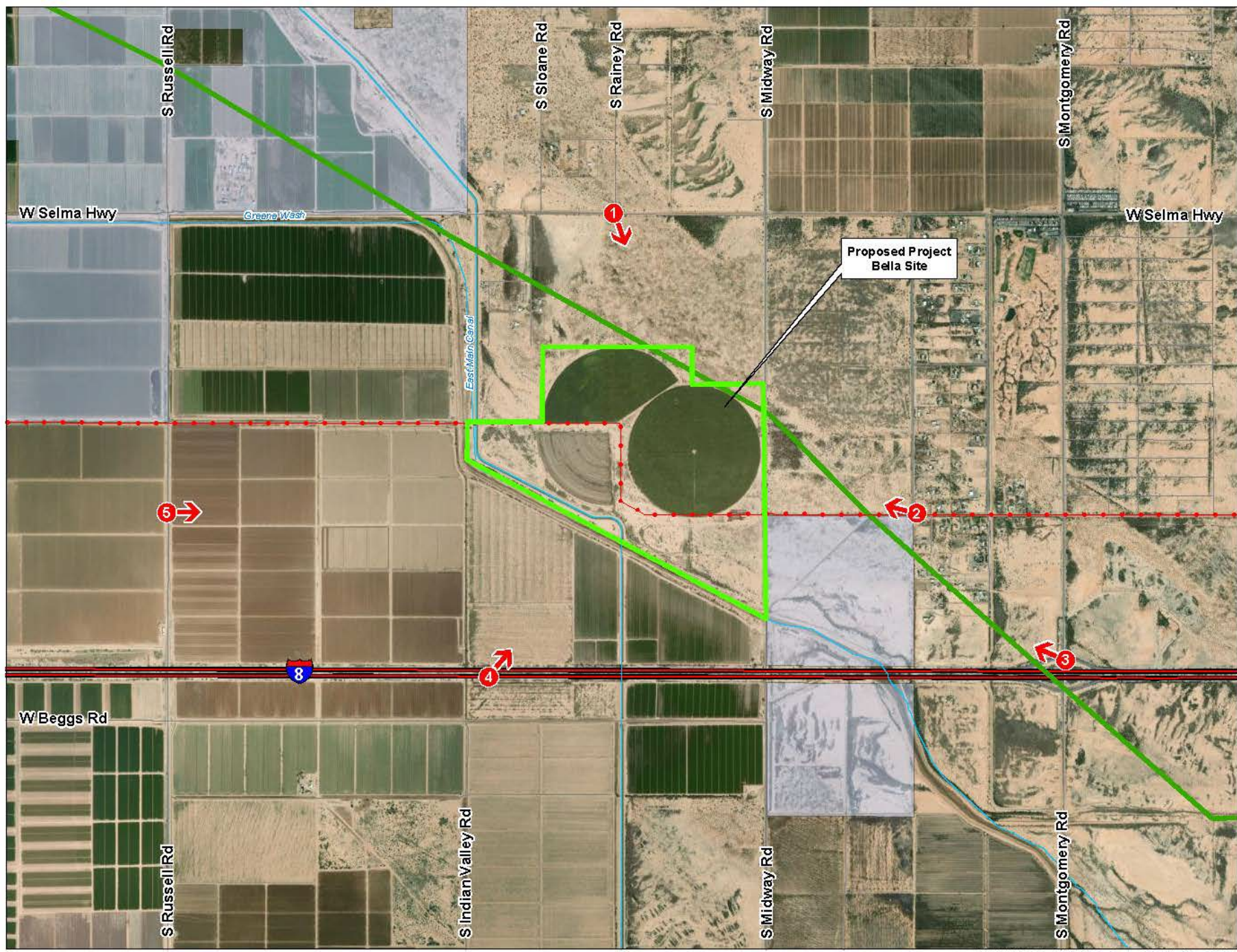
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 - Existing Natural Gas Pipeline
 - Interstate Highway
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 - Stream / Wash
- Jurisdictional Land Ownership**
- State Land



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Feet

PROJECT bella

PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

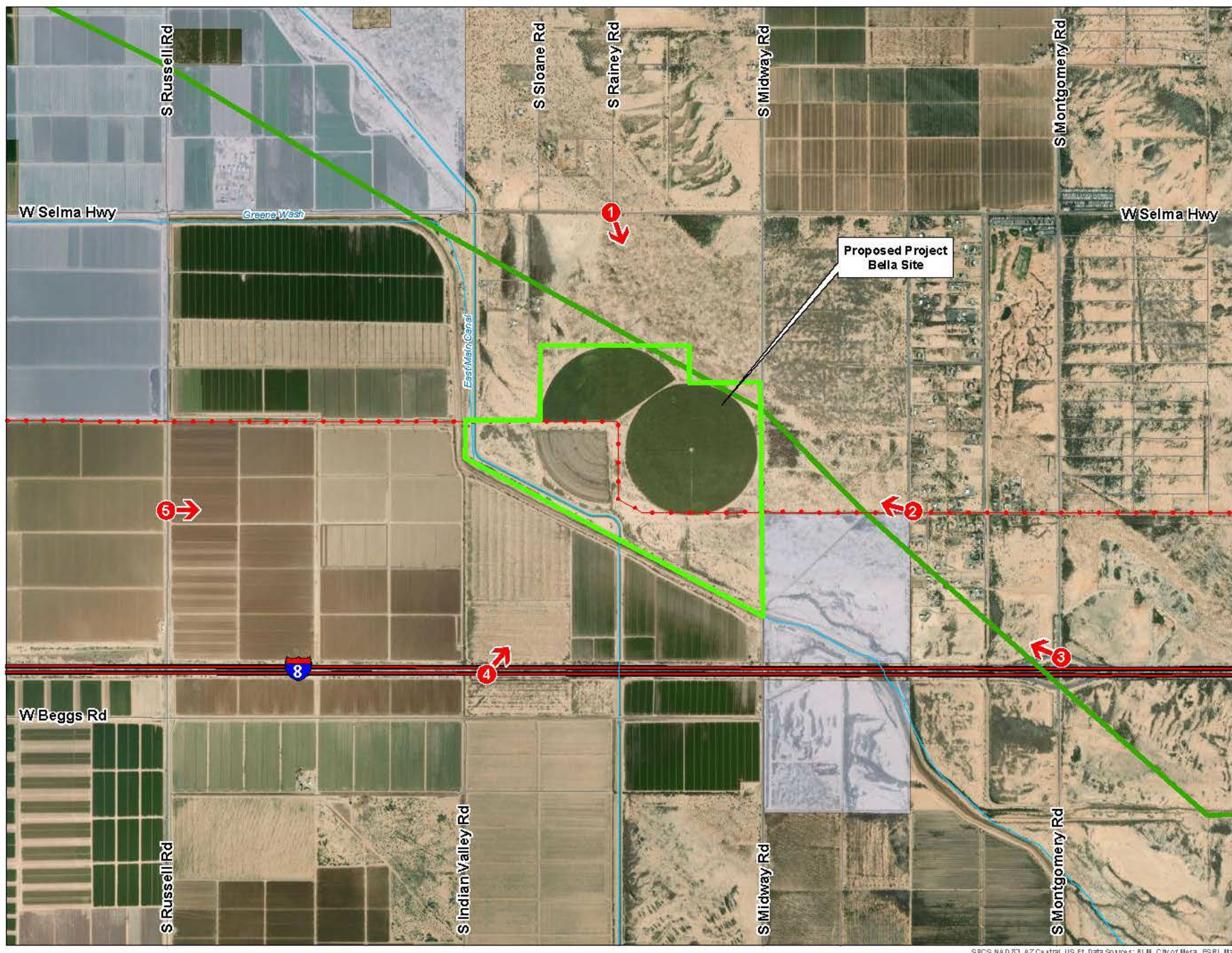
Map Extent: Pinal County, AZ

Date: 6.13.24 Author: dkum

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 - Interstate Highway
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- Jurisdictional Land Ownership**
- State Land



0 500 1,000 1,500
Feet

PROJECT bella

PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

Map Extent: Pinal County, AZ

Date: 6.13.24 Author: dkum

SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., SRP, Town of Gilbert, Town of Queen Creek, USGS.



Cultural Resources

Historic and Archeological Sites

Cultural Resources Summary

- Results of the Class I Report found that eight investigations have been conducted within one mile of the Project
- Five previously recorded cultural resource sites were identified within the one-mile buffer of the Project components
- Consulted with the tribes

Recreational Areas

Existing and Future Recreational Sites

Recreation Summary

- No designated recreation facilities are directly affected by the Project
 - The closest existing recreational area is Desert Springs Ranch, a 55+ RV Resort and Golf Community, approximately one mile northeast of the Project
- Project components will not be available for public recreation purposes, but the Project would not preclude recreational uses in the area around the Project components

Existing Plans

Plans of State, Local Government and Private Entities

Existing Plans Summary

- Limited existing and proposed energy development in the Project area
- There are no planned local, state, or federal developments that would conflict with the proposed Project

Noise and Communications

Anticipated Noise Levels and Potential Interference

Noise and Communications

Decibel Scale Rating Explained

Sound Summary

The Sound Modeling Measured the Sound Rating (in Decibels) at the Site Property Boundaries.

- The Sound Analysis considered all equipment that could be operating simultaneously.
- The Sound Modeling Results identified that the Project could meet or exceed all applicable Pinal County noise ordinances.

Sound Summary

The Sound Modeling Measured the Sound Rating (in Decibels) at the Site Property Boundaries.

- The Distance from the Project's noise attributing equipment to residential homes was identified.
- The Sound Modeling identified potential noise (at maximum operations) to the residential locations.

Sound Summary

The Sound Modeling Measured the Sound Rating (in Decibels) at the Site Property Boundaries.

- The Distance from Desert Basin's noise attributing equipment to residential homes was identified.
- The Sound Modeling identified potential noise (at maximum operations) to the residential locations.
- Noise Levels and Distance to Residential was also reviewed for Sundance Power Station (APS) and Coolidge Generation Station (SRP), both in Pinal County due to their utilization of similar generation technology (GE LM6000).

Environmental Conclusions

Project is Environmentally Compatible

Environmental Conclusions

Project is Environmentally Compatible

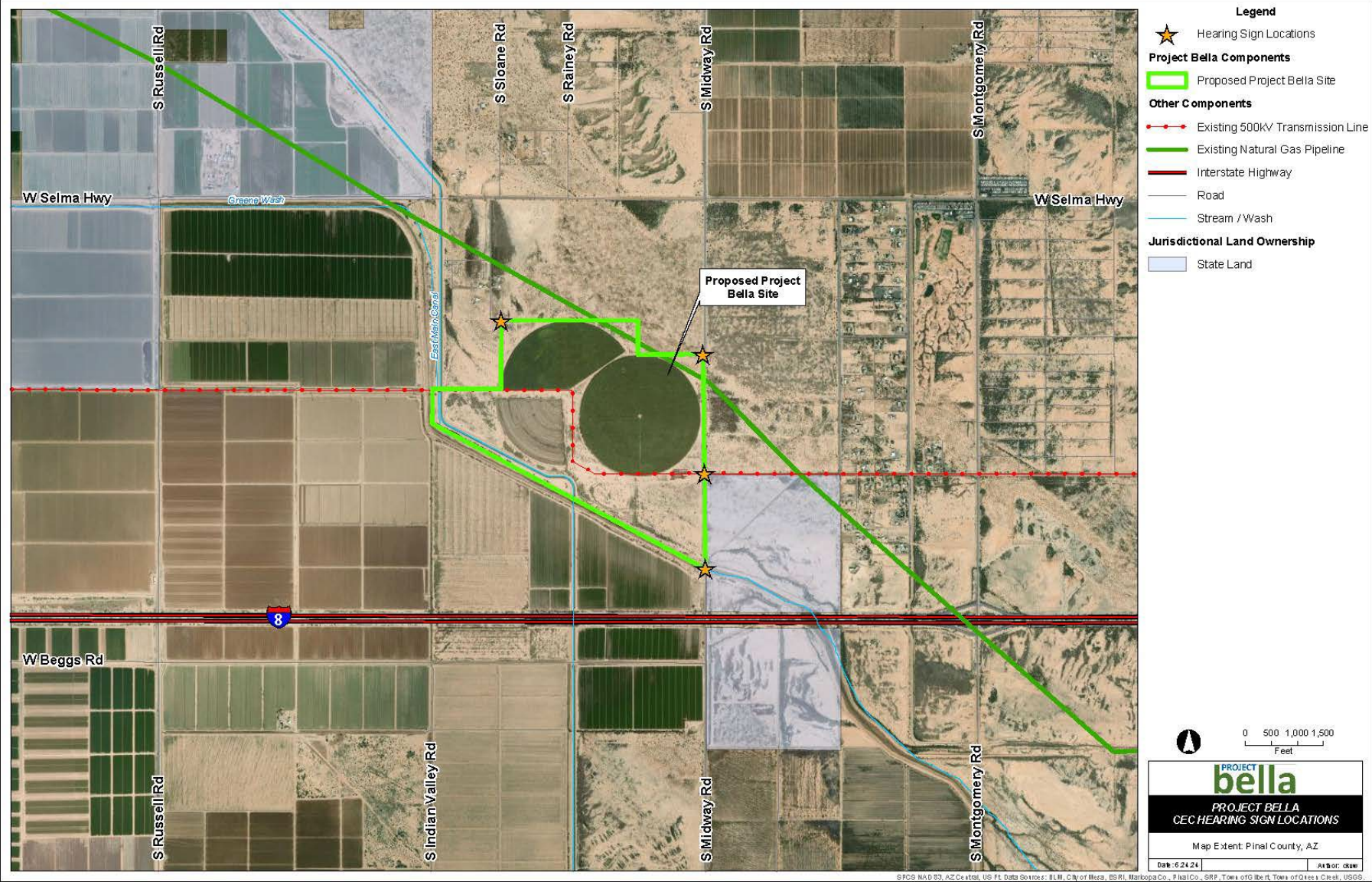
Statutory Notice

Publication, Posting, Affected Jurisdictions

Newspaper Publications

- Casa Grande Dispatch
 - July 4, 2024
 - July 6, 2024

Project Sign Locations



Notice of Filing

Affected Jurisdictions

- Pinal County Board of Supervisors

Public CEC Availability

- Arizona Corporation Commission
 - 1200 West Washington St Suite 108, Phoenix, AZ
- Casa Grande Public Library
 - 499 N Drylake Rd, Casa Grande, AZ
- Arizona City Community Library
 - 13254 Sunland Gin Rd, Arizona City, AZ

Public Process

Public and Stakeholder Involvement

Public Process

- First Virtual and In-Person Open House
- Second Virtual and In-Person Open House
- Project Website and Phone Line
- Project Mailers and Door Hangers
 - Introducing the Project and Open Houses
- Social Media Ads

Public Process

- First Virtual and In-Person Open House
- Second Virtual and In-Person Open House
- Project Website and Phone Line
- Project Mailers and Door Hangers
 - Introducing the Project and Open Houses
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Public Process

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Public Process

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Public Process

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Public Process

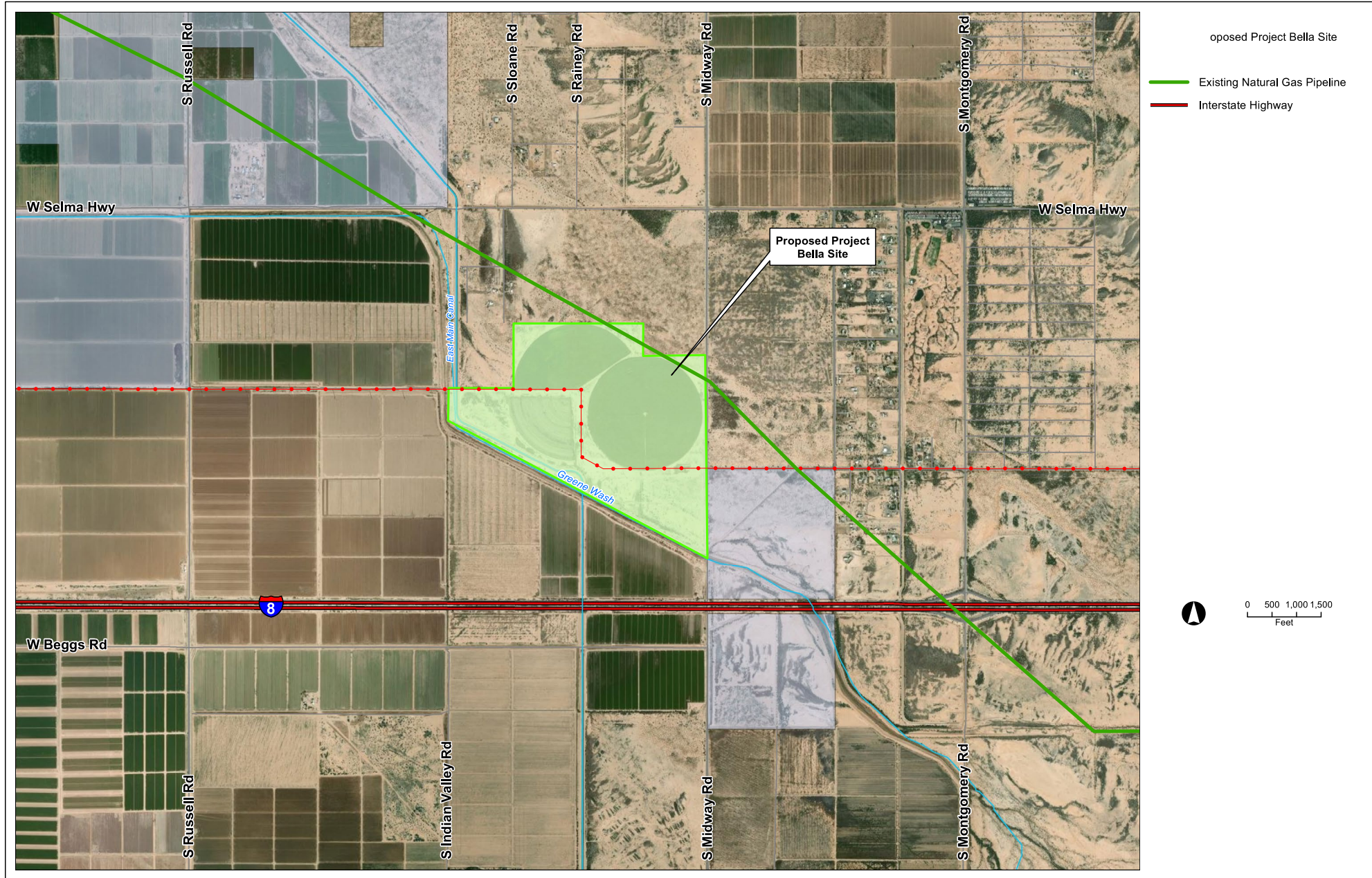
- First Virtual and In-Person Open House
- Second Virtual and In-Person Open House
- Project Website and Phone Line
- Project Mailers and Door Hangers
 - Introducing the Project and Open Houses
- Social Media Ads

Thank you!

RIGHT

Project Bella

Docket No: L-21314A-24-0144
Case No: 0233



Mark Thompson

- Managing Partner at Seguro Energy Partners
- Key areas of focus during nearly thirty years in the energy industry:
 - Asset Development, Valuation, Optimization and Innovative Deal Structuring and Origination.
 - Disciplined Approach for Quantifying, Embracing and Managing Risk.
 - Commercial Advisory Related to Dispatch Optimization, Fuel Supply Deliverability, Risk Minimization and Compliance with Market Rules.
 - Market Fundamentals, Physical Commodity Logistics, Contract Management and Fundamentals.
 - Operational Interface; Efficiency Enhancement; Client Representation
- Education: Creighton University – BSBA in Economics and Finance

Steve Morgan

- Project Manager and Senior Land Planner at KP Environmental, Inc.
- B.S. in Environmental Conservation and Sustainability from the University of New Hampshire
- M.S. in Environmental Science and Policy from Johns Hopkins University
- 10 years of environmental consulting experience
 - Specialize in environmental planning for energy projects, regulatory permitting, and construction compliance
 - Experience on numerous transmission and generation projects across the southwest
 - Experience on four CECs including testifying once before this committee

Garen Demirchian

- President Power Genesis Engineering
- Key areas of focus during nearly forty years in the energy industry:
 - Project Development, Equipment Procurement, Engineering and Construction for Power Generation, Power Delivery Transmission and Distribution and Thermal Energy Utilities.
 - Developments included Conventional and Renewable Energy Sources including Biomass, Liquid Biofuels, Biogas, Hydrogen (H₂), MSW, Solar PV, Wind and Geothermal.
 - Senior Officer at National Power and Utilities Engineering Company (R.G. Vanderweil Engineers) with engineer of record roles in successfully developed and operating combined heat and power facilities, micro-grid installations, peaking electrical generation facilities, combined cycle electric generation facilities, battery energy storage and transmission systems.
 - Responsibilities included Corporate Governance, Organizational Planning and Development, Business Unit Revenue Oversight.
- Education: Northeastern University – B.S. Mechanical Engineering
- Professional Activities: International District Energy Association (IDEA)

James Westbrook

- President of BlueScape Environmental
- Key areas of focus during nearly thirty-five years in the air quality compliance solutions sector:
 - Human Health Risk and Exposure Assessment, Air Permitting for Power Generation, Commercial and Industrial Operations; Air Dispersion Modeling; Greenhouse Gas Management.
 - CEQA Consultant for Air Quality Management.
 - Environmental Impact Air Quality Analysis, Clean Air Regulatory Analysis and Compliance Audits
 - Provide Expert Witness Support Related to Modeling of Air Emissions Sources, Monitoring and Health Impacts.
 - Lead Author and Contributor to Numerous Papers and Presentations Related to Air Emissions, Health Risk Assessment, and Air Dispersion Modeling.
- Education: Indiana University – MS Environmental Science; UCLA – BS Atmospheric Sciences
- Professional Activities: Certified Consulting Meteorologist; Certified Permitting Professional

Nathan Miller

- Vice President, Groundwater Modeling Services at Matrix New World Engineering
- Key areas of focus during nearly thirty-five years in the air quality compliance solutions sector:
 - Advanced proficiency in using the various versions of the U.S. Geological Survey MODFLOW groundwater modeling software.
 - Aquifer Impact Analysis in support of Assured and Adequate Water Supply determinations.
 - Aquifer impact analysis related to siting and permitting production and recovery wells, including aquifer drawdown modeling.
 - Provided primary hydrologist support for the Pinal AMA Groundwater Task Force to propose modifications to the AWS baseline groundwater model scenario.
 - Comprehensive understanding of the regulatory framework for groundwater resource issues in Arizona.
- Education: B.S. Hydrology, Magna Cum Laude, from the University of Arizona
- Experience: OSAH 10 Hour Construction Safety & Health certified.
 - Arizona Hydrological Society – Corporate Board President 2023-2024;
 - Arizona Hydrological Society - Corporate Board 2022.

Brad Sohm

- PE and Senior Noise Specialist for SWCA
- Key areas of focus during nearly twenty-one years in the permitting and noise impact analysis sector:
 - Specialized in Noise Impact Analysis, Air Quality Compliance, Permitting, Health, Safety, Environmental Site Investigations, Environmental Remediation and Impact Analysis.
 - Comprehensive Experience with BACT, CEQA, LAER, NEPA, PSD, and Title V Permit Processes.
 - Environmental Assessment, Environmental Impact and Noise Analysis for Electric Transmission, Electric Thermal Generation, Electric Renewable Generation, and Energy Infrastructure Projects.
- Education: University of Arizona – B.S. Chemical Engineering
- Professional Training: EPA Method 9 Visible Emissions Training; Hazardous Materials Worker Training Certified Consulting Meteorologist; Certified Permitting Professional

Seguro Energy Partners


Introduction

Seguro Energy Partners



Project Bella
480 MW CT
440 MW BESS

Energy Management



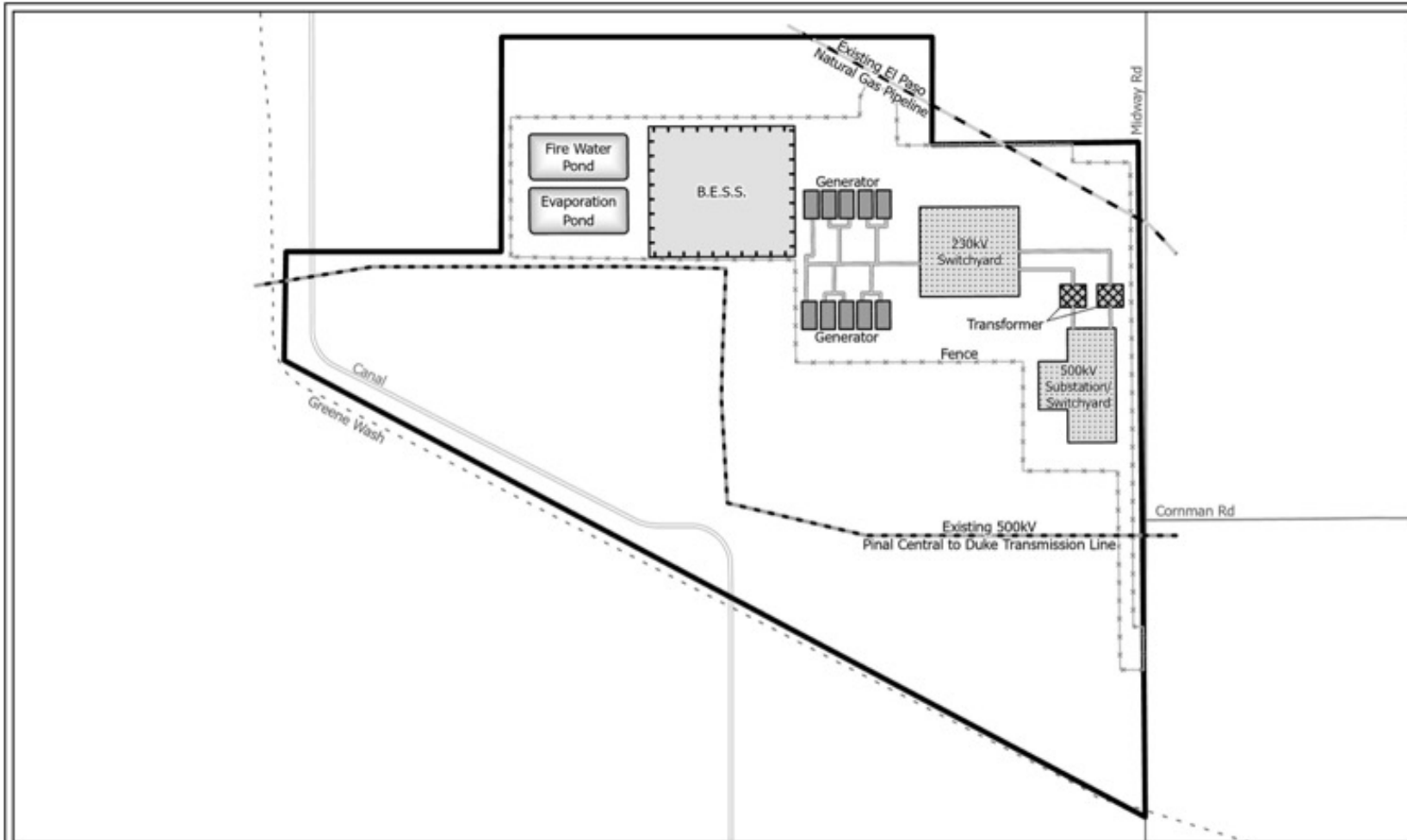
Development



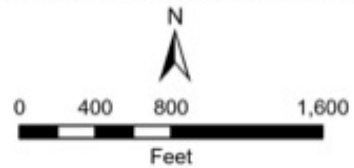
Risk Analysis and Deal Valuation



Project Description



**PROJECT BELLA
CONCEPTUAL SITE PLAN**



- Existing Features**
- Local Road
 - Canal
 - Wash
 - 500kV Electric Line
 - Natural Gas Line

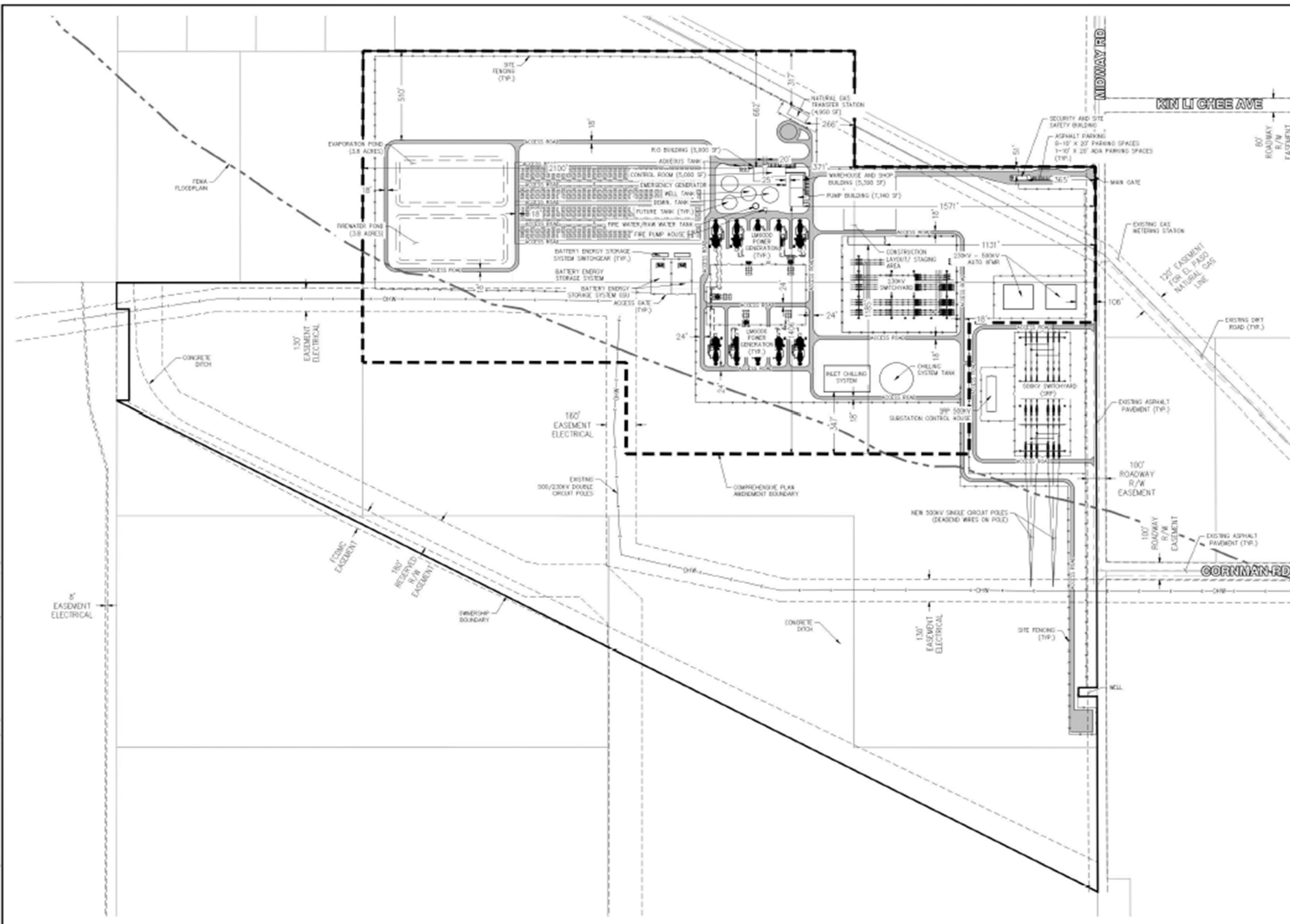
- Proposed Features**
- Transformer Line
 - Project Boundary
 - Generator
 - Switchyard
 - Transformers
 - BESS
 - Pond
 - Fence

ARIZONA



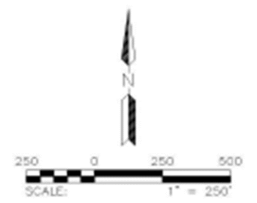
Map Location

Copyright, HilgartWilson
 This plan document set is the sole property of HilgartWilson. No alterations to these plans, other than adding "as-built" information, are allowed by anyone other than authorized HilgartWilson employees.



LEGEND

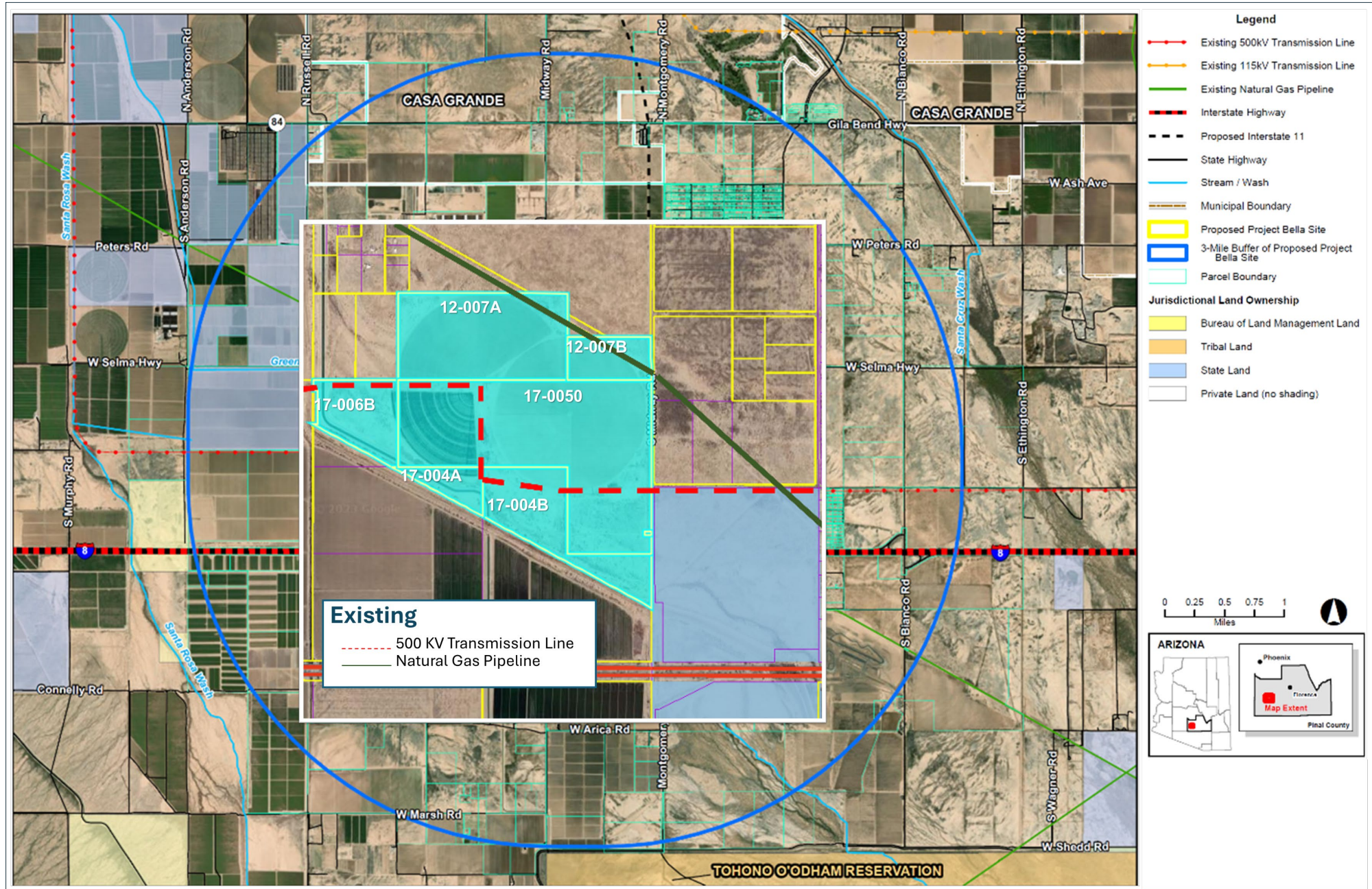
COMPREHENSIVE PLAN AMENDMENT BOUNDARY	---
OWNERSHIP BOUNDARY	---
FEMA FLOODPLAIN	---
ADJACENT PROPERTIES	---
BARB WIRE FENCE	---
EASEMENT LINE	---
ELECTRICAL	---
NATURAL GAS	---
RIGHT-OF-WAY	R/W
OVERHEAD WIRE	OHW



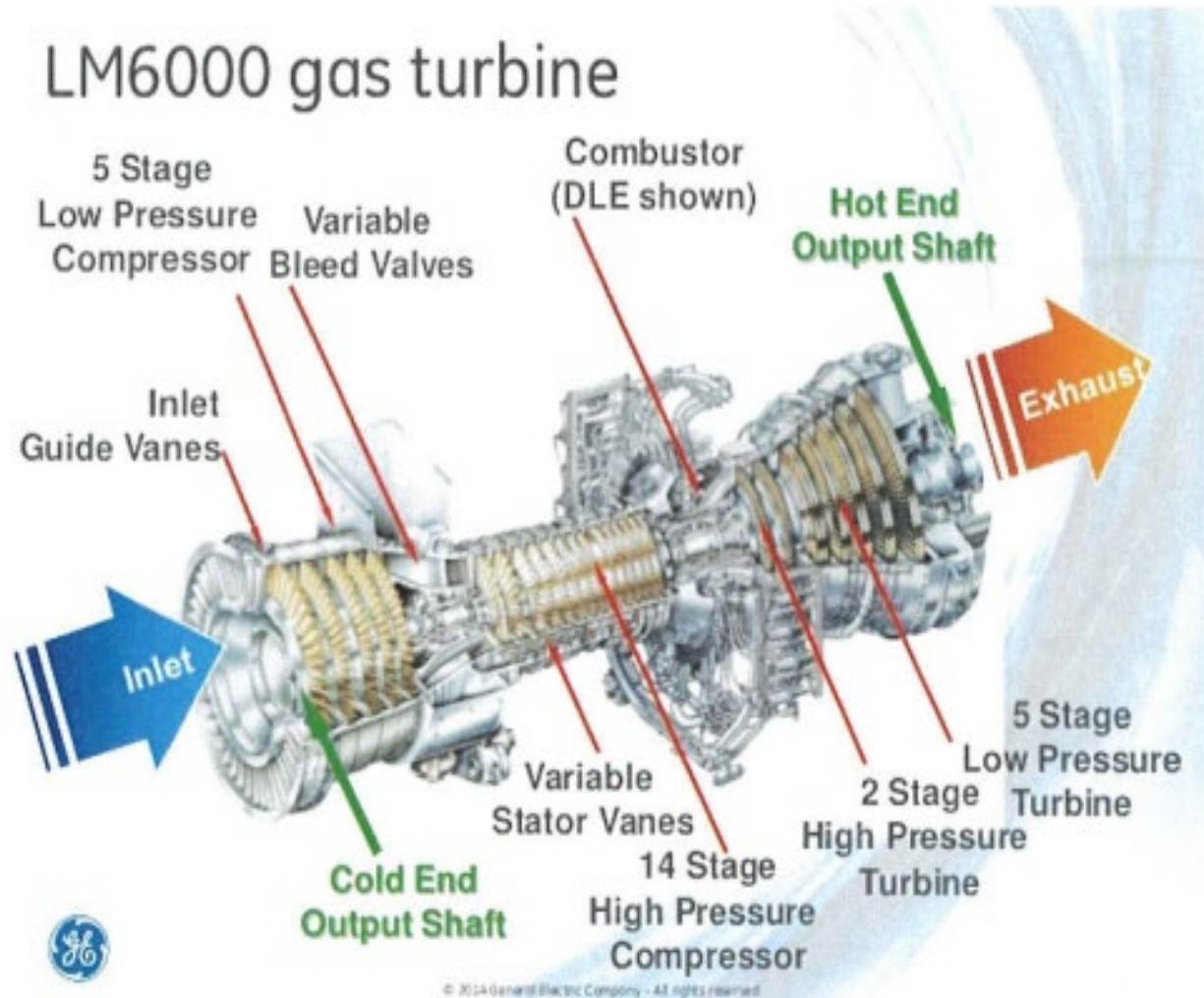
PLAN NAME
PROJECT BELLA
 N.W.C. OF INTERSTATE 8 & MIDWAY ROAD
 CONCEPTUAL SITE PLAN (ZOOM VIEW)

ENGINEER INFORMATION
HILGARTWILSON

ORIGINAL PLAN DATE	
LATEST REVISION DATE	APRIL 2024
DRAWING SCALE	1" = 250'
PROJECT NUMBER	2645
SHEET NUMBER	SHT. 4 OF 4
SEGMENTAL	



GE LM6000 Simple Cycle Combustion Turbine Attributes

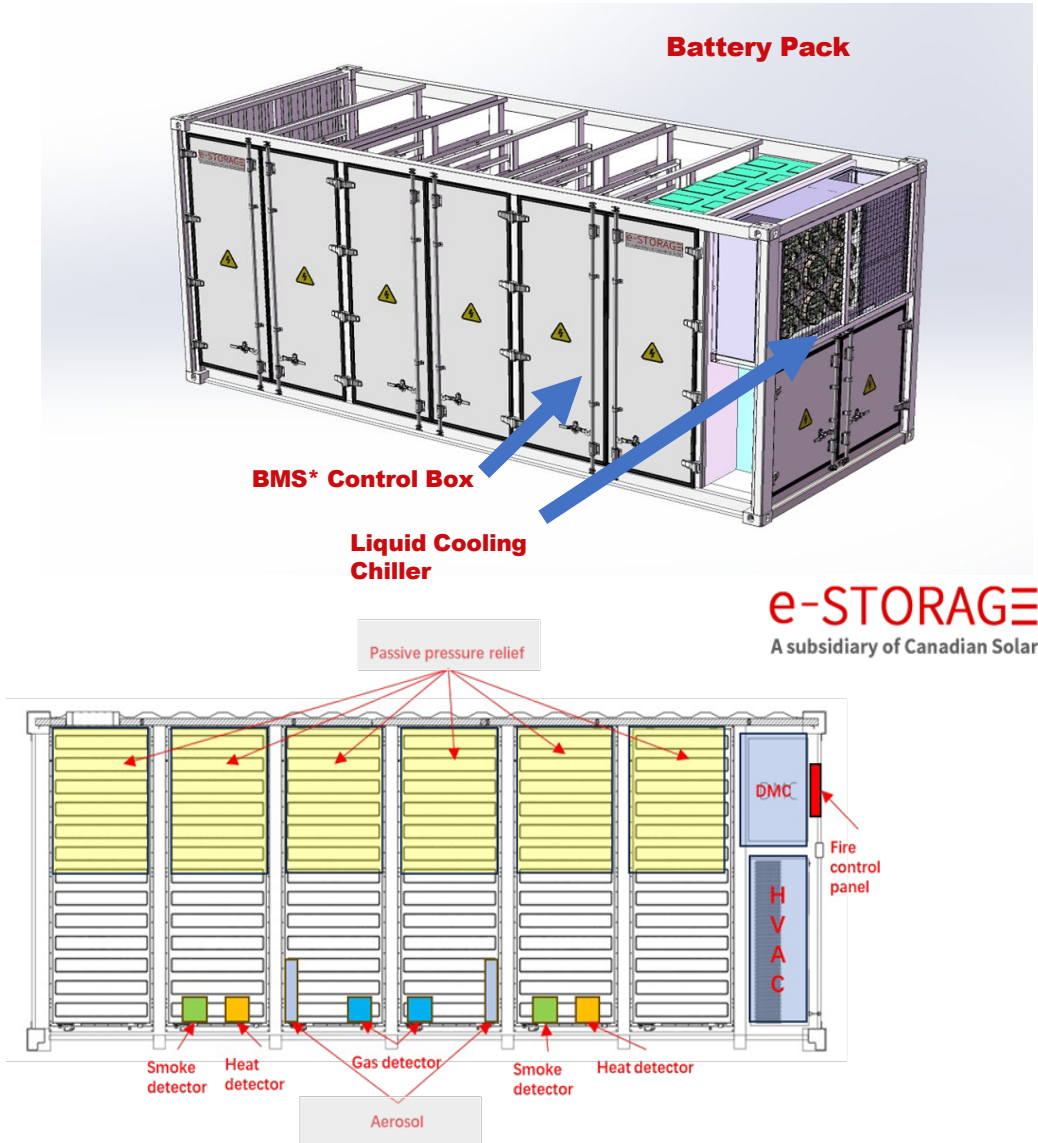


GE LM6000 Combustion Turbine Generators with superior performance, reliability and efficiency, are Power Generation and Utility Industry preferred Gas Turbine Generators

- Highly reliable and fuel efficient fleet of over 1200 units worldwide with over 40 million operating hours;
- With greater than 99% Start and Operation Reliability and 98% Availability, the LM6000 unit is one of the most reliable Gas Turbines in Power Generation Industry;
- Low Emission Combustion Technology for exhaust flow with two post combustion air quality control systems – SCR for NO_x and oxidation catalyst for reduction of carbon monoxide (CO) and volatile organic compounds (VOC). All operations are monitored with state-of-the-art instrumentation and emissions are continuously measured and reported through a continuous emissions monitoring system (CEMS);
- **Quick Dispatch, Superior Efficiency, Low Water Utilization and Effective Emission Controls Compliment Sustainability Objectives; and**
- Power and Capacity augmentation with Inlet Air Cooling (Chillers) utilizing non-peak generated chilled water, stored in Thermal Energy Storage Tank for optimal net peak capacity deliverability.

