Application for a Certificate of Environmental Compatibility

Case Number:

Eleven Mile Solar Center Generation Tie Line Project

Prepared for:

State of Arizona
Arizona Power Plant and Transmission Line Siting Committee

Submitted by:

Eleven Mile Solar Center, LLC

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INTRODUCTION

Pursuant to A.R.S. §§ 40-360, et seq., Eleven Mile Solar Center, LLC (Applicant) is seeking a Certificate of Environmental Compatibility (CEC) for a proposed 230 kilovolt (kV) alternating current (AC) generation transmission tie-in line (Gen-Tie) and associated 34.5/230kV step-up substation facilities (Project Substation) herein collectively called "Project." The Project is designed to deliver power from an adjacent 300-megawatt (MW) AC solar and battery storage facility (Solar Facility) located on 2,336 acres of privately owned land to the regional electric transmission grid by interconnection at the Pinal Central 230/500kV Substation (Pinal Central Substation).

The short 0.3-mile-long Gen-Tie line will be constructed with below ground and above ground segments as shown in Figure 1. Applicant is seeking two CECs for the Project because of the separate ownership and construction of portions of the Project. The first CEC (CEC-1) would cover the Project Substation and the above-ground segment of the Gen-Tie from the Project Substation to the Point of Change of Ownership (PCO), and the second CEC (CEC-2) would cover the segment of the Gen-Tie from the PCO to the point of interconnection at the Pinal Central Substation.

The Applicant is a wholly owned indirect subsidiary of Ørsted North America Onshore, LLC (Ørsted). Ørsted develops, constructs, and operates offshore and onshore wind farms, solar farms, energy storage facilities, renewable hydrogen and green fuels facilities, and bioenergy plants. Moreover, Ørsted provides energy products to its customers. Ørsted is the only energy company in the world with a science-based net-zero emissions target as validated by the Science Based Targets initiative (SBTi). Ørsted ranks as the world's most sustainable energy company in Corporate Knights' 2022 index of the Global 100 most sustainable corporations in the world and is recognized on the CDP Climate Change A List as a global leader on climate action. Headquartered in Denmark, Ørsted employs 6,836 people. Ørsted's shares are listed on Nasdaq Copenhagen (Ørsted).

The Project will permit the delivery of approximately 900,000 Megawatt-hour (MWh) of energy that will be generated annually by the Solar Facility – enough to power 68,000 Arizona homes each year. As detailed in this Application, the Project is compatible with the environment and ecology of the surrounding area and the state of Arizona.

Project Overview

The Project consists of (1) the Gen-Tie, which is an approximately 0.3-mile 230kV transmission line between the Project Substation and the existing Pinal Central Substation and (2) the Project Substation, which is a new 34.5/230kV substation dedicated exclusively to serve the Solar Facility (Figure 2). The above ground segment of the Gen-Tie will occupy a 100-foot-wide right-of-way and the structures used for the above ground segment will consist of the risers and 90- to 160-foot-tall steel monopoles. Distances between poles may vary from 200 feet to 600 feet. The structures that are likely to be utilized to construct the Gen-Tie are shown in Exhibit G.

Gen-Tie Route

CEC-1

The Applicant is requesting approval of the Route Corridor shown on Figure 3 to achieve site-specific mitigation objectives or meet site-specific engineering requirements and obtain the right-of-way for the route for the Gen-Tie line. The Route Corridor is an area approximately 30 acres in size and measures approximately 1,000 feet wide north to south and measures vary between 1,500 to 1,800 feet wide east to west.

Approximately half of the 0.3-mile-long Gen-Tie line would be below ground[1]. The below ground portion of the Gen-Tie will extend approximately 400 feet (0.07 mile) east of the Project Substation and cross below (underground) Eleven Mile Corner Road and the Western Area Power Administration (WAPA) 115kV transmission lines. On the east side of Eleven Mile Corner Road, the route would continue northeast for 400 feet (0.07 mile) and then continue north for approximately 300 feet (0.06 mile) to a riser structure.

From the riser structure located on the east side of Eleven Mile Corner Road, the transmission line would continue above ground to the east approximately 200 feet (0.04 mile) to a new structure and PCO. The physical location of PCO transfer is approximately 250 feet (0.06 mile) east of the existing Pinal Central Substation fence and adjacent and north of the main substation access road (Figure 2).

Project Substation

The Project Substation would be located within the Solar Facility boundary on approximately 1.5 acres (Figure 2). It is anticipated the Project Substation would include a power transformer, one 230-kV main breaker, two-35kV feed breakers, switches, a control house, and a substation superstructure within an approximately 6-foot-tall fence enclosure.

CEC-2

From the PCO transfer, the Gen-Tie line would extend 600 feet (0.11 mile), crossing sublateral 9 of the Casa Grande Canal and fencing for Pinal Central Substation before co-locating on an existing 500kV structure (P1) within Pinal Central Substation (Figure 3). The owner of CEC-2 also will install 2-3 wood poles to support all-dielectric self-supporting cable (ADSS). Wooden poles will be less than 60 feet tall. The final path of the line to its point of interconnection at Bay 4 of the Pinal Central Substation may require up to two additional monopole structures.

Purpose and Need

The Project is needed to connect the Eleven Mile Solar Project to the regional transmission grid. The proposed locations of the Gen-Tie line and Project Substation have been identified as optimal based on the recognized need to interconnect renewable energy sources to the regional grid, the proximity to existing Pinal Central Substation, and the existence of compatible land uses. The location removes the need for a long Gen-Tie line or costly system upgrades while at the same time minimizing the impacts of the Project on the environment and ecology of the State of Arizona.

[1] The applicant is only seeking a CEC for the aboveground portion of the line.

Environmental and Public Siting Process

The siting process focused on the identification of possible transmission routes to interconnect the Solar Facility to the adjacent Pinal Central Substation. The Applicant sought to minimize transmission route impacts and expense by interconnecting to the Pinal Central Substation as directly as possible, while also accounting for and avoiding existing and planned infrastructure, including the 115kV transmission lines running along the east side of Eleven Mile Corner Road.

The Route for the Gen-Tie line is 0.3 mile and sited on privately owned land in previously disturbed areas. It is designed to cross the existing 115kV transmission lines below ground and above ground over sublateral 9 of the Casa Grande Canal, an existing canal lateral within the San Carlos Irrigation Project, which is a federal reclamation project administered by the Bureau of Indian Affairs.

Public Outreach Process

The Applicant has been actively meeting with agencies and the public to secure the necessary zoning clearances to construct and operate the Solar Facility. The intent of these meetings is to discuss various aspects of the Solar Facility and the Project (CEC-1 and CEC-2), provide interested parties with current information, and solicit feedback. Public outreach efforts include mailing newsletters, a project webpage, and a virtual open house as outlined below:

- Newsletter #1 (July 19, 2022) with social media posts
- Project Website (July 21, 2022)
- Virtual Open House (July 11, 2022)
- In person Open House (November 9, 2022)
- Newsletter #2 (September 29, 2022) with social media posts
- Newsletter #3 (October 26, 2022) with social media posts

Further information about the public outreach process is included as Exhibit J.

Conclusion

The Applicant is committed to thoroughly studying, avoiding, and minimizing environmental impacts of the Project, and based on the factors outlined in A.R.S. § 40-360.06, believes that the Project is environmentally compatible. The Project is necessary to deliver energy generated from a renewable energy source that would include battery storage technology, use virtually no water, and produce no carbon or other emissions to meet Arizona’s growing demand for renewable energy.

As further described in exhibits accompanying this application, the Project would:

- disturb a very small amount of previously disturbed land;
- be compatible with existing plans in the vicinity of the proposed site;
- not disturb any areas of unique biological wealth nor impact special status species;
- result in minimal visual effects and would not disturb any known significant archaeological or historical sites; and

- would be sited adjacent to existing transmission infrastructure to reduce impacts from constructing new lines and is not anticipated to result in significant impacts associated with noise or signal interference.

This application includes the environmental evaluation and documentation relevant to the Project as specified by Arizona Administrative Code Rule R14-3-210. The Applicant is committed to avoiding and minimizing environmental impacts, and believes the Project is environmentally compatible. As such, the Applicant respectfully requests that the Siting Committee grant, and the Commission approve, the requested CEC for the construction of the Gen-Tie line and the Project Substation necessary to interconnect the Solar Facility to the Pinal Central Substation.