Equipment includes metal acoustical enclosure and baffles to reduce sound; inlet chiller; compressor valves and intercooler system; fire detection and protection system and state-of-the-art instrumentation for safety and performance monitoring.

Grid Charged Battery Energy Storage System Attributes



e-Storage Solbank lithium-ion battery storage systems are self-contained units that store electricity via an inverter charging process during non-peak periods in order to discharge electricity back to the electrical grid during peak periods, typically post solar generation hours.

- Durable, proven LFP battery cell for quick charge and discharge (4 hour) system managed through an active balancing battery management system to ensure continuous balancing during daily operations.
- Integrated Liquid Cooling-Heating System, designed for optimal battery temperature. Integrated multi-level BMS monitoring and fire detection, units provide timely report of battery status and fire detection, linked actions with other system components;
- BMS and Controller Integration, seamlessly integrated for real-time monitoring and issue reporting. Complete fire propagation verification from cell, module (pack) to unit level based on the latest UL 9540A: 2019 (4th Edition). Designed to meet the newest fire and safety codes. NFPA69, NFPA855 and NFPA72 compliant. Explosion prevention with gas detection, NFPA69 rated.
- Site Specific Fire Safety Design includes Emergency Response Plan (ERP); Hazard Mitigation Analysis (HMA); First responder training for fire department, AHJ, site operator, O&M teams; and Heat Flux Analysis (HFA) for verification of layout design per site conditions.

Resource Adequacy Technology Selection



Source: GE LM6000 Units at Desert Basin in Casa Grande (SRP)



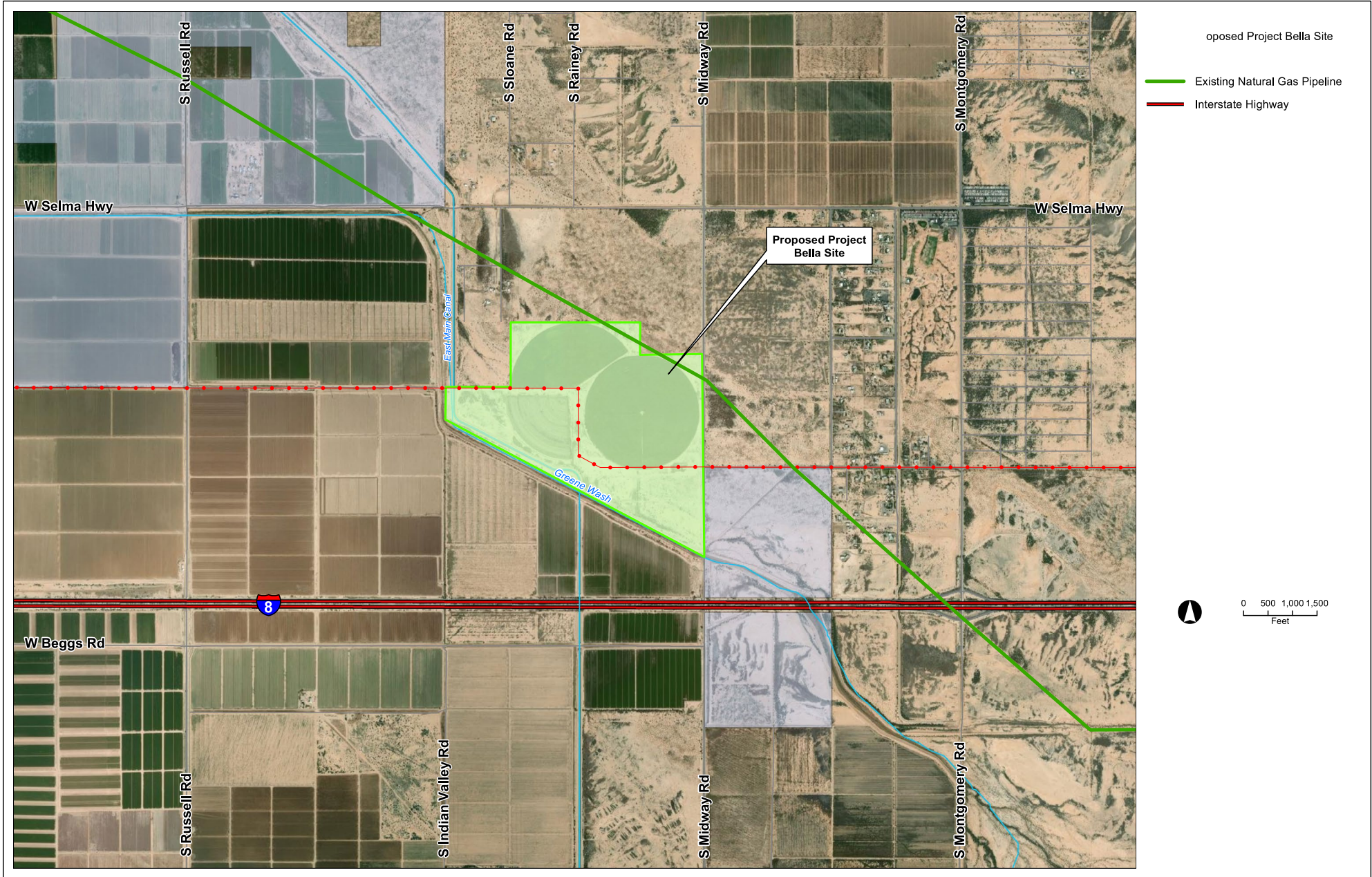
**Frequency
Regulation**



**Reliability
Reserves**



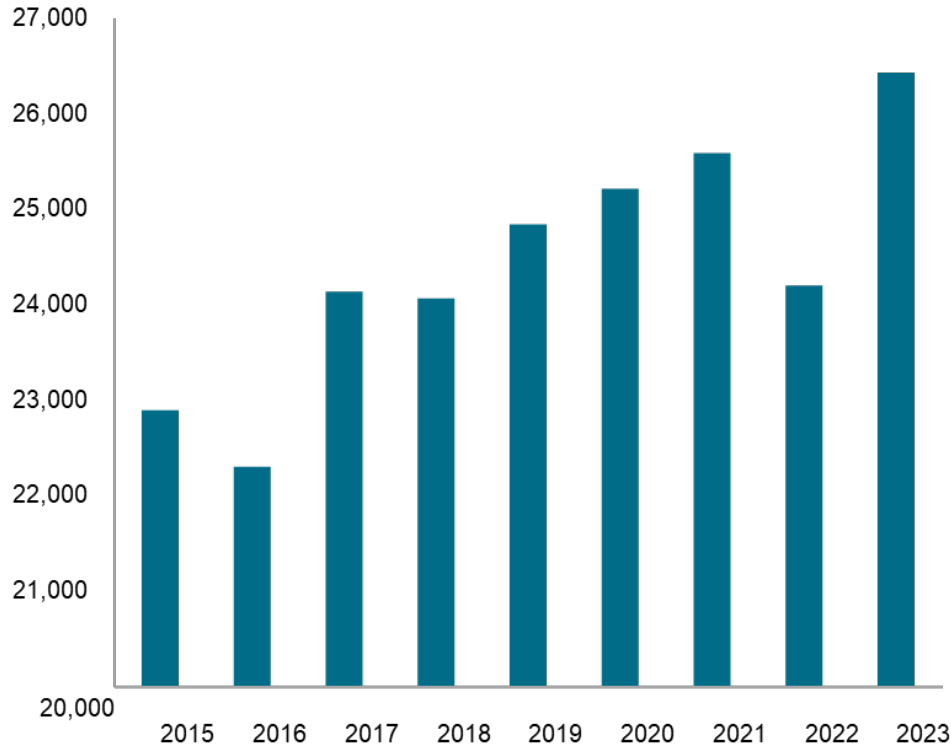
Equipment includes metal acoustical enclosure and baffles to reduce sound; inlet chiller; compressor valves and intercooler system; fire detection and protection system and state-of-the-art instrumentation for safety and performance monitoring.



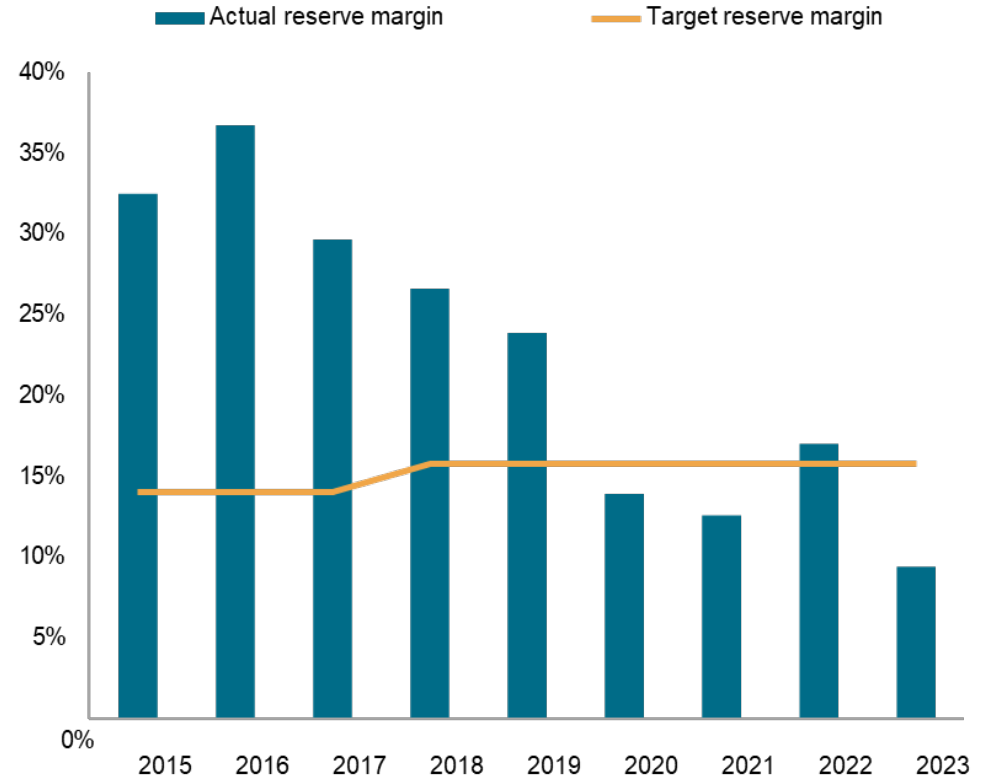
Project Need and Benefits

Project Need

DSW net on-grid peak electricity demand, MW



DSW reserve margins

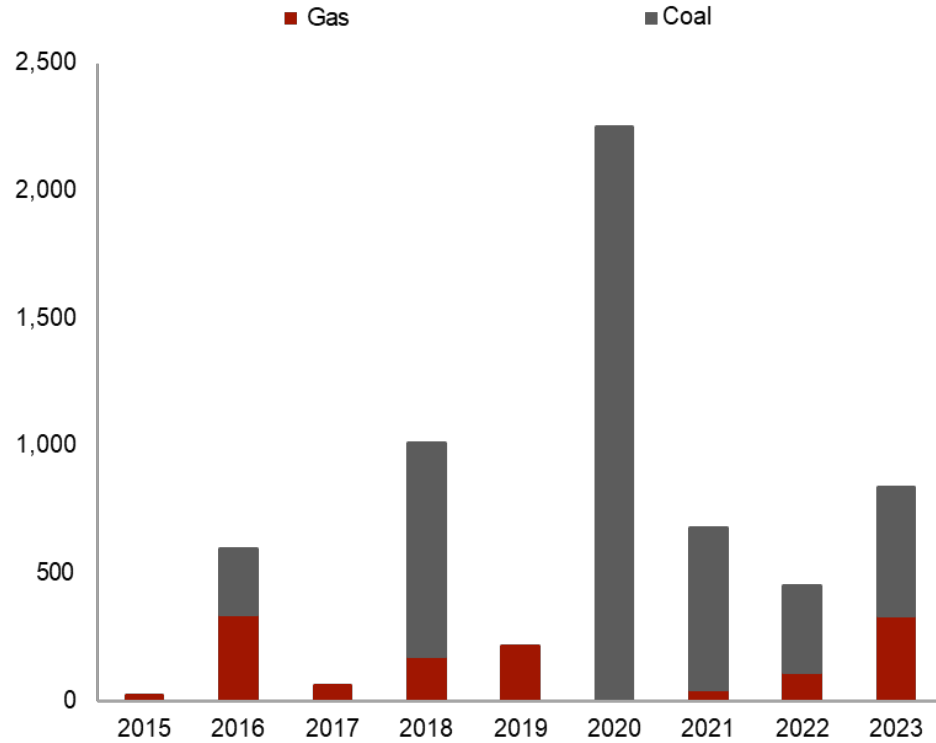


DSW is a summer peaking region. As peak demand continues to rise annually, Reserve Margins are decreasing as firm capacity additions have not kept pace. Reserve Margins are now significantly below Target levels for Reliability and will deteriorate further due to 5,036 MW of additional baseload coal retirements and increasing demand over the next seven (7) years.

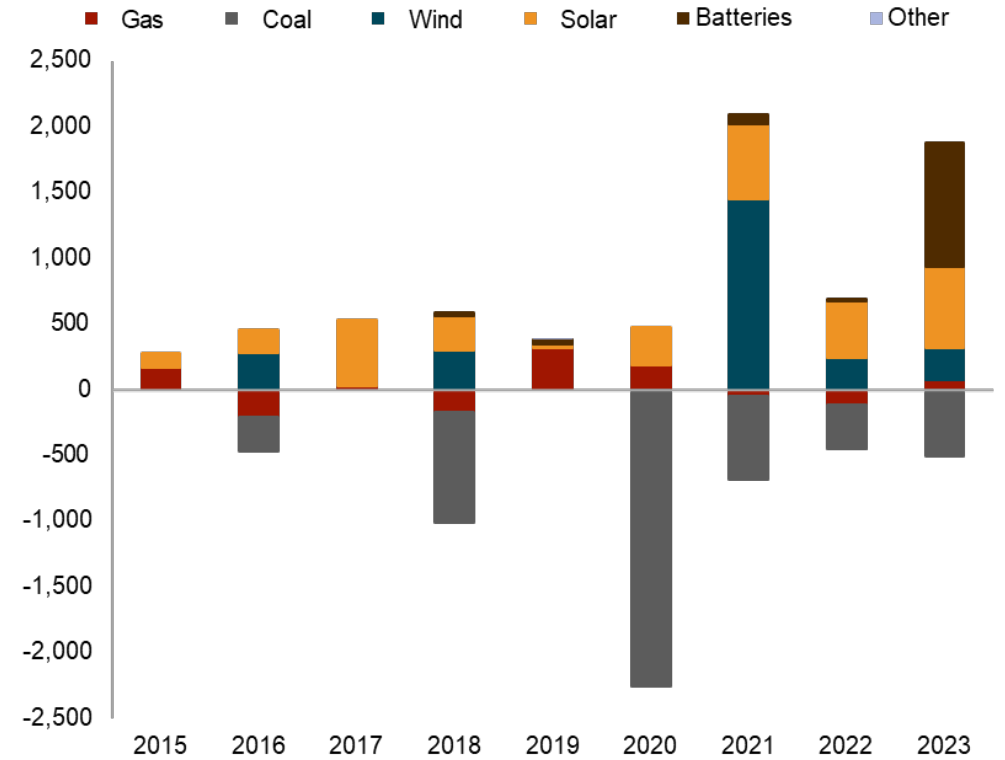
Data compiled March 2024.
Source: S&P Global Commodity Insights.

Project Need

Retirements by Year, MW



Net Capacity Additions by Fuel Source, MW



With over 6 GW of thermal capacity retirements since 2015, The DSW has largely turned to renewables along with some new gas to replace thermal retirements

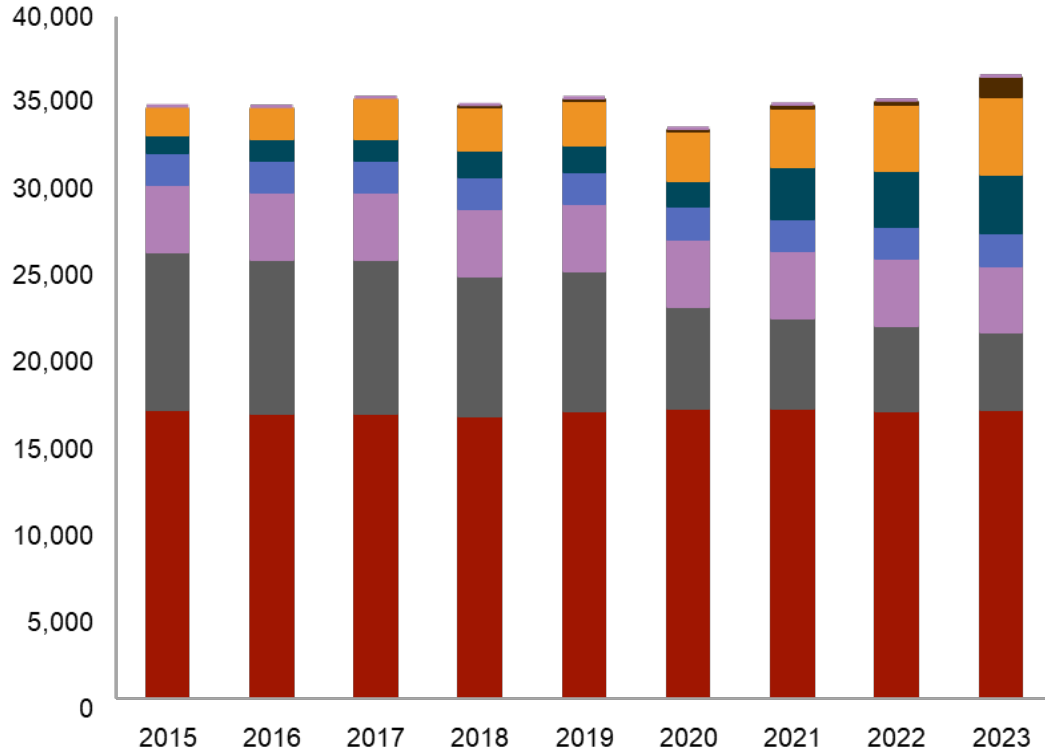
Data compiled March 2024. Source: S&P Global Commodity Insights

Project Need

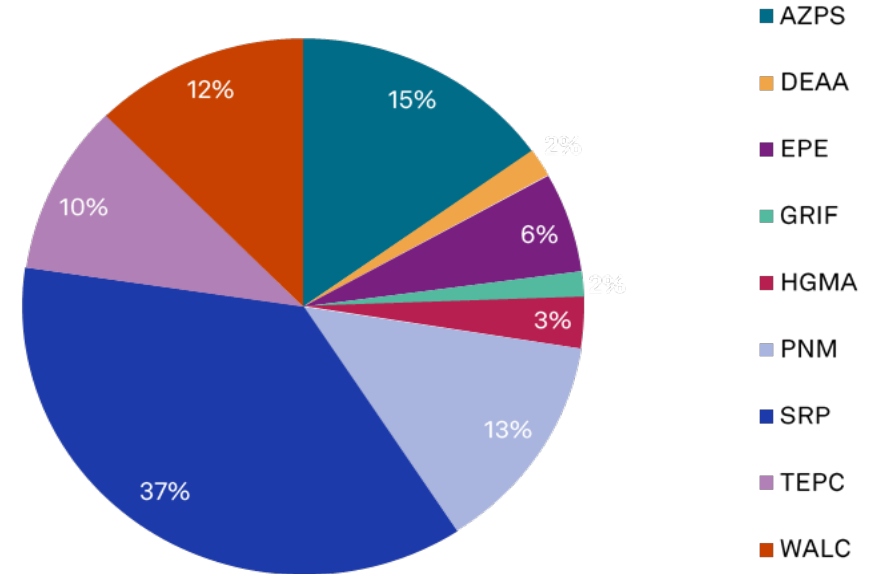
DSW Operating Capacity (MW)

Excludes distributed solar

■ Gas ■ Coal ■ Nuclear ■ Hydro ■ Wind ■ Solar ■ Batteries ■ Other



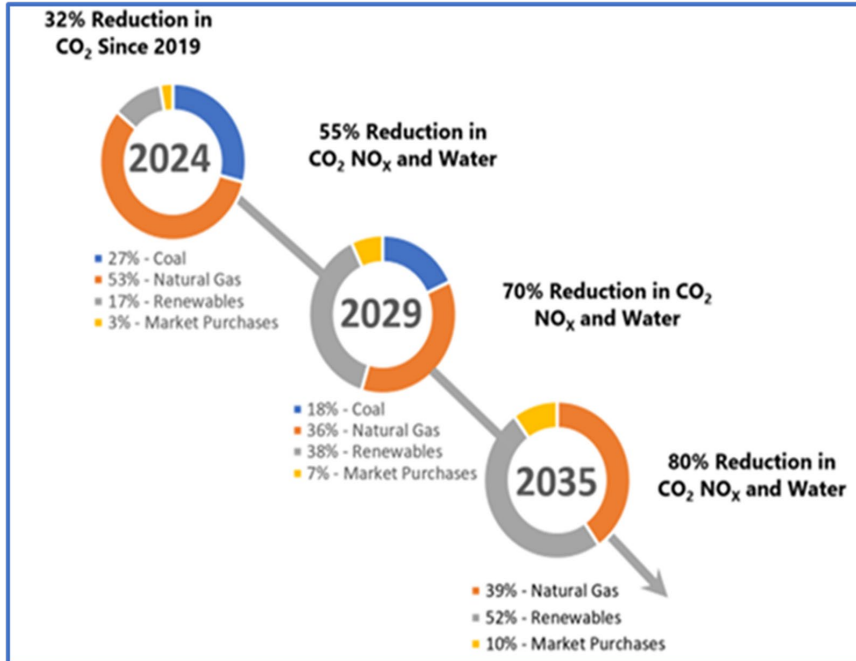
Installed Capacity by Balancing Authority



Data compiled March 2024.

DEAA = Arlington Valley; EPE = El Paso Electric; GRIF = Griffith Energy; HGMA = New Harquahala; PNM = Public Service Co. of New Mexico; WALC = Western Area Power Administration-Desert Southwest. Sources: S&P Global Commodity Insights; EIA.

Project Benefits



Source: TEP 2023 IRP

- Compliments the Priority Utilization of Renewable Energy while providing reliability reserves in the form of Resource Adequacy
- Significantly less land intensive (1 /10th solar)
- Minimal Water Consumption - 78 % less than a CCGT
- Low Emissions (NO_x and CO Control Systems)
- Lower Stack (65 ft) – visual and noise mitigation
- Utilizes Existing Infrastructure - Electrical Transmission and Natural Gas Pipeline cross the property site.

Environmental Analysis

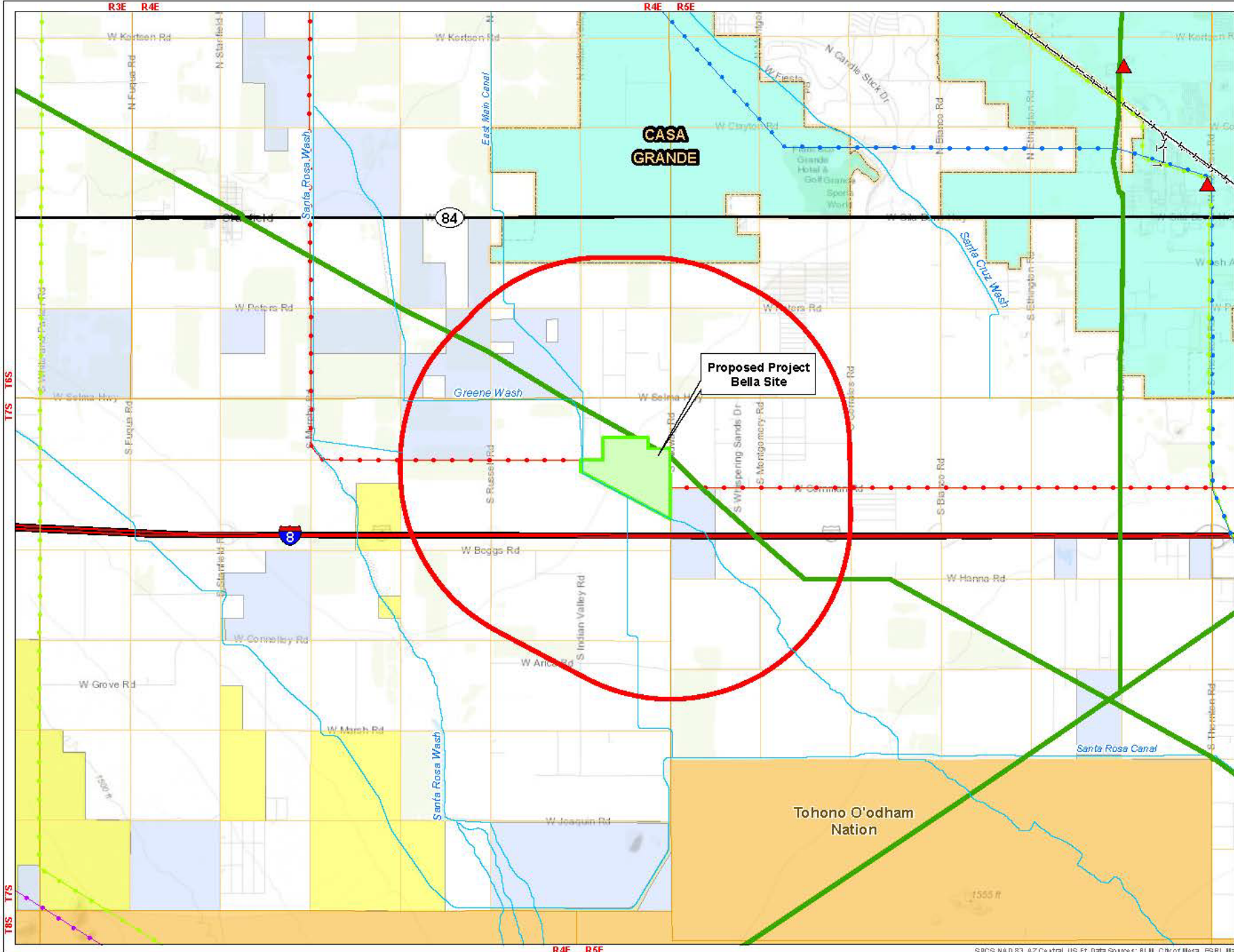
Overview and Results of Studies

Overview of Environmental Studies

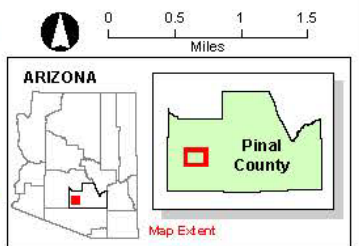
- Ownership, Jurisdiction and Land Use (Exhibit A)
- Air Quality and Water Resources (Exhibit B)
- Biological Resources (Exhibits C and D)
- Visual Resources (Exhibit E)
- Cultural Resources (Exhibit F)
- Recreation Resources (Exhibit F)
- Existing Plans (Exhibit H)
- Noise (Exhibit I)
- Public Process (Exhibit J)

Land Use

Ownership, Jurisdiction and Land Use



- Legend**
- Project Bella Components**
- Proposed Project Bella Site
 - 2-Mile Buffer of Project Site
- Other Components**
- Existing Substation
 - Existing 500kV Transmission Line
 - Existing 345kV Transmission Line
 - Existing 230kV Transmission Line
 - Existing 115kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - State Highway
 - Stream / Wash
 - Railroad
 - Municipal Boundary
 - Township / Range Boundary
 - Section Boundary
- Jurisdictional Land Ownership**
- Bureau of Land Management Land
 - Bureau of Reclamation Land
 - Tribal Land
 - State Land
- Jurisdiction**
- Unincorporated County
 - City of Casa Grande

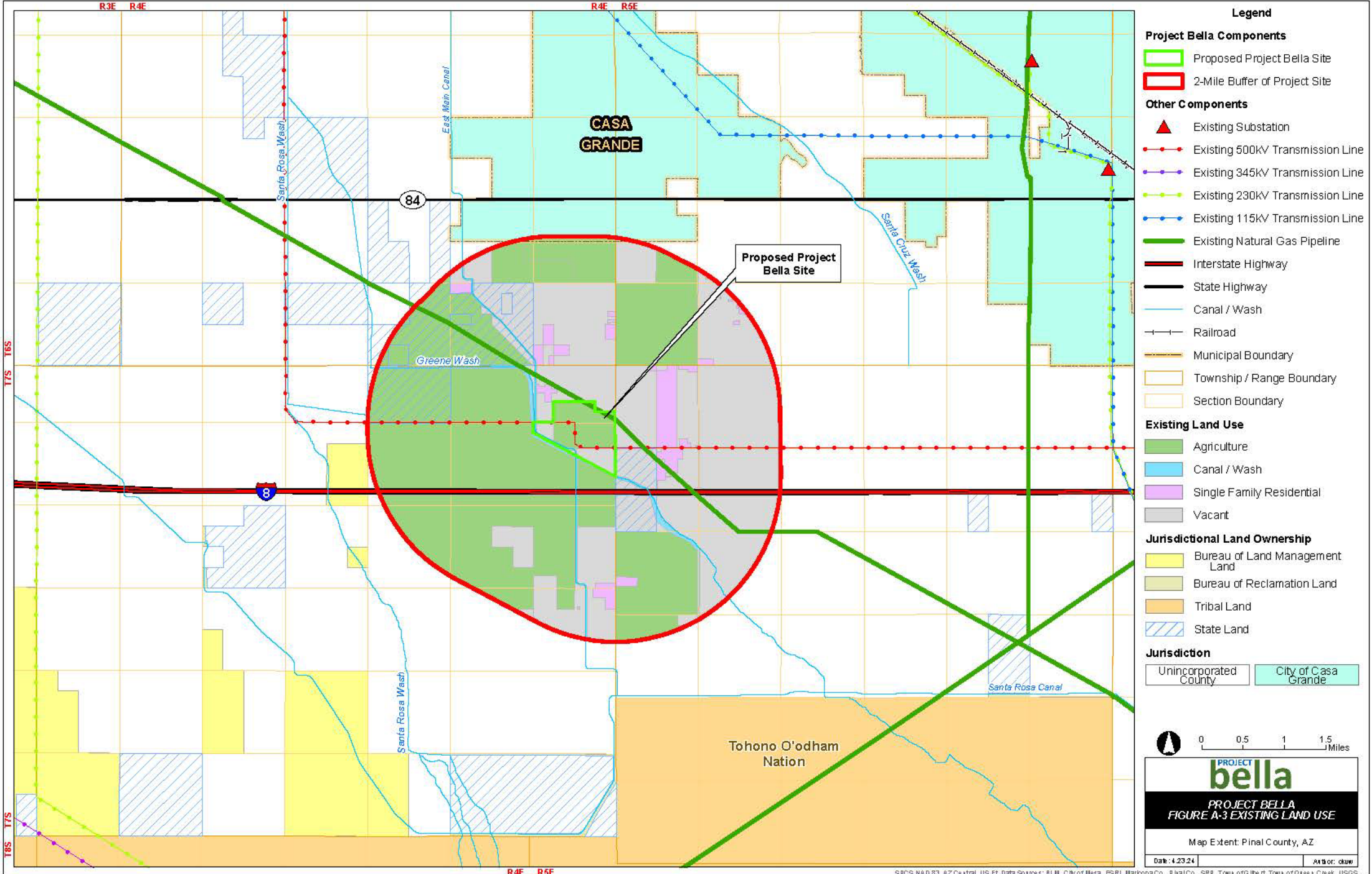


PROJECT bella

PROJECT BELLA
FIGURE A-2 JURISDICTION

Map Extent: Pinal County, AZ

Date: 4.23.24 Author: dukw



- Legend**
- Project Bella Components**
- Proposed Project Bella Site
 - 2-Mile Buffer of Project Site
- Other Components**
- Existing Substation
 - Existing 500kV Transmission Line
 - Existing 345kV Transmission Line
 - Existing 230kV Transmission Line
 - Existing 115kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - State Highway
 - Canal / Wash
 - Railroad
 - Municipal Boundary
 - Township / Range Boundary
 - Section Boundary
- Existing Land Use**
- Agriculture
 - Canal / Wash
 - Single Family Residential
 - Vacant
- Jurisdictional Land Ownership**
- Bureau of Land Management Land
 - Bureau of Reclamation Land
 - Tribal Land
 - State Land
- Jurisdiction**
- Unincorporated County
 - City of Casa Grande

0 0.5 1 1.5 Miles

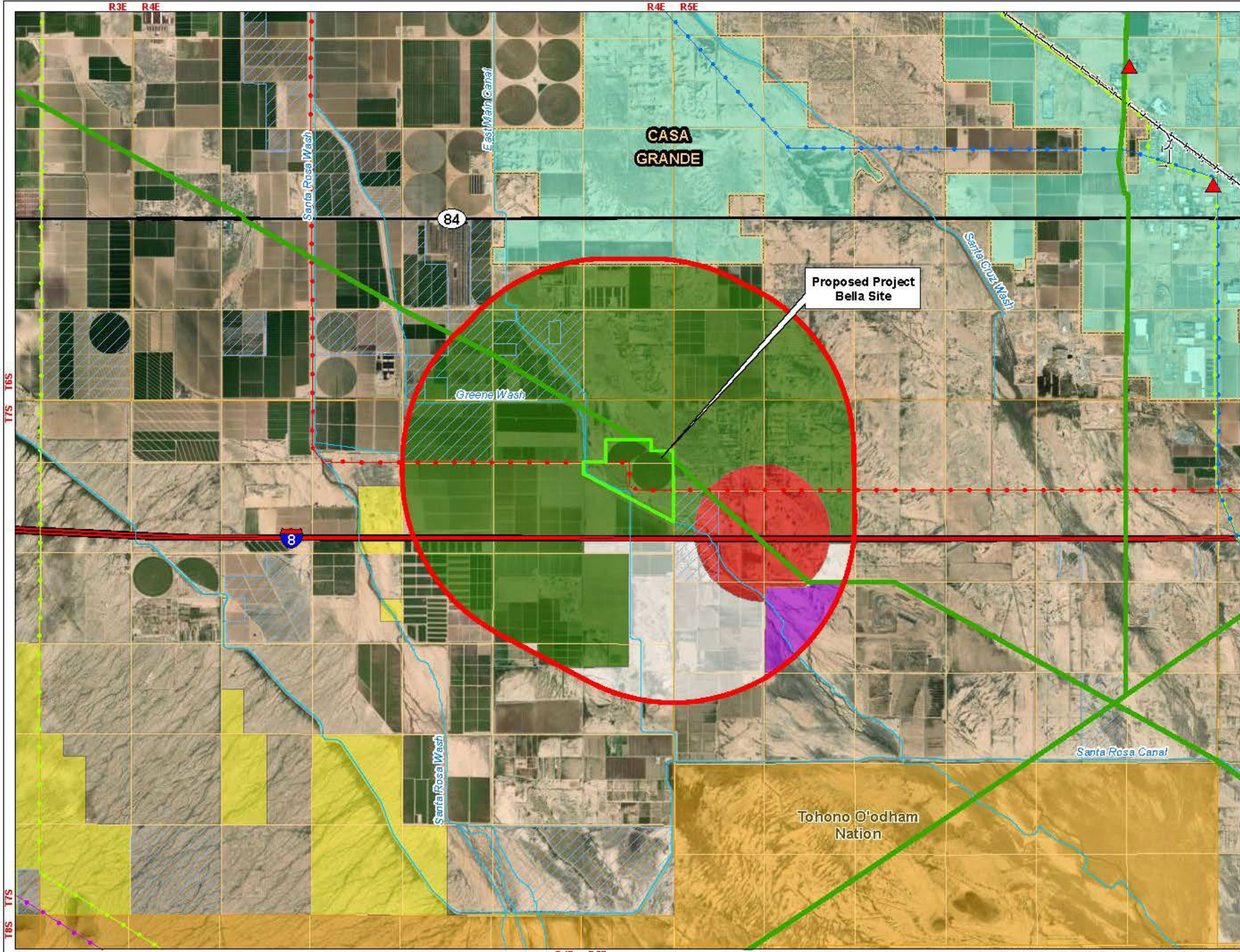
PROJECT bella

PROJECT BELLA
FIGURE A-3 EXISTING LAND USE

Map Extent: Pinal County, AZ

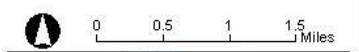
Date: 4.23.24 Author: dukw

SPCS NAD 83, AZ Central, US FT. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., SRP, Town of Gilbert, Town of Queen Creek, USGS.