Figure 1. Project Vicinity

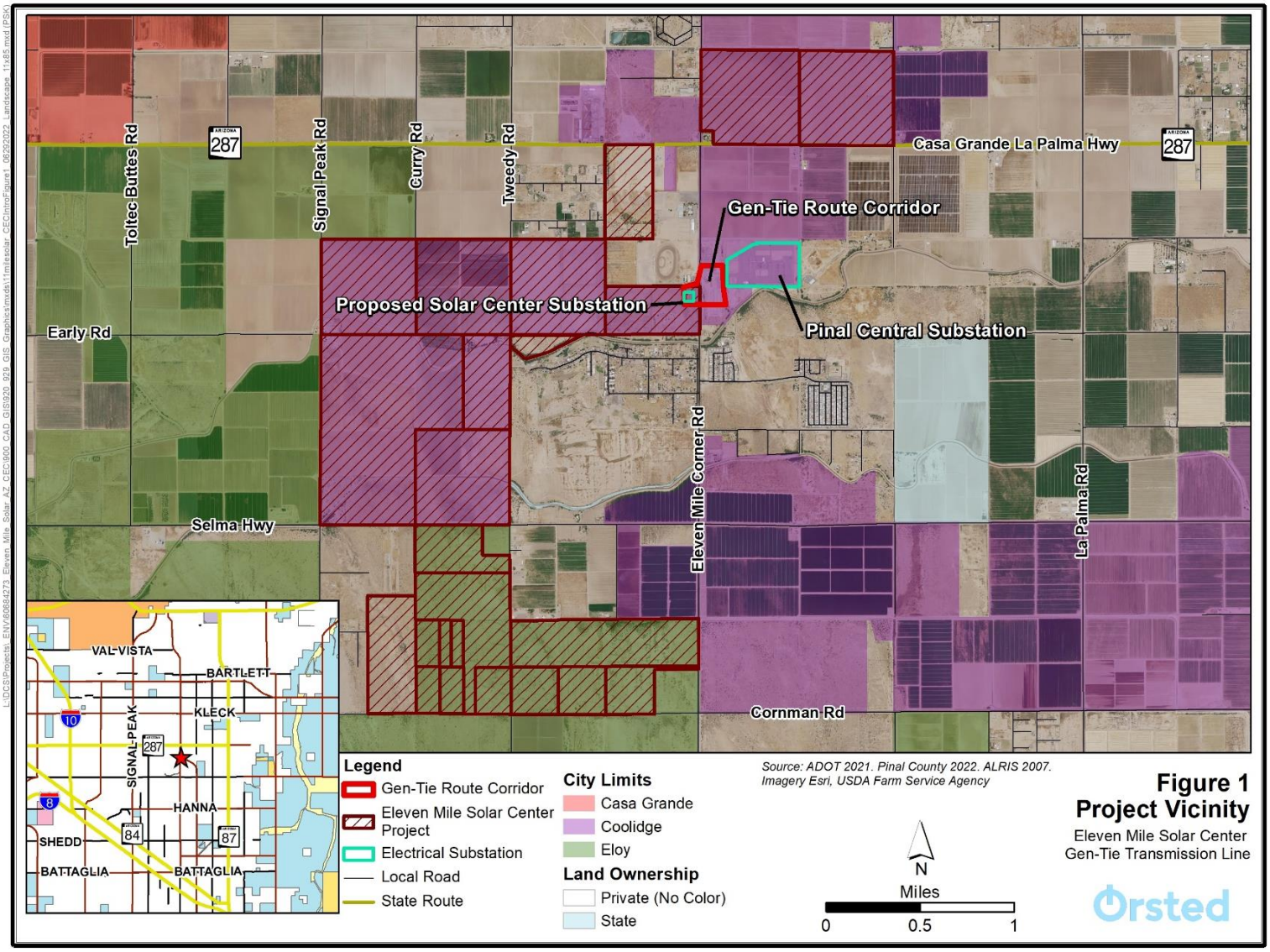


Figure 2. Gen-Tie Route Corridor

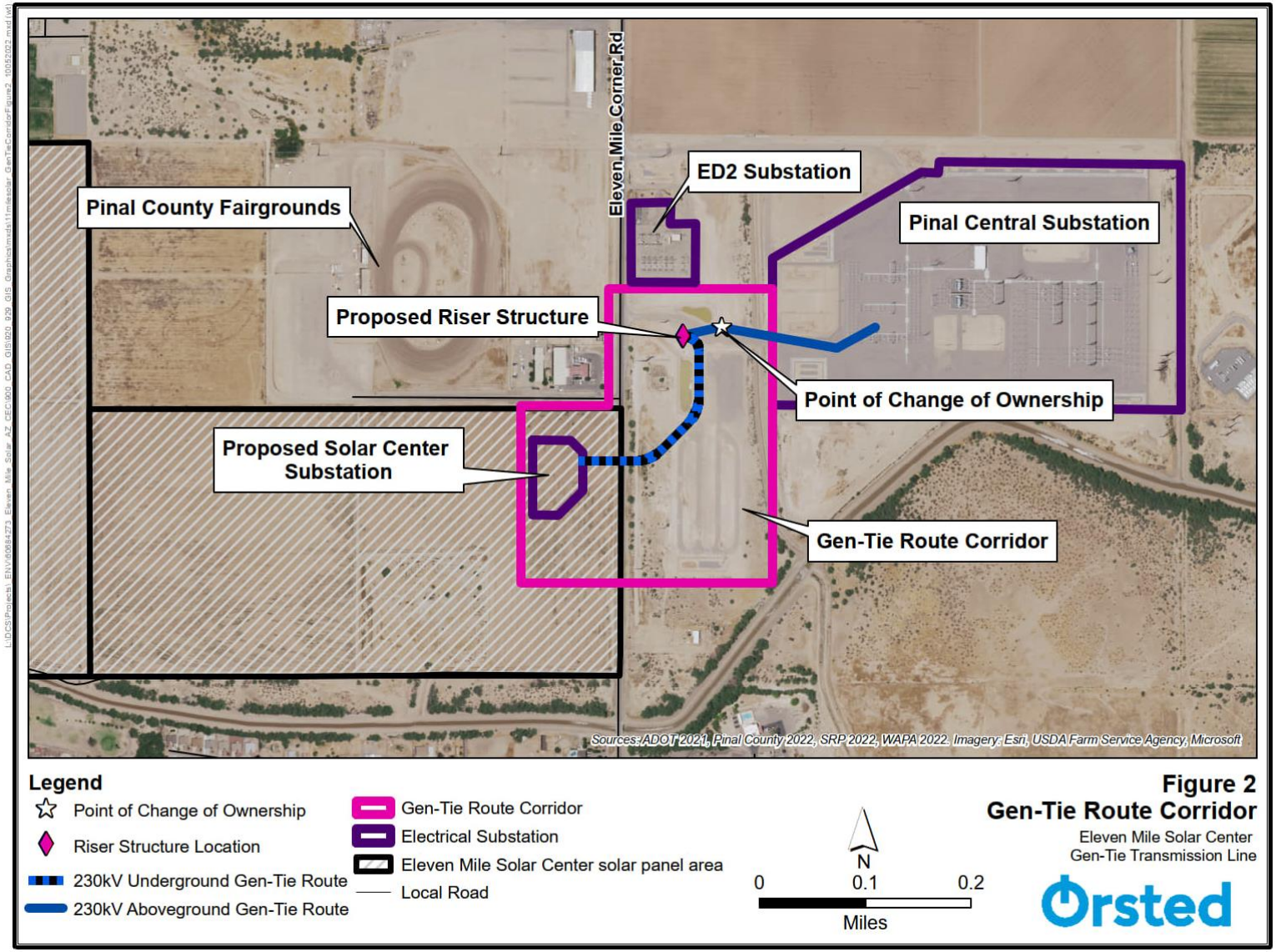
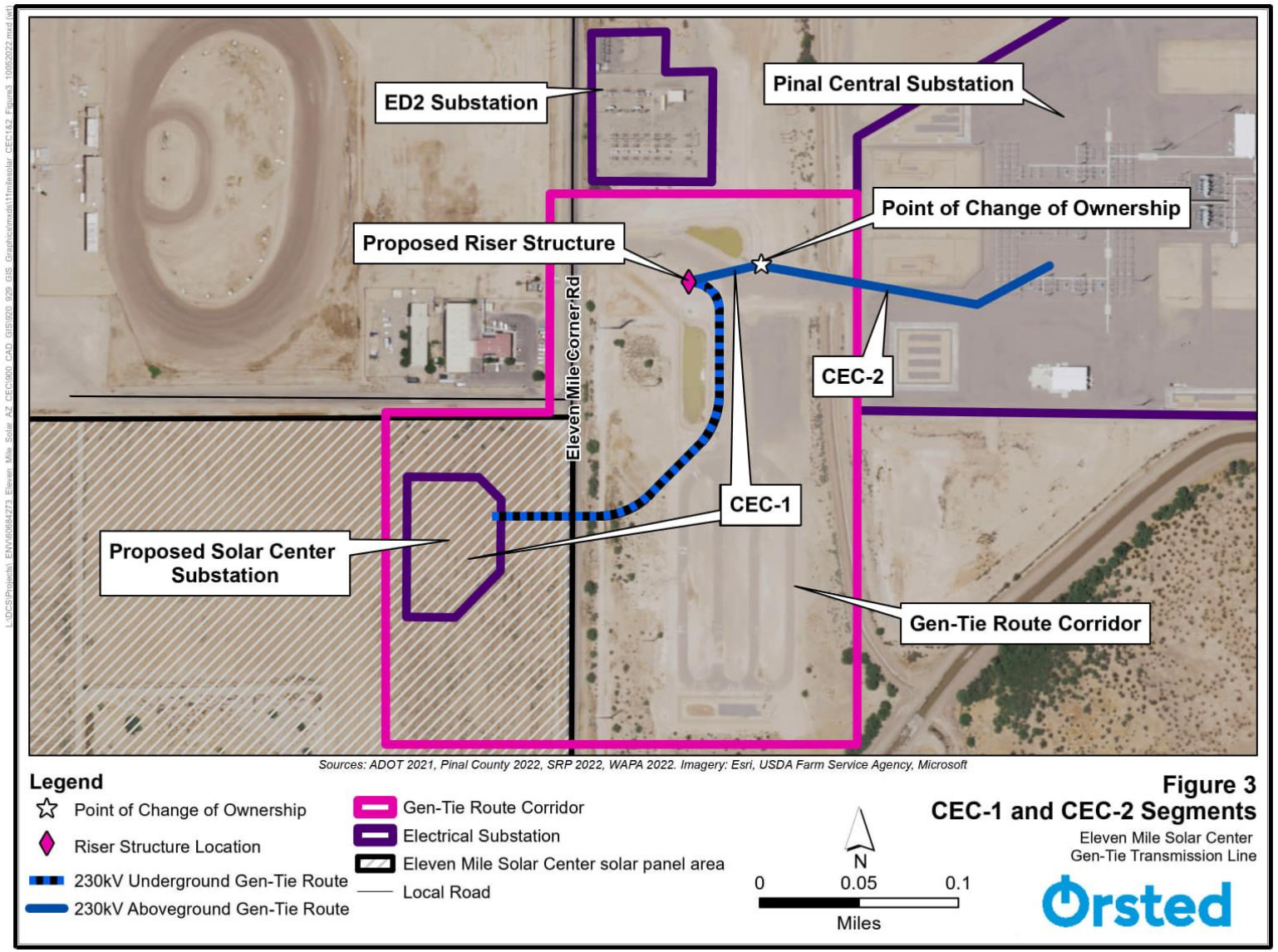


Figure 3. CEC-1 and CEC-2 Segments



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APPLICATION FOR CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY

(Pursuant to A.R.S. §40-360.03 and 40-360.06)

1. **Name and address of the Applicant**

   Eleven Mile Solar Center LLC
   Ørsted Onshore North America
   401 North Michigan Avenue, Suite 501
   Chicago, IL 60611

2. **Name, address, and telephone number of a representative of the applicant who has access to technical knowledge and background information concerning this application, and who will be available to answer questions or furnish additional information**

   Amy Shanahan
   Project Development Manager
   Eleven Mile Solar Center, LLC
   Ørsted Onshore North America
   812 San Antonio St. Suite 500
   Austin, TX, 78701
   (512) 241-5329

3. **Date on which the applicant filed a Ten-Year Plan in compliance with A.R.S. § 40-360.02, in which the facilities for which this application is made were described**

   The Project is included in Ørsted Onshore North America's Ten-Year Plan that was filed with the Commission on July 13, 2022 and amended on November 11, 2022.

4. **Description of the proposed facility, including:**

   a. **With respect to an electric generating plant:**

      There are no electrical generating plants included as part of the Project.

   b. **With respect to a proposed transmission line:**

      i. **Nominal voltage for which the line is designed; description of the proposed structures and switchyards or substations associated therewith; and purpose for constructing said transmission line**

         (1) **Nominal voltage:**

         The nominal voltage for the Project's transmission line 230kV alternating current, single circuit.

(2) Description of the proposed structures:

The Gen-Tie is anticipated to be constructed using steel monopole structures similar in design and height to the existing structures on the adjacent transmission line. The structures would be approximately 90 feet in height on average but could be as high as 160 feet to maintain necessary clearances. The average span length between structures will range between approximately 200 and 600 feet, depending on final design. The structures would have a dulled gray or weathering finish, and conductors would have a non-specular finish in order to reduce visibility. Variations may be required to achieve site-specific mitigation objectives or meet site-specific engineering requirements.

Conceptual drawings showing the typical structures that may be used are provided in Exhibit G.

(3) Description of proposed switchyards and substations:

The Project Substation would be located within the Solar Facility boundary on a 1.5-acre tract. It is anticipated the Project Substation would include a power transformer, one 230kV main breaker, two 35kV feed breakers, switches, a control house, and a substation superstructure within an approximately 6-foot-tall fence enclosure.

A concept drawing of the Project Substation is provided in Exhibit G.

(4) Purpose for constructing said transmission line:

The purpose of the Gen-Tie line is to deliver electrical power generated by a planned new 300MW photovoltaic solar energy generating facility and 300MW/1200MWh battery storage facility to the regional transmission grid for distribution to customers.

ii. Description of geographical points between which the transmission line will run, the straight-line distance between such points and the length of the transmission line for each alternative route for which the application is made

(1) Description of geographical points between which the transmission line will run:

The Project Substation would be constructed on parcel APN 401-14-0060 at the SE1/4 of Section 25, Township 6 South, Range 7 East to serve the Solar Facility which is being developed on approximately 2,336 acres of privately owned land located within the City of Coolidge, City of Eloy, and Pinal County.

The Gen-Tie Line would start within the Project Substation located within the Solar Facility's site control in the SE1/4 of Section 25, Township 6 South, Range 7 East. The Preferred Route would extend approximately 400 feet (0.07 mile) east of the Project Substation and cross below (underground) Eleven Mile Corner Road and WAPA's 115kV transmission lines. On the east side of Eleven Mile Corner Road, the route would continue northeast for 400 feet (0.07 mile) and then continue north for

approximately 300 feet (0.06 mile) to the proposed riser structure. The Gen-Tie becomes above ground with a riser structure. From the riser structure, the Gen-Tie would extend to the east approximately 200 feet (0.04 mile) to a new structure and PCO.

From the PCO transfer located approximately 250 feet west of the existing Pinal Central Substation, the transmission line would extend further east 600 feet (0.11 mile) and cross sublateral 9 of the Casa Grande Canal and fencing for Pinal Central Substation before connecting into an existing substation structure.

Figures 1 and 2 illustrate the Project Substation and the Gen-Tie line.

(2) Straight-line distance between such points:

The straight-line distance between the Project Substation to the point of ownership transfer it would be (800 feet) 0.15 miles.

(3) Length of the transmission line for each alternative route:

The length of the Preferred Route is approximately 0.30 mile.

iii. Nominal width of right-of-way required, nominal length of spans, maximum height of supporting structures and minimum height of conductor above ground

(1) Nominal width of right-of-way required:

The right-of-way would be up to 100 feet wide within a requested corridor consisting of a combination of the Applicant and Pinal Central Substation parcels (401-44-003A, 401-44-0050, and 401-44-001B) (Project Corridor). The full Applicant-controlled Gen-Tie Route Corridor is being requested to allow for minor adjustments to the location of structures that might be necessary to achieve site-specific mitigation objectives or meet site-specific engineering requirements.

(2) Nominal length of spans:

The typical span length between structures would be approximately 200 to 600 feet, with variations made to achieve site-specific mitigation objectives or meet site-specific engineering requirements.

(3) Maximum height of supporting structures:

The maximum height of the supporting structures is anticipated to be approximately 90 feet above ground but could be as high as 160 feet to maintain necessary clearances.

(4) Minimum height of conductor above ground:

The minimum height of the conductor above existing grade would be 25 feet.

iv. To the extent available, the estimated costs of proposed transmission line and route, stated separately. (If application contains alternative routes, furnish an estimate for each route and a brief description of the reasons for any variations in such estimates.)

The estimated cost for CEC-1 (the proposed Gen-Tie and Project Substation) is $14,000,000 to $15,000,000. The Cost for CEC-2 is $16,700,000. This includes the costs for construction of the transmission line, including the conductor and the supporting structures.

v. Description of proposed route and switchyard locations. (If application contains alternative routes, list routes in order of applicant's preference with a summary of reasons for such order of preference and any changes such alternative routes would require in the plans reflected in (i) through (iv) hereof.)

The Route for the Gen-Tie and Project Substation location are described generally in (ii) above and is depicted in Figures 2 and 3.

The Route connects the Project Substation located on Applicant-controlled privately owned land within the proposed Solar Facility on the west side of Eleven Mile Corner Road and the existing Pinal Central Substation on the east side of Eleven Mile Corner Road. The Project Substation is located on flat ground previously used for agriculture. From the Project Substation, the proposed transmission line route would extend approximately 400 feet (0.07 mile) to the east and cross below (underground) Eleven Mile Corner Road and WAPA's 115kV transmission lines. On the east side of Eleven Mile Corner Road, the route would continue underground northeast for 400 feet (0.07 mile) and then continue north for approximately 300 feet (0.06 mile) to the proposed riser structure. From the point where the Gen-Tie becomes above ground with a riser structure, the Gen-Tie would extend to the northeast approximately 200 feet (0.04 mile) to a new structure and PCO.

The PCO transfer structure would be located approximately 250 feet west of the existing Pinal Central Substation, the Gen-Tie would extend east 600 feet (0.11 mile) from the PCO and cross sublateral 9 of the Casa Grande Canal and the fencing for Pinal Central Substation before connecting into an existing substation structure with the substation property.

vi. For each alternative route for which application is made, list the ownership percentages of land traversed by the entire route (federal, state, Indian, private, etc.).

The Project Substation is located on private land (401-14-0060) controlled by the Applicant. The portion of the Gen-Tie route east of and within the Pinal Central Substation is on private land controlled by the owners of the Pinal Central Substation. The Pinal Central Substation parcels (401-44-003A, 401-44-0050, and 401-44-001B) are owned by Tucson Electric Power Company and Salt River Project Agricultural Improvement and Power District.

5. List the areas of jurisdiction [as defined in A.R.S. § 40-360(1)] affected by each alternative site or route and designate those proposed sites or routes, if any, which are contrary to the zoning ordinances or master plans of any of such areas of jurisdiction.

The Project Substation and Gen-Tie line are located within the jurisdiction of the City of Coolidge. The Project Substation is on land zoned by the City of Coolidge for agricultural use. The Applicant secured a Conditional Use Permit (CUP) to construct and operate a solar farm (Resolution No. COOLPZ 19-02) on May 8, 2019.

The Project Corridor Study Area east of Eleven Mile Corner Road is zoned for agriculture but used as a buffer zone for the surrounding existing substations. The parcels associated with the Gen-Tie line are currently occupied by the existing Pinal Central Substation or vacant and are owned by Tucson Electric Power Company and Salt River Project Agricultural Improvement and Power District.

Refer to Exhibit A for more information regarding Land Use.

6. Describe any environmental studies applicant has performed or caused to be performed in connection with this application or intends to perform or cause to be performed in such connection, including the contemplated date of completion.

The Applicant has evaluated available secondary and field data related to biological resources, visual resources, cultural resources, recreational resources, land use, noise levels, and communications signals in order to assess the potential impacts that may result from the construction, operation, and maintenance of the Project. These evaluations are included in Exhibits C, D, E, F, H, I, and J to this application.

Eleven Mile Solar Center, LLC

_____

By Amy Shanahan, Project Development Manager

I HEREBY CERTIFY that on this 2nd day of December 2022, I have delivered to the Arizona Corporation Commission twenty-five (25) copies of this Application for a Certificate of Environmental Compatibility.

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EXHIBIT A

LOCATION AND LAND USE INFORMATION

In accordance with A.A.C. R14-3-219 Applicant provides the following location maps and land use information:

1. *"Where commercially available, a topographic map, 1:250,000 scale, showing the proposed plant site and the adjacent area within 20 miles thereof. If application is made for alternative plant sites, all sites may be shown on the same map, if practicable, designated by applicant's order of preference."*
2. *"Where commercially available, a topographic map, 1:62,500 scale, of each proposed plant site, showing the area within two miles thereof. The general land use plan within this area shall be shown on the map, which shall also show the areas of jurisdiction affected and any boundaries between such areas of jurisdiction. If the general land use plan is uniform throughout the area depicted, it may be described in the legend in lieu of an overlay."*
3. *"Where commercially available, a topographic map, 1:250,000 scale, showing any proposed transmission line route of more than 50 miles in length and the adjacent area. For routes of less than 50 miles in length, use a scale of 1:62,500. If application is made for alternative transmission line routes, all routes may be shown on the same map, if practicable, designated by applicant's order of preference."*
4. *"Where commercially available, a topographic map, 1:62,500 scale, of each proposed transmission line route of more than 50 miles in length showing that portion of the route within two miles of any subdivided area. The general land use plan within the area shall be shown on a 1:62,500 map required for Exhibit A-3, and for the map required by this Exhibit A-4, which shall also show the areas of jurisdiction affected and any boundaries between such areas of jurisdiction. If the general land use plan is uniform throughout the area depicted, it may be described in the legend in lieu of an overlay."*

Project Location

Figure A-1: Eleven Mile Solar Center Gen-Tie Transmission Line Project Site on topographic map (1:62,500 scale)

Figure A-2: Eleven Mile Solar Center Gen-Tie Transmission Line Existing Land Use

Figure A-3: Eleven Mile Solar Center Gen-Tie Transmission Line Future Land Use

Figure A-4: City of Coolidge 2025 General Plan Land Use Policy

Land Use

For the purposes of the Eleven Mile Solar Center Gen-Tie Transmission Line CEC, this Exhibit analyzes the land use impacts of the Eleven Mile Solar Center Gen-Tie Transmission Line Project (Project) which includes the 230kV Gen-Tie Line together with the Solar Center

Substation. The Gen-Tie Line consists of 1,050 feet of new above-ground 230kV transmission line and approximately 1,100 feet of underground segments needed to interconnect the project substation to the Pinal Central Substation. The study boundaries for the environmental review of the Project includes areas within 1.5 miles of the Gen-Tie Line including the proposed Solar Center and Pinal Central substations and connecting lines) (collectively called “analysis area”) (**Figure A-1)**. Prior CEC application data was reviewed to the extent relevant.

The analysis area for the Project is within the City of Coolidge and an unincorporated area of Pinal County (**Figure A-1)**. USGS topographic maps generally refer to the analysis area as Eleven Mile Corner and includes lands that are south of Arizona State Route 287 (SR-287) and west of Arizona State Route 87 (SR-87). The majority of the land within the analysis area is privately owned and managed.

Following is a discussion of the land use considerations and an analysis of existing and future uses relevant to the Project. The analysis is based on the most recently available data from various local and regional plans relevant to the study area and GIS databases including:

- City of Coolidge 2025 General Plan Land Use Policy (CoC 2017)
- City of Coolidge 2025 General Plan (CoC 2014)
- Pinal County Comprehensive Plan (PC 2021)
- State of Arizona Land Resource Information System (ALRIS 2007)
- Pinal County GIS database (PC 2022)
- U.S. Geological Survey (USGS) National Hydrography Dataset (NHD) (NHD 2020)
- Arizona Department of Transportation (ADOT) GIS database (ADOT 2020)
- Federal Emergency Management Agency (FEMA) GIS database (FEMA 2020)

Existing Land Use

Based on a review of recent aerial photography (Google Earth 2022), the analysis area consists of mixed land uses including agricultural, residential, industrial, barren land, and native desert (**Figure A-2**). FEMA floodway and 100-year floodplain designations do not exist in the analysis area. Developed uses within the analysis area include the Pinal County Fairgrounds and Pinal County Animal Control, which are directly north of the proposed solar substation site. The planned Solar Center Substation parcel is zoned for agriculture and was actively used in that capacity in 2022. The Gen-Tie Study Area is zoned for agriculture but currently contains several existing transmission lines connecting to the Pinal Central and ED2 substations. Industrial use in the analysis area includes existing solar facilities to the south and northeast. Residential uses are also present in the analysis area. The closest residence to above ground features of the Gen-Tie line is 1,800 feet south. The largest subdivisions include the Tierra Grande Country Club and Sunscape Estates both located in the southern portion of the analysis area. The closest residence to above ground features of the Gen-Tie line is 1,800 feet (0.34 mile) south. One school, Mary C. O’Brien Elementary, is on the north edge of the analysis area and located

approximately 1.45 miles from the Gen-Tie line. There are no designated trails within the analysis area.

Future Land Use

The analysis area is included in both the Pinal County Comprehensive Plan and the City of Coolidge General Plan Land Use Policy planning areas. Designated uses for the analysis area differ between the two plans. Pinal County (PC 2021) identifies future land use within the analysis area as low density residential, general public facilities/services, and green energy production (**Figure A-3**). The City of Coolidge (CoC 2017) identifies a mix of agriculture, urban neighborhood, business/commercial, and rural ranchettes within the analysis area, and industrial uses within the Project area (**Figure A-4**). Existing energy and Pinal County facilities are expected to remain designated for their use. Residential expansion is expected throughout the analysis area. Pinal County allows for the transition of low density residential zoned lands to be used for green energy production with a minor amendment given the use is less than 640 acres. The City of Coolidge allows for the transition of agriculture use to industrial use with a major plan amendment.

Analysis

Gen-Tie Study Area

The above-ground segment of the Gen-Tie Route is approximately 1,050 feet in length and would not require the relocation of other transmission lines that are in proximity to the Project. From the riser structure located on the east side of Eleven Mile Corner Road, the above ground transmission line route would continue to the east approximately 200 feet (0.04 mile) to a new structure and PCO. The physical location of PCO transfer is approximately 250 feet (0.06 mile) east of the existing Pinal Central Substation fence and adjacent and north of the main substation access road. From the PCO transfer, the Gen-Tie line will extend 600 feet (0.11 mile), crossing sublateral 9 of the Casa Grande Canal and fencing for Pinal Central Substation before connecting into an existing transmission structure within Pinal Central Substation (**Figure A-2**).