Legend

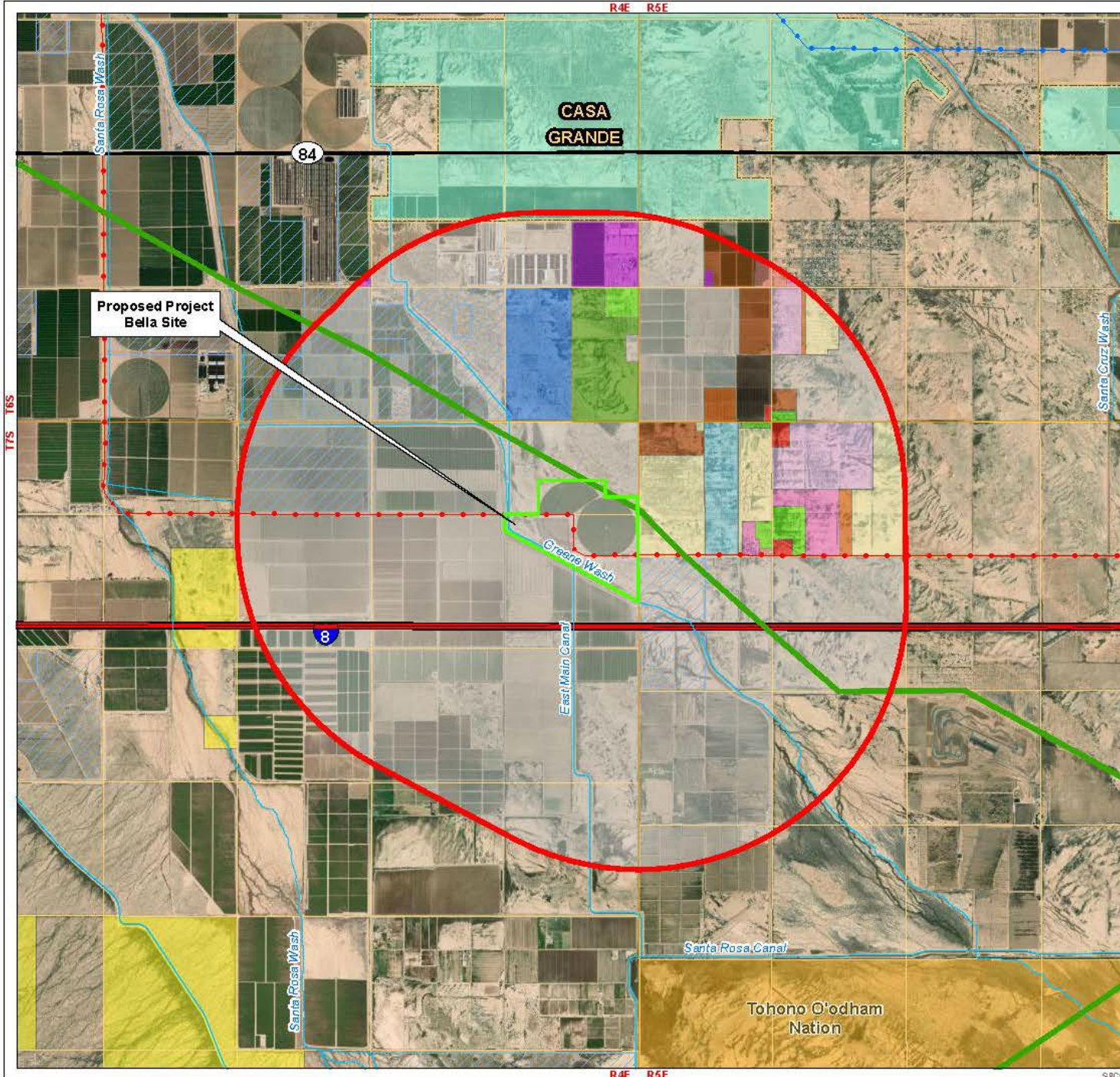
- Project Bella Components**
- Proposed Project Bella Site
 - 2-Mile Buffer of Project Site
- Other Components**
- Existing Substation
 - Existing 500kV Transmission Line
 - Existing 345kV Transmission Line
 - Existing 230kV Transmission Line
 - Existing 115kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - State Highway
 - Stream / Wash
 - Railroad
 - Municipal Boundary
 - Township / Range Boundary
 - Section Boundary
- Pinal County Land Use Plan**
- Employment
 - High Intensity Activity Center
 - Moderate Low Density Residential
 - Very Low Density Residential
- Jurisdictional Land Ownership**
- Bureau of Land Management Land
 - Bureau of Reclamation Land
 - Tribal Land
 - State Land
- Jurisdiction**
- Unincorporated County
 - City of Casa Grande



PROJECT bella
 PROJECT BELLA
 FIGURE A-4 DESIGNATED FUTURE LAND USE

Map Extent: Pinal County, AZ
 Date: 4/23/24 Author: dkmw

SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, BSRI, Pinal Co., SRP, City of Casa Grande, USGS.



Proposed Project Bella Site

Legend

Project Bella Components

- Proposed Project Bella Site
- 2-Mile Buffer of Project Site

Other Components

- Existing 500kV Transmission Line
- Existing 115kV Transmission Line
- Existing Natural Gas Pipeline
- Interstate Highway
- State Highway
- Stream / Wash
- Municipal Boundary
- Township / Range Boundary
- Section Boundary

Pinal County Zoning

- CAR (Commercial Agricultural Ranch)
- CB-1 (Local Business)
- CB-2 (General Business)
- CI-1 (Light Industry and Warehouse)
- CI-2 (Industrial)
- CR-2 / CR-3 (Single Residence)
- CR-4 / CR-5 (Multiple Residence)
- GR (General Rural)
- MH (Manufactured Home)
- MHP (Manufactured Home Park)
- RU-1.25 (Rural)
- RV (Recreational Vehicle Homesite)
- RVP (Recreational Vehicle Park)
- SH (Suburban Homestead)
- SR (Suburban Ranch)

Jurisdictional Land Ownership

- Bureau of Land Management Land
- Bureau of Reclamation Land
- Tribal Land
- State Land

Jurisdiction

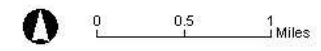
- Unincorporated County
- City of Casa Grande

PROJECT bella

PROJECT BELLA
FIGURE A-5 ZONING

Map Extent: Pinal County, AZ

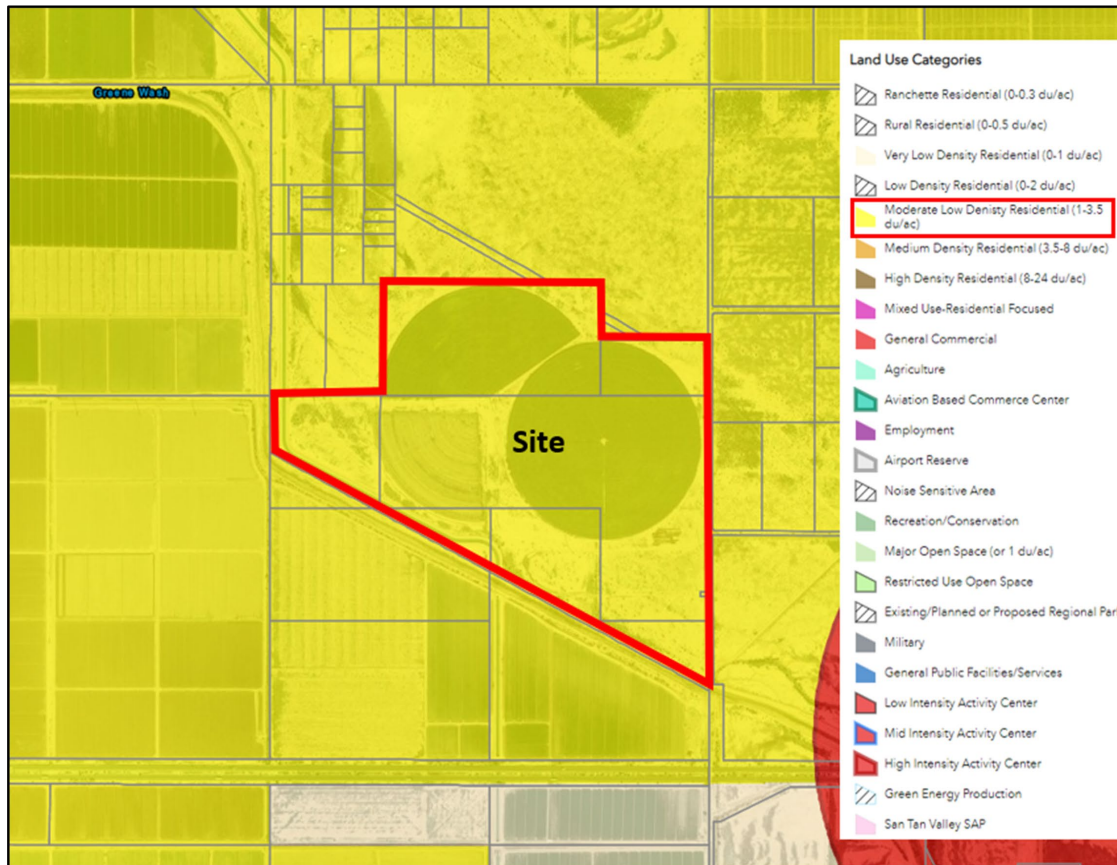
Date: 4.23.24 Author: ckaw



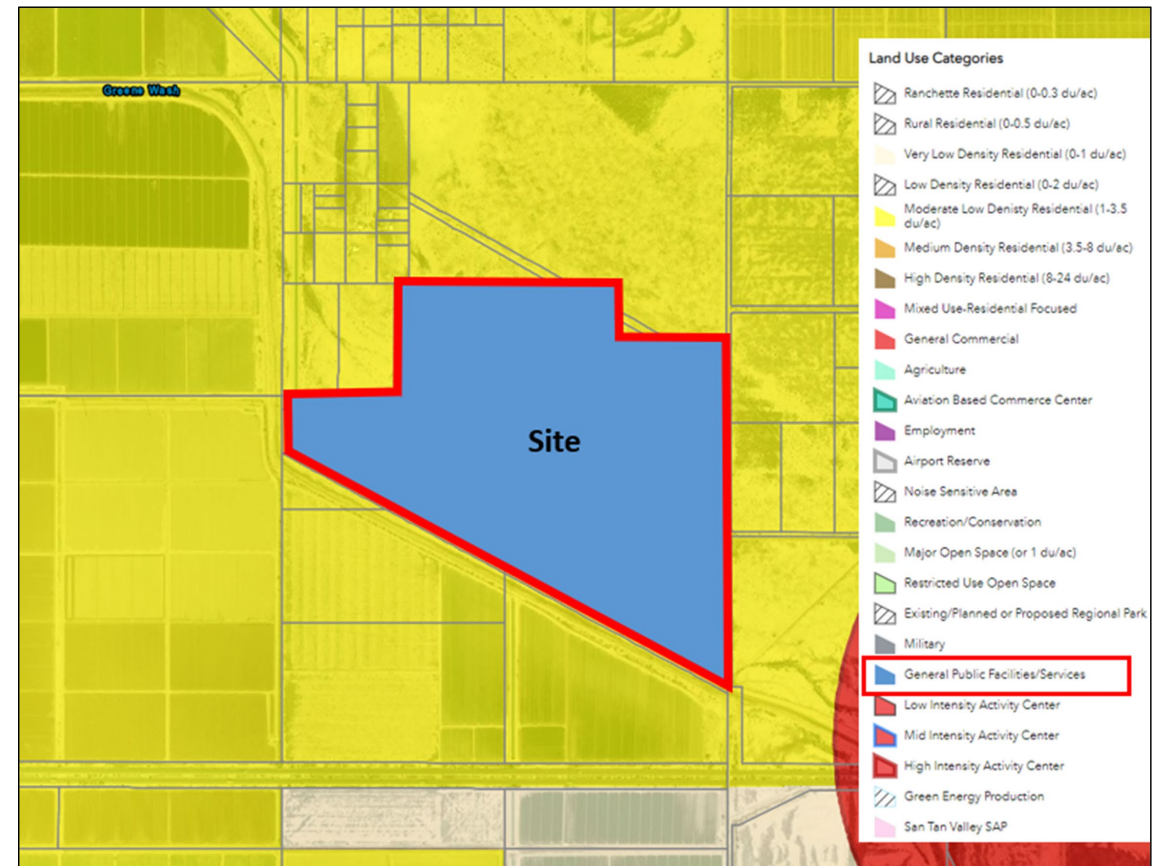
SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., SRP, Town of Gilbert, Town of Queen Creek, USGS.

Pinal County Major Comprehensive Plan Amendment

Existing Designation: Moderate/Low Density Residential



Proposed Designation: General Public Facilities/Services



Air Quality and Water Resources

Analysis of Air Quality and Water Resources

Air Quality Summary

Project Bella Air Permit Application Process Summary

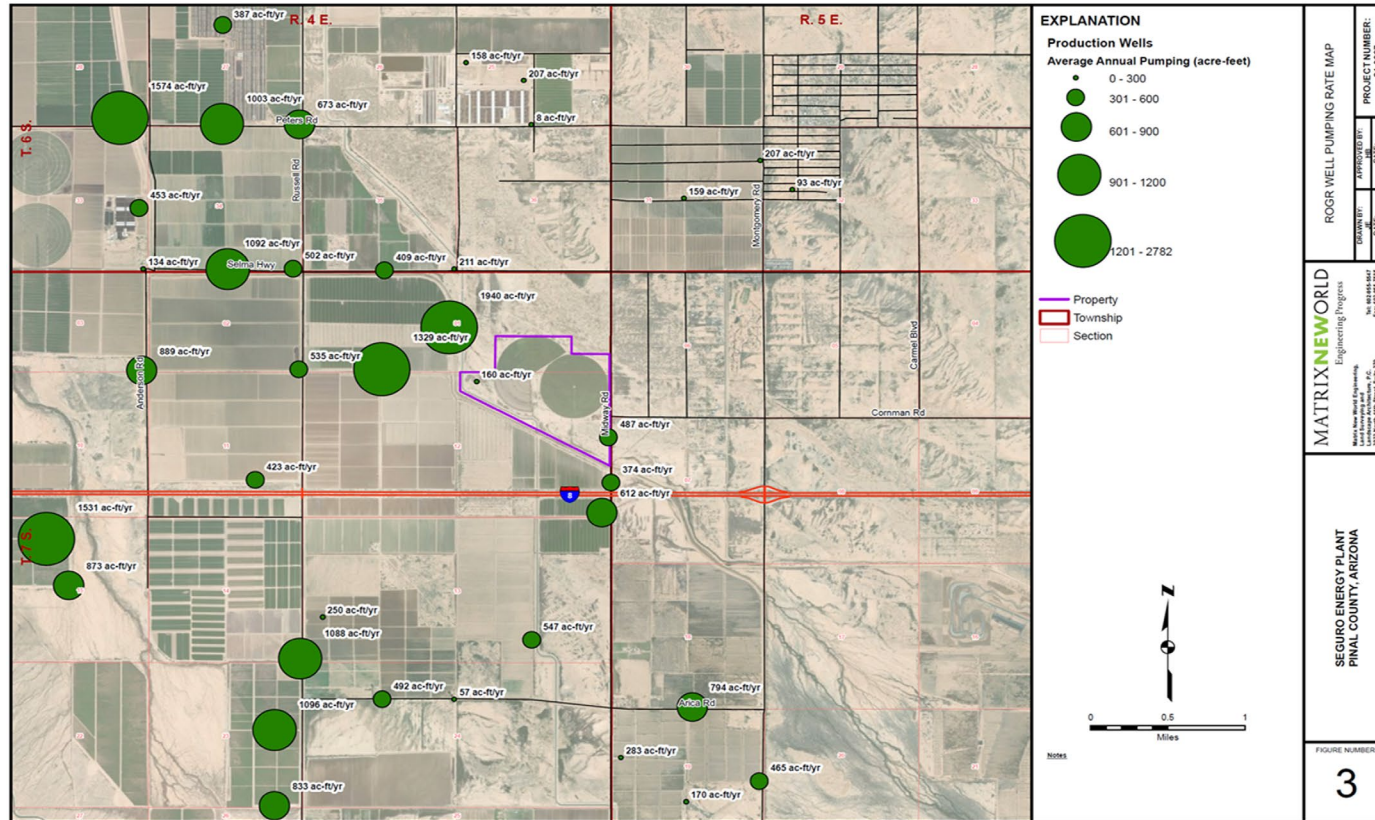
- May 23, 2023: The Application for Class I Permit was submitted to PCAQCD.
- June 22, 2023: Supporting documentation and revision was provided to PCAQCD.
- August 30, 2023: Air Dispersion Modeling Protocol and supporting documentation was provided to PCAQCD.
- December 1, 2023: Modifications to the Air Dispersion Modeling Protocol, pursuant to comments from the PCAQCD modeling expert consultant, was submitted.
- December 22, 2023: Review and clarifications of the Air Dispersion Modeling was approved and accepted by PCAQCD.
- January 9, 2024: Update to site related details and analysis and update stack information provided to PCAQCD.
- February 6, 2024: PCAQCD completed application review process.
- February 15, 2024: PCAQCD approved all application materials and issued draft permit.
- February 29 – March 30, 2024: 30-day Public Comment Period.
- April 1, 2024: A Virtual Public Hearing was held.
- April 25, 2024: PCAQCD submitted draft permit and supporting documentation to US EPA for Administrative Review.
- June 10, 2024: US EPA provided no additional comments.
- June 17, 2024: PCAQCD issued final air permit.

Air Quality Summary

Based on the enforceable limit of annual maximum fuel consumption and the planned emission controls systems, the maximum projected emissions from the natural gas turbines are identified the Table below.

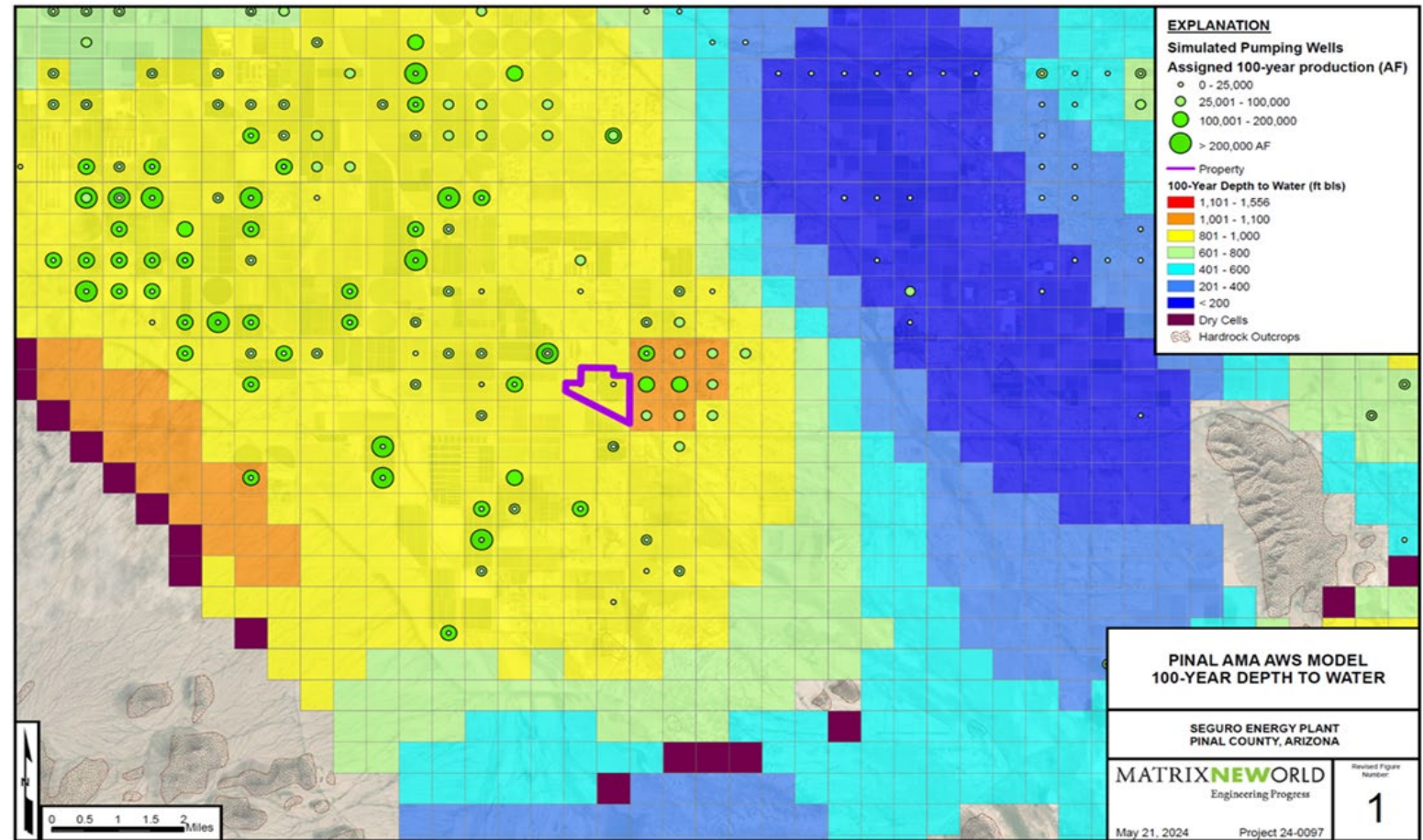
TABLE 2 NATURAL GAS TURBINES – MAXIMUM PROJECTED EMISSION LEVELS	
Pollutant	Emission Limit (Tons per Year)
Particulate Matter (PM, PM ₁₀ , PM _{2.5})	62.1
NO _x	211
VOC	159
CO	222
SO _x	31.1
Hazardous Air Pollutants (HAPs)	9

Water Resources Summary



Current Use: 334 ac-ft
 Projected Use 395 ac-ft
 Max. Modified Use: 530 ac-ft
 Max Net Increase: 196 ac-ft

Water Resources Summary



Current Use (Agriculture): 334 ac-ft
Projected Use (35% CF): 395 ac-ft
Maximum Modified Use: 530 ac-ft
Maximum Net Increase: 196 ac-ft

Figure 1 also shows the pumping well locations with simulated pumping through the 100-year predictive period. The total pumping assigned to wells within three miles of the proposed Project Bella property was over 3.2 million acre-feet, or an average of over 32,000 acre-feet per year throughout the 100-year period. Therefore, the maximum of 530 acre feet per year from the Project Bella site represents less than 1.7% of the total simulated pumping quantity within the 3-mile radius, of which the land use currently utilizes 334 acre feet per year or 63 percent of the Project's maximum projected utilization.

Biological Resources

Analysis of Biological Wealth and Biological Resources

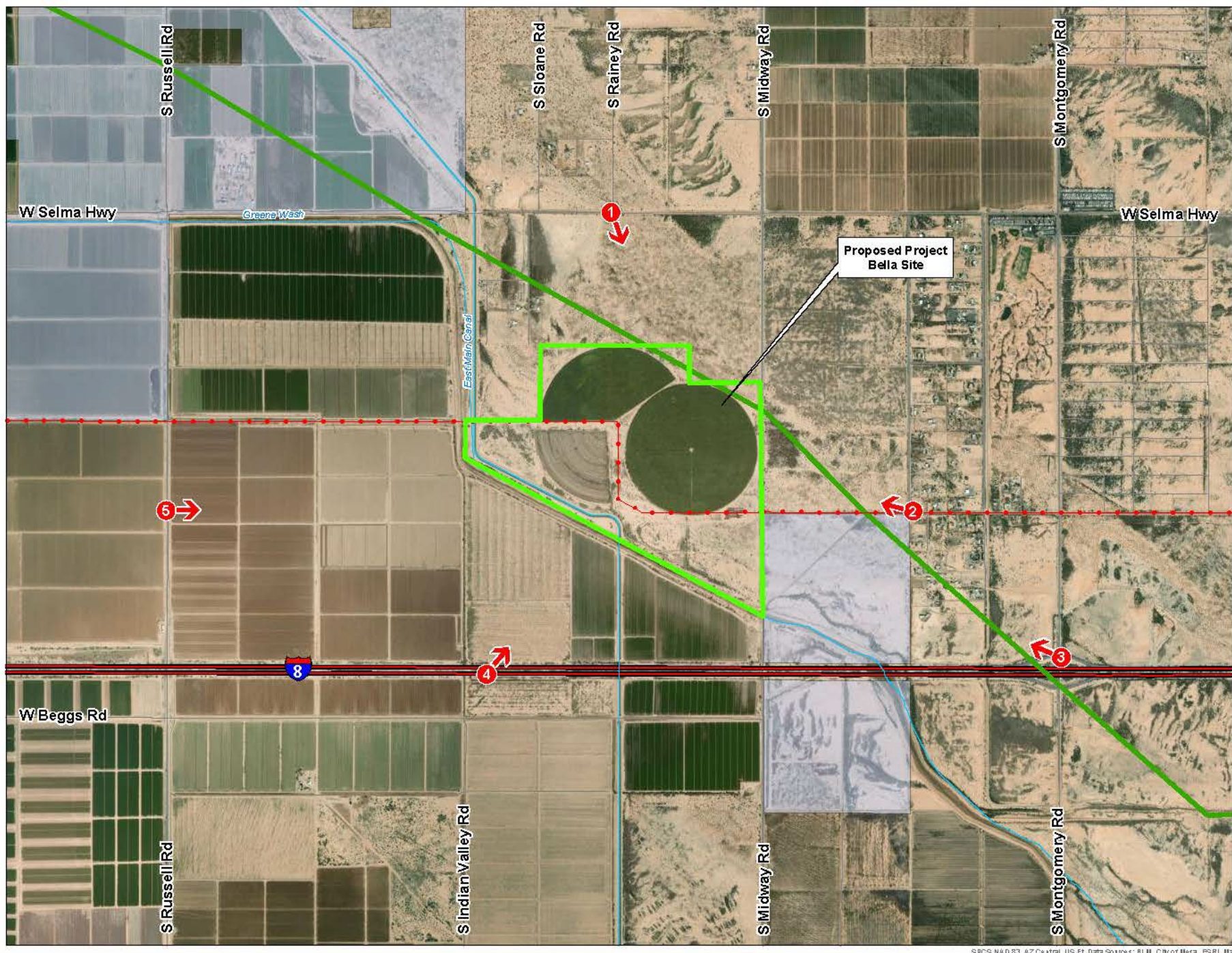
Biological Resources Summary

- Coordinated with AGFD and USFWS
 - AGFD ERT Report and Project Evaluation Program
 - USFWS IPaC Tool
- Previously disturbed areas reducing habitat quality
- Sensitive Species not likely to be negatively affected
- Avoidance and Minimization Measures and BMPs

Visual Resources

Visual Impacts and Simulations

- Legend**
- Visual Resources**
- Key Observation Point (KOP) Location and Direction
- Project Bella Components**
- Proposed Project Bella Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - Road
 - Stream / Wash
- Jurisdictional Land Ownership**
- State Land



0 500 1,000 1,500
Feet

PROJECT bella

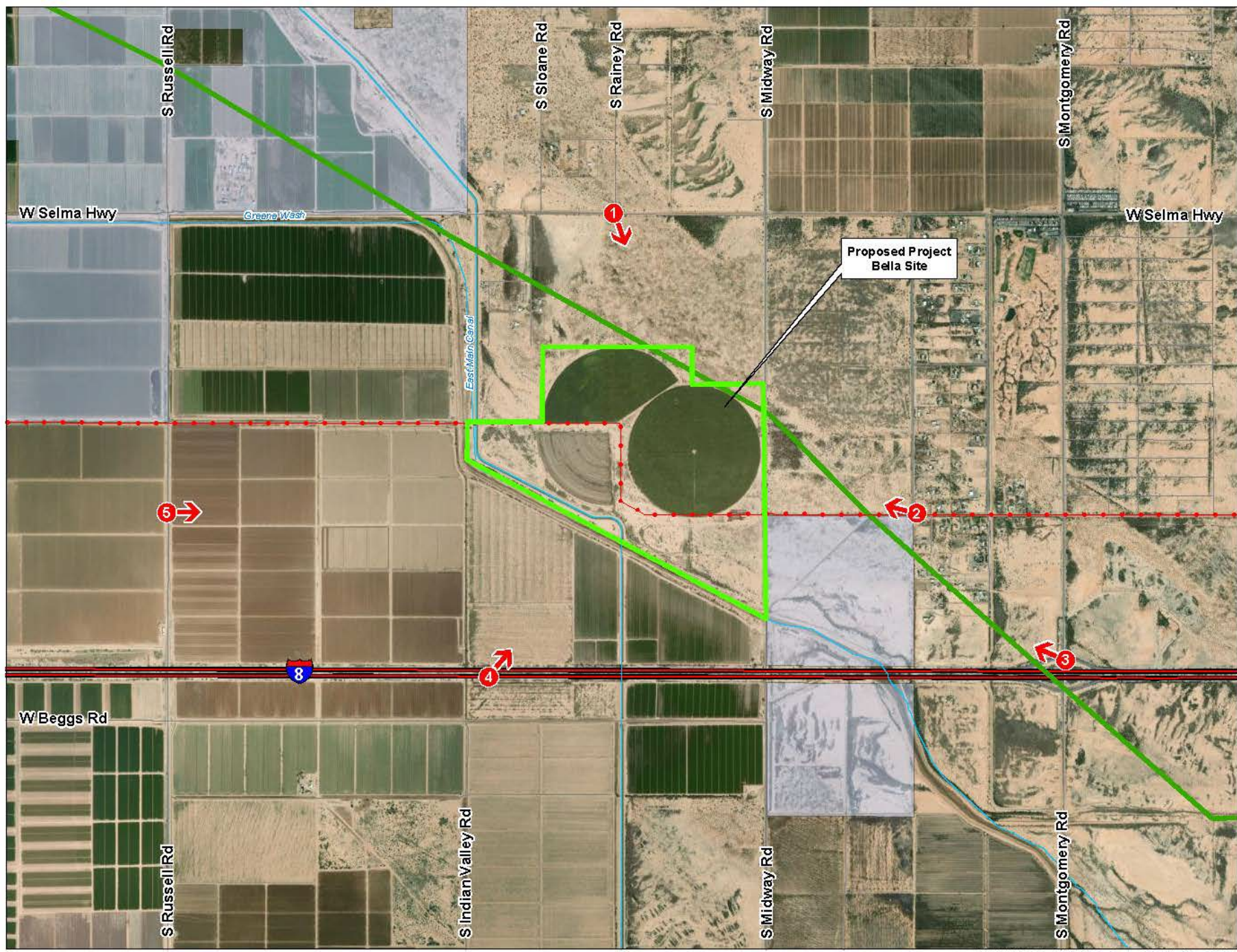
PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

Map Extent: Pinal County, AZ

Date: 6.13.24 Author: dkum



- Legend**
- Visual Resources**
- Key Observation Point (KOP) Location and Direction
- Project Bella Components**
- Proposed Project Bella Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - Road
 - Stream / Wash
- Jurisdictional Land Ownership**
- State Land



0 500 1,000 1,500
Feet

PROJECT bella

PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

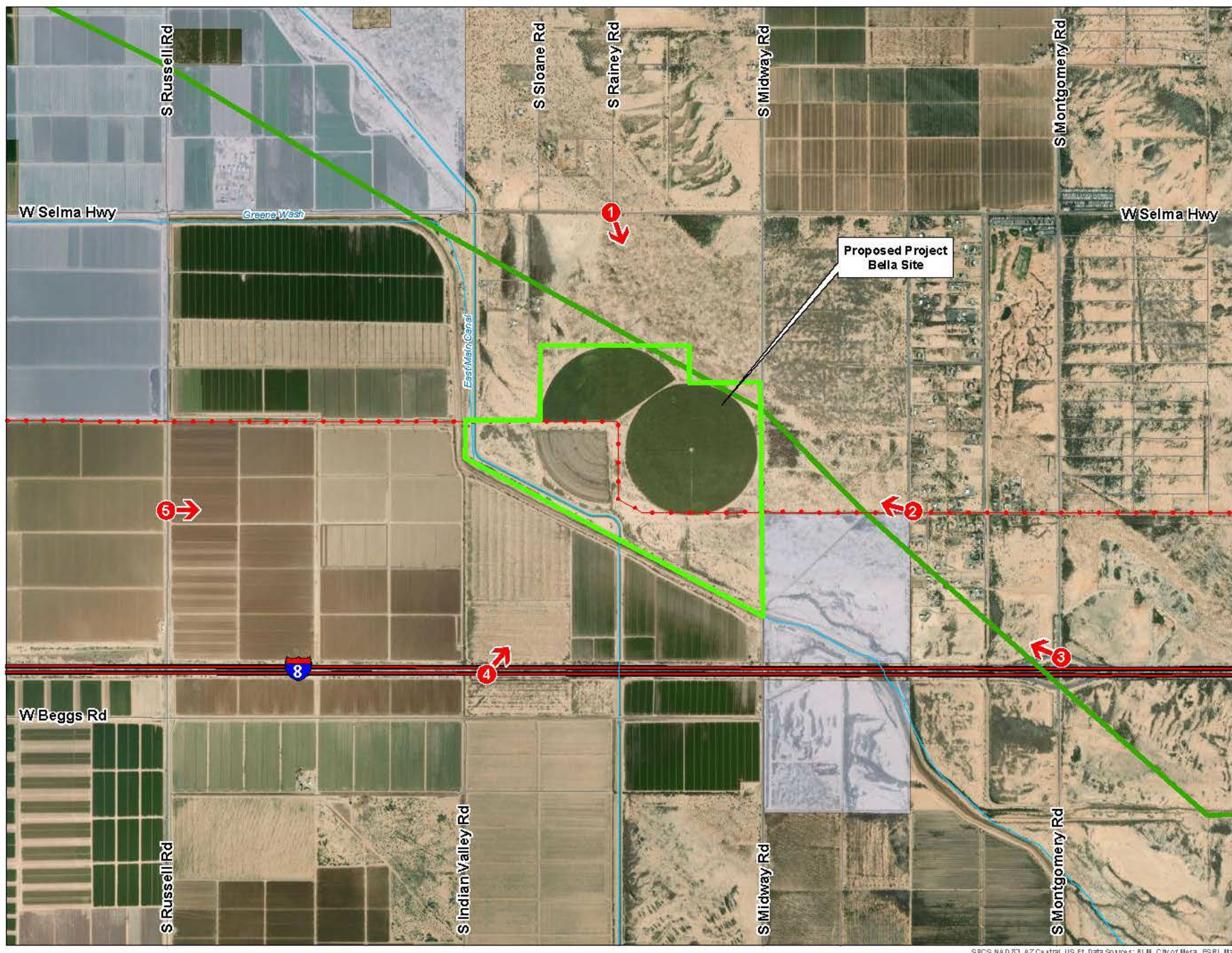
Map Extent: Pinal County, AZ

Date: 6.13.24 Author: dkum

SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., SRP, Town of Gilbert, Town of Queen Creek, USGS.



- Legend**
- Visual Resources**
- Key Observation Point (KOP) Location and Direction
- Project Bella Components**
- Proposed Project Bella Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - Road
 - Stream / Wash
- Jurisdictional Land Ownership**
- State Land



0 500 1,000 1,500
Feet

PROJECT bella

PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

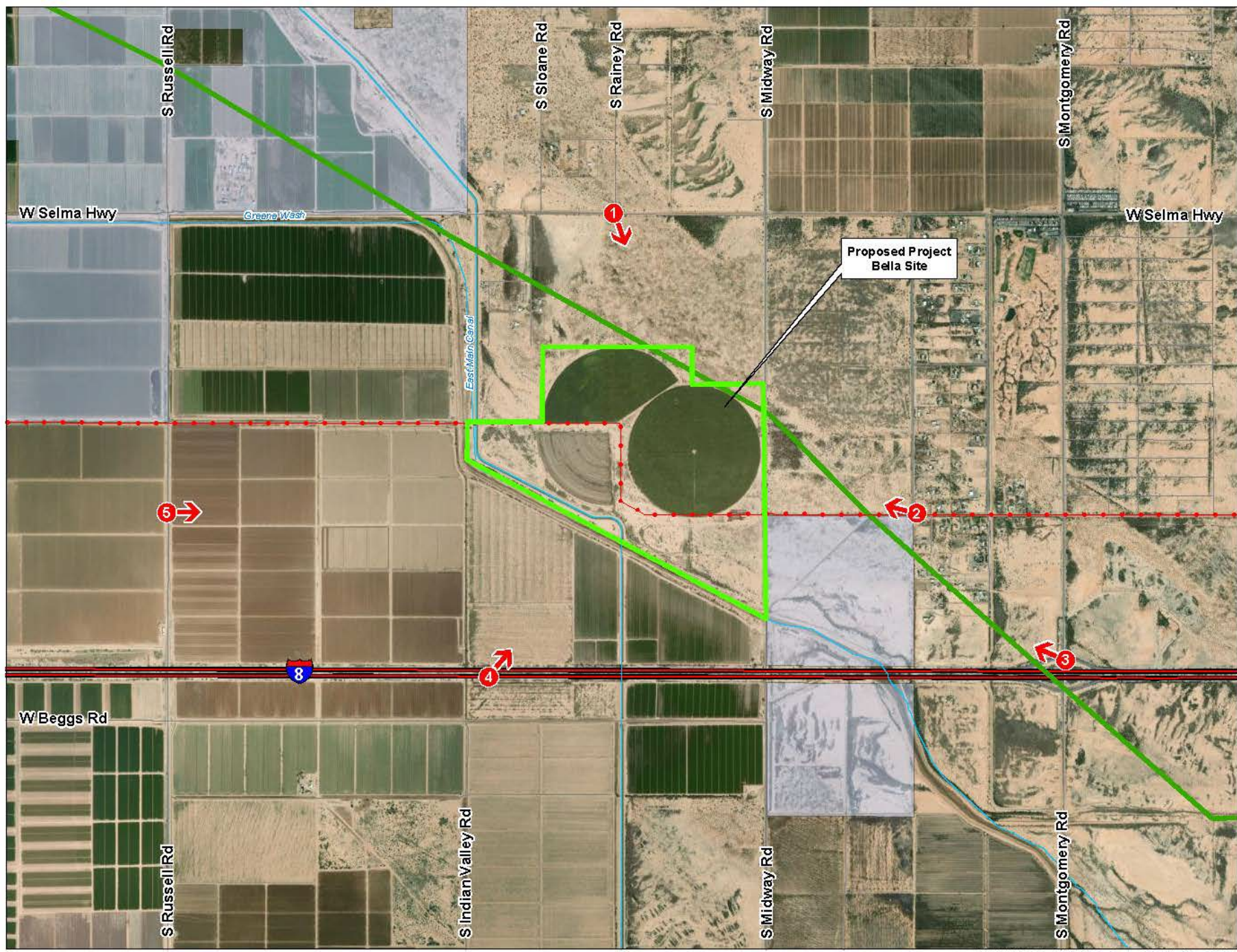
Map Extent: Pinal County, AZ

Date: 6.13.24 Author: dkum

SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., SRP, Town of Gilbert, Town of Queen Creek, USGS.



- Legend**
- Visual Resources**
- Key Observation Point (KOP) Location and Direction
- Project Bella Components**
- Proposed Project Bella Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - Road
 - Stream / Wash
- Jurisdictional Land Ownership**
- State Land



PROJECT **bella**

PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

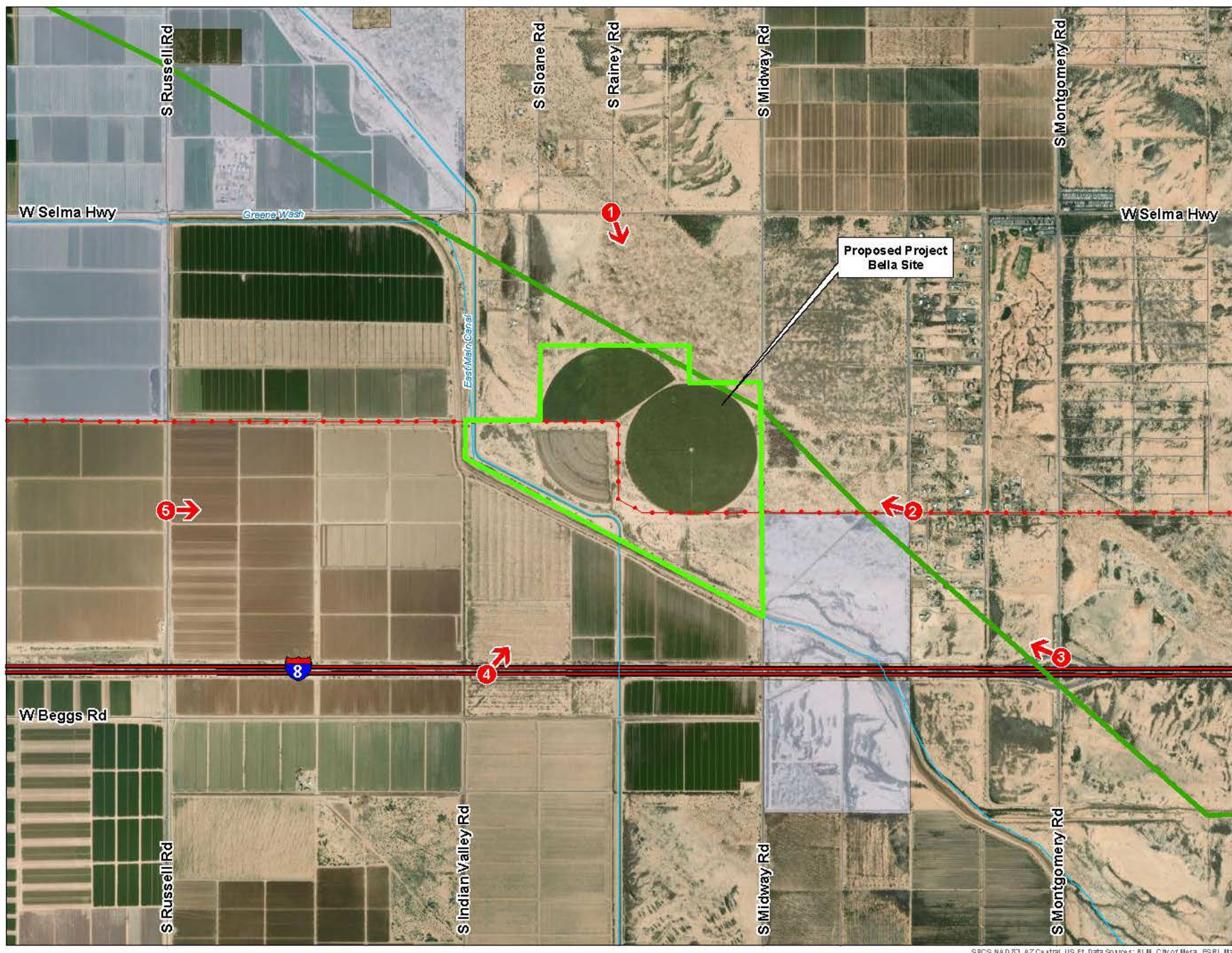
Map Extent: Pinal County, AZ

Date: 6.13.24 Author: dkum

SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., SRP, Town of Gilbert, Town of Queen Creek, USGS.