No portion of the Gen-Tie Line would cross a FEMA 100-year floodplain or floodway. The Pinal County Comprehensive Plan designates the area for future moderate low density residential, and the City of Coolidge General Plan designates future land use for industrial and manufacturing. Therefore, development of the transmission lines is compatible with current and future land use.

Eleven Mile Solar Center Substation

On May 8, 2019, the City of Coolidge granted a Conditional Use Permit (CUP) (resolution no. COOLPZ 19-02) for the construction of the proposed solar substation and associated solar panels on the designated agricultural land. The CUP permitting the construction of the substation in connection with the larger solar project is compatible with surrounding land uses and future land use plans of the City of Coolidge that include low density residential developments.

Conclusion

Construction of the Gen-Tie Transmission Line Project together with the Solar Center Substation will result in minimal impacts to existing and future land uses. Planned additions to Pinal Central Substation will facilitate future expansion in the area. The City of Coolidge has approved the construction of the proposed solar facility within the selected agricultural parcels. For these reasons, the project is consistent with land use plans for this area and would not conflict with existing or future land use.

References

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Figure A-1. Eleven Mile Solar Center Gen-Tie Transmission Line Project Vicinity Map

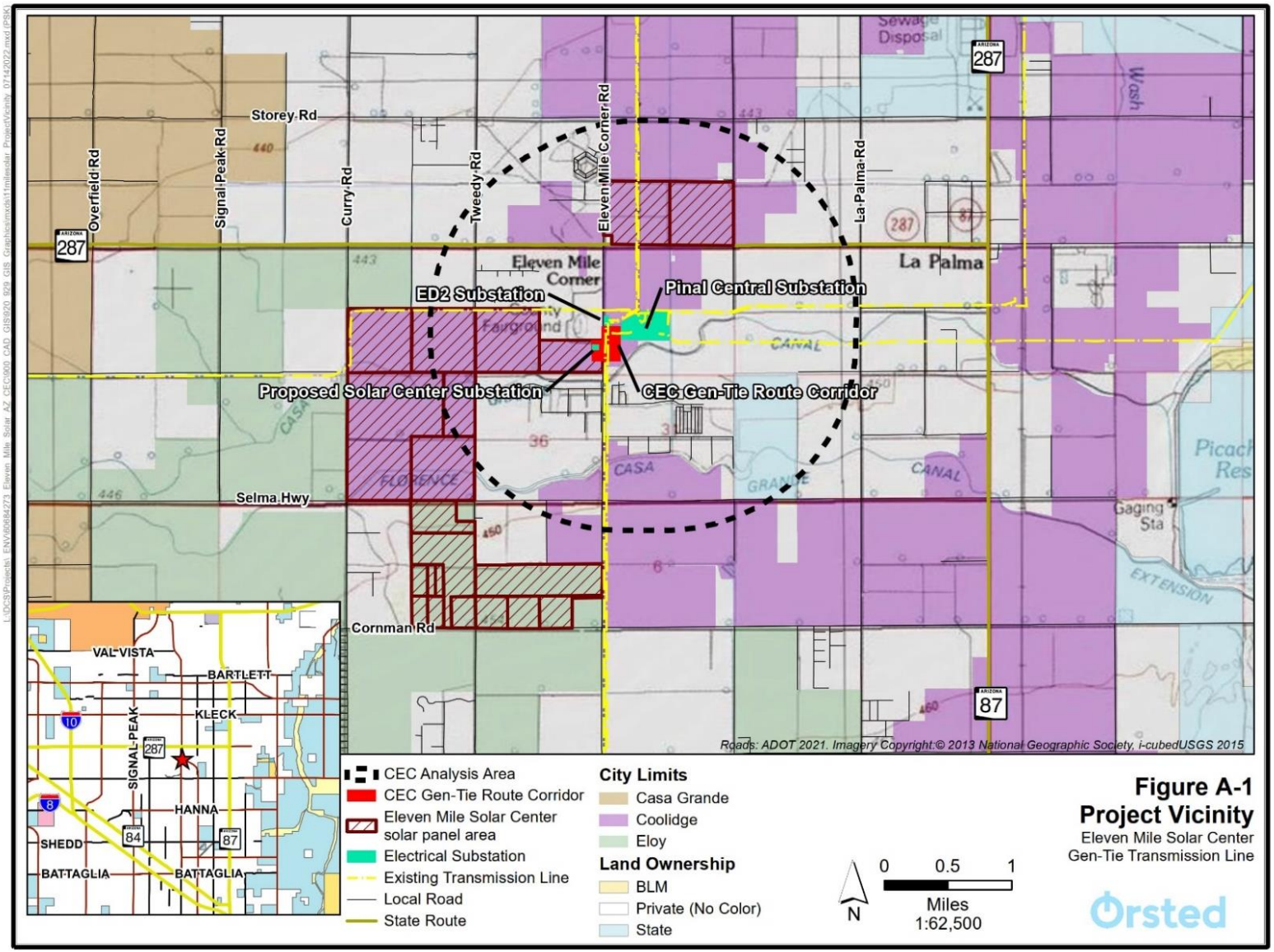

Figure A-2. Eleven Mile Solar Center Gen-Tie Transmission Line Existing Land Use

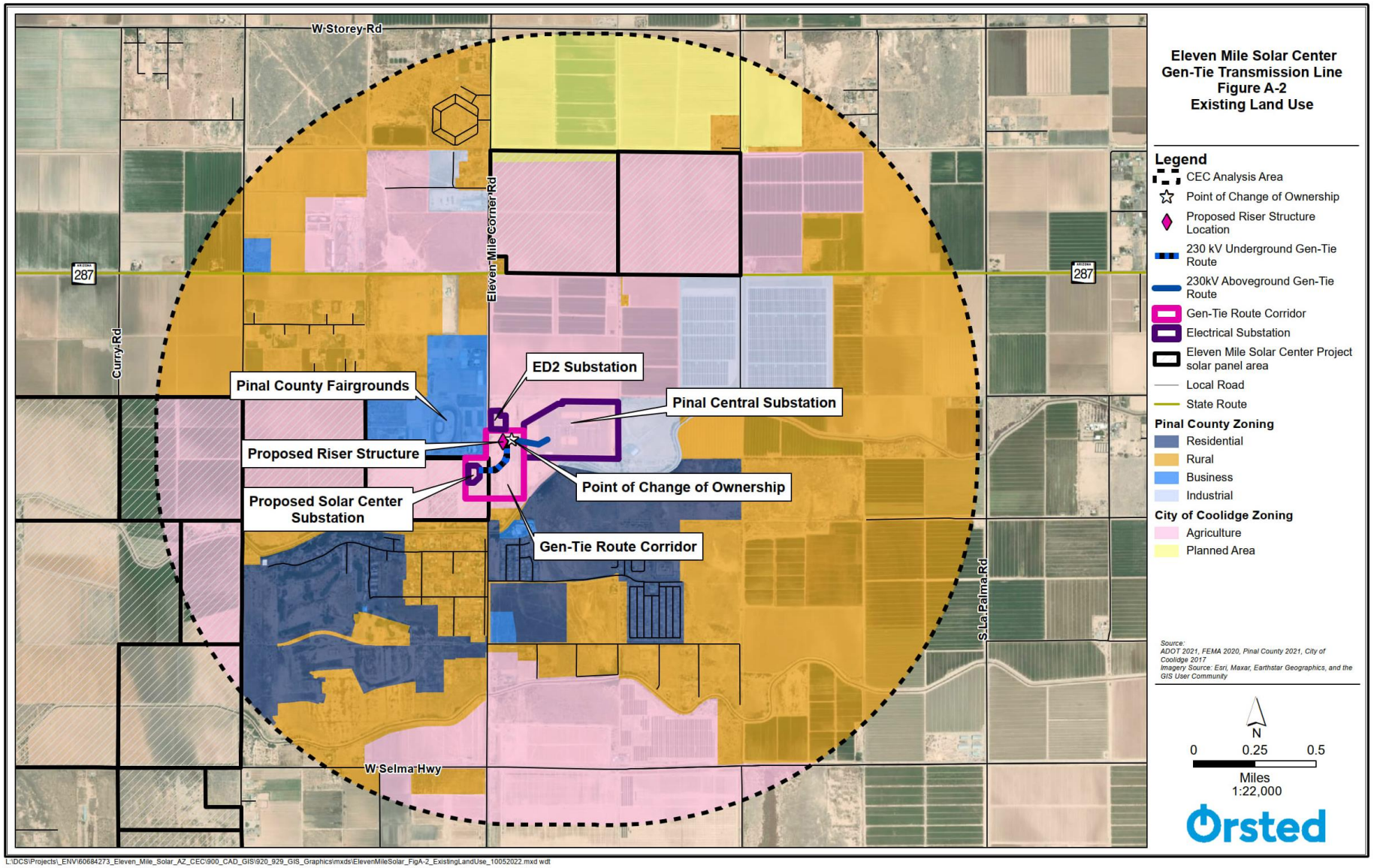

Figure A-.3. Eleven Mile Solar Center Gen-Tie Transmission Line Future Land Use

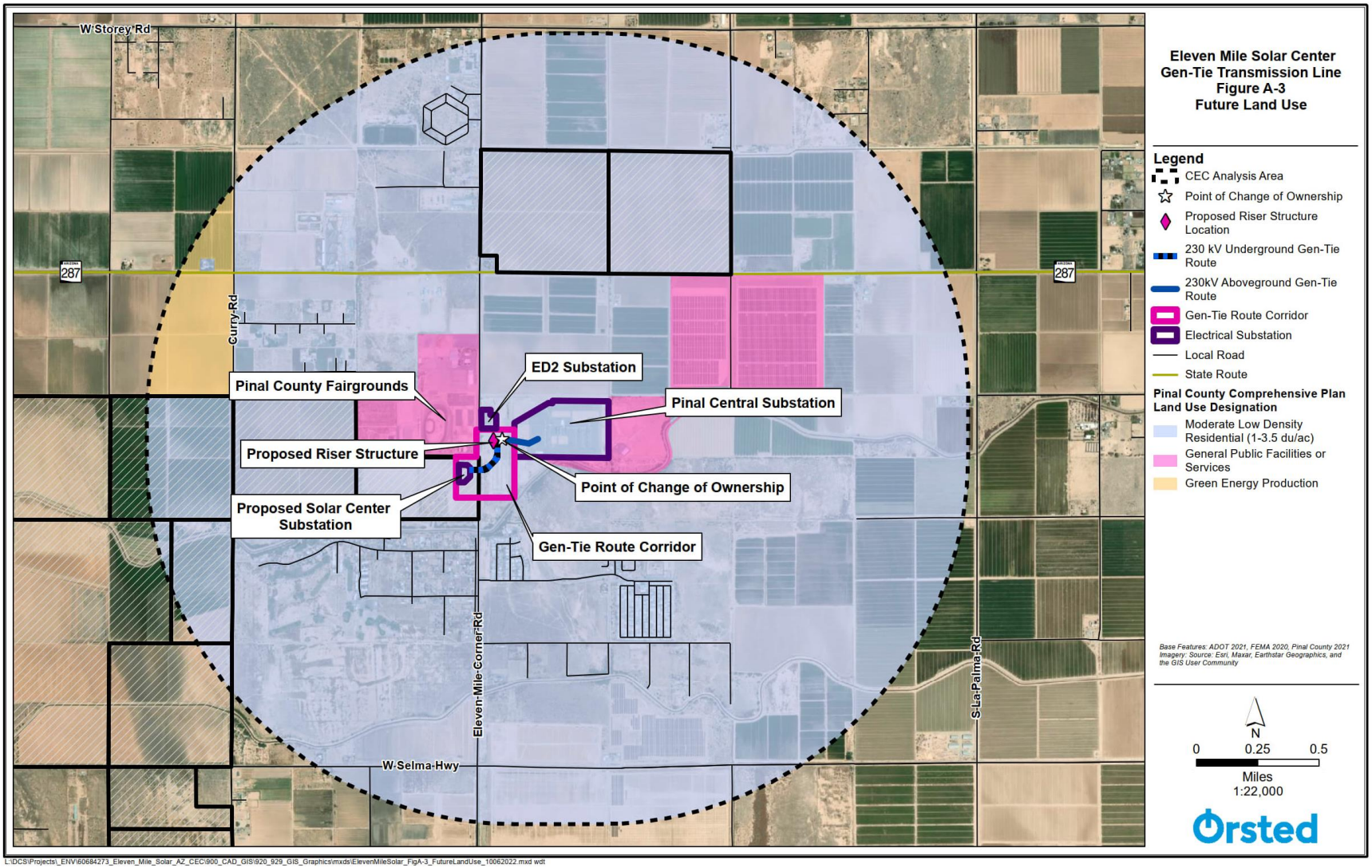

Figure A-4. City of Coolidge 2025 General Plan Land Use Policy

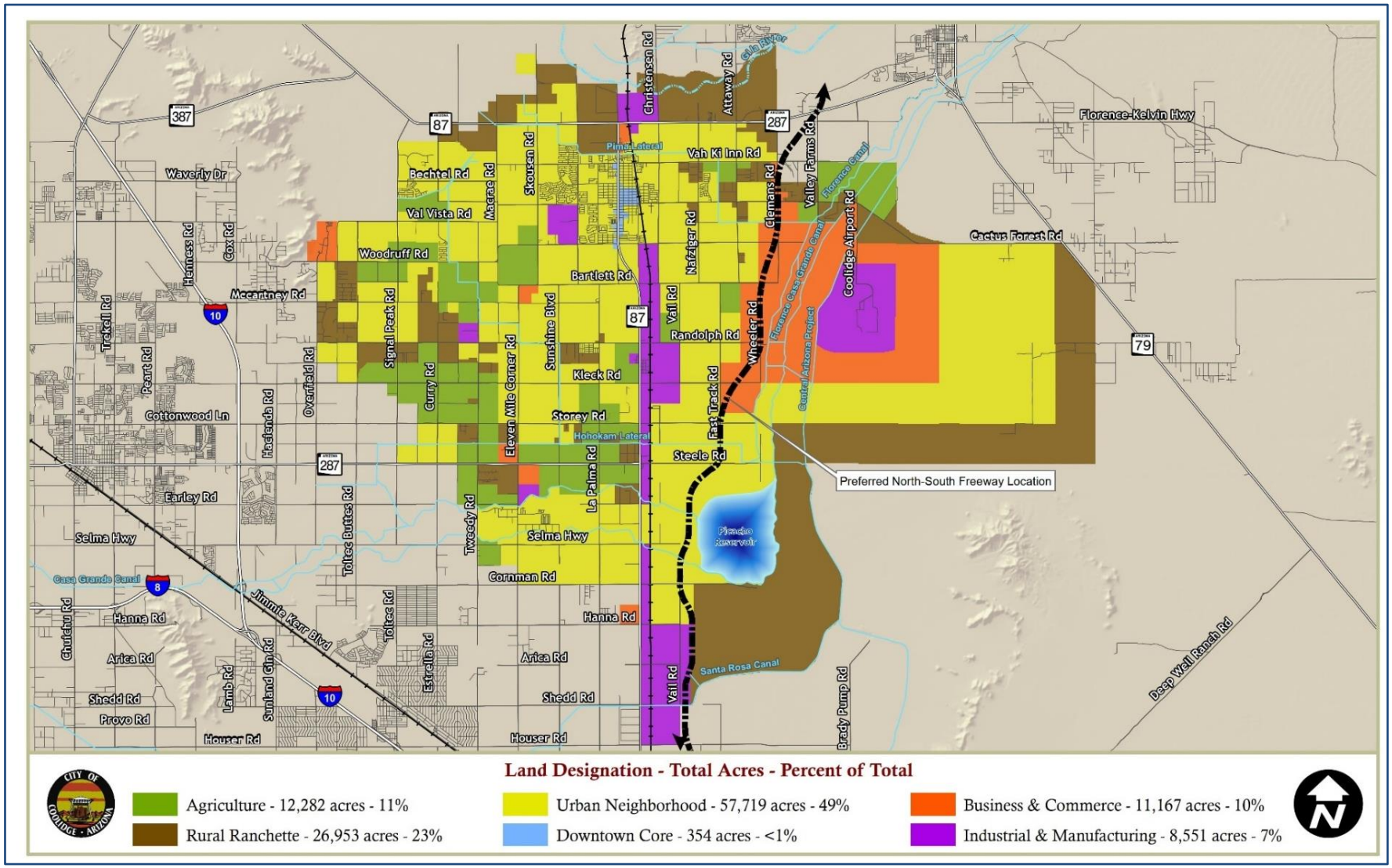

EXHIBIT B
ENVIRONMENTAL STUDIES

As stated in Arizona Corporation Commission Rules of Practice and Procedure R14-3-220, Ex. B.

Attach any environmental studies which applicant has made or obtained in connection with the proposed site(s) or route(s). If an environmental report has been prepared for any federal agency or if a federal agency has prepared an environmental statement pursuant to Section 102 of the National Environmental Policy Act, a copy shall be included as part of this Exhibit.

The results of the environmental studies associated with the Eleven Mile Solar Gen-Tie Project are discussed in previous and subsequent exhibits: **Exhibit A** describes land use; **Exhibit C** addresses potential impacts to sensitive biological resources on the Project site; **Exhibit D** discusses potential impacts to sensitive biological resources on the Project site; **Exhibit E** summaries the potential effects on the area's scenic quality and cultural resources; **Exhibit F** summarizes the potential effects on recreation resources; **Exhibit H** describes how the Project could affect local plans: and **Exhibit I** discusses the noise and interference impacts that are expected.