- Legend**
- Visual Resources**
- Key Observation Point (KOP) Location and Direction
- Project Bella Components**
- Proposed Project Bella Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - Road
 - Stream / Wash
- Jurisdictional Land Ownership**
- State Land



0 500 1,000 1,500
Feet

PROJECT bella

PROJECT BELLA
FIGURE E-1 KEY OBSERVATION POINTS

Map Extent: Pinal County, AZ

Date: 6.13.24 Author: dkum

SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., SRP, Town of Gilbert, Town of Queen Creek, USGS.



Cultural Resources

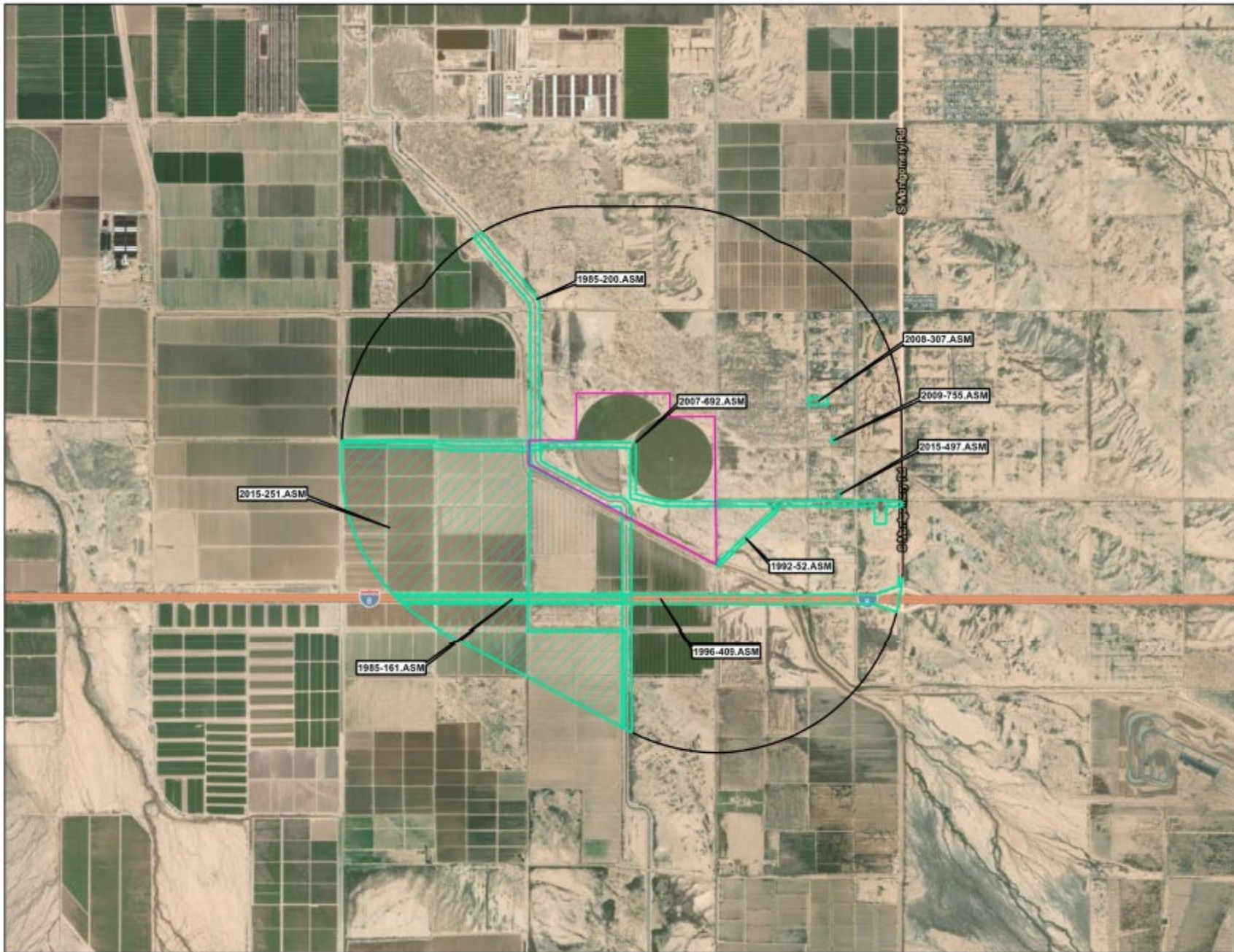
Historic and Archeological Sites

Bella Solar Project

Previous Investigations

Legend

-  Project Area
-  Previous Studies
-  One Mile Buffer

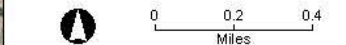


0 2,000 4,000 Feet

Recreational Areas

Existing and Future Recreational Sites

- Legend**
- Project Bella Components**
- Proposed Project Bella Site
 - 1,000-Foot Buffer of Project Site
 - 1-Mile Buffer of Project Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - Stream / Wash
- Recreation**
- Recreational Facility
 - Golf Course
- Jurisdictional Land Ownership**
- State Land

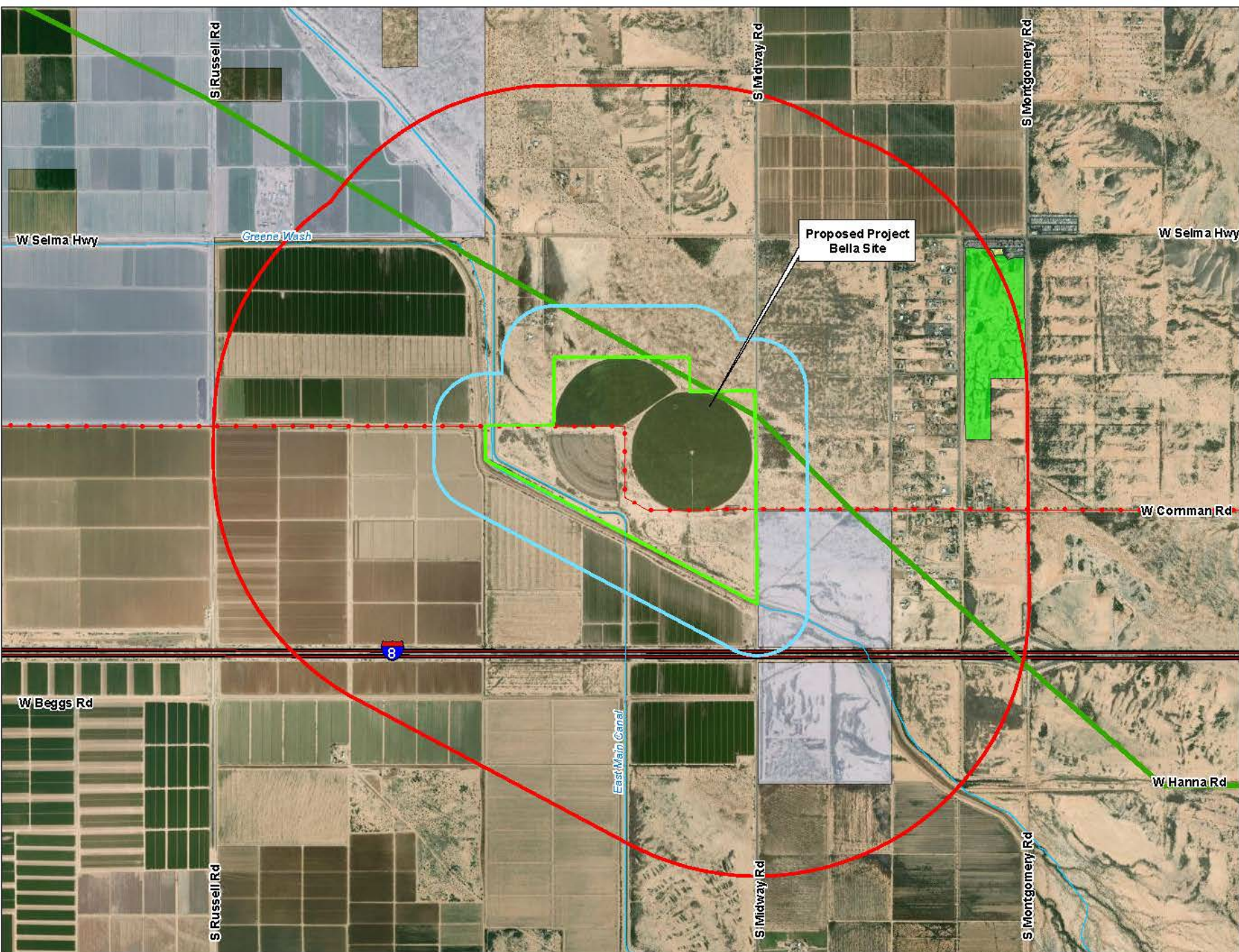


PROJECT
bella

PROJECT BELLA
FIGURE F-1 RECREATION

Map Extent: Pinal County, AZ

Date: 5.15.24 Author: dkum



SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., MAG, SRP, Town of Gilbert, Town of Queen Creek, USGS

Existing Plans

Plans of State, Local Government and Private Entities

- Legend**
- Project Bella Components**
- Proposed Project Bella Site
 - 1,000-Foot Buffer of Project Site
 - 1-Mile Buffer of Project Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - Proposed Interstate-11
 - Stream / Wash
- Planned Area Developments**
- Planned Area Development
- Jurisdictional Land Ownership**
- State Land

0 0.2 0.4
Miles

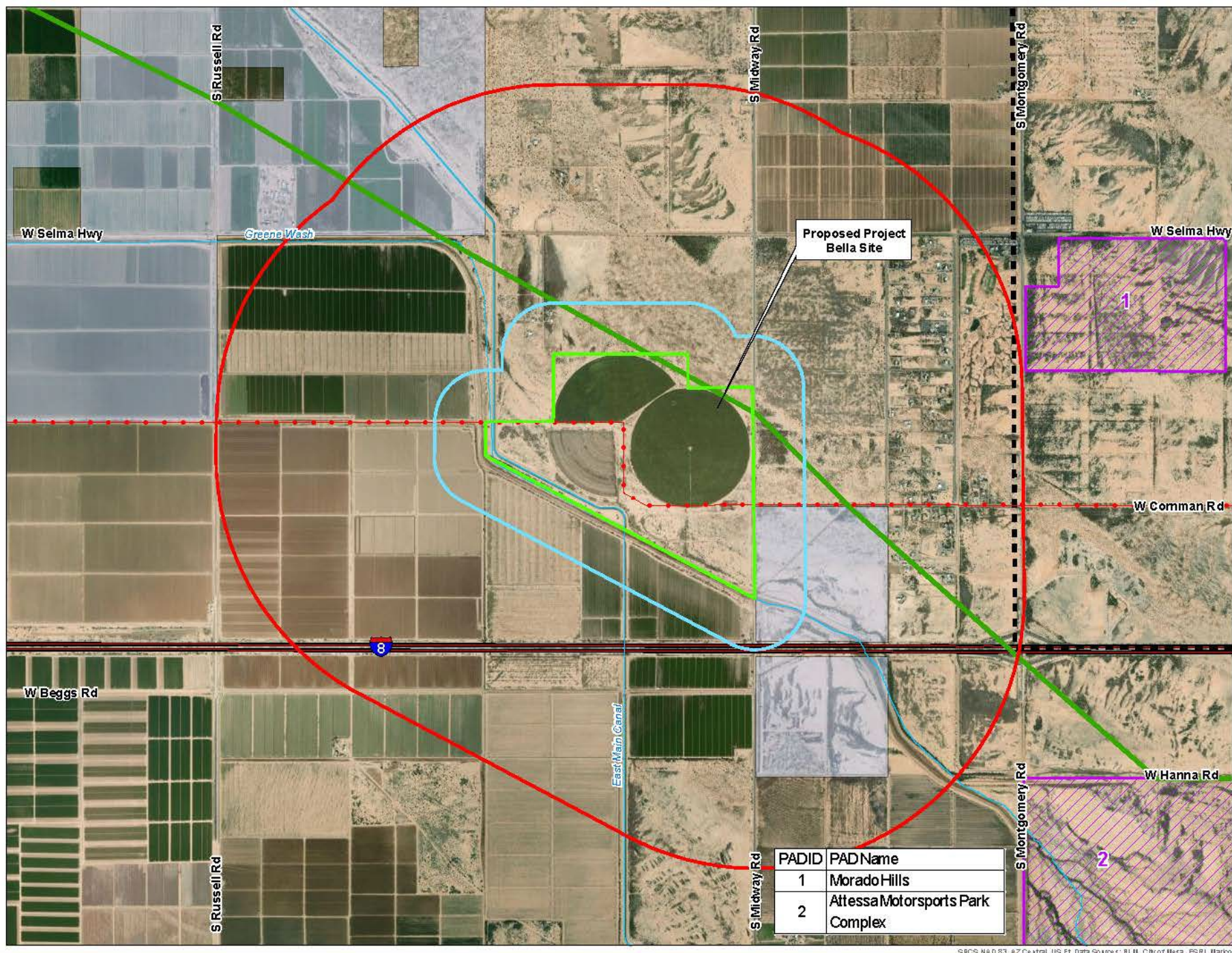
PROJECT bella

PROJECT BELLA
FIGURE H-1 PLANNED AREA DEVELOPMENTS

Map Extent: Pinal County, AZ

Date: 5/22/24 Author: dkum

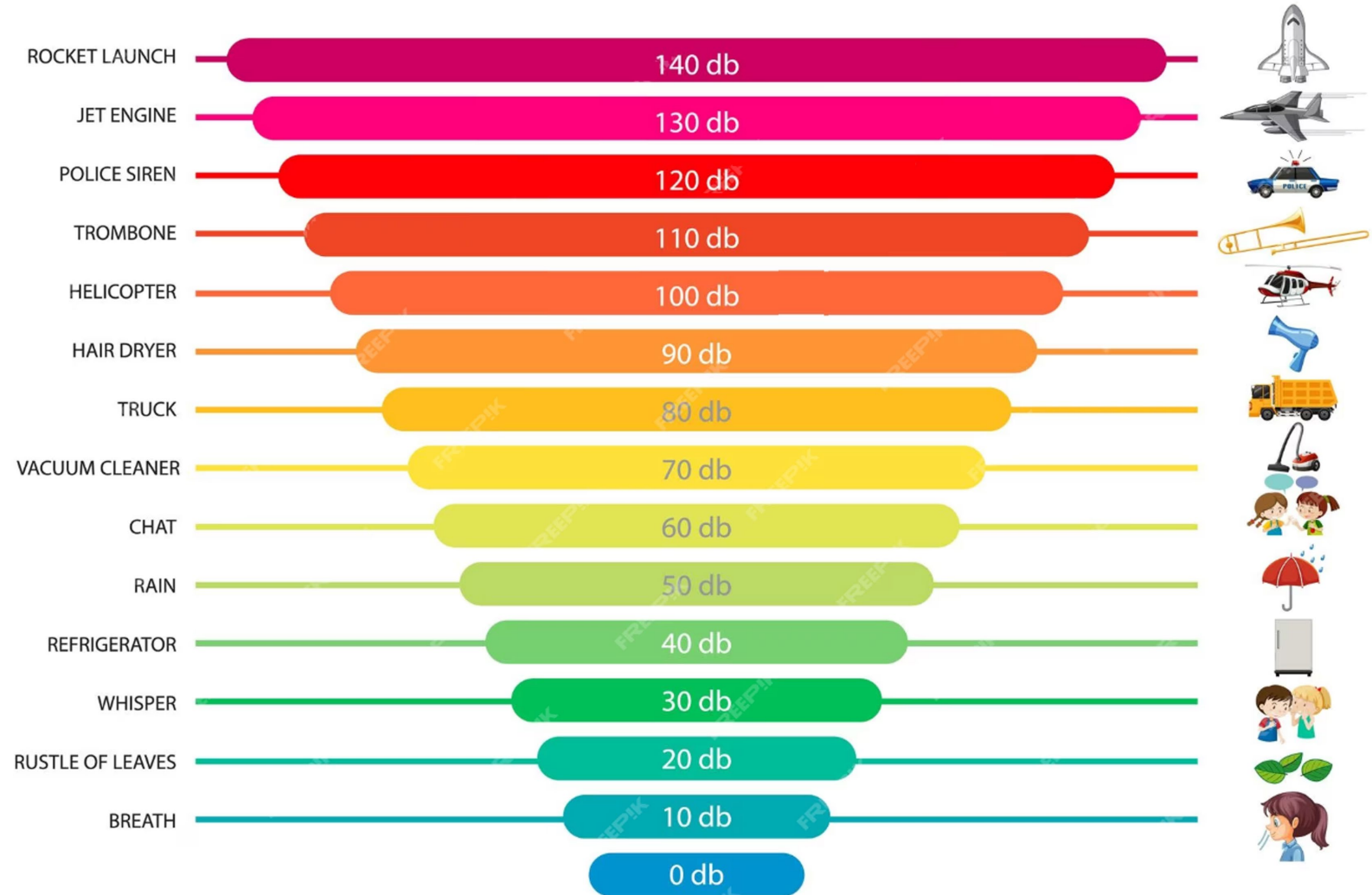
PADID	PAD Name
1	Morado Hills
2	Attessa Motorsports Park Complex



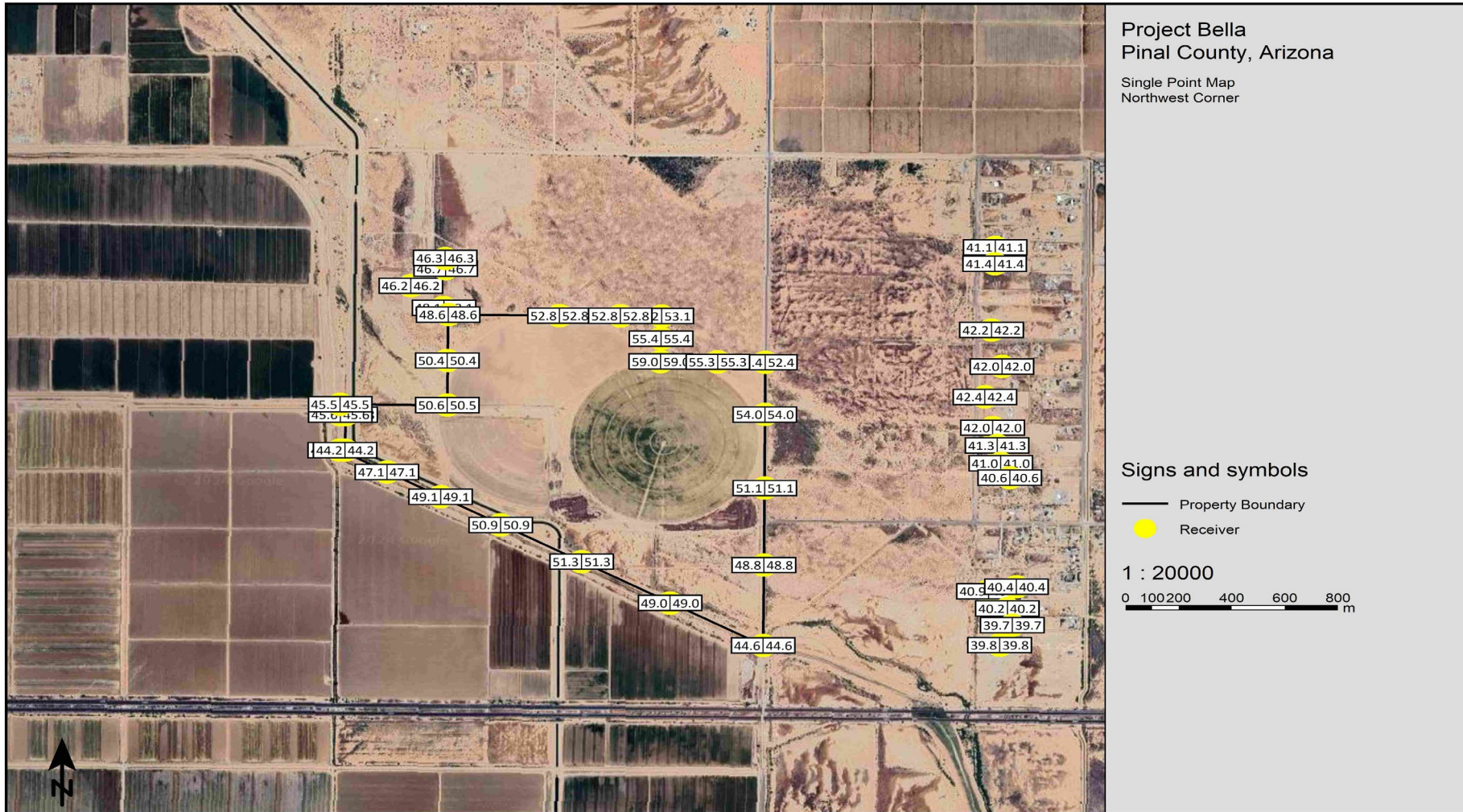
Noise and Communications

Anticipated Noise Levels and Potential Interference

Project Bella – Noise Impact



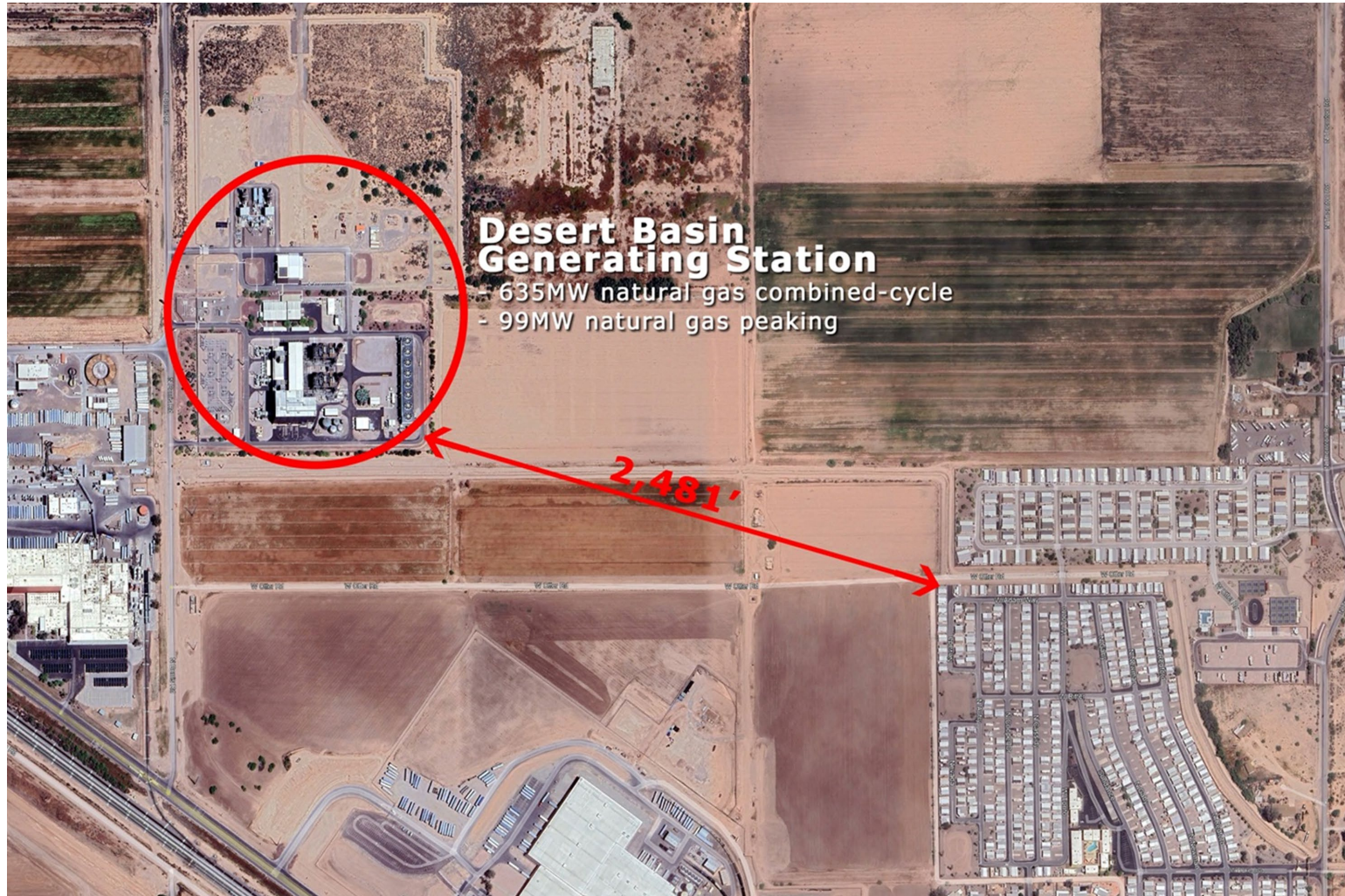
Project Bella - Noise Impact



Project Bella - Noise Impact



Project Bella - Noise Impact



Environmental Conclusions

Project is Environmentally Compatible

Summary of Environmental Compatibility

- No significant or detrimental effects to land use or jurisdictions
- No significant or detrimental effects to fish, wildlife, plant life, and associated forms of life upon which they are dependent
- No significant or detrimental effects to existing scenic areas, historic sites and structures, or archaeological sites at or in the vicinity of the Project
- No plans for future development of recreational facilities associated with the Project or detrimental effects to area plans
- No significant or detrimental effects associated with noise emission levels and interference with communication signals

The Project is environmentally compatible with the total environment of the area

Statutory Notice

Publication, Posting, Affected Jurisdictions

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

Docket No. L-21314A-24-0144-00233

Case No. 233

IN THE MATTER OF THE APPLICATION OF PINAL COUNTY ENERGY CENTER, LLC, IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES 40-360 ET. SEQ., FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING THE CONSTRUCTION OF A 480 MW NATURAL GAS-FIRED, SIMPLE CYCLE, PEAKING POWER GENERATING FACILITY LOCATED NEAR CASA GRANDE, ARIZONA, IN PINAL COUNTY.

NOTICE OF HEARING

A PUBLIC HEARING WILL BE HELD before the Arizona Power Plant and Transmission Line Siting Committee ("Committee") regarding the Application of Pinal County Energy Center LLC, for a Certificate of Environmental Compatibility ("CEC") authorizing construction of a **480 MW natural gas-fired, simple cycle, peaking power generating facility** ("Project Bella" or "Project") located in Sections 1 and 12, Township 7 South, Range 4 East, lying westerly of and adjacent to Midway Road in unincorporated Pinal County, Arizona. A map of the location of Project Bella is attached here as "Exhibit A"

The hearing will be held at the **Francisco Grande Hotel and Golf Resort**, located at 12684 W Gila Bend Highway, Casa Grande, AZ 85193, Telephone: 520-836-6444. The hearing will begin on **Monday, August 12, 2024 at 1:00 p.m. and continue as necessary on August 13, 14, 15, and 16, 2024 at 9:00 a.m. each day.** The hearing will adjourn at approximately 5:00 p.m. each day or earlier at the discretion of the Committee Chairman. If any revisions to the hearing schedule are required, they will be noticed on the Project website at: <https://projectbellaaz.com> and on the Arizona Corporation Commission ("ACC") website at: <https://www.azcc.gov/arizona-power-plant/meeting-schedule>

PUBLIC COMMENT WILL BE TAKEN AT A SPECIAL EVENING SESSION ON AUGUST 12, 2024, AT 5:30 P.M., VIA TELEPHONE OR IN PERSON AT FRANCISCO GRANDE HOTEL AND GOLF RESORT, 12684 W GILA BEND HIGHWAY, CASA GRANDE, AZ 85193. PUBLIC COMMENT MAY ALSO BE TAKEN AT OTHER TIMES DURING THE HEARING AT THE DISCRETION OF THE COMMITTEE CHAIRMAN.

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

THE PUBLIC HAS THE OPTION TO PARTICIPATE BY EITHER WATCHING THE HEARING ONLINE, LISTENING TO THE HEARING VIA TELEPHONE, OR ATTENDING IN PERSON. At least 24 hours in advance of the hearing, information regarding online and telephone hearing access, as well as any additional details regarding safety protocols or other revisions to the hearing schedule will be noticed on the Project website at <https://projectbellaaz.com>. The Chairman may, at his discretion, recess the hearing to a time and place to be announced during the hearing, or to be determined after the recess. The date, time and place at which the hearing will be resumed will be posted on the above-noted Project website and the ACC website.

NOTE: NOTICE OF ANY SUCH RESUMED HEARING WILL BE GIVEN; HOWEVER, PUBLISHED NOTICE OF SUCH RESUMED HEARING IS NOT REQUIRED.

If the Committee decides to conduct a tour, notice that includes a map and itinerary of any such tour will be available at the hearing and posted on the Project and ACC websites. Members of the public may follow the Committee on the tour. During the tour, the Committee may hear testimony at stops concerning elements of the Project. No other discussion or deliberation concerning the Application will occur during the tour. A court reporter or recording device will record any testimony taken on the tour for transcription. Public health and safety protocols specific for the tour will be included on the itinerary.

Copies of the Application, containing detailed maps of the Project site and detailed information about the proposed facilities will be available for inspection at the following locations:

- Docket Control Center of the ACC Phoenix Office at 1200 West Washington Street, Suite 108, Phoenix, AZ 85007
- Casa Grande Public Library – 449 N Drylake St, Casa Grande, AZ 85122
- Arizona City Community Library – 13254 Sunland Gin Rd, Arizona City, AZ 85123
- Project Bella website: <https://projectbellaaz.com>

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

Each county and municipal government and state agency interested in the Project and desiring to be a party to the proceedings shall, not less than ten days before the date set for hearing, file with the Director of Utilities, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, Arizona 85007 a notice of intent to be a party.

Any domestic non-profit corporation or association formed in whole or in part to promote conservation of natural beauty, to protect the environment, personal health or other biological values, to preserve historical sites, to promote consumer interests, to represent commercial and industrial groups, or to promote the orderly development of the area in which the Project are to be located and desiring to become a party to the proceedings shall, not less than ten (10) days before August 12, 2024, file with the Director of Utilities, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, Arizona 85007 a notice of intent to be a party.

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

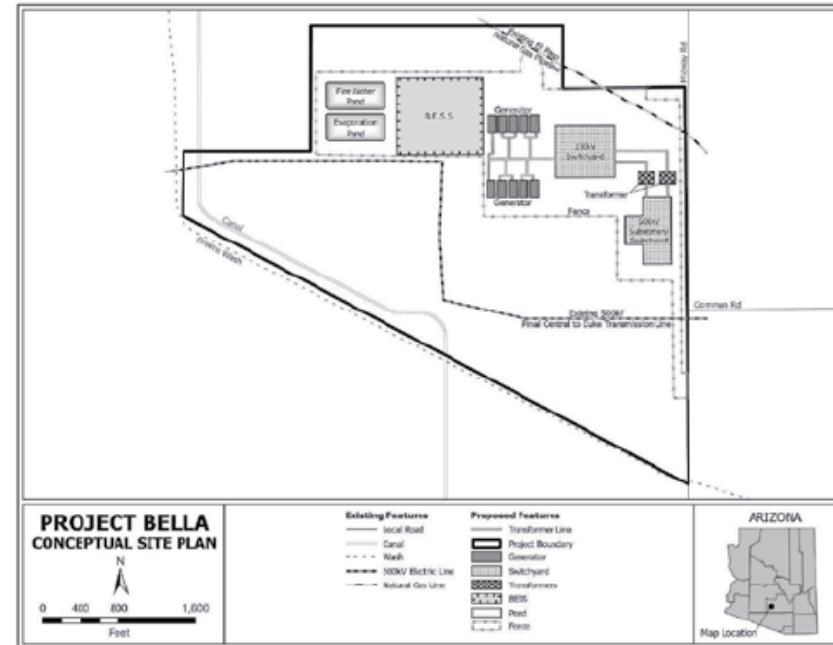
This proceeding is governed by Arizona Revised Statutes §§ 40-360 to 40-360.13 and Arizona Administrative Code R14-3-201 to R14-3-220. No substantive communication not in the public record may be made to any member of the Committee. The written decision of the Committee will be submitted to the Arizona Corporation Commission pursuant to Arizona Revised Statutes § 40-360.07. Any person intending to be a party to the proceedings on these matters before the Arizona Corporation Commission must be a party to the proceedings before the Committee.

ORDERED this 28th day of June, 2024.

/s/Adam Stafford

Adam Stafford, Chairman
ARIZONA POWER PLANT AND TRANSMISSION
LINE SITING COMMITTEE

EXHIBIT A



No. of publications: 2; dates of publication: Jul. 4, 6, 2024.



Notice of Filing

Affected Jurisdictions and Public Availability of CEC

Public Process

Public and Stakeholder Involvement

Notice of Filing

Affected Jurisdictions

- Pinal County Board of Supervisors

Public Availability

- Arizona Corporation Commission
 - 1200 West Washington St Suite 108, Phoenix, AZ
- Casa Grande Public Library
 - 499 N Drylake Rd, Casa Grande, AZ
- Arizona City Community Library
 - 13254 Sunland Gin Rd, Arizona City, AZ

First Open House

- Two Virtual Open Houses on April 29, 2024
 - 12:00 PM – Four members of the public attended, and seven live chat questions/comments were submitted
 - 5:30 PM – Three members of the public attended, and eight live chat questions/comments were submitted
- In-Person Open House on April 30, 2024
 - Francisco Grande Hotel and Golf Resort
 - 65 members of the public attended
 - Received 15 comment forms

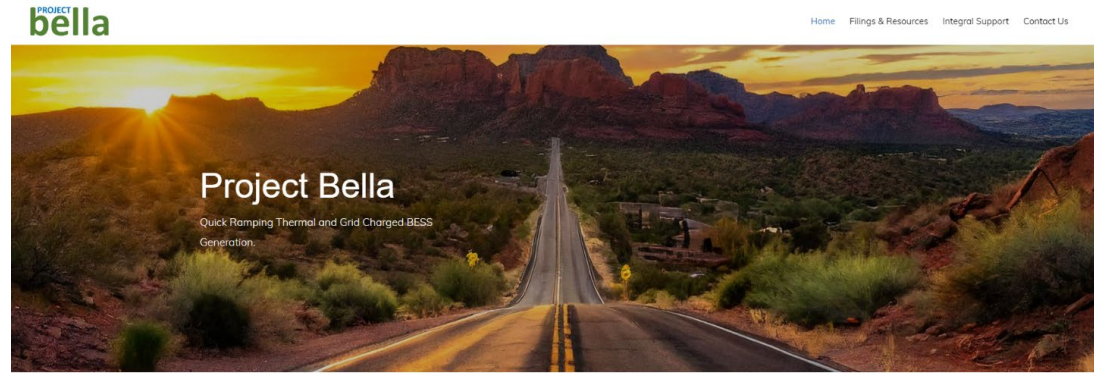


Second Open House

- Two Virtual Open Houses on July 22, 2024
 - 12:00 PM – No Attendees
 - 5:30 PM – Five members of the public attended, and eight live chat questions/comments were submitted
- In-Person Open House on July 23, 2024
 - Francisco Grande Hotel and Golf Resort
 - 12 members of the public attended
 - Received 1 comment form



Website



Project Overview

The total site, located on approximately 350 acres in Pinal County Arizona, will consist of two independent generation facilities. Cazador del Sol, 480 MW of thermal gas-fired generation; Atrapa Soles, 440 MW of Battery Energy Storage in which the facilities will utilize a common, shared



Project Overview

The total site, located on approximately 350 acres in Pinal County Arizona, will consist of two independent generation facilities. Cazador del Sol, 480 MW of thermal gas-fired generation; Atrapa Soles, 440 MW of Battery Energy Storage in which the facilities will utilize a common, shared interconnection to the 500 kV Duke – Pinal Central line. The interconnection to the 500 kV system will provide ideal deliverability to the Arizona load during peak periods and utilize excess solar renewable energy from the grid during low demand periods for battery charging and load shifting. The project may be developed in phases to accommodate the capacity and associated energy requirements of the off-takers. Commercial Operation is planned for late 2027 or early 2028.

FREQUENCY REGULATION

The Projects will provide system reliability through quick dispatch and automatic generation control technology.

PEAK SHAVING

The Projects maintain reliable capacity that can be deployed to provide low-cost electricity and minimize wholesale market price risk.

LOAD SHIFTING

The Projects are specifically designed to manage electricity demand and assist with efficient intra-day balancing.



Project Postcards

April 2024

PROJECT bella

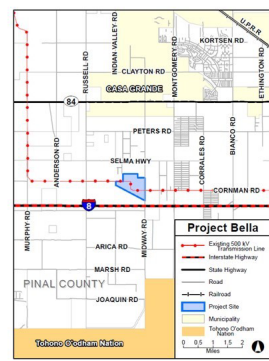
Seguro Energy is developing the proposed Project Bella (Project) which includes 480 MW of thermal gas-fired generation and 440 MW of Battery Energy Storage utilizing a shared transmission interconnection to the existing 500 kV Duke – Pinal Central transmission line. The transmission interconnection to the 500 kV system will provide deliverability to the Arizona load during peak periods and utilize excess solar renewable energy from the grid during low demand periods for battery charging and load shifting.

This Project is designed to provide reliable capacity for integration of renewable energy and deficits impacted by near-term coal retirements while exceeding the sustainability goals identified by SRP and TEP. The proposed Project is expected to reach commercial operations in late 2027 to early 2028.

Seguro Energy will be hosting the following:

In-Person Open House
April 30, 2024, 4:30-6:30 p.m.
 Francisco Grande Hotel and Golf Resort, Ocotillo Room
 12684 W Gila Bend Hwy, Casa Grande, AZ 85193

Virtual Open House (two sessions)
April 29, 2024, 12:00 p.m. and 5:30 p.m.
 Please visit www.signupgenius.com/go/10C0C45ABA622A1FAC25-48838410-project to register for the virtual open house. The information presented will be the same for all open house sessions.



Please visit <https://projectbellaaz.com/> or call 1-833-815-4853 for more information.

280 Melba Rd
Encinitas, CA 92024

Seguro Energy is also preparing an application for a Certificate of Environmental Compatibility (CEC) to be filed with the Arizona Corporation Commission (ACC) in July 2024. The CEC process includes public hearings with the Arizona Power Plant and Transmission Line Siting Committee before seeking final approval from the ACC. Hearings before the Committee will occur in August 2024.

Information about the Project, the CEC filing, and the hearings will be posted to the website as information becomes available.

For more information:
 Please visit <https://projectbellaaz.com/> or call 1-833-815-4853

Stamp

Mailing Label



July 2024

PROJECT bella

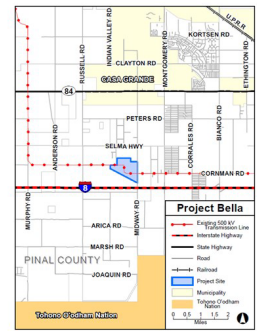
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This Project is designed to provide reliable capacity for integration of renewable energy and deficits impacted by near-term coal retirements while exceeding the sustainability goals identified by SRP and TEP. The proposed Project is expected to reach commercial operations in late 2027 to early 2028.

Seguro Energy will be hosting the following:

In-Person Open House
July 23, 2024, 4:30-6:30 p.m.
 Francisco Grande Hotel and Golf Resort, Ocotillo Room
 12684 W Gila Bend Hwy, Casa Grande, AZ 85193

Virtual Open House (two sessions-registration required)
July 22, 2024, 12:00 p.m. and 5:30 p.m.
 Please scan the QR code or use this Sign-Up Genius link <https://rb.gy/ymc0rp> to register for any open houses. The information presented will be the same for all sessions.



280 Melba Rd
Encinitas, CA 92024

Seguro Energy has recently submitted an application for a Certificate of Environmental Compatibility (CEC) with the Arizona Corporation Commission (ACC). The CEC process includes public hearings with the Arizona Power Plant and Transmission Line Siting Committee before seeking final approval from the ACC. Hearings before the Committee will occur as follows:

Committee Hearings
 Commencing on August 12, 2024 at 1:00 p.m. & August 13-16, 2024 at 9:00 am (as necessary) with a Public Comment Session August 12, 2024 at 5:30 p.m. located at the Francisco Grande Hotel and Golf Resort 12684 W Gila Bend Highway, Casa Grande, AZ 85193

Registration not required to attend Committee Hearings

In addition, to accommodate the proposed development, Seguro Energy is filing applications with Pinal County to amend the Project site's Pinal County Comprehensive Plan land use designation to General Public Facilities/Service and the site's zoning from GR to I-3. You will receive additional public meeting notices when these applications are scheduled for public hearings.

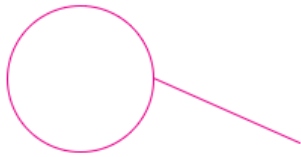
Please visit <https://projectbellaaz.com/> or call 1-833-815-4853 for more information.

Stamp

Mailing Label



Project Door Hangers



PROJECT bella

Seguro Energy is developing the proposed Project Bella (Project) which includes 480 MW of thermal gas-fired generation and 440 MW of Battery Energy Storage utilizing a shared transmission interconnection to the existing 500 kV Duke – Pinal Central transmission line. The transmission interconnection to the 500 kV system will provide deliverability to the Arizona load during peak periods and utilize excess solar renewable energy from the grid during low demand periods for battery charging and load shifting.

Seguro Energy will be hosting the following:
In-Person Open House

April 30, 2024, 4:30-6:30 p.m.
Francisco Grande Hotel and Golf Resort, Ocotillo Room
12684 W Gila Bend Hwy, Casa Grande, AZ 85193

For those that cannot attend in person:
Virtual Open House (two sessions)
April 29, 2024, 12:00 p.m. and 5:30 p.m.

Please visit this link to register for the virtual open house:
www.signupgenius.com/go/10C0C45ABA622A1FAC25-48838410-project



For more information:
Please visit <https://projectbellaaz.com/>
or call 1-833-815-4853

Español

Seguro Energy está desarrollando la propuesta para el proyecto "Project Bella" que incluye 480 MW de generación térmica con base en gas natural y 440 MW de Almacenamiento de Energía en Baterías utilizando una interconexión de transmisión compartida en la línea de transmisión existente de 500kV Duke – Pinal. La interconexión al sistema de transmisión de 500 kV brindará capacidad de entrega a la demanda ubicada en Arizona durante los períodos de alta demanda y utilizará el exceso de energía solar renovable de la red durante los períodos de baja demanda para cargar las baterías y poder hacer la entrega de esta cuando se necesite load shifting.

Seguro Energy será el anfitrión de los siguientes eventos:

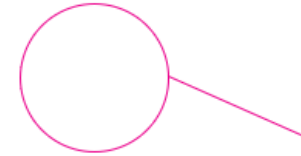
Presencial
Abril 30, 2024, 4:30-6:30 p.m.
Francisco Grande Hotel and Golf Resort, Ocotillo Room
12684 W Gila Bend Hwy, Casa Grande, AZ 85193

Para quienes no pueden asistir en persona:
Virtual (dos sesiones)
Abril 29, 2024, 12:00 p.m. y 5:30 p.m.

Por favor visitar el siguiente enlace para registrarse en el evento virtual: www.signupgenius.com/go/10C0C45ABA622A1FAC25-48838410-project



Para más información:
Favor de visitar <https://projectbellaaz.com/>
o llamar 1-833-815-4853



PROJECT bella

Seguro Energy is developing the proposed Project Bella (Project) which includes 480 MW of thermal gas-fired generation and 440 MW of Battery Energy Storage utilizing a shared transmission interconnection to the existing 500 kV Duke – Pinal Central transmission line. The transmission interconnection to the 500 kV system will provide deliverability to the Arizona load during peak periods and utilize excess solar renewable energy from the grid during low demand periods for battery charging and load shifting.

Seguro Energy will be hosting the following:
In-Person Open House

July 23, 2024, 4:30-6:30 p.m.
Francisco Grande Hotel and Golf Resort, Ocotillo Room
12684 W Gila Bend Hwy, Casa Grande, AZ 85193

For those that cannot attend in person:
Virtual Open House (two sessions)
July 22, 2024, 12:00 p.m. and 5:30 p.m.

Please visit this link to register for the virtual open house:
<https://rb.gy/vnc0rp>

In addition, to accommodate the proposed development, Seguro Energy is filing applications with Pinal County to amend the Project site's Pinal County Comprehensive Plan land use designation to General Public Facilities/Service and the site's zoning from GR to I-3. You will receive additional public meeting notices when these applications are scheduled for public hearings.



For more information:
Please visit
<https://projectbellaaz.com/>
or call 1-833-815-4853

Español

Seguro Energy está desarrollando la propuesta para el proyecto "Project Bella" que incluye 480 MW de generación térmica con base en gas natural y 440 MW de Almacenamiento de Energía en Baterías utilizando una interconexión de transmisión compartida en la línea de transmisión existente de 500kV Duke – Pinal. La interconexión al sistema de transmisión de 500 kV brindará capacidad de entrega a la demanda ubicada en Arizona durante los períodos de alta demanda y utilizará el exceso de energía solar renovable de la red durante los períodos de baja demanda para cargar las baterías y poder hacer la entrega de esta cuando se necesite load shifting.

Seguro Energy será el anfitrión de los siguientes eventos:

Presencial
Julio 23, 2024, 4:30-6:30 p.m.
Francisco Grande Hotel and Golf Resort, Ocotillo Room
12684 W Gila Bend Hwy, Casa Grande, AZ 85193

Para quienes no pueden asistir en persona:
Virtual (dos sesiones)
Julio 22, 2024, 12:00 p.m. y 5:30 p.m.

Por favor visitar el siguiente enlace para registrarse en el evento virtual:
<https://rb.gy/vnc0rp>

Además, para acomodar el desarrollo del proyecto propuesto, Seguro Energy está presentando aplicaciones con el Condado de Pinal para enmendar la designación del sitio del proyecto del Plan Integral del Condado de Pinal para el uso de la tierra e Instalaciones/Servicios Públicos Generales y la designación de la zona del sitio de GR a I-3. Usted recibirá avisos adicionales de reuniones públicas cuando estén agendadas para reuniones públicas.



Para más información:
Favor de visitar
<https://projectbellaaz.com/>
o llamar 1-833-815-4853

Social Media Ads

The image shows a screenshot of a Facebook page for "Project Bella AZ - Energy Supplier". The page features a cover photo of a desert road at sunset. The profile picture is a circular logo with the text "PROJECT bella". The page name is "Project Bella AZ - Energy Supplier" with 22 likes and 71 followers. The navigation bar includes "Following", "Message", and "Search". The main content area is divided into "Intro" and "Posts".

Intro

- Page · Energy Company
- Intersection of W. Comman Rd & S, Midway Rd Casa Grande, AZ
- projectbellaaz.com
- Not yet rated (0 Reviews)

Photos [See all photos](#)

Posts [Filters](#)

Project Bella AZ - Energy Supplier
June 5 at 6:49 PM · 🌐

Located in Pinal County Arizona, will consist of two independent generation facilities. Cazador del Sol, 480 MW of thermal gas-fired generation; Atrapa Soles, 440 MW of Battery Energy Storage in which the facilities will utilize a common, shared interconnection to the 500 kV Duke – Pinal Central line.

The interconnection to the 500 kV system will provide ideal deliverability to the Arizona load during peak periods and utilize excess solar renewable energy from the grid duri... [See more](#)

Like Comment Send Share

Write a comment...

Project Bella AZ - Energy Supplier
June 5 at 6:44 PM · 🌐

Ubicado en el condado de Pinal, Arizona, constará de dos instalaciones de generación independientes. Cazador del Sol, 480 MW de generación térmica con base en gas y Atrapa Soles, 440 MW de Almacenamiento de Energía en Baterías las cuales utilizarán una interconexión común a la línea 500 kV Duke – Pinal Central.

La interconexión al sistema de 500 kV proporcionará una capacidad de entrega ideal a la demanda de Arizona durante los períodos pico y utilizará el exceso de energía ... [See more](#)

Like Comment Send Share

Write a comment...

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Thank you!

PCE-9

Form of Proposed CEC

1	Leonard Drago	Designee for Director, Arizona Department of Environmental Quality
2		
3	David French	Designee for Director, Arizona Department of Water Resources
4		
5	Nicole Hill	Designee for Director, Energy Office of the Department of Commerce
6	David Kryder	Appointed Member, representing Agriculture
7	Roman Fontes	Appointed Member, representing Counties
8	Scott Sommers	Appointed Member, representing Cities and Towns
9	Jon Gold	Appointed Member, representing General Public
10	Margaret “Toby” Little	Appointed Member, representing General Public
11	David Richins	Appointed Member, representing General Public
12		

13 Applicant was represented by Jason Y. Moyes of Moyes Sellers & Hendricks Ltd. No
14 parties requested intervention pursuant to A.R.S. § 40-360.05.

15 At the conclusion of the hearing, the Committee, after considering the (i) Application,
16 (ii) evidence, testimony, and exhibits presented by the Applicant, and (iii) comments of the
17 public, and being advised of the legal requirements of A.R.S. §§ 40-360 through 40-360.13, upon
18 motion duly made and seconded, voted ___ to ___ to grant the Applicant, its successors and
19 assigns, this Certificate of Environmental Compatibility (“CEC” or “Certificate”) for
20 construction of the Project Bella Generation and Battery Storage Project (“Project”) as described
21 below.

22 **B. PROJECT DESCRIPTION**

23 The Project is a proposed 480 megawatt (MW) natural gas-fired electric generation
24 facility consisting of up to ten separate GE LM6000 simple-cycle gas combustion turbines, each
25 with a nameplate capacity of approximately 48 MW, located on approximately 350 acres of
26 private property in Sections 1 and 12, Township 7 South, Range 4 East, in unincorporated Pinal

1 County, Arizona, south of the City of Casa Grande. Also included on the Project site will be an
2 independent grid-charged 440 MW battery energy storage system (BESS) that, together with the
3 gas generation facility, will interconnect to the grid via the existing 500 kV Pinal Central to Duke
4 transmission line and the WAPA 230 kV Test Track to ED5 transmission line, both of which
5 intersect the Project site. Natural gas will be supplied via the existing El Paso Natural Gas
6 (“EPNG”) pipeline that also intersects the Project site. A map and depiction of the proposed
7 Project facilities is shown on **Exhibit A**.

8 **CONDITIONS**

9 This Certificate is granted upon the following conditions:

10 1. This authorization to construct the Project shall expire ten (10) years from the date
11 this Certificate is approved by the Arizona Corporation Commission, with or without
12 modification. Construction of the Project shall be complete, such that the Project is in service
13 within this ten-year timeframe. However, prior to the expiration of the time period, the Applicant
14 may request that the Commission extend the time period. [CEC 229]

15 2. In the event that the Project requires an extension of the term(s) of this CEC prior
16 to completion of construction, the Applicant shall file such time extension request at least one
17 hundred and eighty (180) days prior to the expiration of the Certificate. The Applicant shall use
18 reasonable means to promptly notify the Board of Supervisors of Pinal County, all landowners
19 and residents within a two (2) mile radius of the Project, all persons who made public comment
20 at this proceeding who provided a mailing or email address, and all parties to this proceeding.
21 The notification provided will include the request and the date, time, and place of the hearing or
22 open meetings during which the Commission will consider the request for extension.
23 Notification shall be no more than three (3) business days after the Applicant is made aware of
24 the hearing date or the open meeting date. [Case 229]

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

- 7 a. All applicable land use regulations;
8 b. All applicable zoning stipulations and conditions, including but not limited
9 to landscaping and dust control requirements;
10 c. All applicable water use, discharge and/or disposal requirements of the
11 Arizona Department of Water Resources and the Arizona Department of Environmental Quality;
12 d. All applicable noise control standards; and
13 e. All applicable regulations governing storage and handling of hazardous
14 chemicals and petroleum products. [CEC 229]

15 4. The Applicant shall obtain all approvals and permits necessary to construct,
16 operate and maintain the Project required by any governmental entity having jurisdiction
17 including, but not limited to, the United States of America, the State of Arizona, Pinal County,
18 and their agencies and subdivisions. [CEC 229]

19 5. The Applicant shall comply with the Arizona Game and Fish Department
20 (“AGFD”) guidelines for handling protected animal species, should any be encountered during
21 construction and operation of the Project, and shall consult with AGFD or U.S. Fish and Wildlife
22 Service, as appropriate, on other issues concerning wildlife. [CEC 229]

23 6. The Applicant shall design the Project’s interconnection facilities to incorporate
24 reasonable measures to minimize electrocution of and impacts to avian species in accordance
25 with the Applicant’s avian protection program. Such measures will be accomplished through
26

1 incorporation of Avian Power Line Interaction Committee guidelines set forth in the current
2 versions of *Suggested Practices for Avian Protection on Power Lines and Reducing Avian*
3 *Collisions with Power Lines manuals*. [CEC 229]

4 7. The Applicant shall consult the State Historic Preservation Office (“SHPO”)
5 pursuant to A.R.S. §§ 41-861 through 864, the State Historic Preservation Act. Construction for
6 the project shall not occur without SHPO concurrence. Any project involving federal land is a
7 federal undertaking and requires SHPO concurrence on the adequacy of the survey and area of
8 potential effects. The applicant shall coordinate with SHPO regarding the status of Section 106
9 consultation.

10 8. If any archaeological, paleontological, or historical site or a significant cultural
11 object is discovered on private, state, county or municipal land during the construction or
12 operation of the Project, the Applicant or its representative in charge shall promptly report the
13 discovery to the Director of the Arizona State Museum (“ASM”), and in consultation with the
14 Director, shall immediately take all reasonable steps to secure and maintain the preservation of
15 the discovery as required by A.R.S. §§ 41-844 or 41-865, as appropriate.

16 9. The Applicant shall comply with the notice and salvage requirements of the
17 Arizona Native Plant Law (A.R.S. §§ 3-901 *et seq.*) and shall, to the extent feasible, minimize
18 the destruction of native plants during the construction and operation of the Project. [CEC 229]

19 10. The Applicant shall make every reasonable effort to promptly investigate, identify
20 and correct, on a case-specific basis, all complaints of interference with radio or television
21 signals from operation of the Project addressed in this Certificate and where such interference is
22 caused by the Project take reasonable measures to mitigate such interference. The Applicant
23 shall maintain written records for a period of five (5) years of all complaints of radio or television
24 interference attributable to operations, together with the corrective action taken in response to
25 each complaint. All complaints shall be recorded to include notation on the corrective action
26

1 taken. Complaints not leading to a specific action or for which there was no resolution shall be
2 noted and explained. Upon request, the written records shall be provided to the Staff of the
3 Commission. The Applicant shall respond to complaints and implement appropriate mitigation
4 measures. In addition, the Project shall be evaluated on a regular basis so that damaged insulators
5 or other line materials that could cause interference are repaired or replaced in a timely manner.

6 [CEC 229]

7 11. If human remains and/or funerary objects are encountered during the course of any
8 ground-disturbing activities related to the construction or maintenance of the Project, the
9 Applicant shall cease work on the affected area of the Project and notify the Director of the ASM
10 as required by A.R.S. § 41-865 for private land, or as required by A.R.S. § 41-844 for state,
11 county, or municipal lands. [CEC 229]

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

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

20
21 Such signs shall be inspected at least once annually and, if necessary, be repaired or
22 replaced, and removed at the completion of construction.

23 The Applicant shall make every reasonable effort to communicate the decision either
24 approving or disapproving the Certificate in digital media. [CEC 229]

25 13. At least ninety (90) days before construction commences on the Project, the
26 Applicant shall provide the Board of Supervisors for Pinal County, and known builders and

1 developers who are building upon or developing land within one (1) mile of the of Project with
2 a written description, including the approximate height and width measurements of all structure
3 types, of the Project. The written description shall identify the location of the Project and contain
4 a pictorial depiction of the facilities being constructed. The Applicant shall also encourage the
5 developers and builders to include this information in their disclosure statements. Upon approval
6 of this Certificate by the Commission, the Applicant may commence construction of the Project.

7 [CEC 229]

8 14. The Applicant shall use non-specular conductor and non-reflective surfaces for the
9 transmission line structures on the Project. [CEC 229]

10 15. The Applicant shall be responsible for arranging that all field personnel involved
11 in the Project receive training as to proper ingress, egress, and on-site working protocol for
12 environmentally sensitive areas and activities. Contractors employing such field personnel shall
13 maintain records documenting that the personnel have received such training. [CEC 229]

14 16. The Applicant shall follow the most current Western Electricity Coordinating
15 Council (“WECC”) and North American Electric Reliability Corporation (“NERC”) planning
16 standards, as approved by the Federal Energy Regulatory Commission (“FERC”), National
17 Electrical Safety Code (“NESC”) standards, and Federal Aviation Administration (“FAA”)
18 regulations. [CEC 229]

19 17. The Applicant shall participate in good faith in state and regional transmission
20 study forums to coordinate transmission expansion plans related to the Project and to resolve
21 transmission constraints in a timely manner. [CEC 229]

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

24 a. Ensure grounding and cathodic protection studies are performed to show
25 that the Project’s location parallel to and within one hundred (100) feet of such pipeline results
26

1 in no material adverse impacts to the pipeline or to public safety when both the pipeline and the
2 Project are in operation. The Applicant shall take appropriate steps to ensure that any material
3 adverse impacts are mitigated. The Applicant shall provide to Staff of the Commission, and file
4 with Docket Control, a copy of the studies performed and additional mitigation, if any, that was
5 implemented as part of its annual compliance-certification letter, and
6

7 b. Ensure that studies are performed simulating an outage of the Project that
8 may be caused by the collocation of the Project parallel to and within one hundred (100) feet of
9 the existing natural gas or hazardous liquid pipeline. The studies should either: (a) show that
10 such simulated outage does not result in customer outages, or (b) include operating plans to
11 minimize any resulting customer outages. The Applicant shall provide a copy of the study results
12 to Staff of the Commission and file them with Docket Control as part of the Applicant's annual
13 compliance certification letter. [CEC 229]

14 19. The Applicant shall submit a compliance certification letter annually, identifying
15 progress made with respect to each condition contained in this Certificate, including which
16 conditions have been met. The letter shall be submitted to Commission's Docket Control
17 commencing on December 1, 2025. Attached to each certification letter shall be documentation
18 explaining how compliance with each condition was achieved. Copies of each letter, along with
19 the corresponding documentation, shall be submitted to the Arizona Attorney General's Office.
20 With respect to the Project, the requirement for the compliance letter shall expire on the date the
21 Project is placed into operation. Notification of such filing with Docket Control shall be made
22 to the Board of Supervisors for Pinal County, all parties to this Docket, and all parties who made
23 a limited appearance in this Docket. [CEC 229]

24 20. The Applicant shall provide a copy of this Certificate to the Board of Supervisors
25 for Pinal County. [CEC 229]
26

1 21. Any transfer or assignment of this Certificate shall require the assignee or
2 successor to assume, in writing, all responsibilities of the Applicant listed in this Certificate and
3 its conditions as required by A.R.S. § 40-360.08(A) and R14-3-213(F) of the Arizona
4 Administrative Code. [CEC 229]

5 22. In the event the Applicant, its assignee, or successor, seeks to modify the
6 Certificate’s terms at the Commission, it shall provide copies of such request to the Board of
7 Supervisors for Pinal County, all parties to this Docket, and all parties who made a limited
8 appearance in this Docket. [CEC 229]

9 23. The Certificate Conditions shall be binding on the Applicant, its successors,
10 assignee(s) and transferees, and any affiliates, agents, or lessees of the Applicant who have a
11 contractual relationship with the Applicant concerning the construction, operation, maintenance
12 or reclamation of the Project. The Applicant shall provide in any agreement(s) or lease(s)
13 pertaining to the Project that the contracting parties and/or lessee(s) shall be responsible for
14 compliance with the Conditions set forth herein, and the Applicant’s responsibilities with respect
15 to compliance with such Conditions shall not cease or be abated by reason of the fact that the
16 Applicant is not in control of or responsible for operation and maintenance of the Project
17 facilities. [CEC 229]

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

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

20 1. The Project aids the state and the southwest region of the United States in meeting
21 the need for an adequate, economical, and reliable supply of electric power. [CEC229]

22 2. When constructed in compliance with the conditions imposed in this Certificate,
23 the Project aids the state, preserving a safe and reliable electric transmission system within the
24 operating requirements of the balancing authority and the contractual off-taker. [CEC 299 and
25 CEC 221]

1 **CERTIFICATE OF MAILING**

2 Pursuant to A.A.C. R14-3-204, the **ORIGINAL** of the foregoing and 25 copies were
3 filed this _____ day of August, 2024 with:

4 **Utilities Division - Docket Control**

5 Arizona Corporation Commission
6 1200 West Washington Street
7 Phoenix, AZ 85007

8 **COPIES** of the above mailed this _____ day of _____, 2024 to:

9 Tom Van Flein, General Counsel
10 Arizona Corporation Commission
11 1200 W. Washington Street
12 Phoenix, Arizona 85007
13 TVanFlein@azcc.gov
14 *Counsel for Legal Division Staff*

15 Britton Baxter and Ranelle Paladino,
16 Directors
17 Utilities Division
18 Arizona Corporation Commission
19 1200 West Washington Street
20 Phoenix, Arizona 85007

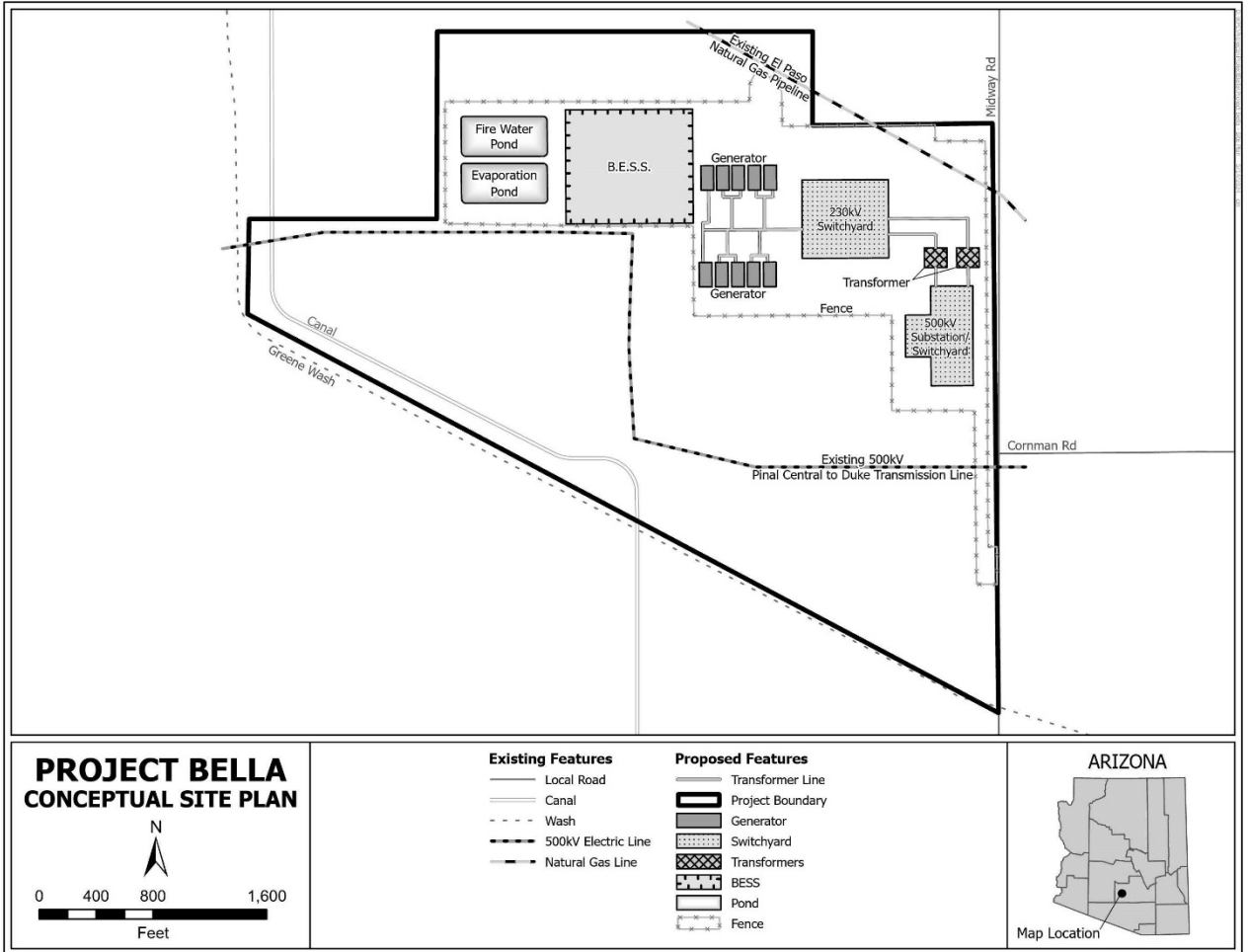
21 Lisa L. Glennie
22 Glennie Reporting Services, LLC
23 1555 East Orangewood
24 Phoenix, Arizona 85020
25 admin@glennie-reporting.com
26 *Court Reporter*

Jason Y. Moyes
Moyes Sellers & Hendricks
1850 N. Central Ave., Suite 1100
Phoenix, AZ 85004
jasonmoyes@law-msh.com
Attorney for Pinal County Energy Center, LLC

By _____

EXHIBIT A

1
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PCE-10

Affidavit of Publication of Notice of
Hearing

Affidavit of Publication

STATE OF ARIZONA
COUNTY OF PINAL

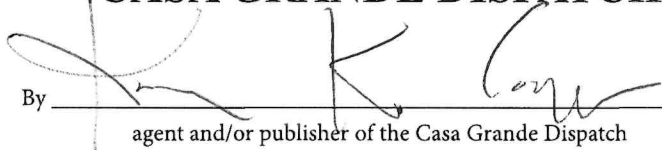


ss.

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

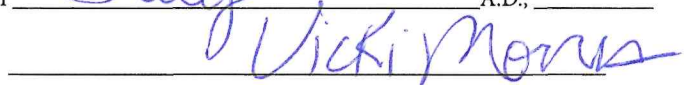
07/04/2024
07/06/2024

CASA GRANDE DISPATCH

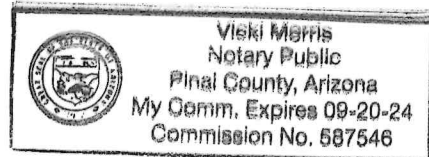
By  _____
agent and/or publisher of the Casa Grande Dispatch

Sworn to before me this 15th _____

day of July _____ A.D., _____



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



PCE-11

Summary of Public Outreach
Efforts and Social Media
Advertisement

Summary of Public Outreach Efforts

Applicant Pinal County Energy Center, LLC (the “Applicant”) conducted a multi-faceted public and agency involvement program. The public involvement program was conducted to provide local jurisdictions, relevant agencies, and community residents or property owners with the opportunity to receive information about Project Bella (“Project”) and communicate their feedback. To contact the potentially affected residents and agencies, the Applicant developed a multipronged approach to public involvement that included the following means of communication:

- Public Involvement
 - Informational postcard mailers
 - Door hangers
 - Project website
 - Social media advertisements/posting
 - Telephone information line
 - Virtual open houses
 - In-person open house

- Public Notice for CEC Hearings
 - Informational postcard mailer
 - Project website updates
 - Social media advertisement/posting
 - Newspaper advertisement
 - Public notice signs
 - Public viewing locations for the CEC application

- Agency Coordination
 - Tribal Consultation and Responses
 - Arizona Game and Fish Department (AZGFD) Correspondence
 - State Historic Preservation Offices (SHPO) Correspondence

Public Involvement

The public involvement for this Project consisted of two phases. Phase 1 was conducted before the Application for Certificate of Environmental Compatibility (“CEC”) was filed, and all exhibits and information are included with the CEC in **Exhibits J-1 and J-2**. Phase 2 occurred after the CEC filing, and the documents are included in **Attachment A**.

Informational Postcards

The Applicant sent informational postcard mailers to all property owners and residents within one mile of the Project to initiate the public involvement process. The first postcard was mailed on April 12, 2024, and included an introduction to the Project, announced the date and time

of the virtual and in-person open houses, and provided links to the Project website and informational phone line. The second postcard was mailed on July 3, 2024, and included an introduction to the Project, announced the date and time of the virtual and in-person open houses, and provided links to the Project website and informational phone line and included additional information about the CEC filing and hearings. Phase 1 informational postcard mailers are included with the CEC in **Exhibit J-1**. Phase 2 informational postcard mailers are included in **Attachment A**.

Informational Door Hangers

On April 24, 2024 and July 16, 2024, Project representatives physically delivered door hangers to residents in the Project vicinity. The door hangers included an introduction to the Project, announced the date and time of the virtual and in-person open houses, and provided links to the Project website and informational phone line in both English and Spanish. On both dates, a total of 100 door hangers were delivered to residences in the vicinity of the Project. Phase 1 door hangers are included with the CEC in **Exhibit J-1**. Phase 2 door hangers are included in **Attachment A**.

Project Website and Social Media

The Project website (<https://projectbellaaz.com/>) was created as a central location to provide stakeholders and interested parties with updates, general Project information, and opportunities for public comment. The website included Project information filings and maps. The website address was included in all public materials (e.g., informational letters, social media advertisements, public meeting materials).

Interested parties were able to visit and review materials at their convenience and submit comments and questions through the contact tab. **Exhibit J-1** includes screenshots from the website. Following the CEC filing, additional information was added to the website to include documents and hearing details.

There were targeted social media ads prior to the first open house to notify the public of the meeting. A sample of a Facebook page is included in **Exhibit J-1**. After the CEC filing, there were additional targeted social media ads to notify the public of the committee hearings. A sample of a Facebook page is included in **Attachment A**.

Open Houses

Virtual Open Houses

The Applicant hosted two virtual open houses on April 29, 2024 – one at 12:00 p.m. and another at 5:30 p.m. These meetings consisted of detailed presentations introducing the Project and Project components as well as question and answer sessions. The virtual open houses were announced in the Phase 1 informational postcard mailer and door hangers. The presentation and summary of the virtual open houses are included with the CEC in **Exhibit J-2**.

A second round of virtual open houses were held on July 22, 2024 – one at 12:00 p.m. and another at 5:30 p.m. These meetings consisted of detailed presentations introducing the Project, Project components, and upcoming committee hearings, as well as question and answer sessions. The virtual open houses were announced in the Phase 2 informational postcard mailer and door hangers. The presentation and summary of the virtual open houses are included in **Attachment A**.

In-Person Open Houses

The first in-person open house was held on April 30, 2024, at the Francisco Grande Hotel and Golf Resort. At the open house, Project information and Project team members were accessible for two hours, with 65 members of the public attending. The open house format provided an opportunity for attendees to have one-to-one conversations with the Project team members. The team addressed questions and listened to attendee comments. This in-person open house meeting was announced in the Phase 1 informational postcard mailer and door hangers. The Applicant created a series of poster boards that were placed around the room with information about various aspects of the Project. A copy of the open house poster boards, sign-in sheets, and comment forms are included in **Attachment A**.

The second in-person open house was held on July 23, 2024, at the Francisco Grande Hotel and Golf Resort. At the open house, Project and upcoming committee hearing information and Project team members were accessible for two hours, with 12 members of the public attending. Following the same format as the first open house, the meeting provided an opportunity for attendees to have one-to-one conversations with the Project team members and get their questions and comments addressed. This in-person open house meeting was announced in the Phase 2 informational postcard mailers and door hangers. A copy of the open house poster boards, sign-in sheets, fact sheet, and comment forms are included in **Attachment A**.

Project Telephone Line

The Applicant provided an additional opportunity for members of the public to leave comments or questions by creating a telephone information line (833-815-4853). The telephone number was provided in the informational postcard mailers, door hangers, and on the Project website. The telephone line informed callers about where to find Project information online and invited questions and comments. All voice messages requesting further information were returned within approximately 24 hours by a Project team member. The Project team continues to monitor the Project voicemail and email throughout the CEC permitting process.

Public Notice for CEC Hearings

The CEC was filed with the Arizona Corporation Commission (“ACC”) on June 28, 2024. In accordance with ACC Administrative Rule R14-3-208 and the Chairman’s procedural order dated July 3, 2024 (“Procedural Order”), the Applicant completed the following activities to distribute the Notice of Hearing and make the community aware of the Project and its CEC hearings.

Informational Postcard Mailer

The second informational postcard mailer included an announcement of the filing of the CEC and the dates, location, and time of the Arizona Power Plant and Transmission Line Siting Committee public hearing and special public comment period. The hearing will take place August 12, 2024, at 1:00 p.m. and August 13 through 16, 2024 at 9:00 a.m. (as necessary) with a Public Comment Session August 12, 2024, at 5:30 p.m. The hearing will be located at the Francisco Grande Hotel and Golf Resort. Additional methods of contact were provided on the postcard including the Project website and telephone number. This postcard is included in **Attachment A**.

Project Website Updates

Prior to the CEC hearing, the Project website was updated with information about the hearing, the Procedural Order, and CEC.

Social Media

The Applicant posted to its Facebook page an announcement of the public hearing. A screenshot of the pre-hearing Facebook posting is included in **Attachment A**.

Newspaper Advertisement

The Applicant placed newspaper advertisements in the *Casa Grande Dispatch* on July 4 and July 6, 2024. The advertisement announced filing of the CEC as well as the dates, location, and time of the Arizona Power Plant and Transmission Line Siting Committee public hearing and special public comment period.

Public Notice Signs

Public notice signs were installed on July 2, 2024, at four locations within the vicinity of the Project. The signs included the hearing date, time, and location as well as public comment opportunities and links to Project information. Three of the signs were installed along South Midway Road within the boundaries of the Project site, and the fourth sign was installed on the northwest corner of the Project site.

Public Viewing Locations for the CEC

Shortly after filing, the CEC was placed in publicly accessible locations for interested parties to review. Specifically, the CEC was placed at the following locations:

- Docket Control Center of the Arizona Corporation Commission Phoenix Office – 1200 West Washington Street, Suite 108, Phoenix, Arizona 85007
- Casa Grande Public Library – 449 North Drylake Street, Casa Grande, Arizona 85122

- Arizona City Community Library – 13254 Sunland Gin Road, Arizona City, Arizona 85123

Agency Coordination

Tribal Consultation

As part of the CEC, the Applicant sent consultation letters to tribes who have claims in the Project area. The following Tribes were sent consultation letters: Pueblo of Zuni, Gila River Indian Community, Tohono O’Odham Nation, Yavapai-Apache Nation, White Mountain Apache, Pascua Yaqui Tribe, Hopi Tribe, Mescalero Apache Tribe, Ak-Chin Indian Community, and the Salt River Pima-Maricopa Indian Community. Response letters received from the tribes before filing the CEC are included with the CEC in **Exhibit E-2** and those received after filing the CEC are included in **Attachment B**.

AZGFD Correspondence

To analyze areas of biological wealth within the Project area, the Applicant utilized the AZGFD Online Environmental Review Tool. In addition to the online tool, a letter was sent to the AZGFD to receive an in-depth review of the Project. **Exhibit C** of the CEC includes the Review Tool and correspondence from AZGFD. Additional correspondence is included in **Attachment B**.

SHPO Correspondence

After filing the CEC, the Applicant received correspondence from SHPO based on their review of **Exhibit E** of the CEC. A copy of this correspondence is included in **Attachment B**.

PHASE 2 INFORMATIONAL POSTCARD MAILERS

PROJECT bella

Seguro Energy is developing the proposed Project Bella (Project) which includes 480 MW of thermal gas-fired generation and 440 MW of Battery Energy Storage utilizing a shared transmission interconnection to the existing 500 kV Duke – Pinal Central transmission line. The transmission interconnection to the 500 kV system will provide deliverability to the Arizona load during peak periods and utilize excess solar renewable energy from the grid during low demand periods for battery charging and load shifting.

This Project is designed to provide reliable capacity for integration of renewable energy and deficits impacted by near-term coal retirements while exceeding the sustainability goals identified by SRP and TEP. The proposed Project is expected to reach commercial operations in late 2027 to early 2028.

Seguro Energy will be hosting the following:

In-Person Open House

July 23, 2024, 4:30-6:30 p.m.

Francisco Grande Hotel and Golf Resort, Ocotillo Room
12684 W Gila Bend Hwy, Casa Grande, AZ 85193

Virtual Open House (two sessions-registration required)

July 22, 2024, 12:00 p.m. and 5:30 p.m.

Please scan the QR code or use this Sign-Up Genius link

<https://rb.gy/vnc0rp> to register for any open houses. The information presented will be the same for all sessions.



280 Melba Rd
Encinitas, CA 92024

Seguro Energy has recently submitted an application for a Certificate of Environmental Compatibility (CEC) with the Arizona Corporation Commission (ACC). The CEC process includes public hearings with the Arizona Power Plant and Transmission Line Siting Committee before seeking final approval from the ACC. Hearings before the Committee will occur as follows:

Committee Hearings

Commencing on August 12, 2024 at 1:00 p.m. & August 13-16, 2024 at 9:00 am (as necessary) with a Public Comment Session August 12, 2024 at 5:30 p.m. located at the Francisco Grande Hotel and Golf Resort 12684 W Gila Bend Highway, Casa Grande, AZ 85193

Registration not required to attend Committee Hearings

In addition, to accommodate the proposed development, Seguro Energy is filing applications with Pinal County to amend the Project site's Pinal County Comprehensive Plan land use designation to General Public Facilities/Service and the site's zoning from GR to I-3. You will receive additional public meeting notices when these applications are scheduled for public hearings.

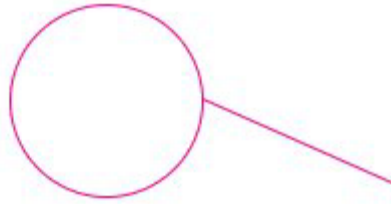
Please visit <https://projectbellaaz.com/> or call 1-833-815-4853 for more information.

Stamp

Mailing Label

PROJECT bella

PHASE 2 DOOR HANGERS



PROJECT bella

Seguro Energy is developing the proposed Project Bella (Project) which includes 480 MW of thermal gas-fired generation and 440 MW of Battery Energy Storage utilizing a shared transmission interconnection to the existing 500 kV Duke – Pinal Central transmission line. The transmission interconnection to the 500 kV system will provide deliverability to the Arizona load during peak periods and utilize excess solar renewable energy from the grid during low demand periods for battery charging and load shifting.

Seguro Energy will be hosting the following:
In-Person Open House
July 23, 2024, 4:30-6:30 p.m.
Francisco Grande Hotel and Golf Resort, Ocotillo Room
12884 W Gila Bend Hwy, Casa Grande, AZ 85193

For those that cannot attend in person:
Virtual Open House (two sessions)
July 22, 2024, 12:00 p.m. and 5:30 p.m.

Please visit this link to register for the virtual open house:
<https://rb.gy/vnc0rp>

In addition, to accommodate the proposed development, Seguro Energy is filing applications with Pinal County to amend the Project site's Pinal County Comprehensive Plan land use designation to General Public Facilities/Service and the site's zoning from GR to I-3. You will receive additional public meeting notices when these applications are scheduled for public hearings.



For more information:
Please visit
<https://projectbellaaz.com/>
or call 1-833-815-4853

Español

Seguro Energy está desarrollando la propuesta para el proyecto "Project Bella" que incluye 480 MW de generación térmica con base en gas natural y 440 MW de Almacenamiento de Energía en Baterías utilizando una interconexión de transmisión compartida en la línea de transmisión existente de 500kV Duke – Pinal. La interconexión al sistema de transmisión de 500 kV brindará capacidad de entrega a la demanda ubicada en Arizona durante los períodos de alta demanda y utilizará el exceso de energía solar renovable de la red durante los períodos de baja demanda para cargar las baterías y poder hacer la entrega de esta cuando se necesite load shifting.

Seguro Energy será el anfitrión de lo siguientes eventos:
Presencial
Julio 23, 2024, 4:30-6:30 p.m.
Francisco Grande Hotel and Golf Resort, Ocotillo Room
12884 W Gila Bend Hwy, Casa Grande, AZ 85193

Para quienes no pueden asistir en persona:
Virtual (dos sesiones)
Julio 22, 2024, 12:00 p.m. y 5:30 p.m.

Por favor visitar el siguiente enlace para registrarse en el evento virtual:
<https://rb.gy/vnc0rp>

Además, para acomodar el desarrollo del proyecto propuesto, Seguro Energy está presentando aplicaciones con el Condado de Pinal para enmendar la designación del sitio del proyecto del Plan Integral del Condado de Pinal para el uso de la tierra e Instalaciones/Servicios Públicos Generales y la designación de la zona del sitio de GR a I-3. Usted recibirá avisos adicionales de reuniones públicas cuando estén agendadas para reuniones públicas.