There is no federal land, nexus, or involvement associated with this Project that would require National Environmental Policy Act (NEPA) documents be developed for this Application.

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EXHIBIT C
AREAS OF BIOLOGICAL WEALTH

As stated in Arizona Corporation Commission Rules of Practice and Procedure R-14-3-219:

"Describe any areas in the vicinity of the proposed site or route which are unique because of biological wealth or because they are habitats for rare or endangered species. Describe the biological wealth or species involved and state effects, if any, the proposed facilities will have thereon."

Overview

For the purposes of the Eleven Mile Solar Center Gen-Tie Transmission Line CEC, this Exhibit analyzes biological wealth resources and impacts related to the construction and operation of the Solar Center Substation, modifications within the footprint of the existing Pinal Central Substation, and the segment of transmission lines used for interconnection (Gen-Tie Study Area), collectively called the Project. The study boundaries for the environmental review of the proposed Project includes areas within 1.5 miles of the Project site (including the proposed Solar Center and Pinal Central substations and connecting lines) (collectively called “analysis area”) (**Figure C-1)**.

Exhibit C addresses species protected by federal and state laws and policies (i.e., endangered and threatened species) because of their conservation status. Exhibit C also addresses whether any areas protected (i.e., wildlife movement corridors) for conservation purposes are present in the analysis area. Federal and State databases used to review the Project do not return results based strictly on a 1.5-mile radius; therefore, Exhibit C addresses the complete results of those database queries and discusses whether identified species or their habitat or other protected areas may be present or affected by the Project.

Special status plant and wildlife species are subject to regulations under the authority of federal and state government agencies. Special status species include those species that are listed by the U.S. Fish and Wildlife Service (USFWS) as federal endangered, threatened, proposed, or candidate species under the Endangered Species Act of 1973 (ESA), Section 4, as amended; protected under the Migratory Bird Treaty Act (MBTA); protected as Birds of Conservation Concern (BCC); listed as Species of Greatest Conservation Need (SGCN) by the Arizona Game and Fish Department (AZGFD); or are protected under the Arizona Native Plant Law (ANPL) administered by the Arizona Department of Agriculture (AZDA). Descriptions of special status species are listed below:

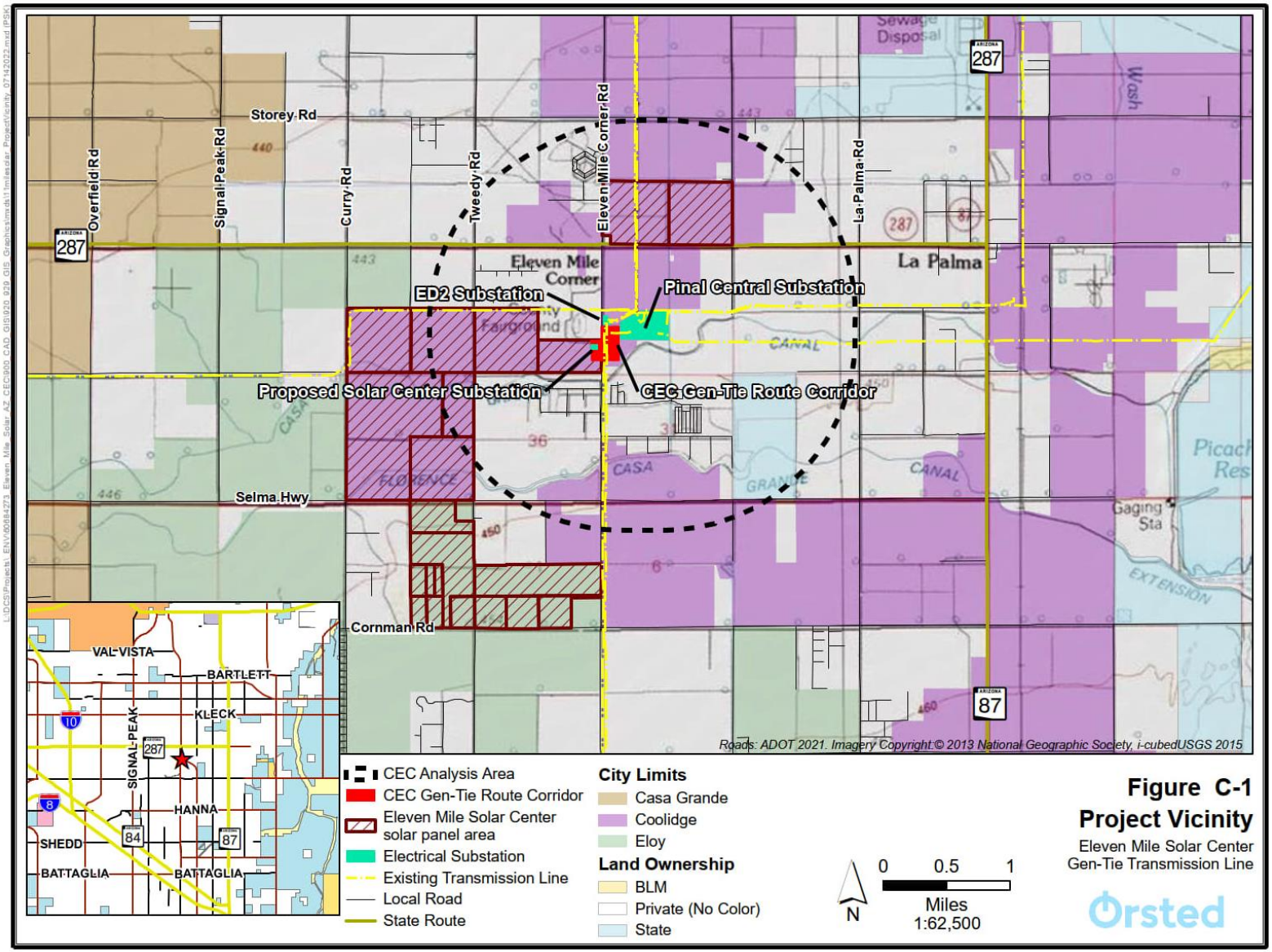
- Endangered species (federal) are those species in danger of extinction throughout all or a significant portion of their range.
- Threatened species (federal) are those species likely to become endangered in the foreseeable future.
- Proposed species (federal) are those species recommended for listing under Section 4 of the ESA.

- Candidate species (federal) are those species for which the USFWS has sufficient information on their biological status and threats to propose them as endangered or threatened under the ESA, but for which development of a proposed listing regulation is precluded by other higher priority listing activities. Candidate species are not protected under the ESA.
- USFWS Species of Concern is an informal term that refers to those species that the USFWS believes may need concentrated conservation actions. Conservation actions, such as monitoring, vary depending on the health of the populations and degree and types of threats. USFWS Species of Concern receive no legal protection under the ESA and the use of the term does not necessarily mean that the species will eventually be proposed for listing as a threatened or endangered species.
- AZGFD SGCN are species determined to be vulnerable in at least one of the following eight criteria: extirpated from Arizona; federal or state status; declining status; disjunct status; demographic status; concentration status; fragmentation status; and distribution status, as described by the AZGFD's listing of SGCN in the State Wildlife Action Plan.

Certain bird species are protected under the MBTA (1918), the Bald and Golden Eagle Protection Act (1940), 50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a). Any person or organization who plans to conduct activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implanting appropriate conservation measures. USFWS lists BCC and provides a list of their breeding seasons and probability of presence for a defined project area in the Information for Planning and Conservation (IPaC) report.

ANPL (ARS § 3-901 to 3-916) is administered by the AZDA, which manages native plant resources and impacts to protected native plant species. ANPL-listed plants include four protection categories: Highly Safeguarded, Salvage Restricted, Salvage Assessed, and Harvest Restricted. Landowners have the right to destroy or remove native plants growing on their land, but at least 60 days prior to the destruction of any protected native plants, landowners are required to notify the AZDA. At the time of the notification the landowner can state if they would allow salvage companies an opportunity to salvage the plants or if they intend to destroy the plants. Removal of protected native plants from the site would require tags/permits from AZDA. The landowner is allowed to transplant healthy native trees within the site without a permit or notification.

Figure C-1. Project Vicinity



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Biological Resources Information

Data were gathered from the IPaC (USFWS 2022a) and AZGFD online Environmental Review Tool (ERT) (AZGFD 2022) to develop a list of special status species that could occur within the analysis area. In summary, the USFWS IPaC identified four (4) federally listed, threatened, endangered, or candidate species that may have the potential to occur in the analysis area (**Table C-1**). Four (4) Birds of Conservation Concern (BCC) were also identified (**Table C-2**). IPaC did not list any critical habitat or National Wildlife Refuge Lands or fish hatcheries in the analysis area. The AZGFD ERT identified forty-six (46) special status species that may have the potential to occur in within the analysis area (**Table C-3**). AZGFD ERT also identified several small groupings of riparian area concentrated around agricultural parcels and canals.

Table C-1: Endangered Species Act (ESA) Species Potentially Occurring in the Analysis Area

Species	Status	Habitat Requirements	Habitat Suitability
INSECTS			
Monarch butterfly *Danaus plexippus*	ESA-C	Breeding and migratory monarch butterfly populations occur throughout Arizona habitats include riparian areas, native desert habitats and urban habitats concentrated on parks. Abundance of milkweed is critical for this species. Additional plant species monarchs are known to utilize include dogbane, alfalfa, thistles, seep willow, sunflowers, groundsel, and clovers (Morris et al 2015).	**No suitable habitat** in analysis area. Suitable plant species most commonly associated with butterfly are not prevalent in the analysis area, nor is an abundance of water needed during high temperatures.
REPTILES			
Northern Mexican gartersnake *Thamnophis eques megalops*	ESA-LT	Occurs primarily in wetlands, stock tanks, large river riparian woodlands and forests, streamside gallery forests by well-developed broadleaf deciduous riparian forests with limited herbaceous ground cover (AZGFD 2012).	**No suitable habitat**. Suitable habitat for this species is not present in the analysis area.
BIRDS			
Yuma Ridgway's rail *Rallus obsoletus yumanensis*	ESA-LE	Found in freshwater and brackish marshes below 4,500 feet amsl (AZGFD 2020).	**No suitable habitat** in analysis area.
Yellow-billed cuckoo *Coccyzus americanus*	ESA-LT	Uses large contiguous patches of multi layered riparian habitat, such as cottonwood-willow gallery forests along rivers and streams below 6,600 feet (AZGFD 2021).	**No suitable habitat.** Suitable habitat for this species is not present in the analysis area. Picacho Reservoir, approximately 4.5 miles to the east, may contain suitable habitat for this species.

NOTES: Agency or Law: ESA = Endangered Species Act;
Status Definitions: LE = listed endangered; LT = listed threatened; C = candidate

Table C-2. Birds of Conservation Concern (BCC) Potentially Occurring in the Analysis Area

Species	Breeding Season	Habitat Requirements	Habitat Suitability
Bendire's Thrasher *Toxostoma bendirei*	March 15 – July 31	Uses a variety of desert habitats with large shrubs, cacti and open ground. In lower elevations, occurs in desert grasslands and shrubland (NatureServe 2022a).	**Suitable habitat does occur.** Sonoran desertscrub community exists as undisturbed desert land throughout the analysis area.
Costa's Hummingbird *Calypte costae*	January 15 – Jun 10	Occurs in washes and arid brushy foothills and chaparral. Nests in trees, shrubs, or cactus, often far from water. (NatureServe 2022b).	**Suitable habitat does occur.** Sonoran desertscrub community exists as undisturbed desert land throughout the analysis area.
Gila Woodpecker *Melanerpes uropygialis*	April 1 – August 31	Breeds throughout arid regions of the southwestern U.S. In Arizona, found in deserts with saguaro and other large cacti. Density is positively correlated with large saguaro and flat landscapes (NatureServe 2022c).	**Suitable habitat does occur.** Sonoran desertscrub community exists as undisturbed desert land throughout the analysis area.
Willet *Tringa semipalmata*	Breeds elsewhere	Found in marshes, mudflats and lake margins (NatureServe 2022d).	**No suitable habitat.**

Table C-3. Species of Concern and SGCN Potentially Occurring in the Analysis Area*

Species	Common Name	FWS SC[1]	AZGFD SGCN[2, 3]	Potential to Occur
BIRDS				
Aix sponsa	Wood Duck		1B	No potential to occur. Associated with ponds, marshes and streams.
Athene cunicularia hypugaea	Western Burrowing Owl	SC	1B	Yes. Known to be found near agriculture fields and irrigation canals.
Botaurus lentiginosus	American Bittern		1B	No. Associated with freshwater wetlands and grassy uplands.
Buteo regalis	Ferruginous Hawk	SC	1B	No. Generally avoids areas of intensive agriculture or human activity. Prefers open grasslands and shrub steppe communities.
Cistothorus palustris	Marsh Wren		1C	No. Associated with freshwater or brackish marshes.
Colaptes chrysoides	Gilded Flicker		1B	Yes. Nests in giant cactus and riparian trees in warm desert lowlands and foothills.
Haliaeetus leucocephalus	Bald Eagle	SC, BGA	1A	No. Nests on cliffs or large trees usually within 1km of riparian corridor.

Table C-3. Species of Concern and SGCN Potentially Occurring in the Analysis Area*

Species	Common Name	FWS SC[1]	AZGFD SGCN[2, 3]	Potential to Occur
Melospiza lincolnii	Lincoln's Sparrow		1B	No. Associated with wet, dense riparian area.
Melozone aberti	Abert's Towhee		1B	No. Prefers woodlands and thickets along rivers or streams.
Micrathene whitneyi	Elf Owl		1C	Yes. Nests often in saguaro or in cottonwood, mesquite, and willow trees.
Myiarchus tyrannulus	Brown-crested Flycatcher		1C	Yes. Nests in saguaro desert and arid shrubs.
Oreoscoptes montanus	Sage Thrasher		1C	Yes. Nonbreeding winter season nests in arid scrub, brush and thickets.
Oreothlypis luciae	Lucy's Warbler		1C	Yes. Nests in deserts, mesquite and riparian woodlands.
Passerculus sandwichensis	Savannah Sparrow		1B	No. Associated with pastures and grasslands.
Setophaga petechia	Yellow Warbler		1B	Yes. Associated with open scrub and farmlands in the West.
Sphyrapicus nuchalis	Red-napped Sapsucker		1C	No. Prefers mixed conifer forests and negatively associated with shrub cover.
Spizella breweri	Brewer's Sparrow		1C	Yes. Nests in sagebrush or cactus. Non-breeding and winter and inhabit desert scrub and creosote bush.
Sturnella magna	Eastern Meadowlark		1C	No. Associated with grasslands, open fields and pastures.
Toxostoma lecontei	LeConte's Thrasher		1B	Yes. Prefers sparsely vegetated desert flats and alluvial fans with saltbrush and thorny desert shrubs.
Vireo bellii arizonae	Arizona Bell's Vireo		1B	Yes. Prefers scrubby habitat, including brushy fields and mesquite bosques
MAMMALS				
Ammospermophilus harrisii	Harris' Antelope Squirrel		1B	Yes. Associated with dry, sparsely vegetated desert with saltbush-creosote bush – bursage.
Corynorhinus townsendii pallescens	Pale Townsend's Big-eared Bat	SC	1B	Yes. In Arizona, associated with desertscrub desert mountains and conifer forests.
Euderma maculatum	Spotted Bat	SC	1B	Yes. Forages in desert scrub.

Table C-3. Species of Concern and SGCN Potentially Occurring in the Analysis Area*

Species	Common Name	FWS SC[1]	AZGFD SGCN[2, 3]	Potential to Occur
Eumops perotis californicus	Greater Western Bonneted Bat	SC	1B	No. Roosts high above ground in crevices and shallow caves.
Lasiurus blossevillii	Western Red Bat		1B	No. Prefers riparian habitat dominated by large trees and is rarely found in desert.
Lasiurus xanthinus	Western Yellow Bat		1B	No. Prefers riparian woodlands with oak or pinyon-juniper trees.
Leptonycteris yerbabuenae	Lesser Long-nosed Bat	SC	1A	No. Roosts in old mines and caves.
Lepus alleni	Antelope Jackrabbit		1B	Yes. Prefers desert scrub.
Myotis occultus	Arizona Myotis	SC	1B	No. Prefers ponderosa pine and oak-pine woodland near water.
Myotis velifer	Cave Myotis	SC	1B	No. Prefers evergreen or pine-oak forest, riparian areas near desert scrub.
Myotis yumanensis	Yuma Myotis	SC	1B	No. Roosts in caves and cliffs, forages
Nyctinomops femorosaccus	Pocketed Free-tailed Bat		1B	No. Associated with rugged canyons and high cliffs.
Tadarida brasiliensis	Brazilian Free-tailed Bat		1B	Yes. Bats roost primarily in caves in the southwest but can forage in desert, shrublands and agricultural landscapes.
Vulpes macrotis	Kit Fox	No Status	1B	Yes. Primarily found in open desert or grassland around creosote bush.
REPTILES				
Chilomeniscus stramineus	Variable Sandsnake		1B	Yes. Prefers sandy soils and deserts with mesquite creosotebush
Chionactis annulata	Resplendent Shovel-nosed Snake	SC	1C	Yes. Found in sparsely vegetated desert.
Crotalus tigris	Tiger Rattlesnake		1B	Yes. Found in several vegetation zones throughout Arizona.
Gopherus morafkai	Sonoran Desert Tortoise	CCA	1A	Not likely to occur. Prefers upland habitats of the Sonoran desert scrub.
Heloderma suspectum	Gila Monster		1A	Not likely to occur. In Arizona, more abundant in wetter and rockier palo verde sahuaro habitats than in creosote-bursage habitats. Not likely to be found in agricultural areas.