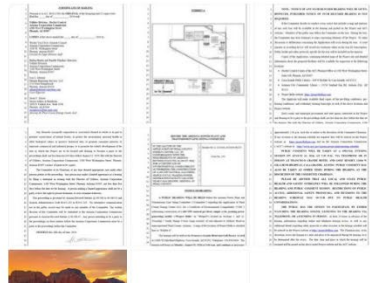
Para más información:
Favor de visitar
<https://projectbellaaz.com/>
o llame al 1-833-815-4853

Intro

- Page** · Energy Company
- Intersection of W. Corrman Rd & S, Midway Rd Casa Grande, AZ
- projectbellaaz.com
- Not yet rated (0 Reviews)

Photos

[See all photos](#)



Notice of Hearing

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE HEARING COMMITTEE

IN THE MATTER OF THE APPLICATION OF THE ARIZONA POWER PLANT AND TRANSMISSION LINE HEARING COMMITTEE TO THE ARIZONA CORPORATION COMMISSION FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY (CEC) FOR THE CONSTRUCTION OF A 400 MW NATURAL GAS-FIRED GENERATING FACILITY LOCATED NEAR CASA GRANDE, ARIZONA IN PINAL COUNTY.

Sub No. L-2316A-24 04-0013
Case No. 201

NOTICE OF HEARING:

A PUBLIC HEARING WILL BE HELD before the Arizona Power Plant and Transmission Line Hearing Committee ("Committee") regarding the Application of Pinal County Energy Center LLC, Inc. for a Certificate of Environmental Compatibility ("CEC") authorizing construction of a 400 MW natural gas-fired, single cycle peaking power generating facility ("Project Bella" or "Project") located in Sections 1 and 12, Township 7 South, Range 4 East, being wholly or in part adjacent to Midway Road in unincorporated Pinal County, Arizona. A map of the location of Project Bella is attached hereto as "Exhibit A".

Approximately 100 p.m. each day or earlier at the discretion of the Committee Chairman. If any persons to the hearing schedule are required, they will be notified on the Project website at: <http://www.projectbellaaz.com> and on the Arizona Corporation Commission ("ACC") website at: <http://www.azcc.com.arizona.gov/energy/noticeofhearing.cfm>

PUBLIC COMMENT WILL BE TAKEN AT A SPECIAL EVENING SESSION ON AUGUST 12, 2024, AT 5:00 P.M. VIA TELEPHONE OR IN PERSON AT FRANKING SQUARE HOTEL, 300 GALE ROAD, 1000 W. GILA ROAD, SUITE 100, CASA GRANDE, AZ 85829. PUBLIC COMMENT MAY ALSO BE TAKEN AT OTHER TIMES DURING THE HEARING AT THE DISCRETION OF THE COMMITTEE CHAIRMAN.

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

THE PUBLIC HAS THE OPTION TO PARTICIPATE BY EITHER WATCHING THE HEARING ONLINE, LISTENING TO THE HEARING VIA TELEPHONE, OR ATTENDING IN PERSON. At least 72 hours in advance of the hearing, additional information regarding online and telephone hearing access, as well as any additional details regarding safety protocols or other revisions to the hearing schedule will be posted on the Project website at <http://www.projectbellaaz.com>. The Chairman may, at his

GENERAL PUBLIC HEARING

Project Bella AZ - Energy Supplier

July 22 at 3:44 PM

Public Comment will be taken at a special evening session on August 12, 2024, at 5:00 p.m. via telephone or in person at Franking Square Hotel, 300 Gale Road, Suite 100, Casa Grande, AZ 85829. Public comment may also be taken at other times during the hearing at the discretion of the Committee Chairman.

Please be advised that all local and state public health and safety regulations will be followed during the hearing and public comment session. Restrictions on public access, additional safety protocols, and revisions to the hearing schedule may occur due to public health considerations.

The public has the option to participate by either watching the hearing online, listening to the hearing via telephone, or attending in person. At least 72 hours in advance of the hearing, additional information regarding online and telephone hearing access, as well as any additional details regarding safety protocols or other revisions to the hearing schedule will be posted on the Project website at <http://www.projectbellaaz.com>. The Chairman may, at his

OPEN HOUSE PRESENTATION AND BOARDS

PROJECT
bella

OPEN HOUSE

**Quick Ramping Thermal
and
Grid Charged BESS Generation**

Seguro Energy Partners

www.projectbellaaz.com

PROJECT
bella

Welcome and Sign In

Seguro Energy Partners

www.projectbellaaz.com

Project Overview

Seguro Energy Partners

www.projectbellaaz.com

Project Overview

Two Projects – One Efficient Solution



Frequency Regulation



Reliability Reserves

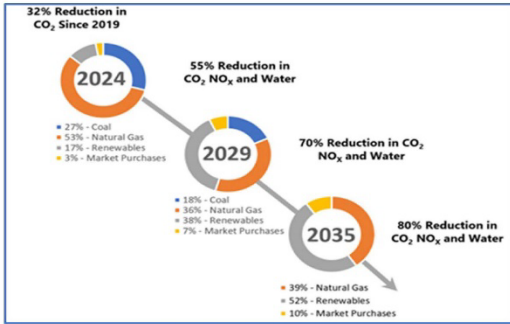


Efficient Dispatch Optimization

Cazador del Sol consists of ten (10) GE LM6000 natural gas turbines, each with a capacity of 48 MW and a total project capacity of 480 MW. The highly reliable aeroderivative units are designed for quick start, ramping and efficient overall heat rate. The quick ramping structure is ideal for renewable energy integration and local reliability purposes. Assuming NTP (notice to proceed) the projected Commercial Operation Date is between Spring 2027 and Spring 2028.

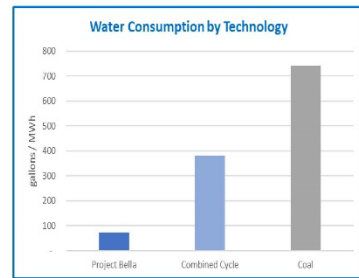
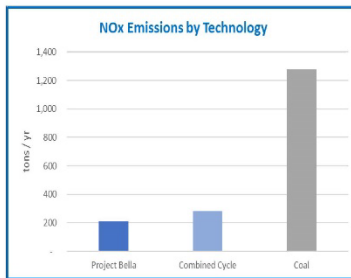
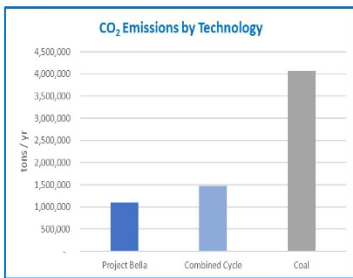
Atrapa Soles, designed specifically for the SW conditions, will consist of a total 440 MW AC of grid-charged battery energy storage with liquid cooled cabinets and self-contained fire suppression systems. The quick deployment of charge and discharge to and from the grid can provide essential load shifting, renewable integration, frequency regulation and peak energy supply to compliment local reliability. Assuming NTP (notice to proceed) the projected Commercial Operation Date is Spring - Fall 2027.

Project Bella's Significant Sustainability Contribution

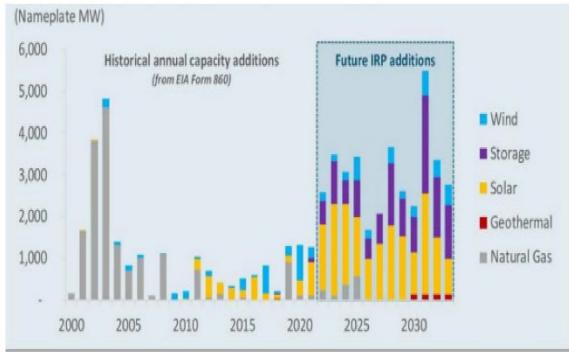


- ✓ Minimal Water Consumption - 78 % less than a CCGT
- ✓ Low Emissions (NOx and CO Control Systems)
- ✓ Compliments the Priority Utilization of Renewable Energy
- ✓ Provides Reliable Capacity and Energy Storage
- ✓ Air Cooled Chillers Reduces Water consumption
- ✓ Lower Stack (65 ft) – visual and noise mitigation
- ✓ Electrical Transmission and Natural Gas Pipeline On-Site

Current Use (Agriculture): 334 ac-ft
 Projected Use (35% CF): 395 ac-ft
 Maximum Modified Use: 530 ac-ft
 Maximum Net Increase: 196 ac-ft



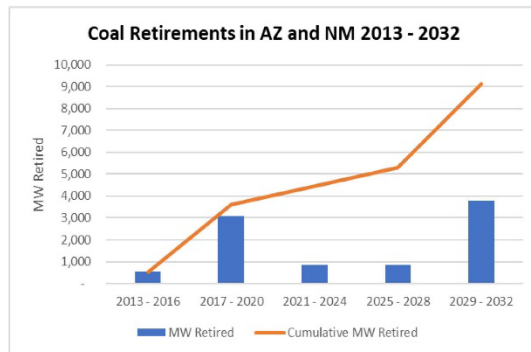
Historical Resource Additions are Offset by Coal Retirements



Source: *Resource Adequacy in the Desert Southwest*, Energy+Environmental Economics, 2022. Includes all balancing areas in AZ and NM.

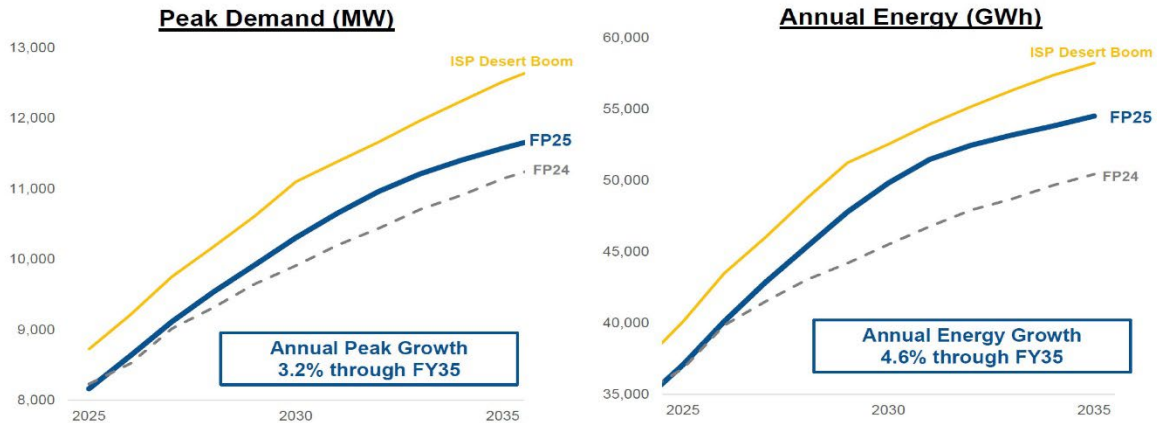
Source: TEP 2023 IRP Figure 2. A Historical Perspective on the Rate of New Capacity Additions in the Desert Southwest

The Western Energy Crisis of 2001 was followed by one of the most rapid periods of new resource development in the history of the Western Interconnection. Nearly 10,000 MW of new, clean natural gas generation mitigated the acute reliability concerns that were followed by a period of coal retirements. While most of these resources continue to operate today in support of utilities' resource adequacy and reliability requirements, the capacity additions from 20 years ago will be completely offset by nearly 9,000 MW of coal retirements. Therefore, additional capacity is required for load growth over the last twenty years as well as to plan for the future electric reliability, sustainability and renewable integration.



SRP Demand Forecast

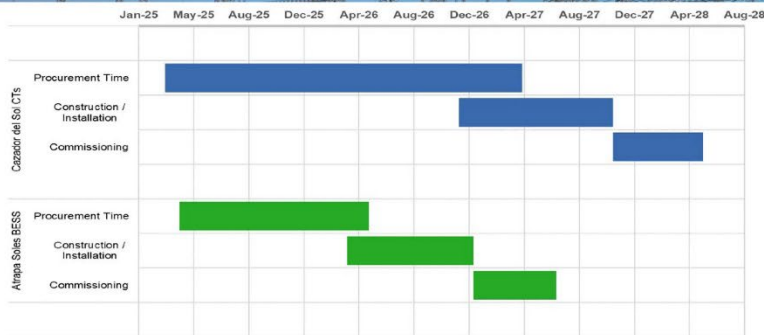
Load Forecast Continues to Trend Higher



02/22/2024 Power Committee -- G. Smedley

5

General Project Timeline (Post NTP)



Two Projects - One Clear Focus

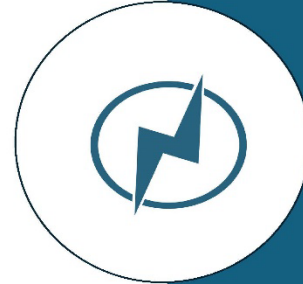
Achieve Sustainability Goals with Reliable and Efficient Capacity.

- ✓ Accommodates Renewable Energy Integration;
- ✓ Promotes the transition to electric vehicles;
- ✓ Compliments the Retirement of Coal Generation; and
- ✓ Responsibly Meets Local Energy Supply Requirements.

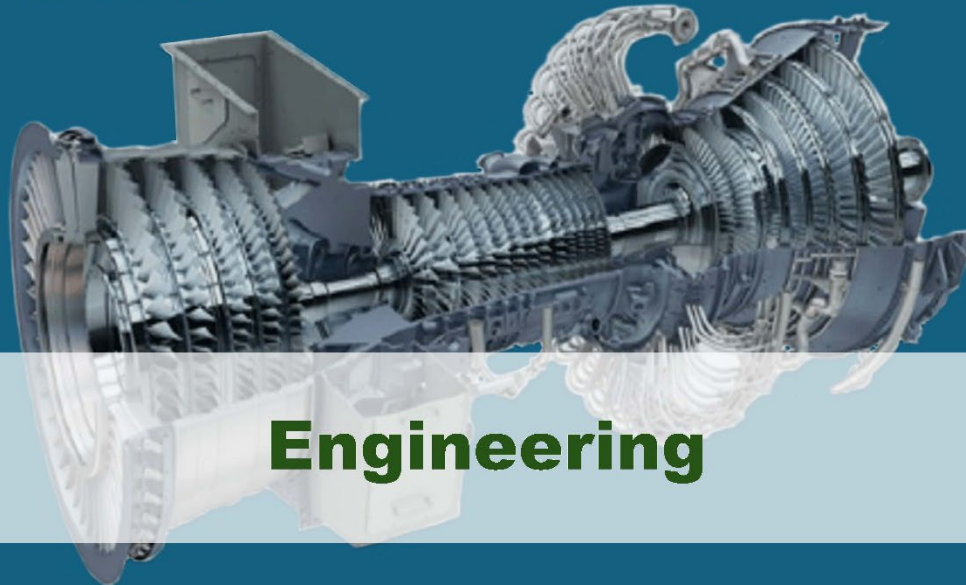


Project Overview

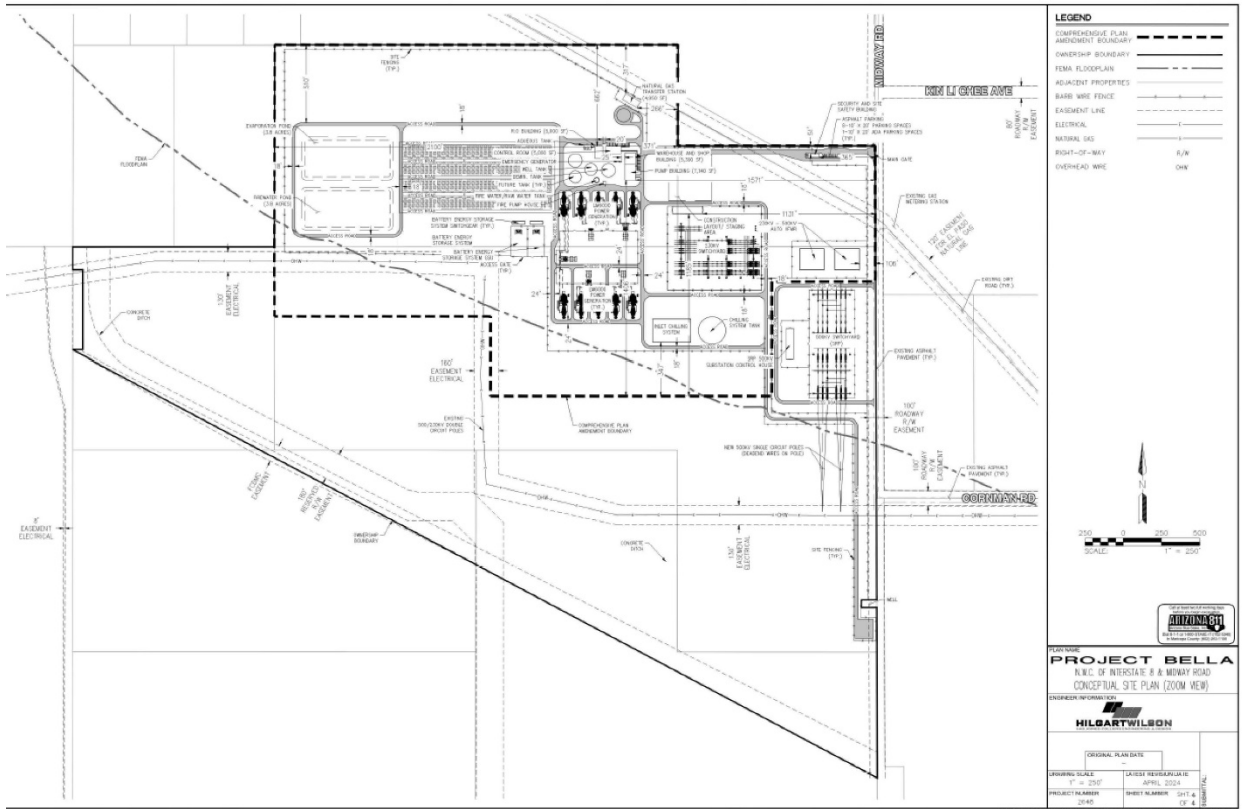
- Two quick deployment Capacity and Energy Projects
- Proven, safe, reliable and efficient electric generation capacity to accommodate:
 - Increasing electrical demand;
 - Renewable energy resource integration;
 - Retirement of Coal Generation, serving Arizona
 - Electric vehicle transition;
- Projects footprint requires less than 158 acres within the 345 acre site in Pinal County
- Interconnection to the 500 kV Pinal Central - Duke transmission line, which crosses the property for reliable deliverability to SRP, TEP and rural Arizona load centers.



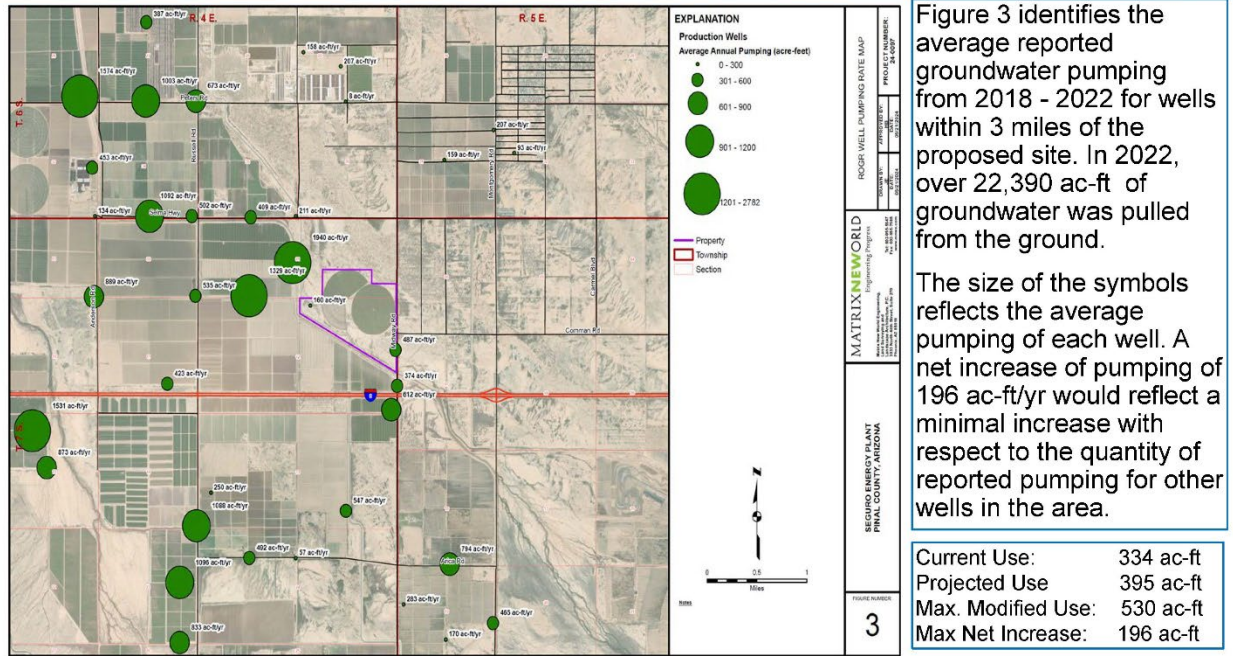
PROJECT **bella**



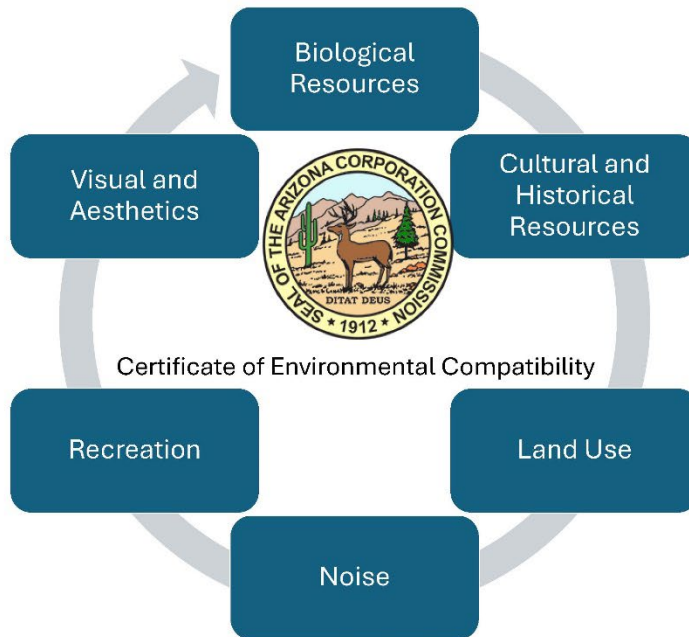
Engineering



Site Current Consumption Versus other Wells in the Area



Statutory Requirements: Environmental



Statutory Requirements

Next Steps

Arizona Corporation Commission (ACC)

Transmission Line Siting Committee Process

- File CEC Application
- Siting Committee Public Hearings
 - August 12-16, 2024
 - Francisco Grande Hotel and Golf Resort
 - *Special Public Comment Session will be held*
- ACC Public Hearings (minimum 30 days after Siting Committee Decision)



Statutory Requirements

For More Information:

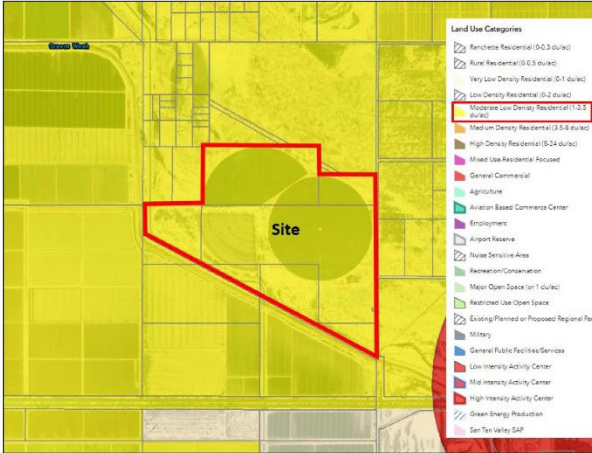
- Informational Hotline
 - 1-833-815-4853
- Project Website
 - <https://projectbellaaz.com/>
- Project Social Media
 - <https://www.facebook.com/ProjectBellaAZ>
- Open Houses
 - Virtual Open House April 29th
 - In-Person Open House April 30th
 - Virtual Open House July 22nd
 - In-Person Open House July 23rd
- ACC Siting Committee Hearings
 - August 12-16th, 2024
 - Francisco Grande Hotel and Golf Resort
- ACC Public Hearings
 - Minimum 30 days after the ACC Committee Hearings



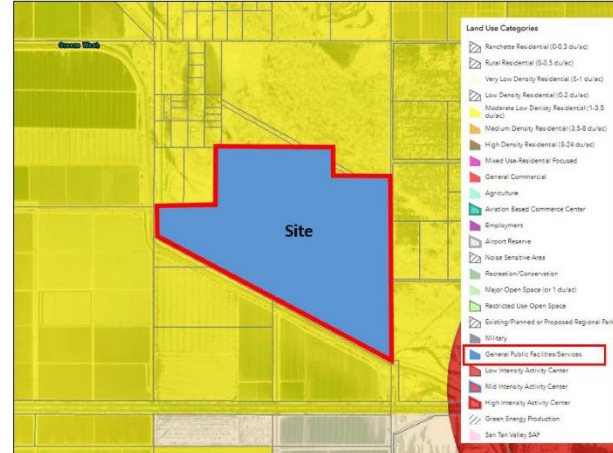
Land Use

Pinal County Major Comprehensive Plan Amendment

Existing Designation: Moderate/Low Density Residential



Proposed Designation: General Public Facilities/Services



Land Use

Pinal County Major Comprehensive Plan Amendment



PINAL COUNTY
www.pinalcounty.gov

SCHEDULE-2024

Comprehensive Plan Major Amendment

- Friday, May 14:** Deadline to submit Comprehensive Plan pre-application form
- Tuesday, May 28:** Deadline for applicants to complete pre-application meeting with staff
- Friday, May 31:** Deadline for application submittal (4:30 pm)
- Friday, June 10:** Applications mailed to agencies for 60 day review
- Wednesday, June 19*:** Work Session with Board of Supervisors (*county initiated items only*)
- Thursday, July 18:** Work Session with Planning and Zoning Commission
- Wednesday, August 7*:** Work Session with Board of Supervisors ← **Next Step**
- Wednesday, August 10:** Deadline for 60 day review responses
- Thursday, September 5:** Citizen Advisory Committee reviews requests and makes recommendations to the Planning and Zoning Commission
- Thursday, September 19:** Public Hearing of the Planning and Zoning Commission to review requests and make recommendations to the Board of Supervisors
- Wednesday, October 23*:** Public Hearing of the Board of Supervisors to approve, deny, or continue requests

OPEN HOUSE SUMMARY

July 22, 2024, 12:00 PM

Online Open House

Start time: 12:00 PM

Total Number of registered: 1

Total Number of attendees: 0 (does not include Project Bella or KPE employees)

Number of questions submitted: 0

Question Summary: N/A

End time: 12:15 PM

July 22, 2024, 5:30 PM

Online Open House

Start time: 5:30 PM

Total Number of registered: 5

Total Number of attendees: 4 (does not include Project Bella or KPE employees)

Number of questions submitted: 8

Question Summary: Most of the questions concerned water, noise, and visual aesthetics.

End time: 6:20 PM

Questions submitted in Zoom chat/Q&A (verbatim):

- how much ground water is going to be used? how much noise in decibels at what range?
- why can't I see who else is on this meeting?
- what is the decibel level expected to be emitted? day and night?
- why do you think it's ok to destroy a peaceful neighborhood with a monstrosity like this
- will this plant look like the photo at the beginning? what is the maximum height?
- you talk about responsibility yet you ignore the real issues of being responsible to the people it actually affects.
- did you look at the impact of residential wells?
- How far away is the plant from Corman Rd and Montgomery?

July 23, 2024, 4:30 PM – 6:30 PM

Francisco Grande Hotel and Golf Resort

Start time: 4:30PM

Total Number of registered: 0

Total Number of attendees: 12 (does not include Project Bella or KPE employees).

Number of Comment Forms submitted: 1

Comment Summary: The Comment Form that was submitted at the Open House is included. The respondent simply stated they do not support the Project.

Steve Morgan, KPE opened the meeting with a statement of gratitude for those attending. He introduced the Project representatives, Mark Thompson, Ian Calkins, Garen Demirchian, Jason Moyes and Stan Barnes. Attendees were provided the opportunity to view visual representations of the Project, as well as maps and FAQ's. The Project representatives were available for questions and provided feedback to the attendees. As a result, several concerns were raised by the attendees and a summary of these are as follows:

- Water Safety:
 - Concerns about the aquifer, as many residents use wells near the Project.
 - What would a section of 60-100 homes use versus the Project?
 - Better explanation of the voluntary Tier II offsets

- Fire Safety and Suppression:
 - Identify and engage the local Fire Chief with Hiller Companies
 - Identify the toxins that may be emitted in the unlikely event of a fire.

- Noise:
 - Explain noise mitigation techniques.
 - Truck traffic

- Power Going to California:
 - There is a proposed AES project in California called Seguro and explained it is not related but it is a similar BESS project.
 - Explained that the electricity is designed to stay local. We will not contract with any entity in California.
 - Explained that wholesale power prices in AZ are higher than CAISO.

OPEN HOUSE SIGN-IN SHEETS

PROJECT bella

<p>Location</p> <p>Pinal County, AZ via Existing Transmission Infrastructure</p>	<p>Purpose</p> <p>Resource Adequacy Reliability and Integration of Renewable Energy</p>	<p>Project Benefits</p> <p>Provides over \$167,000,000 in Property Tax over 25 Years</p> <p>Utilizes existing transmission and pipeline infrastructure</p> <p>Embraces long-term sustainability objectives</p> <p>Creation of skilled jobs</p>
<p>Cazador del Sol</p> <p> 480 MW Quick Start Gas Turbines</p>	<p>Atrapa Soles</p> <p> 440 MW Grid Charged Battery Energy Storage</p>	<p>Sustainability</p> <ul style="list-style-type: none"> • Low Water Consumption • Low-Carbon Approach • Enhances Renewable Integration
		<p>Process</p> <ul style="list-style-type: none"> • Air Permit – Completed • System Impact Study (07/24) • ACC CEC - (08/24) • Pinal County Zoning (12/24)
<p>Reliable, Resource Adequacy Capacity will dispatch when renewable energy is not available in sufficient quantity to meet electric demand. Total dispatch limited by permit.</p>	<p>Batteries are Charged from the Grid during Periods of Excess Renewable energy. Provides Load Shifting during Peak Net Demand.</p>	<p>Resource Requirement</p> <ul style="list-style-type: none"> • 8,149 MW of Coal Retirements which currently supply the SW • 4.60% annual Energy Load Growth through 2035
<p>Commercial Operation Date: Phase I June 2027 Phase II June 2028</p>		



Two Projects – One Efficient Solution



Frequency Regulation



Reliability Reserves



Efficient Dispatch Optimization

Project Bella
Open House (7/23/2024)
Comment Form

Thank you for your interest in this Project. Please complete this form and provide any comments about the Project.

PLEASE PRINT

NAME: David Monter PHONE: 480-818-1963
ADDRESS: 5106 S. Whispering Sands dr. 85193
ORGANIZATION: N/A
EMAIL: Dave and Paula monter

COMMENTS: We don't want it!

Thank you for your time and interest!

Please visit <https://www.projectbellaarizona.com> for more information



TRIBAL RESPONSE LETTERS

From: [Karl Hoerig](#)
To: [Steve Morgan](#)
Subject: Project Bella consultation
Date: Monday, July 1, 2024 4:03:37 PM

You don't often get email from khoerig@pascuayaqui-nsn.gov. [Learn why this is important](#)

[External]

Dear Mr. Morgan,

Thank you for requesting consultation with the Pascua Yaqui Tribe regarding the planned thermal gas-fired generation plant and Battery Energy Storage project in Pinal County. The PYT THPO has no information regarding heritage resources of importance to the Yaqui people located within the project boundary. However we concur with KP Environmental's recommendation for a full Class III survey of the property to determine whether ancestor places and other archaeological sites of importance may be located there. Please keep us apprised of progress, and provide a copy of the Class III report when it is available so that we can make final determinations about the project's potential effects to historic properties.

With best regards,
Karl Hoerig

Karl A. Hoerig, Ph.D.
Tribal Historic Preservation Officer
Pascua Yaqui Tribe
5100 W. Calle Tetakusim, Room 130
Tucson, AZ 85757
(520) 883-5116
karl.hoerig@pascuayaqui-nsn.gov

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



White Mountain Apache Tribe

Office of Historic Preservation

PO Box 1032

Fort Apache, AZ 85926

Ph: (928) 338-3033 Fax: (928) 338-6055

To: Steve Morgan – Project Manager – KP Environmental Inc.

Date: July 03, 2024

Re: *Project Bella Thermal Generation & Energy Storage Project*

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; June 05, 2024. In regards to this, please refer to the following statement(s) below.

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above proposed development of the Bella Project which includes 480 megawatts of thermal gas-fired generation and 440 megawatts of Battery Energy Storage on approximately 350 acres in Pinal County, Arizona.

Please be advised, we have reviewed the information provided, we have determined the proposed development project will have ***“No Adverse Effect”*** to the tribe’s traditional cultural resources and/or historic properties. We concur with the project plans.

Thank you for the continued tribal engagement and consultation, and collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark Altaha

White Mountain Apache Tribe – THPO
Historic Preservation Office

Mark,

Attached you will find our Departments comments for the Bella Power Plant and Battery Energy Storage System Project, along with the referenced ERT species report. We appreciate the opportunity to review and look forward to any further updates.

Thank you,

-Bobby

--

BOBBY LAMOUREUX | HABITAT EVALUATION AND LANDS SPECIALIST, REGION VI

ARIZONA GAME AND FISH DEPARTMENT

OFFICE: 480-324-3547

MOBILE: 480-262-9427

EMAIL: rlamoureux@azgfd.gov

azgfd.gov | 7200 East University Drive, Mesa, AZ 85207

Join our new [Conservation Membership](#) program and ensure a wildlife legacy for the future.

--

BOBBY LAMOUREUX | HABITAT EVALUATION AND LANDS SPECIALIST, REGION VI

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azgfd.gov | 7200 East University Drive, Mesa, AZ 85207

Join our new [Conservation Membership](#) program and ensure a wildlife legacy for the future.

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On Wed, Jun 19, 2024 at 10:43 PM Mark Thompson <mthompson@seguroenergyllc.com> wrote:

Bobby:

Good evening. Thank you for providing the guidelines and recommendations for Project Bella in Pinal County. We sincerely appreciate the detailed information and will ensure that all items are taken into account.

For further information, due to lead time of equipment, we do not anticipate any disturbance to the property related to the power project until mid 2026. Furthermore, we are working through zoning and CEC permit processes which will be a criteria prior to final financial investment decision. The project will only occupy approximately 158 acres of the 350 acre site and we have intentionally designed the project to be located on the north side of the property, furthest away from the greenwash areas.

We will continue to coordinate with your team as the project advances. Thank you for your ongoing stewardship.

Kind Regards,

Mark

Seguro Energy Partners

Mark D. Thompson | Managing Partner

 mthompson@seguroenergyllc.com

 Main Phone: 832 260 6042, Direct: 406 490 1109

 1000 River Walk Dr # 200, Idaho Falls, ID 83402

 <https://www.seguroenergy.com/>

From: Bobby Lamoureux <rlamoureux@azgfd.gov>

Sent: Wednesday, June 19, 2024 5:27 PM

To: Mark Thompson <mthompson@seguroenergyllc.com>

Cc: Project Evaluation Program - Game and Fish <pep@azgfd.gov>; Ginger Ritter <gritter@azgfd.gov>; Joshua Hurst <jhurst@azgfd.gov>; Kelly Wolff <kwolff@azgfd.gov>

Subject: AZGFD Comments - Belle BESS

From: Bobby Lamoureux <rlamoureux@azgfd.gov>

Sent: Friday, June 21, 2024 1:53 PM

To: Mark Thompson <mthompson@seguroenergyllc.com>

Subject: Re: AZGFD Comments - Belle BESS

Hey Mark,

Thanks for the update! It's good to hear you are avoiding Greenwash and I'll keep an eye out for any future updates.

-Bobby

From: [Caroline Klebacha](#)
To: [Steve Morgan](#)
Cc: [Jason Moyes](#); [Kenda Pollio](#)
Subject: Re: Project Bella - New Contact Form Submission
Date: Thursday, August 1, 2024 1:29:00 PM
Attachments: [image001.png](#)

You don't often get email from cklebacha@azstateparks.gov. [Learn why this is important](#)

[External]

Good afternoon,

Thank you for following up with me regarding our comments. As we discussed on the phone, we are currently recommending Applicants include the following conditions with the CEC.

1. The Applicant shall consult the State Historic Preservation Office (SHPO) pursuant to A.R.S. § 41-861 through 41-864, the State Historic Preservation Act. Construction for the project shall not occur without SHPO concurrence. Any project involving federal land is a federal undertaking and requires SHPO concurrence on the adequacy of the survey and area of potential effects. The applicant shall coordinate with SHPO regarding the status of Section 106 consultation.
2. If any archaeological, paleontological, or historical site or a significant cultural object is discovered on private, state, county, or municipal land during the construction or operation of the Project, the Applicant or its representative in charge shall promptly report the discovery to the Director of the Arizona State Museum (ASM), and in consultation with the Director, shall immediately take all reasonable steps to secure and maintain the preservation of the discovery as required by A.R.S. §41-844 or A.R.S. §41-865, as appropriate.

Let me know if you have any questions. I'll be out of town this afternoon and tomorrow, but will be back on Monday to answer any questions.

Thank you,

Caroline

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

1110 West Washington Street, Suite 100
Phoenix, AZ 85007-2957
Phone: 602-542-7140

Email: cklebacha@azstateparks.gov

Web: <http://AZStateParks.com/SHPO>



On Wed, Jul 31, 2024 at 1:11 PM Steve Morgan <smorgan@kpenvironmental.com> wrote:

Hello Caroline,

Thank you for your review and comments on behalf of the Arizona State Historic Preservation Office (SHPO) on the Project Bella Certificate of Environmental Compatibility (CEC).

We appreciate your attention to detail in your review of the "Potential Effects" section of Exhibit E. We will be issuing a correction at the CEC Hearing to revise the language regarding the amount of the Project area that has been subject to previous survey. Our correction will revise the statement in Exhibit E to match the statements made in the Class I Report that was attached as Exhibit E-1 of the CEC.

The Project Applicant will be following SHPO's recommendation to conduct Class III pedestrian survey of the entire Project area and submit findings to Arizona SHPO pursuant to the Arizona State Historic Preservation Act. In addition, the Applicant will continue consultation with Native American Tribes and provide information provided by the Tribes that may inform the SHPO review, as necessary.

Please feel free to reach out with any additional questions or comments related to this Project.

Thanks,



Steve Morgan, Project Manager

603.557.8974

smorgan@kpenvironmental.com

www.kpenvironmental.net

From: Caroline Klebacha <no-reply@projectbellaarizona.com>

Sent: Wednesday, July 31, 2024 9:51 AM

To: Jesus Arredondo

Subject: Project Bella - New Contact Form Submission

Name

Caroline Klebacha

Email

cklebacha@azstateparks.gov

Phone

602-542-7140

Message

On behalf of the State Historic Preservation Office (SHPO), I have reviewed Exhibit E regarding scenic areas, historic sites and structures, and archaeological sites. We do not concur with the conclusions presented in this exhibit.

In the "Potential Effects" section (Exhibit E-12 and pg 336 of the PDF), the applicant states that, "the entire Project site has been subject to previous cultural resources survey, and no previously identified archaeological sites, historic buildings or structures would be impacted by the Project," and that "the Project would result in a finding of no historic properties affected." These two statements are not supported by the Class I report (Mengers and Eckhardt 2024) prepared by KP Environmental, Inc., which is included in the CEC application and states in their "Management Recommendations" (pg 14 of the report and 363 of the PDF) that "approximately 12 percent of the proposed Project footprint has been surveyed...." and that they recommend a Class III pedestrian survey of the remainder of the project area.

Four projects are described as crossing the project area, however based on the figures in the report and the information available on AZSITE, Arizona's online cultural resources inventory, these projects are all over 10 years old and based on SHPO guidance point 5, need to be reviewed for adequacy and meeting current site and survey standards. Additionally only two of the referenced projects clip the edges of the project area. The other two projects are linear and only cover narrow corridors within the project areas.

We recommend that the entire Project area be surveyed and/or resurveyed for cultural resources and submitted to our office for review pursuant to the Arizona State Historic Preservation Act (SHPA; ARS 41-861 - 41-864). Additionally, we recommend continued consultation with Native American Tribes.

The views of Tribes are based on expertise and information not available and/or possessed by our staff, but are critical to informing the SHPA review process. We request that our office be provided with a summary of any views conveyed by Native American tribes that may inform our review and findings. SHPO reserves the right to exercise our responsibility to respond to new information and modify our findings, as necessary.

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

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

PCE-12

Proof of Delivery of
Application for CEC and
Transcripts to Public
Locations

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

N THE MATTER OF THE APPLICATION
OF PINAL COUNTY ENERGY CENTER,
LLC, IN CONFORMANCE WITH THE
REQUIREMENTS OF ARIZONA REVISED
STATUTES 40-360 ET. SEQ., FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AUTHORIZING THE
CONSTRUCTION OF A 480 MW NATURAL
GAS-FIRED, SIMPLE CYCLE, PEAKING
POWER GENERATING FACILITY
LOCATED NEAR CASA GRANDE,
ARIZONA, IN PINAL COUNTY.