Table C-3. Species of Concern and SGCN Potentially Occurring in the Analysis Area*

Species	Common Name	FWS SC[1]	AZGFD SGCN[2, 3]	Potential to Occur
Kinosternon sonoriense	Desert Mud Turtle		1B	No. Occupies slow-flowing bodies of water with soft mud.
Micruroides euryxanthus	Sonoran Coralsnake		1B	Yes. Can be found in farmland, desert, bushland, thornscrub. Most commonly found in upland desert scrub.
Phrynosoma goodei	Goode's Horned Lizard		1B	Yes. This is a terrestrial, desert dwelling lizard.
Phrynosoma solare	Regal Horned Lizard		1B	Yes. Occupies gently sloping terrain with openly spaced desert vegetation.

NOTES:

*Habitat requirements were reviewed using Arizona Game and Fish Department's *Arizona's Natural Heritage Program* species abstracts. https://www.azgfd.com/wildlife/heritagefund/. September 20, 2022

[1]BGA= Bald and Golden Eagle Protection Act, SC= species of concern, CCA= Candidate Conservation Agreement

[2]SGCN= Species of Greatest Conservation Need

[3]AZGFD vulnerability categories= Extirpated from Arizona: Federal or State status: Declining status; Disjunct status; Demographic status, Concentration status; Fragmentation status, and Distribution Status
1A=Vulnerability in at least one of the eight categories
1B=Vulnerability in at least of the eight categories, but not match IA
1C=Unknown status species.

Analysis

Gen-Tie Study Area

Landcover in the Gen-Tie Transmission Line study area is comprised of an irrigated agricultural parcel and a developed electrical substation connection parcel containing several other transmission line routes. The analysis area retains minimal natural vegetation and would be unlikely to attract or support special status species. Potential impacts to special status species are anticipated to be low, short-term in duration and would be mostly limited to effects from construction activities such as noise. Once constructed, the powerline and towers may pose a risk of collision for birds and other flying species. The power line would be constructed following industry standards aimed at reducing avian collisions and electrocutions (Avian Power Line Interaction Committee [APLIC] 2006, 2012). Construction and operation of the Gen-Tie transmission line is not expected to result in a measurable decline to special status species nor result in a change in the species' management status.

Pinal Central Substation

The Pinal Central Substation is an existing electrical substation with no trees and little to no shrub and herbaceous vegetation. Construction conducted at the substation would be contained within its existing footprint. It is unlikely for this parcel to attract or support special status species. Minimal impacts are expected and would be limited to effects from construction activities. The proposed expansion of the substation is not expected to result in a measurable decline to special status species nor result in a change in the species' management status.

Solar Center Substation

The Solar Center Substation will be built on an irrigated agriculture field that no longer retains native vegetation. Agriculture fields and associated irrigation ditches may provide habitat for western burrowing owls (*Athene cunicularia hypugaea*). In addition to burrowing owls other SSS as identified in Tables C-2 and C-3 have the potential to occur; however, given that the proposed substation area is composed of regularly disturbed agricultural lands, the potential for project-related impacts to special status species is extremely low. Construction and operation of the proposed substation is not expected to result in a measurable decline to special status species nor result in a change in the species' management status.

Conclusion

Implementation of the Gen-Tie alignment within the analysis area would occur on pre-disturbed lands that provide minimal habitat for special status species. Special status species would not experience long-term detrimental impacts related to the loss or alteration of vegetative cover within the right-of-way based on a lack of suitable habitat in areas that may be impacted by the proposed Project and on the availability of other suitable and unaffected habitats in the vicinity of the proposed Project. Potential impacts to avian species would be minimized by following industry standards that are aimed at reducing avian collisions and electrocutions (Avian Power Line Interaction Committee [APLIC] 2006, 2012).

References

Arizona Game and Fish Department (AZGFD). 2012. Northern Mexican gartersnake (*Thamnophis eques megalops*). Unpublished abstract compiled and edited by the Heritage Data Management System, Arizona Game and Fish Department, Phoenix, AZ. 8pp.

_____.2020. Yuma ridgeway's rail (*Rallus obsoletus yumaensis*). Unpublished abstract compiled and edited by the Heritage Data Management System, Arizona Game and Fish Department, Phoenix, AZ. 7pp.

_____.2021. Yellow-billed cuckoo (*Coccyzus americanus*). Unpublished abstract compiled and edited by the Heritage Data Management System, Arizona Game and Fish Department, Phoenix, AZ. 7pp.

_____. 2022. Online Environmental Review. http://www.azgfd.gov (accessed May 2022).

Avian Power Line Interaction Committee (APLIC). 2006. Suggested Practices for Avian Protection on Power Lines – The State of the Art in 2006. Accessed July 17, 2022.

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NatureServe. 2022a. *Toxostoma bendirei* Bendire's Thrasher. https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.105855/Toxostoma_bendirei

.2022b. Calypte costae Costa's Hummingbird. https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.105238/Calypte_costae

.2022c. *Melanerpes uropygialis* Gila Woodpecker. https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.105515/Melanerpes_uropygialis

.2022d. *Tringa semipalmata* Willet. https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.100605/Tringa_semipalmata

U.S. Fish and Wildlife Service. 2022. Information for Planning and Conservation (IPaC) Threatened and endangered species. (Accessed May 2022).

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EXHIBIT D

BIOLOGICAL RESOURCES

As stated in Arizona Corporation Commission Rules of Practice and Procedure R-14-3-219:

"List the fish, wildlife, plant life, and associated forms of life in the vicinity of the proposed site or route and describe the effects, if any, other proposed facilities will have thereon."

Overview

For the purposes of the Eleven Mile Solar Center Gen-Tie Transmission Line CEC, this Exhibit analyzes biological resource impacts related to the addition of the Solar Center Substation, modifications within the footprint of the existing Pinal Central Substation, and the segment of transmission lines used for interconnection (Gen-Tie Study Area), collectively called the Project. The study boundaries for the environmental review of the proposed Project includes areas within 1.5 miles of the project site (including the proposed Solar Center and Pinal Central substations and connecting lines) (collectively called “analysis area”) (**Figure D-1)**.

The elevation at the Solar Center Substation siting area and Pinal Central Substation is approximately 1,470 feet above mean sea level. The topography is flat with a slight slope towards the northwest. Signal Peak is located approximately eight miles northwest, the Casa Grande Mountains are located approximately nine miles southwest, and Picacho Reservoir is located approximately four miles east. The analysis area can be found on the Eloy North and the Coolidge, Arizona, U.S. Geological Survey 7.5-minute topographic quadrangle. The analysis area is within Sections 23, 24, 25, 26, 35 and 36 of Township 6 South, Range 7 East; Sections 19, 20, 29, 30, 31, and 32 of Township 6 South, Range 8 East; Section 1 of Township 7 South, Range 7 East; and Sections 5 and 6 of Township 7 South, Range 8 East.

The analysis area is located in the Lower Colorado River Valley subdivision of the Sonoran Desert scrub biome (Brown 1994). The Lower Colorado River Valley subdivision is characterized by high temperatures and low precipitation and is the most arid subdivision of the Sonoran Desert. The analysis area is comprised predominately by developed lands with little native desert components remaining.

Overall, the biotic environment is heavily disturbed throughout the analysis area. Land use is predominantly irrigated agriculture and energy production and transmission. Residential and undisturbed desert scrubland is concentrated in the southern portion of the analysis area. Riparian scrub and trees are contained around the Casa Grande Canal, an earthen irrigation channel.

Biological Resources Information

Desktop-level review of the analysis area included federally and state-protected species, sensitive habitats, soils, and streams, wetlands and irrigation canals. The below publicly available data was reviewed. Prior CEC application data was reviewed to the extent relevant.

- Aerial photography (Google Earth, Environmental Systems Research Institute [ESRI] online imagery)

- United States Geologic Survey (USGS) 7.5-minute topographic maps for the Coolidge and Eloy North quadrangles
- Wetlands data from the United States Fish and Wildlife Service (USFWS) National Wetland Inventory (NWI) (USFWS 2022b)
- Surface water features data from the U.S. Environmental Protection Agency (USEPA) Waters Mapper (USEPA 2022)
- Floodplain data from the Federal Emergency Management Agency (FEMA) Flood Map Service Center (FEMA 2022)
- Soil data from the National Resources Conservation Service (NRCS) Web Soil Survey (NRCS 2022)
- USFWS Information for Planning and Consultation (IPaC) system (USFWS 2022a)
- Arizona Game and Fish Department (AZGFD) Online Environmental Review Tool (AZGFD 2022)
- Land cover data from the Southwest Regional Gap Analysis Project (USGS 2005; USGS 2021)

The data were used to develop a characterization of the biological resources in the analysis area. The impact analysis focused on vegetation communities, existing human disturbance, the presence of riparian or wetland habitats, and other habitats for special status species and species of concern.

The native vegetation communities in the analysis area includes the Lower Colorado River Valley subdivision of the Sonoran Desert scrub biotic community. A summary of the vegetation community and a list of the representative wildlife species found within the analysis area is included in **Table D-1**.

Lower Colorado River Valley Subdivision/Sonoran Desertscrub Community

This is the most arid portion of the Sonoran Desert. Vegetation is dominated by low, open stands of creosotebush (*Larrea tridentata*) and white bursage (*Ambrosia dumosa*). Cacti including saguaro (*Carnegiea gigantea*) and fishhook barrel cactus (*Ferocactus wislizenii*), though present, are less abundant than in the neighboring upland desertscrub areas. Trees and taller vegetation are largely confined to washes and other drainages. Smaller areas of low, undrained and salt-affected soils commonly are dominated by four-wing saltbush (*Atriplex canescens*), catclaw acacia (*Acacia greggii*), and velvet mesquites (*Prosopis velutina*). Other conspicuous species include: desertbroom (*Baccharis sarothroides*), chuparosa (*Justicia californica*), jumping cholla (*Cylindropuntia fulgida*), ironwood (*Olneya tesota*), and blue paloverde (*Parkinsonia florida*) (Brown 1994; USGS 2021).