Docket No. L-21314A-24-0144-00233

Case No. 233

AFFIDAVIT OF POSTING

AFFIDAVIT OF POSTING

I, Leah O’Connell, hereby declare and state as follows:

1. I work for KP Environmental, the environmental consulting firm assisting the Applicant with this above-captioned CEC proceedings.

2. Pursuant to Commissioner Adam Stafford’s Procedural Order, on June 28, 2024, I hand-delivered copies of the Application for a Certificate of Environmental Compatibility (“Application”) and Notice of Hearing (“Notice”) to the Chairman at the Arizona Attorney General’s Office located at 2005 N Central Ave, Phoenix, AZ 85004

3. Further pursuant to Commissioner Stafford’s Procedural Order, on June 28, 2024, I hand-delivered copies of the Application and Notice to

Casa Grande Public Library, 449 N. Drylake Rd., Casa Grande, AZ 85122

Arizona City Community Library, 13254 Sunland Gin Rd, Arizona City, AZ 85193

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I declare under penalty of perjury that the foregoing is true and correct.

RESPECTFULLY SUBMITTED this 29th day of July, 2024.

Leah O'Connell

Leah O'Connell, Executive Assistant
KP Environmental
280 Melba Rd
Encinitas, CA 92024

PCE-13

Proof of Service to
Affected Jurisdictions

ALERT: FLOODING AND SEVERE WEATHER IN THE SOUTHERN AND CENTRAL U.S. MAY IM...

USPS Tracking®

FAQs >

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Remove X

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Your item was picked up at a postal facility at 4:26 pm on July 15, 2024 in FLORENCE, AZ 85132.

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USPS Tracking Plus®

Feedback

Delivered

Delivered, Individual Picked Up at Postal Facility

FLORENCE, AZ 85132

July 15, 2024, 4:26 pm

Available for Pickup

FLORENCE

501 N MAIN ST

FLORENCE AZ 85132-9998

M-F 0900-1630; SAT 1100-1330

July 12, 2024, 1:09 pm

Arrived at USPS Regional Facility

PHOENIX AZ DISTRIBUTION CENTER

July 10, 2024, 9:22 pm

Hide Tracking History

[What Do USPS Tracking Statuses Mean?](https://faq.usps.com/s/article/Where-is-my-package) (<https://faq.usps.com/s/article/Where-is-my-package>)

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USPS Tracking Plus®



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Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

Feedback



**MOYES SELLERS
& HENDRICKS**

JASON MOYES

1850 N. Central Avenue, Suite 1100 • Phoenix, AZ 85004

☎ (602) 604-2139

✉ jasonmoyes@law-msh.com

July 3, 2024

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Pinal County Board of Supervisors
135 N. Pinal Street
Florence, Arizona 85132

RE: Project Bella
Arizona Corporation Commission Docket No. L-21314A-24-0144

Dear Supervisors:

Pursuant to A.R.S. § 40-360.04(A), enclosed herewith is a copy of the Notice of Hearing before the Arizona Power Plant and Transmission Line Siting Committee in regards to the Application of Pinal Country Energy Center, LLC for a Certificate of Environmental Compatibility for a 480 MW natural gas-fired, simple cycle, peaking power generating facility known as Project Bella.

If you have any questions or need additional information, please feel free to contact us. Thank you.

Respectfully yours,

Jason Y. Moyes
Attorney for Applicant

Enclosure

cc: Chairman Adam Stafford (w/o enclosure)

1 approximately 5:00 p.m. each day or earlier at the discretion of the Committee Chairman.
2 If any revisions to the hearing schedule are required, they will be noticed on the Project
3 website at: <https://projectbellaaz.com> and on the Arizona Corporation Commission
4 (“ACC”) website at: <https://www.azcc.gov/arizona-power-plant/meeting-schedule>

5 **PUBLIC COMMENT WILL BE TAKEN AT A SPECIAL EVENING**
6 **SESSION ON AUGUST 12, 2024, AT 5:30 P.M., VIA TELEPHONE OR IN**
7 **PERSON AT FRANCISCO GRANDE HOTEL AND GOLF RESORT, 12684 W**
8 **GILA BEND HIGHWAY, CASA GRANDE, AZ 85193. PUBLIC COMMENT MAY**
9 **ALSO BE TAKEN AT OTHER TIMES DURING THE HEARING AT THE**
10 **DISCRETION OF THE COMMITTEE CHAIRMAN.**

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

17 **THE PUBLIC HAS THE OPTION TO PARTICIPATE BY EITHER**
18 **WATCHING THE HEARING ONLINE, LISTENING TO THE HEARING VIA**
19 **TELEPHONE, OR ATTENDING IN PERSON.** At least 24 hours in advance of the
20 hearing, information regarding online and telephone hearing access, as well as any
21 additional details regarding safety protocols or other revisions to the hearing schedule will
22 be noticed on the Project website at <https://projectbellaaz.com>. The Chairman may, at his
23 discretion, recess the hearing to a time and place to be announced during the hearing, or to
24 be determined after the recess. The date, time and place at which the hearing will be
25 resumed will be posted on the above-noted Project website and the ACC website.

1 **NOTE: NOTICE OF ANY SUCH RESUMED HEARING WILL BE GIVEN;**
2 **HOWEVER, PUBLISHED NOTICE OF SUCH RESUMED HEARING IS NOT**
3 **REQUIRED.**

4 If the Committee decides to conduct a tour, notice that includes a map and itinerary
5 of any such tour will be available at the hearing and posted on the Project and ACC
6 websites. Members of the public may follow the Committee on the tour. During the tour,
7 the Committee may hear testimony at stops concerning elements of the Project. No other
8 discussion or deliberation concerning the Application will occur during the tour. A court
9 reporter or recording device will record any testimony taken on the tour for transcription.
10 Public health and safety protocols specific for the tour will be included on the itinerary.

11 Copies of the Application, containing detailed maps of the Project site and detailed
12 information about the proposed facilities will be available for inspection at the following
13 locations:

- 14 • Docket Control Center of the ACC Phoenix Office at 1200 West Washington Street,
15 Suite 108, Phoenix, AZ 85007
- 16 • Casa Grande Public Library – 449 N Drylake St, Casa Grande, AZ 85122
- 17 • Arizona City Community Library – 13254 Sunland Gin Rd, Arizona City, AZ
18 85123
- 19 • Project Bella website: <https://projectbellaaz.com>

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

23 Each county and municipal government and state agency interested in the Project
24 and desiring to be a party to the proceedings shall, not less than ten days before the date set
25 for hearing, file with the Director of Utilities, Arizona Corporation Commission, 1200
26 West Washington Street, Phoenix, Arizona 85007 a notice of intent to be a party.

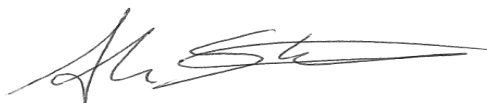
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1 Any domestic non-profit corporation or association formed in whole or in part to
2 promote conservation of natural beauty, to protect the environment, personal health or
3 other biological values, to preserve historical sites, to promote consumer interests, to
4 represent commercial and industrial groups, or to promote the orderly development of the
5 area in which the Project are to be located and desiring to become a party to the
6 proceedings shall, not less than ten (10) days before August 12, 2024, file with the Director
7 of Utilities, Arizona Corporation Commission, 1200 West Washington Street, Phoenix,
8 Arizona 85007 a notice of intent to be a party.

9 The Committee or its Chairman, at any time deemed appropriate, may make other
10 persons parties to the proceeding. Any person may make a limited appearance at a hearing
11 by filing a statement in writing with the Director of Utilities, Arizona Corporation
12 Commission, 1200 West Washington Street, Phoenix, Arizona 85007, not less than five
13 days before the date set for hearing. A person making a limited appearance shall not be a
14 party or have the right to present testimony or cross-examine witnesses.

15 This proceeding is governed by Arizona Revised Statutes §§ 40-360 to 40-360.13 and
16 Arizona Administrative Code R14-3-201 to R14-3-220. No substantive communication
17 not in the public record may be made to any member of the Committee. The written
18 decision of the Committee will be submitted to the Arizona Corporation Commission
19 pursuant to Arizona Revised Statutes § 40-360.07. Any person intending to be a party to
20 the proceedings on these matters before the Arizona Corporation Commission must be a
21 party to the proceedings before the Committee.

22 ORDERED this 28th day of June, 2024.

23
24 

25
26 _____
Adam Stafford, Chairman
ARIZONA POWER PLANT AND TRANSMISSION
27 LINE SITING COMMITTEE

CERTIFICATE OF MAILING

Pursuant to A.A.C. R14-3-204, the **ORIGINAL** of the foregoing and 25 copies were filed this ____ day of _____, 2024 with:

**Utilities Division - Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007**

COPIES of the above mailed this ____ day of _____, 2024 to:

Wesley Van Cleve, General Counsel
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007
Counsel for Legal Division Staff

Britton Baxter and Ranelle Paladino, Directors
Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

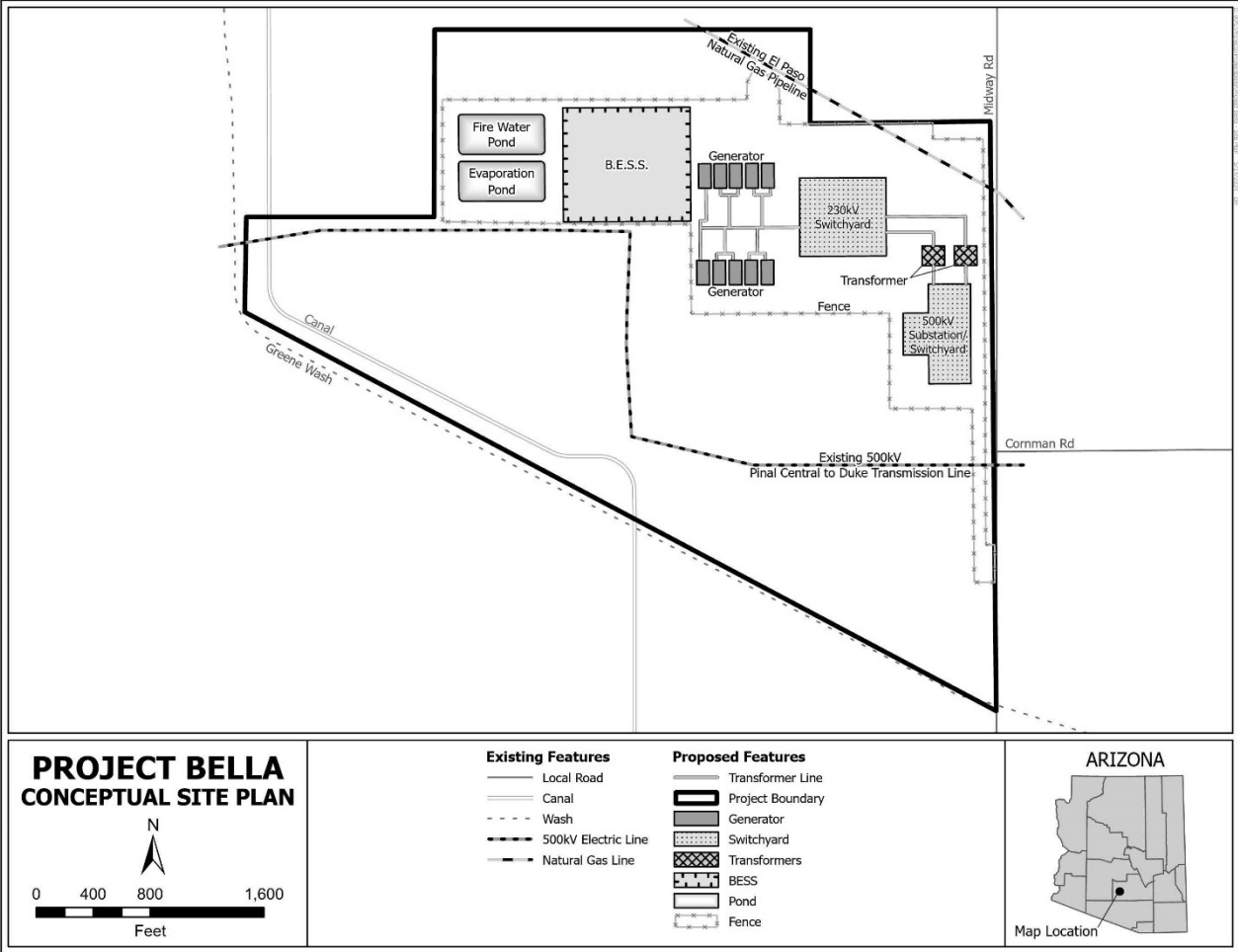
Lisa L. Glennie
Glennie Reporting Services, LLC
1555 East Oranewood
Phoenix, Arizona 85020
admin@glennie-reporting.com
Court Reporter

Jason Y. Moyes
Moyes Sellers & Hendricks
1850 N. Central Ave., Suite 1100
Phoenix, AZ 85004
jasonmoyes@law-msh.com
Attorney for Pinal County Energy Center, LLC

T.Brewer/CEC /

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EXHIBIT A



MSH
**MOYES SELLERS
& HENDRICKS**

1850 N. Central Avenue, Suite 1100
Phoenix, Arizona 85004

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Pinal County Board of Supervisors

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Florence, AZ 85132

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Certified Mail Fee	\$ 4.40
Extra Services & Fees (check box, add fee as appropriate)	
<input type="checkbox"/> Return Receipt (hardcopy)	\$
<input checked="" type="checkbox"/> Return Receipt (electronic)	\$ 3.65
<input checked="" type="checkbox"/> Certified Mail Restricted Delivery	\$
<input type="checkbox"/> Adult Signature Required	\$
<input type="checkbox"/> Adult Signature Restricted Delivery	\$
Postage	\$ 1.80
Total Postage and Fees	\$ 8.93

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Sent To Pinal County Board of Supervisors
Street and Apt. No., or PO Box No. P.O. Box 827
City, State, ZIP+4® Florence, AZ 85132

PS Form 3800, April 2015 PSN 7530-02-000-9047 See Reverse for Instructions

PCE-14

Proof Posting: Photos of Notice of
Hearing signs posted at site

Jason Moyes

From: Sarah Justus <sjustus@kpenvironmental.com>
Sent: Tuesday, July 2, 2024 10:54 AM
To: Jason Moyes
Cc: Steve Morgan
Subject: FW: Update: New Estimate Waiting

Jason,
Photos of the signs in place for Project Bella notice are below. Do you need anything else from me as documentation of the posting?
Sarah



Sarah Justus, Public Relations Manager

608.279.0129

sjustus@kpenvironmental.com

www.kpenvironmental.net

From: Jordan Mansfield <jordan.mansfield@fastsigns.com>
Sent: Tuesday, July 2, 2024 11:29 AM
To: Sarah Justus <sjustus@kpenvironmental.com>
Cc: Chris Herrera <chris.herrera@fastsigns.com>; Gabriella Glener <gglener@kpenvironmental.com>; Steve Morgan <smorgan@kpenvironmental.com>
Subject: Re: Update: New Estimate Waiting

[External]

Completion photos are attached

NOTICE OF HEARING

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE
Docket No. L-21314A-24-0144

A PUBLIC HEARING WILL BE HELD regarding the Application of Pinal County Energy Center, LLC, for a Certificate of Environmental Compatibility authorizing construction in the vicinity of this sign of a **480 MW thermal gas-fired generation facility**.

WHERE: Francisco Grande Hotel and Golf Resort, 12684 W Gila Bend Highway, Casa Grande, AZ 85193

WHEN: Monday, August 12, 2024 at 1:00 p.m.;
and continue as necessary August 13, 14, 15, and 16, 2024 at 9:00 a.m. each day.

PUBLIC COMMENT WILL BE TAKEN AT A SPECIAL EVENING SESSION ON AUGUST 12, 2024, AT 5:30 P.M. VIA TELEPHONE, ONLINE OR IN PERSON.

Additional hearings, if necessary, will be noticed on the Project website at: <https://projectbellaaz.com/> and the Arizona Corporation Commission website at <https://azcc.gov/arizona-power-plant/meeting-schedule>.

Details of the Project, including Site Maps, are contained in the Application, a copy of which can be viewed at <https://projectbellaaz.com/> or the Docket Control Center of the Arizona Corporation Commission, 1200 West Washington, Phoenix, Arizona 85007. Information Regarding participation through a limited appearance or as a party at the hearing may be obtained by contacting the Arizona Commission's Consumer Services at 1-800-222-7000 or 602-542-4251.

NOTICE OF HEARING

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE
Docket No. L-21314A-24-0144

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Justin Beauford
Manager

Project Bellaaz
12684 West Gila Highway, AZ 85193

On Wed, Jun 26, 2024 at 3:53 PM Sarah Justice <sjustice@azcc.com> wrote:

Sorry to keep putting you off Chris - we get the exact language for the sign from the Arizona ACC Chair's office and we're still waiting for it. I'll continue to keep you posted and get it back as soon as available.

Thanks
Sarah

PCE-15

Route Tour Itinerary and Map

Project Bella Route Tour Directions

Francisco Grande Hotel and Golf Resort → Observation Point 1: From the Francisco Grande Hotel and Golf Resort, exit through the lobby's main entrance and meet in the Hotel driveway. Exit the Hotel driveway to the south, turning right on Gila Bend Highway and travel west for approximately 0.8 miles. Turn left onto South Montgomery Rd and travel south for approximately 2 miles to the intersection at West Selma Hwy. Turn right onto West Selma Hwy and travel west for approximately 1 mile to the intersection at South Midway Rd. Turn left to onto South Midway Rd and travel south for approximately 1 mile. Pull off on the gravel to the right of the roadway to arrive at Observation Point 1. Travel time to Observation Point 1: approximately 10 minutes.

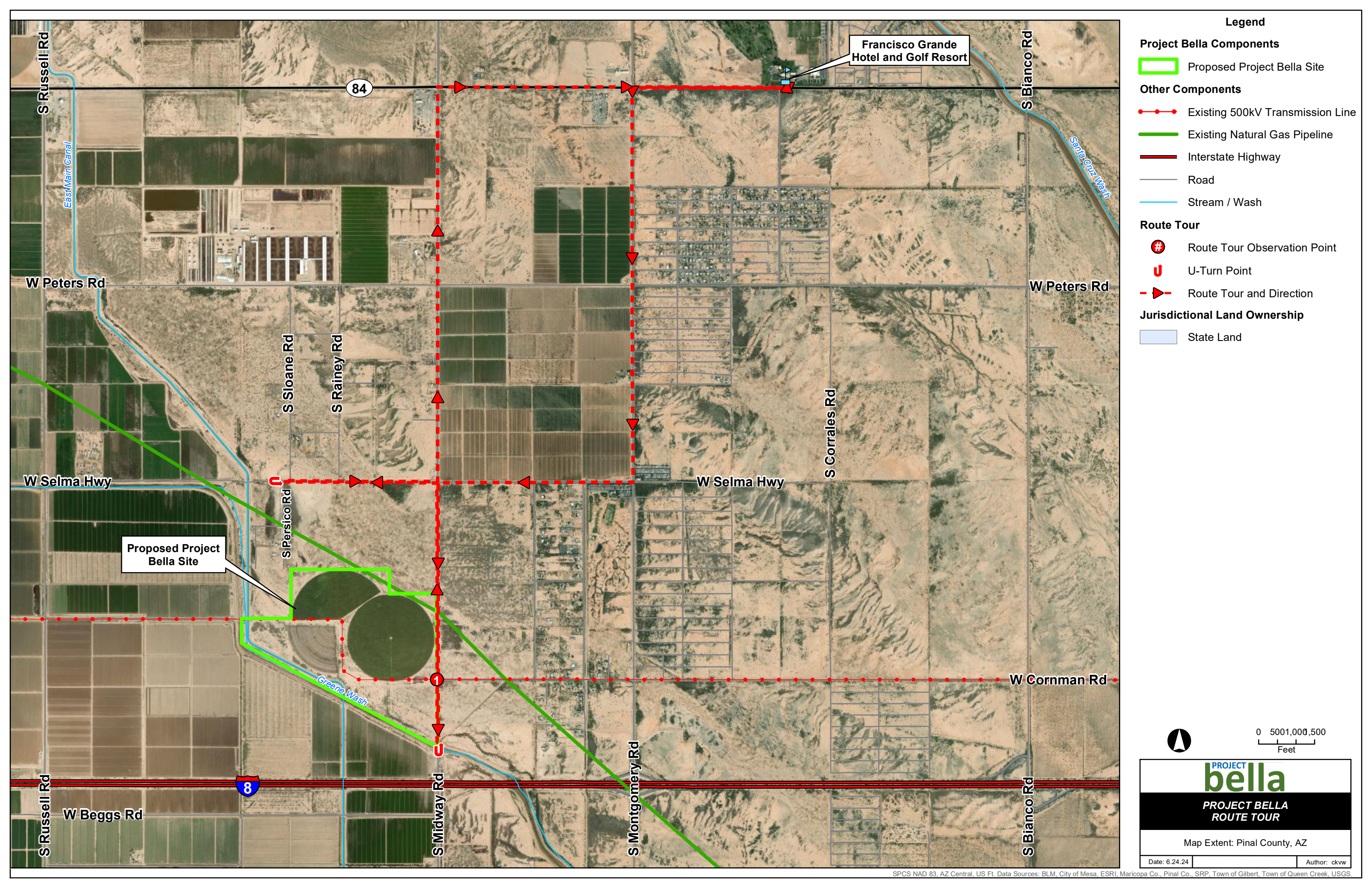
Observation Point 1: The proposed Project Bella site is located immediately west of observation point 1. The existing 500kV Transmission Line that would connect to the Proposed Project Bella site is located overhead, immediately south of observation point 1.

Note: While driving on South Midway Road, look to the west to view the proposed Project Bella site.

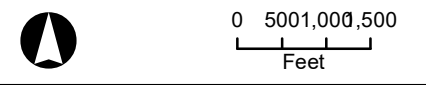
Observation Point 1 → Francisco Grande Hotel and Golf Resort: Continue south on South Midway Road for approximately 0.3 miles to the Greene Wash. Pull off to the right of the roadway and turn around on South Midway Road. Travel north on South Midway Road until West Selma Highway, approximately 1.4 miles. Turn left on West Selma Highway and continue west for approximately 0.7 miles until you reach South Persico Road. Pull off on the dirt to the right of the roadway and turn around on West Selma Highway.

Note: While driving on West Selma Highway, look to the south to view the proposed Project Bella site.

Travel east on West Selma Highway back to the intersection at South Midway Road. Turn left on South Midway Road. Travel north on South Midway Road to the intersection at Gila Bend Highway, approximately 2 miles. Turn right onto Gila Bend Highway and travel east for approximately 1.8 miles to the Francisco Grande Hotel and Golf Resort driveway. Turn left into the Hotel driveway. Travel time from Observation Point 1 to Francisco Grande Hotel and Golf Resort: approximately 12 minutes.



- Legend**
- Project Bella Components**
- Proposed Project Bella Site
- Other Components**
- Existing 500kV Transmission Line
 - Existing Natural Gas Pipeline
 - Interstate Highway
 - Road
 - Stream / Wash
- Route Tour**
- Route Tour Observation Point
 - U-Turn Point
 - Route Tour and Direction
- Jurisdictional Land Ownership**
- State Land



PROJECT bella

PROJECT BELLA ROUTE TOUR

Map Extent: Pinal County, AZ

Date: 6.24.24 | Author: ckww

SPCS NAD 83, AZ Central, US Ft. Data Sources: BLM, City of Mesa, ESRI, Maricopa Co., Pinal Co., SRP, Town of Gilbert, Town of Queen Creek, USGS.

PCE-16

Letter to ACC Business
Office re: Committee
Expenses



MOYES SELLERS & HENDRICKS

JASON MOYES

1850 N. Central Avenue, Suite 1100 • Phoenix, AZ 85004

☎ (602) 604-2139

✉ jasonmoyes@law-msh.com

July 29, 2024

VIA HAND DELIVERY

Business Office
Arizona Corporation Commission
1300 W. Washington
Phoenix, AZ 85003

Attn: Docket Control

RE: Project Bella; Docket No. L-21314A-24-0144, Case No. 233; Financial Arrangements for Line Siting Committee Expenses

Dear Sir or Madam:

Pursuant to A.R.S. § 40-360.10, on June 28, 2024, we delivered to the Commission Business Office a check for \$1,000 payable to the Utility Siting Fund to cover the statutory filing fee in the above-referenced docket. On July 3, 2024, Chairman Adam Stafford of the Line Siting Committee issued a Procedural Order which included the following order:

5. The Applicant shall contact the appropriate member of the staff of the Commission, and advise them of the Applicant's position concerning reimbursement of the Line Siting Fund should the expenses of the hearing exceed the application fee, and discuss financial arrangements regarding hotel reservations and other expenses of the Committee Members. A.R.S. § 40-360.10. The Applicant shall advise the Chairman of the results of these discussions so that the necessary information may be communicated to the Committee Members.

In accordance with the Chairman's order, we are writing this letter to confirm that, to the extent additional funds are needed to meet expenses incurred by the Line Siting Committee in accordance with A.R.S. § 40-360.10, we are prepared to provide on behalf of the Applicant the additional check(s) to the Utility Siting Fund as necessary to cover the reimbursement of such expenses. Please contact us at any time with questions. We will expect to hear from you in this regard upon conclusion of the Committee's activities in this docket.

Respectfully yours,

Jason Y. Moyes

cc: via email
Chairman Stafford

PCE-17

Applicant Response to ACC
Staff First Data Request

Pinal County Energy Center, LLC
Docket No. L-21314A-24-0144-00233

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

STF 1.2 Please explain whether the proposed project will improve system reliability. Provide any studies that have been done that indicate the proposed project would improve system reliability.

Response II Supplement:

Project Bella is providing this supplemental response to the above Data Request. Please note that the attached file is provided by SRP, as transmission owner. [File: "SRP Transitional System Impact Study Case Study 2026"] Since the detailed data contained in the identified file identifies specific transmission constraints and transmission impacts of not only Project Bella, but of other Projects participating in the Transition Cluster, it should be treated as **strictly confidential**.

Project Bella is identified in the Transitional System Impact Study as Project: PV-PC Q32. As identified, the Project will add a 928 MW Natural Gas and Battery Energy Storage System with the POI with a new Station looped through the 500 kV transmission line between Duke and Pinal Central substations, located near Casa Grande in Pinal County, Arizona. The proposed BESS may charge from the grid at a 440 MW capacity. The Queue Date of the Project is August 17, 2023, the requested In-Service Date is September 5, 2026.

The interconnection will be a direct tie to the 500 kV transmission line which cross the Project Bella site on the 140-foot existing towers. Thus, there is no generation tie or new towers will be constructed to accommodate the interconnection. No new right of ways or public crossings are required to accommodate the interconnection.

The confidential SRP Transitional System Impact Study identifies the minimal impact to the network and estimated cost allocation of network upgrades of \$5,023,200 (page 55 – 56).

Stephen Foster an Engineering Project Manager with K. R. Saline & Associates PLC an Electrical Engineering consulting firm located in Mesa, Arizona has reviewed and provided the following evaluation of the 2026 Salt River Project (SRP) Transitional System Impact Study (TSIS):

SRP's TSIS analyzed the system's thermal ratings during normal operating conditions along with single and multiple contingencies and ensured any new "overloads" were documented before and after the interconnection and commercial operation of Project Bella (PV-PC Q32). The TSIS also reviewed the transient stability, post-transient, short circuit analysis, and performed a power factor test.

The study found that the "TSIS projects for the case year 2026 will not impact the reliability of the interconnection transmission system with the recommended upgrades." The TSIS found that Project Bella, like all new transmission and generation projects in central Arizona, would be partially responsible for Phase III's mitigation for the ANPP HVS short Circuit upgrade and would have to pay \$19,400 per amp of contribution (\$5M TTL). Additionally, the study indicated that Bella increased existing overloads on both a Duke – Test Track 230kV jumper and a Santa Rosa – Test Tract 230kV jumper. The TSIS did not indicate a mitigation to these overloads as this is a Western Area Power Administration (WAPA) element and mitigation for these overloads would need to be resolved with WAPA.

Both elements have a fairly small physical impact totaling less than a mile in length and any mitigation is assumed to be relatively easy to implement.

In summary, the Project Bella's interconnection to the existing 500 kV line on the 140-foot towers which cross the Project property. This transmission line flows from Palo Verde to Pinal Central and was designed to transmit large amounts of power from Palo Verde generation area into southeast Mesa. The utilization of this existing path by Project Bella does not cause any reliability concerns and upgrade costs are relatively low which will benefit existing and future ratepayers as Arizona continues its rapid electrical demand growth and retirement of large, aging thermal energy resources.

Response I:

Pinal County Energy Center (the Project or Project Bella), is participating in the Salt River Project (SRP) Transition Cluster which closed in early December 2023. As a participant in the Transition Cluster, the Project anticipated receiving its System Impact Study (SIS) in early June. Due to process reviews and queue status and SRP's communication, we anticipate receiving the SIS from SRP by the end of July 2024 and such official SRP SIS will be provided as soon as it is released. In the interim, the Project has contracted K.R. Saline & Associates, PLC ("KRSA") to assist with conducting a mock System Impact Study (SIS). The KRSA report is attached.

As identified in the application, the Project is a quick ramping thermal and grid-charged BESS hybrid generating station with an expected commercial date of June 2027 for the BESS portion, and June 2028 for the thermal portion. As identified in the official SRP queue, the Project will consist of 440 MW BESS, and 480 MW Gas, with a maximum net combined output of 905 MW. The Point of Interconnection (POI) is the 500kV Duke – Pinal Central transmission line.

KRSA analyzed the transmission system surrounding the POI to identify thermal injection capacity and evaluate how the addition of the Project affects the thermal flows of elements and bus voltages on the surrounding systems in Arizona. KRSA utilized various Project and queue dispatch conditions to fully interrogate the system for possible issues. The load/grid-charge portion of the Project was not studied herein, though it is not expected to cause any major issues as it would be studied in an off-peak scenario on its 500kV line with ample capacity and close access to flexible generation.

The results of the analysis concluded, based on the assumptions, that:

- The Project performs well and does not independently cause any significant new system violations.
- Several transmission elements are heavily overloaded prior to the Project's interconnection.
 - The Project has light to moderate flow contribution on several of these but should not incur sole mitigation responsibility.
 - Depending on the dispatch assumptions (case), the Project output helps alleviate some of the pre-overloaded elements.
- The Project circumstantially causes several new overloads (in some stressed cases and not others), of which it would be unlikely to garner full mitigation responsibility of due to the overloads being dependent on chosen sinks and other generation dispatch levels.

- The Project circumstantially causes one new voltage deviation issue, which is unlikely to garner mitigation responsibility due to the conditions revealing it and relative distance to the violated bus.
- The Project helps reduce some pre-existing high voltage violations.
- No voltage violations were found for “severe” (P3-P7) contingencies.

Cases Studied

WECC’s latest 2029 Heavy Summer (29HS) case was utilized as the seed case to find the POI’s impact to surrounding transmission. It was modified with planned transmission projects, retirements, and interconnection queue preceding the Project.

KRSA utilized WECC’s 2029 Heavy Summer base case to conduct thermal analyses on the Arizona system under system in-tact (Category P0) and single contingency outage (Category P1) conditions for all of Arizona, as well as multiple and simultaneous outages (Category P2-P7) for the 115kV - 500kV system surrounding the POI.

Case Modifications

The Results section reflects the outlined assumptions and modifications discussed and provides results of the analysis for the WECC power flow models under different conditions as shown in the table below. The 2024 SWAT Ten Year Plan for Arizona utilities was consulted for a planned Transmission Upgrade reference.

The Project was modeled with full output under the “29HS Extreme” and “29HS Extreme 2” cases in order to fully analyze a conservative set of assumptions. Under the “29HS Extreme 2” case, we advance the pending coal retirements for SRP’s share of Four Corners and Coronado.

“Full” Case Comparison

P0-P2 Conditions

OVERLOADED ELEMENT	29HS_Pre_Full	29HS_Extreme	29HS_Extreme2
AMARGOSA T1 230kV - MEAD N 230kV ck:1	102.90%	0.50%	1.00%
COOLIDGE 230kV - ROGSWAPA 230kV ck:1	146.20%	25.30%	14.00%
COOLIDGE 230kV - SUN ARIZ 230kV ck:1	119.80%	9.10%	5.30%
COOLIDGE 230kV - SUN ARIZ 230kV ck:2	119.80%	9.10%	5.30%
FLAGSTAF 345kV - GLENCANY 345kV ck:1	101.70%	1.20%	-1.40%
FLAGSTAF 345kV - GLENCANY 345kV ck:2	101.50%	1.20%	-1.40%
PAPAGOBT 230kV - KYR-EAST 230kV ck:1	< 75%	101.40%	95.70%
RACEWAY 230kV - WESTWNGN 230kV ck:1	113.70%	2.80%	-4.40%
ROGERS 230kV - ROGSWAPA 230kV ck:1	91.00%	9.60%	< 75%
ROGERS 230kV - ROGSWAPA 230kV ck:2	91.00%	9.60%	< 75%

The Rogers – Rogers WAPA #1 and #2 bus ties, and Papago Buttes – Kyrene East 230kV line overload circumstantially due to chosen sink (high SRP load increase), not strictly due to the Project.

Simultaneous and Multiple Contingencies

OVERLOADED ELEMENT	29HS_Pre_Full	29HS_Extreme	29HS_Extreme2
COOLIDGE 230kV - ROGSWAPA 230kV ck:1	177.90%	16.00%	14.30%
COOLIDGE 230kV - SUN ARIZ 230kV ck:1	138.10%	13.50%	8.40%
COOLIDGE 230kV - SUN ARIZ 230kV ck:2	138.10%	13.50%	8.40%
DUKE 230kV - TESTTRAK 230kV ck:1	110.50%	33.90%	30.00%
ED-4 115kV - ED-5 115kV ck:1	94.20%	8.10%	4.20%
MILLIGAN 230kV - CASGRAPS 230kV ck:1	104.10%	-0.20%	-0.20%
SAGUARO 230kV - MILLIGAN 230kV ck:1	148.20%	-0.60%	-0.30%
SNTAROSA 230kV - DBG 230kV ck:1	95.50%	4.70%	1.60%

The new overloads, ED4-ED5 115kV and Santa Rosa – Desert Basin 230kV, are unique to the conditions of the “29HS_Extreme” case and only overload slightly under one N-1-1 outage pair each. Their mitigations would be unlikely to be assigned to the Project in an official SIS.

Project Bella

Duke – Pinal Central 500kV | SRP

Interim System Impact Study

Prepared exclusively for:
Seguro Energy Partners

July 19, 2024



Executive Summary

Seguro Energy Partners (“The Client”) has contracted K.R. Saline & Associates, PLC (“KRSA”) to assist with conducting a mock System Impact Study (SIS) for presentation of system generator performance and impact to the Arizona Corporation Commission (ACC), in lieu of Salt River Project’s (SRP) completed, official SIS. Project Bella (Project) is a fast ramping thermal and grid-charged BESS hybrid generating station with an expected commercial date of June 2027 for the BESS portion, and June 2028 for the thermal portion. From the official SRP queue, the project is slated for 440 MW BESS, and 488 MW Gas, with a maximum combined output of 905 MW. The Point of Interconnection (POI) is the 500kV Duke – Pinal Central transmission line.

KRSA analyzed the transmission system surrounding the POI to identify thermal injection capacity and evaluate how the addition of the Project affects the thermal flows of elements and bus voltages on the surrounding systems in Arizona. KRSA utilized various Project and queue dispatch conditions to fully interrogate the system for possible issues. The load/grid-charge portion of the Project was not studied herein, though it is not expected to cause any major issues as it would be studied in an off-peak scenario on its 500kV line with ample capacity and close access to flexible generation.

KRSA used WECC’s 2029 Heavy Summer base case to conduct thermal analyses on the Arizona system under system in-tact (Category P0) and single contingency outage (Category P1) conditions for all of Arizona, as well as multiple and simultaneous outages (Category P2-P7) for the 115kV - 500kV system surrounding the POI (Appendix 4). The following criteria was monitored for compliance:

- All equipment must be below the normal rating for N-0 (Category P0)
- All equipment must be below the emergency rating for N-1, N-1-1, and N-2 outages (Category P1-P7)
- All bus voltages must conform to voltage and outage category specific levels and deviations

The results of the analysis concluded, based on the assumptions, that:

- The Project performs well and does not independently cause any significant new system violations.
- Several transmission elements are heavily overloaded prior to the Project’s interconnection.
 - o The Project has light to moderate flow contribution on several of these but should not incur sole mitigation responsibility.
 - o Depending on the dispatch assumptions (case), the Project output helps alleviate some of the pre-overloaded elements.
- The Project circumstantially causes several new overloads (in some stressed cases and not others), of which it would be unlikely to garner full mitigation responsibility of due to the overloads being dependent on chosen sinks and other generation dispatch levels.
- The Project circumstantially causes one new voltage deviation issue, which is unlikely to garner mitigation responsibility due to the conditions revealing it and relative distance to the violated bus.
- The Project helps reduce some pre-existing high voltage violations.
- No voltage violations were found for “severe” (P3-P7) contingencies.



Injection Analysis Methodology

PSLF’s SStools (Steady-State Analysis Tools) were used to create multiple P0 – P7 outage files, run the outages, and perform traditional thermal analyses.

Cases Studied

WECC’s latest 2029 Heavy Summer (29HS) case was utilized as the seed case to find the POI’s impact to surrounding transmission. It was modified with planned transmission projects, retirements, and interconnection queue preceding the Project.

Case Modifications

The Results section reflects the outlined assumptions and modifications discussed and provides results of the analysis for the WECC power flow models under different conditions as shown in the table below. The 2024 SWAT Ten Year Plan for Arizona utilities was consulted for a planned Transmission Upgrade reference. Those studied are broken out in Appendix 3.

The cases below were developed by assuming that locally, Gas and PV/BESS would generally not be producing together; that one’s pricing and availability would determine the dispatch over the other. However, there were several sensitivities studied with only the Project outputting using both sources, and two “Extreme” cases with the entire queue exporting independently of resource type. The latter exceeded the available 29HS SRP load and started to destabilize power flow solution on the California side, even after planned SRP retirements, so SRP load was increased universally by the percentages stated. In the final case, increased SRP load was reduced in favor of deactivating the future coal retirement portfolio out to 2032.

CASE ID	TRANS. UPGRADES	SRP PLANNED RETIREMENTS	SRP LOCAL GAS	SRP LOCAL QUEUE	SRP LOAD ADJUST	CALI. EXPORT	PROJECT DISPATCH
29HS_PRE_RENEW	Yes	Yes	Min (-)	PV/BESS	None	785 MW	0 MW
29HS_PRE_GAS	Yes	Yes	Max (+)	Gas Only	None	913 MW	0 MW
29HS_PRE_FULL	Yes	Yes	Max (+)	Full	+10%	1177MW	0 MW
29HS_RENEW	Yes	Yes	Min (-)	PV/BESS	None	1184MW	440 MW** (Full BESS only)
29HS_GAS	Yes	Yes	Max (+)	Gas Only	None	1349MW	488 MW (Full Gas Only)
29HS_RENEW+	Yes	Yes	Min (-)	PV/BESS	+10%	685 MW	905 MW (Full Hybrid)
29HS_GASHYB10	Yes	Yes	Max (+)	Gas Only	+10%	768 MW	905 MW (Full Hybrid)
29HS_GASHYB15	Yes	Yes	Max (+)	Gas Only	+15%	277 MW	905 MW (Full Hybrid)
29HS_EXTREME	Yes	Yes	Max (+)	Full	+20%*	1457MW	905 MW (Full Hybrid)
29HS_EXTREME2	Yes	Yes + 4C ¹ + Coronado	Max (+)	Full	+10%*	1679MW	905 MW (Full Hybrid)

*Case cannot solve with lower increments.

**2027 COD equivalent

To add generation to the modified cases, generation must be removed elsewhere in the system so that the source (generation) and sink (load) are in balance. Therefore, KRSA must make educated assumptions about

¹ Four Corners Generating Station



where to reduce/increase power. Planned SRP generator retirements were used to sink the added generation, as was increasing SRP load universally. Excess was sunk to a swing generator sufficiently deep in California, correlating to the “Cali Export” above. The generation dispatch is further explained in Appendix 2.

Outages

The contingencies used in the analysis were developed using NERC TPL-001-5 Transmission System Planning Performance Requirements². The different contingencies and their definitions are shown in the table below.

P1-P2 contingencies were defined as all 100kV and up elements (including modeled bus ties) in Arizona (Areas 14, 15, 16, 17, and 19).

Development of P3 – P7 contingencies utilized a script to create multiple contingency (P3 and P6) and simultaneous contingency (P4 and P7) outage files, which were combinations of 115kV+ P1 outages within 4 nodes of the POI (shown in Appendix 4).

CATEGORY	OUTAGE TYPE	DESCRIPTION
P0	No contingency	Normal system
P1	Single contingency	Single outage of generator, line, transformer, or shunt device
P2	Single contingency	Non fault line outage, bus section fault, internal breaker fault
P3	Multiple contingency	Loss of generator followed by P1 outage (excluding generator faults) with system adjustments
P4	Simultaneous contingency	P1 fault plus stuck breaker causing loss of multiple elements
P5	Simultaneous contingency	P1 fault plus failure of protection system
P6	Multiple contingency	Two P1s (excluding generator faults) with system adjustments
P7	Simultaneous contingency	Loss of a common structure such as a transmission tower that causes multiple outages

Monitoring Criteria

If any thermal ratings are exceeded in the Pre-Project cases, these are treated as pre-existing overloads, and are not the fault of the Project. All Arizona Area flows over 90% of element ratings were logged, for all system conditions. Over 99.5% of normal or emergency ratings, respectively, is considered overloaded. To screen out negligible changes, a threshold of 0.1% from “Pre” to “Post” cases was chosen for a violation to be reported as impactful.

Voltage testing parameters were based on local utility criteria, as displayed below. To screen out negligible changes, a threshold of 0.005pu (0.5%) was chosen for a violation to be reported as impactful.

VOLTAGE RANGE	NORMAL RANGE (P0)	CONTINGENCY RANGE (P1)	CONTINGENCY RANGE (P2-P7)	DELTA TOLERANCE (P1 ONLY)
60 - 69KV	0.98 – 1.05 (SRP) 0.95 – 1.05 (Others)	0.90 – Any (SRP) 0.90 – 1.10 (Others)	Any	Any
115 - 230KV	0.98 – 1.05 (SRP) 0.95 – 1.05 (Others)	0.90 – 1.10	0.90 – 1.10	0.05 (SRP) 0.08 (Others)
345 - 500KV	0.9975 – 1.1025	0.945 – 1.10 ³	0.945 – 1.10	0.05 (SRP) 0.08 (Others)

² <https://nerc.com/pa/Stand/Reliability%20Standards/TPL-001-5.pdf> Last accessed 7/19/2024.

³ Some SRP sources state a 550kV limit for 525kV-base buses. However, the utilized WECC base case did not contain any 525kV buses, so 1.1pu was maintained on this range (551.25kV max).



Results

Results are categorized according to their closest “Pre-Project” case, as follows:

Test Set	Pre-Project Case ID	Compared Post-Project Case IDs	Validation Purpose
“Renewable”	29HS_Pre_Renew	29HS_Renew, 29HS_Renew+	The Project (BESS only and Full output), when paired with renewables-based queued projects and increased SRP load, does not independently cause adverse effects.
“Gas”	29HS_Pre_Gas	29HS_Gas, 29HS_GasHyb10, 29HS_GasHyb15	The Project (Gas only and Full output), when paired with a high gas-based generation fleet (existing and queued), and increased SRP load, does not independently cause adverse effects.
“Full”	29HS_Pre_Full	29HS_Extreme, 29HS_Extreme2	The Project (Full output), when paired with a maximum amount of local queue, existing gas-based generation fleet, and increased SRP load, does not independently cause adverse effects.

Steady-State Thermal Flows

Steady-State flows across all 100kV and up elements across Arizona were monitored. Elements over 99.5% loading, with over 0.1% change and are shown below. Overloads may be caused by multiple contingencies; only the maximum loading condition is presented. The base maximum loading for each overload is presented, with the Project effects to that loading in the following columns (absolute loading presented when the prior loading is not available). Conditions where the Project instigates a new overload are colored red, and colored blue if it alleviates a pre-existing overload.

“Renewable” Case Comparison

P0-P2 Conditions

OVERLOADED ELEMENT	29HS_PRE_RENEW	29HS_RENEW	29HS_RENEW+
COOLIDGE 230KV - SUN ARIZ 230KV CK:1	96.4%	+2.7%	+9.6%*
COOLIDGE 230KV - SUN ARIZ 230KV CK:2	96.4%	+2.7%	+9.6%*
COOLIDGE 230KV - ROGSWAPA 230KV CK:1	101.1%	+5.2%	+21.7%
AMARGOSA T1 230KV - MEAD N 230KV CK:1	102.6%	+0.5%	-0.1%
FLAGSTAF 345KV - GLENCANY 345KV CK:2	102.4%	-0.7%	+0.9%
FLAGSTAF 345KV - GLENCANY 345KV CK:1	102.6%	-0.7%	+0.9%
RACEWAY 230KV - WESTWNGN 230KV CK:1	109.9%	-2.1%	+6.2%
DUKE 230KV - TESTTRAK 230KV CK:1	< 75%	102.6%	126.0%

*These overloads are pre-overloaded in other studied Pre-Project cases (see next sections).

The Duke – Test Track 230kV bus tie overload is a known issue from other local studies and should not be the responsibility of the Project.



Simultaneous and Multiple Contingencies

OVERLOADED ELEMENT	29HS_PRE_RENEW	29HS_RENEW	29HS_RENEW+
COOLIDGE 230KV - ROGSWAPA 230KV CK:1	124.8%	+6.9%	+29.2%
COOLIDGE 230KV - SUN ARIZ 230KV CK:1	106.6%	+4.1%	+13.9%
COOLIDGE 230KV - SUN ARIZ 230KV CK:2	106.6%	+4.1%	+13.9%
DUKE 230KV - TESTTRAK 230KV CK:1	142.9%	+14.3%	+44.7%
ROGSWAPA 230KV - PINPK 230KV CK:2	99.9%	-7.3%	+6.5%
SNTAROSA 230KV - TESTTRAK 230KV CK:1	103.1%	+8.4%	+30.4%

“Gas” Case Comparison

P0-P2 Conditions

OVERLOADED ELEMENT	29HS_PRE_GAS	29HS_GAS	29HS_GASHYB10	29HS_GASHYB15
COOLIDGE 230KV - SUN ARIZ 230KV CK:1	102.0%	+2.8%	+9.4%	+11.3%
COOLIDGE 230KV - SUN ARIZ 230KV CK:2	102.0%	+2.8%	+9.4%	+11.3%
COOLIDGE 230KV - ROGSWAPA 230KV CK:1	118.1%	+5.6%	+20.6%	+25.6%
ROGERS 230KV - ROGSWAPA 230KV CK:2	< 75%	< 75%	97.8%	107.6%
ROGERS 230KV - ROGSWAPA 230KV CK:1	< 75%	< 75%	97.8%	107.6%
AMARGOSA T1 230KV - MEAD N 230KV CK:1	102.7%	+0.6%	-0.2%	-0.8%
FLAGSTAF 345KV - GLENCANY 345KV CK:2	102.6%	-0.8%	+1.0%	+2.2%
FLAGSTAF 345KV - GLENCANY 345KV CK:1	102.8%	-0.8%	+1.0%	+2.2%
RACEWAY 230KV - WESTWNGN 230KV CK:1	110.8%	-2.5%	+7.0%	+12.4%
DUKE 230KV - TESTTRAK 230KV CK:1	< 75%	< 75%	109.5%	113.4%

The Rogers – Rogers WAPA #1 and #2 bus ties overload circumstantially, due to the extra 5% SRP load increase rather than higher exports, not strictly due to the Project.

The Duke – Test Track 230kV bus tie overload is a known issue from other local studies and should not be the responsibility of the Project.

Simultaneous and Multiple Contingencies

OVERLOADED ELEMENT	29HS_PRE_GAS	29HS_GAS	29HS_GASHYB10	29HS_GASHYB15
COOLIDGE 230KV - ROGSWAPA 230KV CK:1	144.1%	+7.6%	+29.7%	+15.1%
COOLIDGE 230KV - SUN ARIZ 230KV CK:1	116.7%	+4.5%	+13.9%	+16.5%
COOLIDGE 230KV - SUN ARIZ 230KV CK:2	116.7%	+4.5%	+13.9%	+16.5%
DUKE 230KV - TESTTRAK 230KV CK:1	127.0%	+16.1%	+43.4%	+50.8%
MILLIGAN 230KV - CASGRAPS 230KV CK:1	106.5%	0.0%	+0.1%	+0.1%
ROGSWAPA 230KV - PINPK 230KV CK:1	91.4%	-91.4%	+7.3%	+18.5%
ROGSWAPA 230KV - PINPK 230KV CK:2	98.5%	-8.0%	+7.9%	+19.9%
SNTAROSA 230KV - TESTTRAK 230KV CK:1	< 75%	90.6%	110.7%	117.3%



The Santa Rosa – Test Track 230kV is a known pre-existing overload that can occur during certain severe (N-1-1/N-2) outages. This Project should not be responsible for its mitigation.

The Project causes the two Rogers – Pinnacle Peak 230kV circuits to overload in its maximum output cases. The Project may be forced to curtail, or otherwise involved in a RAS during the causal contingencies, which share one base element outage. The Project should not be solely required to mitigate through network upgrades, however, as the subsequent “Full” and “Extreme” cases do not exhibit pre-overloading in the severe outage category, meaning the overloads are dependent on how the surrounding queued generation is dispatched.

“Full” Case Comparison

P0-P2 Conditions

OVERLOADED ELEMENT	29HS_PRE_FULL	29HS_EXTREME	29HS_EXTREME2
AMARGOSA T1 230KV - MEAD N 230KV CK:1	102.9%	+0.5%	+1.0%
COOLIDGE 230KV - ROGSWAPA 230KV CK:1	146.2%	+25.3%	+14.0%
COOLIDGE 230KV - SUN ARIZ 230KV CK:1	119.8%	+9.1%	+5.3%
COOLIDGE 230KV - SUN ARIZ 230KV CK:2	119.8%	+9.1%	+5.3%
FLAGSTAF 345KV - GLENCANY 345KV CK:1	101.7%	+1.2%	-1.4%
FLAGSTAF 345KV - GLENCANY 345KV CK:2	101.5%	+1.2%	-1.4%
PAPAGOBT 230KV - KYR-EAST 230KV CK:1	< 75%	101.4%	95.7%
RACEWAY 230KV - WESTWNGN 230KV CK:1	113.7%	+2.8%	-4.4%
ROGERS 230KV - ROGSWAPA 230KV CK:1	91.0%	+9.6%	< 75%
ROGERS 230KV - ROGSWAPA 230KV CK:2	91.0%	+9.6%	< 75%

The Rogers – Rogers WAPA #1 and #2 bus ties, and Papago Buttes – Kyrene East 230kV line overload circumstantially due to chosen sink (high SRP load increase), not strictly due to the Project.

Simultaneous and Multiple Contingencies

OVERLOADED ELEMENT	29HS_PRE_FULL	29HS_EXTREME	29HS_EXTREME2
COOLIDGE 230KV - ROGSWAPA 230KV CK:1	177.9%	+16.0%	+14.3%
COOLIDGE 230KV - SUN ARIZ 230KV CK:1	138.1%	+13.5%	+8.4%
COOLIDGE 230KV - SUN ARIZ 230KV CK:2	138.1%	+13.5%	+8.4%
DUKE 230KV - TESTTRAK 230KV CK:1	110.5%	+33.9%	+30.0%
ED-4 115KV - ED-5 115KV CK:1	94.2%	+8.1%	+4.2%
MILLIGAN 230KV - CASGRAPS 230KV CK:1	104.1%	-0.2%	-0.2%
SAGUARO 230KV - MILLIGAN 230KV CK:1	148.2%	-0.6%	-0.3%
SNTAROSA 230KV - DBG 230KV CK:1	95.5%	+4.7%	+1.6%

The new overloads, ED4-ED5 115kV and Santa Rosa – Desert Basin 230kV, are unique to the conditions of the “29HS_Extreme” case and only overload slightly under one N-1-1 outage pair each. Their mitigations would be unlikely to be assigned to the Project in an official SIS.



Steady-State Voltages

Voltage Deltas (Deviations)

Deviation violations were tabulated with all cases together. They are not a concern for outage categories higher than P1.

A handful of voltage deltas higher than the criteria thresholds were found to be pre-existing. However, the Project was only found to influence these pre-existing violations minorly, within +/-0.004pu.

There was one new delta violation found in two of the “Post-Project” cases, shown below:

BUS VIOLATED	AREA	CAUSAL OUTAGES	29HS_GASHYB15	29HS_EXTREME
HENSHAW 230KV	SRP	1	0.050	0.054

These are slight violations caused by a single 230kV outage, in the two most artificially inflated SRP load cases. The extreme conditions of the case are shown to be the cause of the violation rather than the Project.

“Renewable” Case Comparison

P0-P2 Conditions

BUS VIOLATED	29HS_PRE_RENEW	29HS_RENEW	29HS_RENEW+
BAGDADTAP 115KV	1.177	1.176	1.172
BAGDTWN 115KV	1.173	1.172	1.168
CH-SAG SC1 500KV	1.188	1.185	1.179
CORSIL 1 500KV	1.109	1.108	Resolved

Voltages over the change threshold only improved pre-existing high voltage conditions.

Simultaneous and Multiple Contingencies

No voltage violations were found for “Renewable” Case severe contingencies.

“Gas” Case Comparison

P0-P2 Conditions

BUS VIOLATED	29HS_PRE_GAS	29HS_GAS	29HS_GASHYB10	29HS_GASHYB15
BAGDADTAP 115KV	1.174	1.173	1.169	1.167
BAGDTWN 115KV	1.169	1.168	1.164	1.162
CH-SAG SC1 500KV	1.179	1.176	1.173	1.172

Voltages over the change threshold only improved pre-existing high voltage conditions.

Simultaneous and Multiple Contingencies

No voltage violations were found for “Gas” Case severe contingencies.



“Full” Case Comparison

P0-P2 Conditions

BUS VIOLATED	29HS_PRE_FULL	29HS_EXTREME	29HS_EXTREME2
BAGDADTAP 115KV	1.172	1.165	1.17
BAGDTWN 115KV	1.168	1.161	1.166
CH-SAG SC1 500KV	1.177	1.172	1.173
NAV-DUG SC1 500KV	1.125	1.12	1.123
NAV-DUG SC2 500KV	1.108	1.102	1.102
YAV-WW SC1 500KV	1.107	1.101	1.102

Voltages over the change threshold only improved pre-existing high voltage conditions.

Simultaneous and Multiple Contingencies

No voltage violations were found for “Full” Case severe contingencies.



Appendices

Appendix 1: Interconnection Queue Modeled

Interconnection queues for SRP, APS, TEP, and WALC projects that precede the subject Project and are locally influential were considered for adding to the “Pre” and “Post” cases. SRP had the majority, while APS had two. WALC had several local projects at ED5 and Test Track 230kV which were ignored due to unknown status/timeline, and a lack of clear redispatch/sink practice. The APS projects were included due to being on the nearby 230kV system that the SRP queue shared and were in the LGIA-signed phase.

SRP

Green in the SRP table below signifies that the project was already active in the Base case, and no additional changes were made regarding it. Yellow is the subject Project of this study, of which the modeled dispatch depended on the modified case.

Queue Position	Queue Date	Status	Requested COD	Point of Interconnection	Location	Generator(s) Type	Modeled (MW)	MW	Max Summer (MW)
Q44	4/26/2018	In-Service	12/31/2020	Vah-Ki 230 kV	Pinal, AZ	Photovoltaic	0	100	*
Q44	4/26/2018	In-Service	12/31/2023	Vah-Ki 230 kV	Pinal, AZ	Battery	0	100	100
Q09	9/12/2018	In Progress	12/31/2023	Pinal Central 230 kV	Pinal, AZ	Photovoltaic/Battery	200	200/200	200
Q47	9/14/2018	In Progress	6/1/2023	Randolph 230 kV	Pinal, AZ	Photovoltaic	0	200	*
Q47	9/14/2018	In Progress	9/14/2025	Randolph 230 kV	Pinal, AZ	Battery	0	200	200
Q01	9/24/2018	In-Service	4/30/2024	Rudd 230 kV	Maricopa, AZ	Battery	250	250	250
Q50	10/5/2018	In Progress	5/1/2022	Browning 230 kV	Maricopa, AZ	Battery	250	250	250
Q55	1/13/2019	In-Service	6/30/2023	Vah-Ki 230 kV	Pinal, AZ	Photovoltaic/Battery	0	125/125	125
Q13	4/1/2019	In-Service	6/1/2024	Pinal Central 230 kV	Pinal, AZ	Photovoltaic/Battery	300	300/300	300
Q60	1/28/2020	In Progress	5/1/2025	Abel 230 kV	Pinal, AZ	Photovoltaic/Battery	300	300/300	300
Q64	6/19/2020	In Progress	12/1/2020	Desert Basin 230 kV	Pinal, AZ	Natural Gas	0	17	*
Q64	6/19/2020	In Progress	3/30/2022	Desert Basin 230 kV	Pinal, AZ	Natural Gas	17	17	673
Q71	3/18/2021	In Progress	6/1/2022	Desert Basin 230 kV	Pinal, AZ	Natural Gas	99	99	772
Q76	5/6/2021	In Progress	6/1/2026	Pinal Central-Browning 500 kV Line	Pinal, AZ	Natural Gas	0	332	*
Q76	5/6/2021	In Progress	6/1/2026	Pinal Central-Browning 500 kV Line	Pinal, AZ	Natural Gas	655	332	655
Q89	1/13/2022	In Progress	10/8/2026	Vah-Ki 230 kV	Pinal, AZ	Photovoltaic/Battery	150	156.5/156.5	150
Q32	8/17/2023	In Progress	11/5/2026	Pinal Central-Duke 500 kV Line	Pinal, AZ	Natural Gas/Battery	905	488/440	905

Source: https://www.oasis.oati.com/woa/docs/SRP/SRPdocs/SRP_Generation_Queue_2024-06-18.pdf Accessed: 7/11/2024



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Q #	MW Output	County	Requested_POI	COD_Requested	Date of Issuance	Current Status	Request Type	Submission Date	Energy Source Type	Customer Status
Q295	259.2	Pinal	Milligan 230kV Substation	3/30/2026	3/27/2019	LGIA Executed	NRIS	3/27/2019	PV + Storage	Active
Q264	130	Pinal	Milligan Substation 230kV	12/1/2022	9/29/2017	LGIA Executed	NRIS	9/29/2017	PV + Storage	In Construction

Source: https://www.oasis.oati.com/woa/docs/AZPS/AZPSdocs/ACTIVE_LIST_OasisQueuePosting_2024-05-30_08-28-09.pdf Accessed: 7/12/2024



Appendix 2: Generation Re-Dispatch

Retirements were modeled based on SRP’s website: “The plan includes Hayden in 2027, Craig Unit 1 in 2025 and Unit 2 in 2028, Four Corners in 2031 and Coronado no later than 2032.” Hayden and Craig Units 1 and 2 were deactivated in accordance with SRP’s ownership percentage of each to correspond with the case seed year of 2029. In the “29HS_Extreme2” case, the same was done to Four Corners and Coronado.

Source: <https://www.srpnet.com/grid-water-management/grid-management/power-generation-stations>

For SRP “Minimum Gas (-)” cases, Desert Basin and Coolidge Generating Station units were turned off. For “Maximum Gas (+)” cases, all of Desert Basin’s units were enabled; the remaining local gas plants were already at their maxima.

There must always be a system swing bus set for any successful load flow computation. The Haynes gas generator in Los Angeles, California was utilized for the purpose of absorbing excess generation queue and system error, and for providing a sink in the direction of the CAISO market.

Appendix 3: Transmission Upgrades

The following were extracted from the SWAT and SRP 2024 Ten Year Planning documents for local relevance. KRSA modeled or verified these projects in the 2029 Base case before proceeding with further modifications.

Local Transmission Change	ISD	KRSA Action
Sundance - Pinal Central 230kV	2027	Added
Hassayampa - Pinal West #2 500kV	2028	Verified
10 Ohm Series Reactor Henshaw - Knox #1 & #2	2028	Added
10 Ohm Series Reactor Kyrene E-W 230kV	2028	Added
Browning 500/230kV #3 & #4	2024	Verified
Browning 230/69kV #3	2024	Added
Pinal Central 500/230kV #3 & #4	2024	Added
Duke 500/230kV #2	2028	Added
Rudd 500/230kV #5	2026	Added
Rudd 500/230kV #6	2029	Added
Pinal Central - ED5 230kV	2025	Added
Test Track 230/69kV #2 + TT-SR 69kV #2	2028	Added

Source: <https://doc.westconnect.com/Documents.aspx?NID=21071&dl=1>
https://www.oasis.oati.com/woa/docs/SRP/SRPdocs/SRP_2024_10_Year_Plan.pdf

Appendix 4: Outage List

The following single outages (85) were used to create the Multiple contingency and Simultaneous contingency outages by combining them in all possible ways. If there were issues found for a given N-2 outage, the instigating elements were analyzed for validity (as a P4, P5, or P7) using spatial/aerial imagery and local utility single line diagrams before including them in the results. There were 1,009 N-1 outages (all of Arizona utility areas), and approximately 6,770 N-1-1 and N-2 outages studied in the analysis.

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line_3 " 15080 PINAL_C 500.00 - 155450 Q76_CPG500 500.00" 1.000 " " " " 0
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tran_6 " 15087 DUKE 500.00 - 15232 DUKE 230.00" 1.000 " " " " 0
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tran_8 " 15088 PINAL_W 500.00 - 160304 PINAL_WEST 345.00" 1.000 " " " " 0
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Acronyms and Common Terms

Electrical:

Acronym	Meaning	Definition
“DFX” or “DFAX”	“distribution factor”	The percentage a given element in the system is impacted by a connection at a specific POI.
“kV”	“kilo-volts”	Equivalent to 1,000 volts; refers to the common voltage of transmission or distribution circuit.
“MVA”	“mega volt-ampere”	Equivalent to 1 million volt-amps of apparent power. Apparent power includes both real and reactive power, and is defined by the trigonometric identity: $S = \sqrt{(Real(P)^2 + Reactive(Q)^2}$
“MW”	“mega-watt”	Equivalent to 1 million watts of real power.
“pf”	“power factor”	Can be defined in several ways but refers to the ratio of real to apparent power (pf = P/S). Power factors as close to unity (1.0) are preferred.
“VAr”	“volt-ampere, reactive”	The ‘imaginary’ power component of apparent power. Both reactive and capacitive power are in this category, and each can be considered opposite to each other, in that the goal is to balance each other to achieve a unity power factor.

Interconnection:

Term	Meaning	Definition
“BES”	“Bulk Electric System”	The high voltage “grid”, typically 69kV and higher.
“Contingency”	“System Contingency”	Refers to any simulated or real event to a transmission or distribution system that takes it out of normal operating condition. These are defined by NERC in terms of “P-x” events.
“LGIA”	“Large Generator Interconnection Agreement”	Typically references the official submission or confirmed documentation with the interconnecting utility for a new generator at a specific POI. “Large” typically implies over 20MW.
“Overload”	“Overloaded Element”	Refers to an element that exceeds its maximum rating in a system. These studies consider normal and emergency ratings; emergency ratings are typically higher and are applicable during a contingency.
“POI”	“Point(s) of Interconnection”	The location on a transmission or distribution system being analyzed for a new generator interconnection.
“RAS”	“Remedial Action Scheme”	A method in place from a utility or organizer that mitigates an element’s overload in certain conditions.
“Queue”	“(Large) Generator Interconnection Queue”	Refers to one of several project queues in a given utility or RTO, etc. These include network/transmission upgrade queues, LGIA project queues, generator retirement queues, etc.

System Operators:

Acronym	Full Name
“CAISO”	California Independent System Operator
“ERCOT”	Electric Reliability Council of Texas
“MISO”	Midcontinent Independent System Operator
“NEISO”	New England Independent System Operator
“NYISO”	New York Independent System Operator
“PACE/W”	Pacificorp East/Pacificorp West
“PJM”	Pennsylvania-New Jersey-Maryland Interconnection
“SERC”	Southeast Reliability Corporation
“SPP”	Southwest Power Pool
“WECC”	Western Electricity Coordinating Council



Analysis Tools

Power Flow

To perform an injection overload analysis, KRSA relies on a steady-state power-flow case that characterizes the transmission system for a specific “snapshot” in time (i.e., summer peak conditions). This means that generation, load, and all elements comprising the transmission system are assumed to be in a static state. The intent in this approach is to allow the transmission planner to evaluate the power system under stressed conditions, including the effects due to a single line and transformer outages. These conditions will never occur exactly as modeled.

KRSA utilized the following software to perform the work:

1. PSLF v23 – Industry-standard power flow modeling software by GE. It is used to open, view, and appropriately modify the power flow data.
2. TTools – A proprietary set of scripts developed to expedite power flow case production and optimize and expand RiMod post-processing and study abilities.
3. ArcGIS 10.8 – GIS Application by ESRI. It is used to analyze and manipulate geographic data extracted from power flow models.

Disclaimer

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An injection overload analysis is limited by the quality of power flow data. Unforeseen changes to the grid that are not modeled in a power flow case, such as new power plants, substations, and power lines, power plant closures, transmission upgrades, substation upgrades, or planned transmission and generation projects being canceled, may change the actual amount of power that can be injected into a specific substation bus or transmission line. The authors of power flow cases work to incorporate foreseeable changes to the grid. Despite these efforts, it is impossible to know which projects will be completed and what the grid will look like exactly in the year modeled. KRSA works to model relevant projects in queue and transmission to the best of their ability with the data and information available.

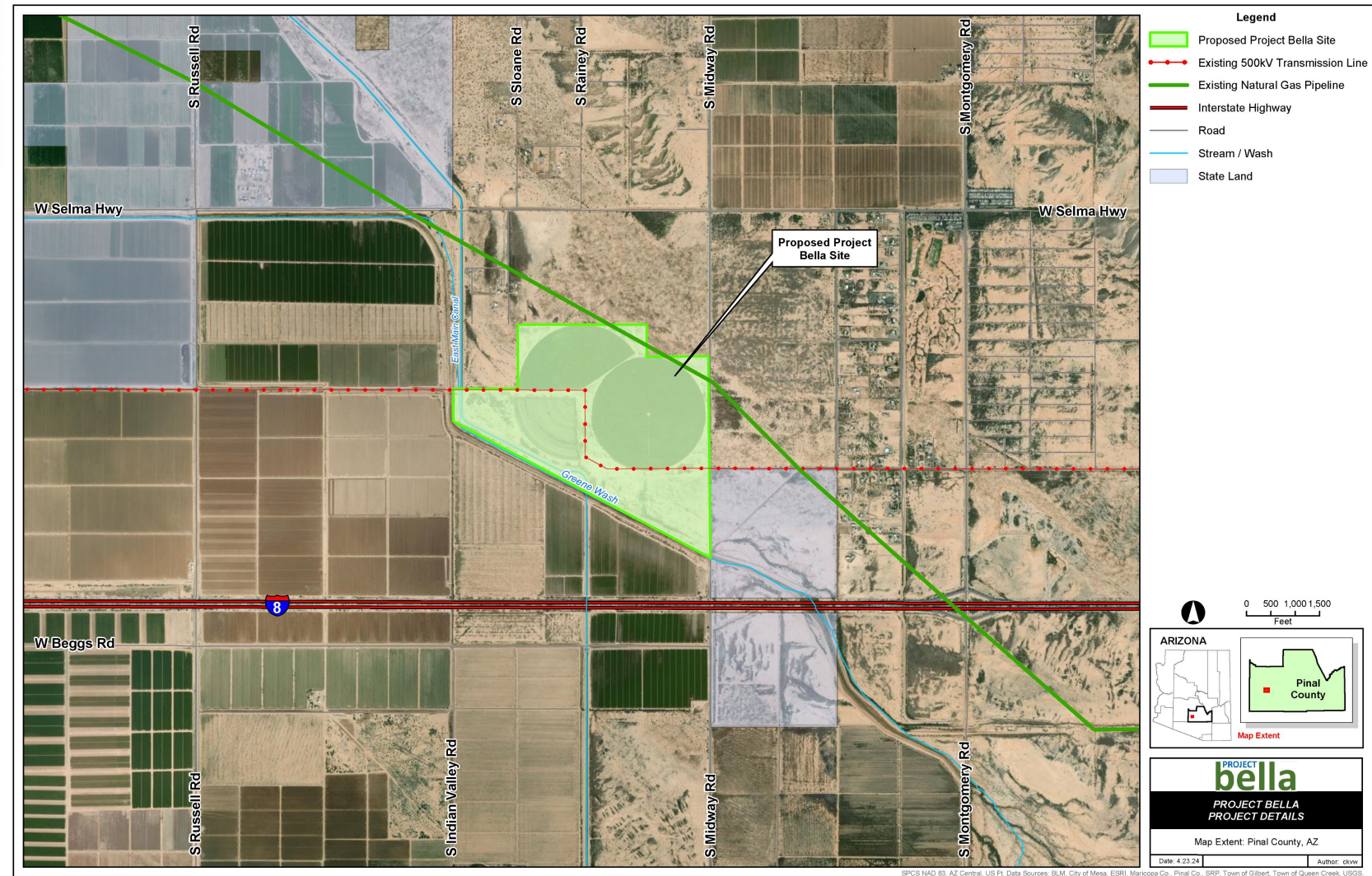
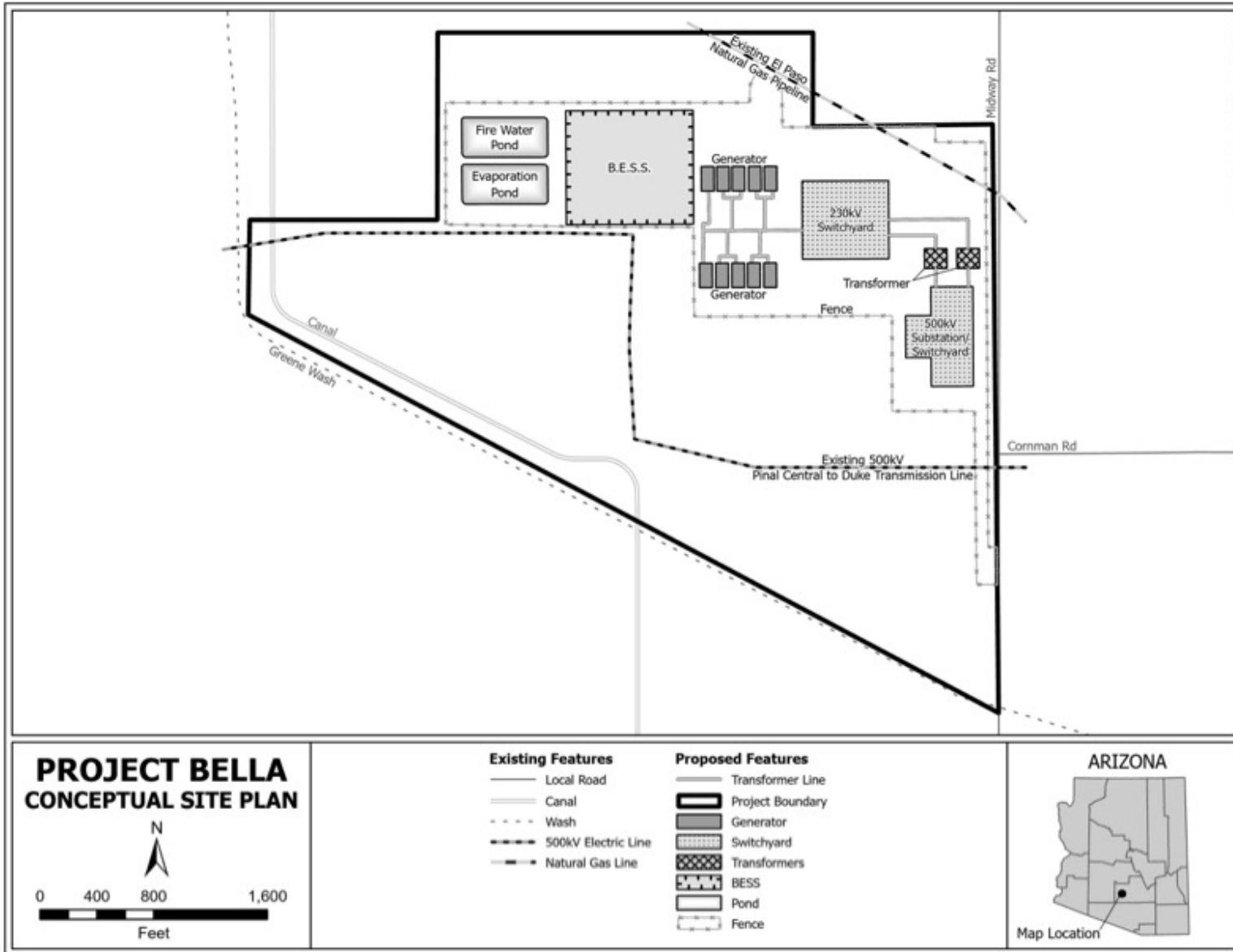
Any recommendations, opinions, or findings stated in this report are based on circumstances and facts as they existed at the time KRSA performed the work. Any changes in such things (upon which this report is based) may adversely affect any recommendations, opinions, or findings discussed in this report. No part of this report may be modified to change its context without the express written permission of KRSA.



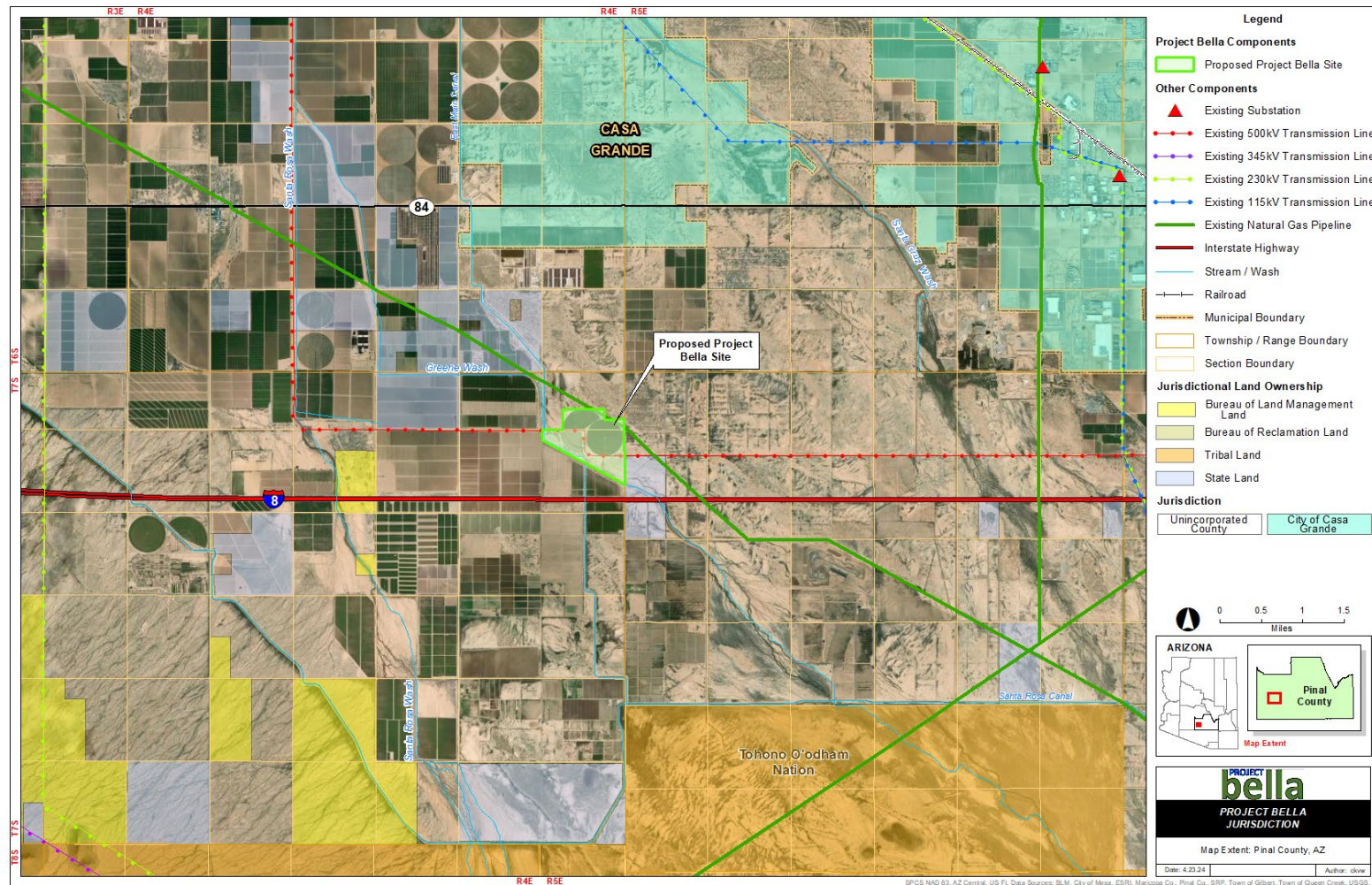
PCE-18

Project Hearing Placemat

Project Bella



Project Bella



PROJECT bella PROJECT BELLA
WEST SELMA HIGHWAY & RAINY RD - LOOKING SOUTHEAST - PROPOSED VIEW

THIS RENDERING IS BASED ON CURRENT INFORMATION AS OF THIS DATE AND IS SUBJECT TO CHANGE.

KOP# 1

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Figure E-2B

PCE-19

Docketed 90-Day Plan



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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-

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,

A handwritten signature in black ink, appearing to read 'Jason Y. Moyes', with a stylized flourish at the end.

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.

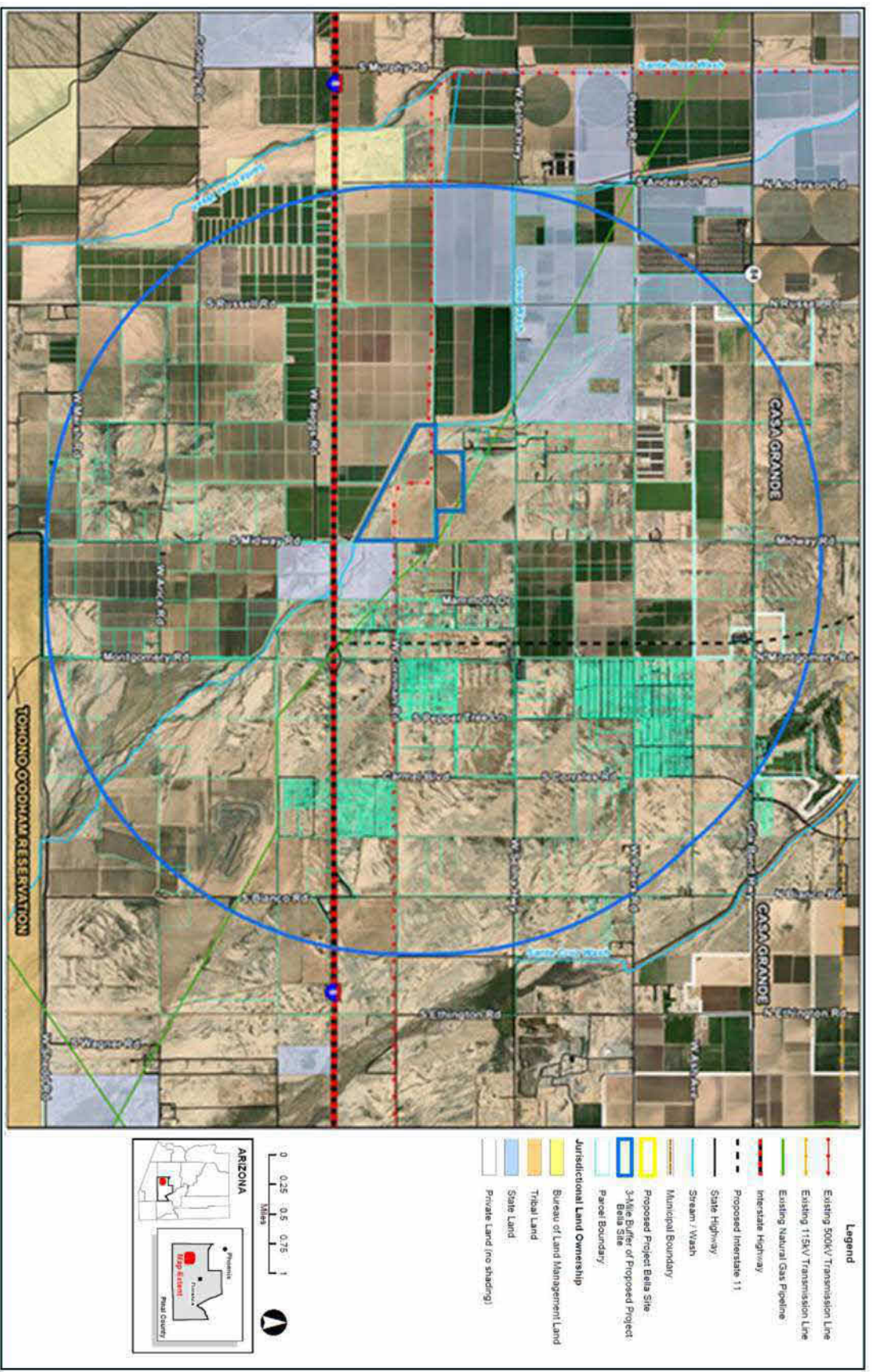
Transmission owners shall provide the technical reports, analysis or basis for projects that are included for serving customer load growth in their service territories.

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)