Figure D-1. Project Vicinity

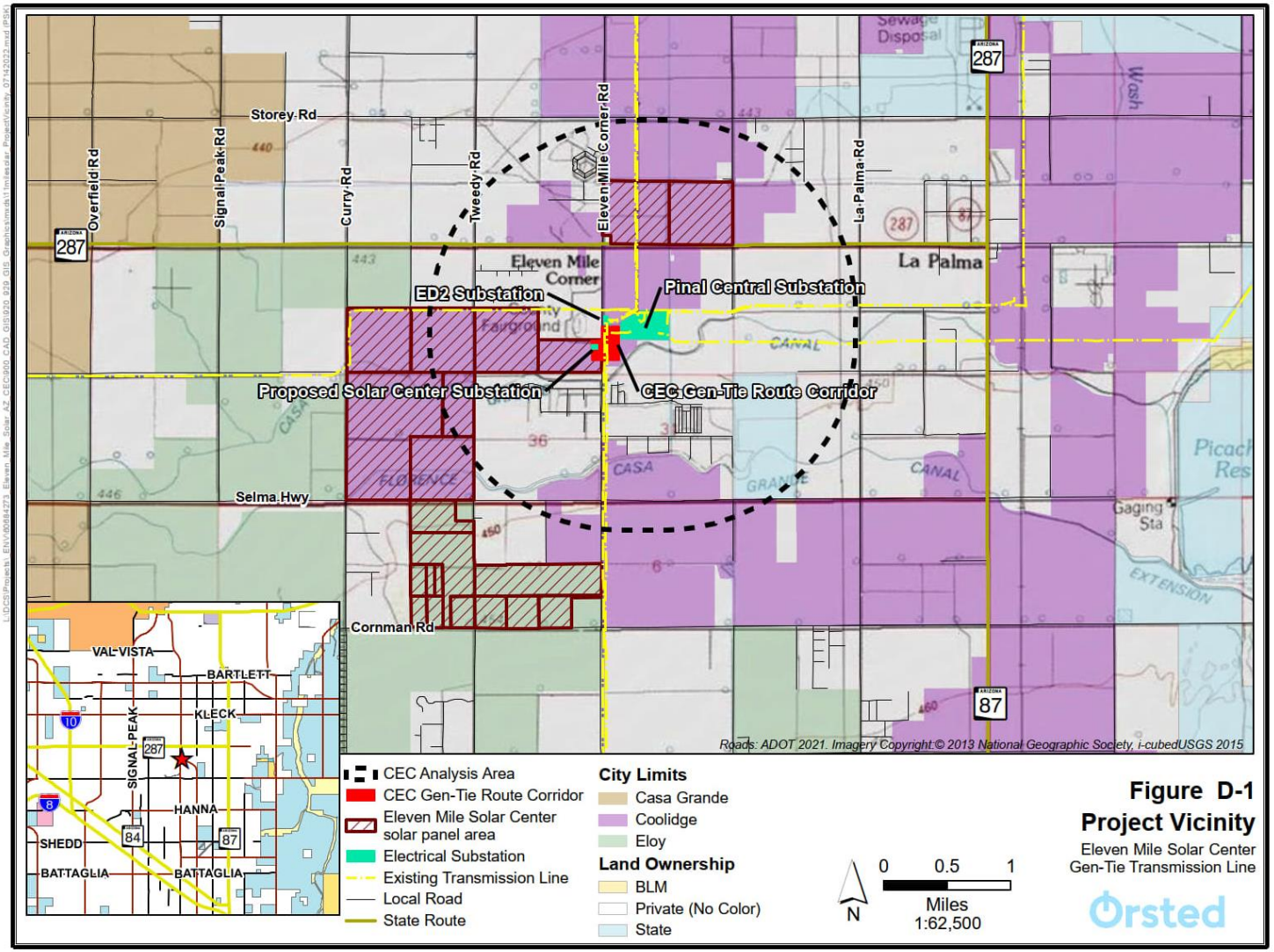

Table D-1. Representative Wildlife Species Associated with the CEC Analysis Area

Species	Habitat Requirements	Habitat Suitability
REPTILES		
-Gila monster (*Heloderma suspectum)* -Goode's horned lizard (*Phrynosoma goodei*) -Regal horned lizard (*Phrynosoma solare*) -Variable sandsnake (*Chilomeniscus stramineus)* -Tucson shovel-nosed snake (*Chionactis occipitalis klauberi*) -Tiger rattlesnake (*Crotalus tigris*) -Sonoran whipsnake (*Coluber bilineatus*) -Sonoran coralsnake (*Micruroides euryxanthus*)	Species in this list can be found throughout the desertscrub, shrubland, thornscrub and sandy washes of the Sonoran Desert (Holycross et al. 2022). In Arizona, Gila monster are more abundant in wetter and rocker palo verde-sahuaro desert than in drier creosote-bursage desert (NatureServe 2022a).	Suitable Sonoran desertscrub habitat exists throughout the analysis area where land has not been developed.
BIRDS		
-Abert's towhee (*Melozone aberti*) -American bittern (*Botaurus lentiginosus)* -Arizona bell's vireo (*Vireo bellii arizonae)* -Bald eagle (*Aliaeetus leucocephalus*) -Ferruginous hawk (*Buteo regalis*) -Gila woodpecker (*Melanerpes uropygialis*) -Gilded flicker (*Colaptes chrysoides*) -Golden eagle (*Aquila chrysaetos*) -Le Conte's trasher (*Toxostoma lecontei)* -Lincoln's sparrow (*Melospiza lincolnii)* -Savannah sparrow (*Passerculus sandwichensis*) -Western burrowing owl *(Athene cunicularia hypugaea*) -Wood duck (*Aix sponsa*) -Yellow warbler (*Setophaga petechia*)	Birds such as Abert's towhee, American bittern, bald eagle, Gila woodpecker, Lincoln's sparrow and wood duck prefer denser, larger riparian vegetation near streams and rivers (NatureServe 2022b, 2022c, and 2022d). Western burrowing owl are known to inhabit the perimeter of agricultural fields (AZGFD 2001). Golden eagles are found in mountainous terrain and are vacant after breeding in some desert areas (AZGFD 2002).	Suitable habitat for western burrowing owl is found in the irrigation canals and agriculture fields. Limited riparian habitat is restricted to the area directly adjacent to the Casa Grande canal.
MAMMALS		
-Antelope jackrabbit (*Lepus alleni*) -Arizona myotis (*Myotis occultus*) -Arizona pocket mouse (*Perognathus amplus*) -Cave myotis (*Myotis velifer*) -Greater western mastiff bat (*Eumops perotis*) -Harris' antelope squirrel (*Ammospermophilus harrisii*) -Kit fox (*Vulpes macrotis*) -Lesser long-nosed bat (*Leptonycteris yerbabuenae*) -Mexican free-tailed bat (*Tadarida brasiliensis*) -Pale Townsend's big-eared bat (*Corynorhinus townsendii pallescens*) -Pocketed free-tailed bat (*Nyctinomops femorosaccus*) -Spotted bat (*Euderma maculatum*) -Western red bat (*Lasiurus blossevillii*) -Western yellow bat (*Lasiurus xanthinus*) -Yuma myotis (*Myotis yumanensis*)	Bat species occupy diverse habitats in the southwestern US including coniferous woodlands, dense riparian trees, and desert habitats) (NatureServe 2022e, NatureServe 2022f). Small mammals such as antelope jackrabbit and Arizona pocket mouse reside in grassy shrub and desertshrub and are less common in barren deserts (NatureServe 2022g, NatureServe 2022h).	Not likely to occur. Larger vegetation and limited riparian habitat may be used by mammal species sparingly.

Native Plants

Arizona Native Plant Law (ANPL) (A.R.S. §§ 3-901 to 3-916) is administered by the Arizona Department of Agriculture (AZDA), who manages native plant resources and impacts to protected native plant species. Arizona Native Plant Law-listed plants include four protection categories: Highly Safeguarded, Salvage Restricted, Salvage Assessed, and Harvest Restricted. Landowners have the right to destroy or remove native plants growing on their land, but at least 60 days prior to the destruction of any protected native plants, landowners are required to notify the AZDA. At the time of the notification the landowner can state if they would allow salvage companies an opportunity to salvage the plants or if they intend to destroy the plants. Removal of protected native plants from the site would require tags/permits from ADA. The landowner is allowed to transplant healthy native trees within the site without a permit or notification.

Analysis

Gen-Tie Transmission Line Study Area

The Gen-Tie Transmission Line Study Area is comprised of an irrigated agricultural parcel and a heavily developed electrical substation connection parcel containing several other transmission line routes. The study area retains minimal natural vegetation and would be unlikely to attract or support native wildlife. Potential impacts to wildlife are anticipated to be low, short-term in duration and would be mostly limited to effects from construction activities such as noise. Tall powerlines, towers and other support structures may pose a risk of collision for birds and other flying species.

Pinal Central Substation

The Pinal Central Substation is an existing electrical substation parcel with little to no natural vegetation. Construction conducted on the substation would be contained within its existing footprint. It is unlikely for this parcel to attract or support native wildlife. Minimal impacts are expected and would be limited to effects from construction activities.

Solar Center Substation

The Solar Center Substation will be built on an irrigated agriculture parcel that no longer retains native vegetation of the Lower Colorado River subdivision. Agriculture parcels may provide temporary habit for western burrowing owls (*Athene cunicularia hypugaea*). Construction activities may result in temporary disturbance of wildlife due to the presence of construction equipment and human activity. Any impacts are anticipated to be low and short-term in duration and would be limited to the construction phase of development.

Conclusion

Implementation of any Gen-Tie alignment within the analysis area would occur on pre-disturbed lands that provide minimal wildlife habitat values. Wildlife species are not expected to experience long-term detrimental impacts from the loss or alteration of vegetative cover within the right-of-way given the pre-disturbed nature of the lands proposed for use by the Project and on the availability of other suitable and unaffected habitats in the vicinity of the proposed Project. Potential impacts to avian species would be minimized by following industry standards

that are aimed at reducing avian collisions and electrocutions (Avian Power Line Interaction Committee [APLIC] 2006, 2012).

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. 2022g. *Lepus alleni* Antelope Jackrabbit. https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.106344/Lepus_alleni (Accessed: August 17, 2022)

.2022h. *Perognathus amplus* Arizona Pocket Mouse. https://explorer.natureserve.org/Taxon/ELEMENT_GLOBAL.2.103544/Perognathus_amplus (Accessed: August 17, 2022)

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EXHIBIT E

SCENIC AREAS, HISTORIC SITES AND STRUCTURES, AND ARCHAEOLOGICAL SITES

As stated in Arizona Corporation Commission Rules of Practice and Procedure R-14-3-219:

"Describe any existing scenic areas, historic sites and structures, or archaeological sites in the vicinity of the proposed facilities and state the effects, if any, the proposed facilities will have thereon."

For the purposes of the Eleven Mile Solar Center Gen-Tie Transmission Line CEC, Exhibit E analyzes the inventory and potential effects associated with scenic, or visual resources, as well as with existing historic sites and structures, or archaeological sites, related to the construction and operation of the Solar Center Substation, modifications within the footprint of the existing the Pinal Central Substation and the segment of the transmission line used for interconnection (Gen-Tie Study Area or Project). The study boundaries for the environmental review of the proposed Project includes areas within 1.5 miles of the project site (including the proposed Solar Center and Pinal Central substations and connecting lines) (collectively called “analysis area”). The methodology for this assessment is provided below and includes separate discussions for scenery and sensitive viewers. The methodology is followed by the results of the inventory and impact assessment, both of which also include separate discussions for scenery (e.g., scenic quality) and sensitive viewers. The Project would not cross lands managed by the BLM, United States Forest Service, or any other agencies that require conformance with visual resource management objectives or management guidelines. A discussion of the existing historic sites and structures, and archaeological sites and associated impacts follows the discussion on scenic areas.

Scenic Areas

The purpose of the scenic area impact assessment is to identify and characterize the level of visual modification in the landscape that would result from the construction and operation of the Project. Modification of the landscape is described in levels of visual contrast, which can potentially affect both scenic quality and sensitive viewers. The analysis area for the Project is located east of Casa Grande and south of State Route 287 (SR-287) in Pinal County, Arizona. Most of the landscape setting can be characterized as flat with expansive views. General views within and around the analysis area feature irrigated agriculture parcels, undeveloped land, electrical substations and transmission lines, existing solar facilities, with residential development south of the project. In addition to the analysis area, locations up to approximately 2.5 miles are characterized to evaluate potential impacts on scenic resources and views.

Inventory data for visual resources within the analysis area were collected from aerial photography, previous studies, and field review. The inventory focused on landscape character, determination of scenic quality, identification of sensitive viewers, and viewing conditions (e.g., distance zones, viewer orientation, and screening). The landscape character within the analysis area generally includes open expanses and flat agriculture parcels bordered by

irrigation canals with large electrical transmission lines throughout. Very little surface area within the analysis area contains natural vegetation. Natural vegetation that does occur includes palo verde, mesquite, creosote bush, and some cacti such as saguaro, cholla, barrel cactus, and seasonal grasses. Higher densities of trees are found along washes and canals. Modifications to the landscape setting include existing electrical infrastructure (transmission lines and substations), transportation corridors, residential neighborhoods and dispersed residential, irrigated agriculture and canals, Tierra Grande Golf Course, the Pinal County Fairgrounds, and existing solar infrastructure.

In consideration of the sensitivity of viewers, existing residential neighborhoods are typically considered to be of high sensitivity. Residential development within the analysis area is located south of the Casa Grande Canal. Views between the residential neighborhoods and existing electrical infrastructure are largely blocked by existing riparian vegetation. The Pinal County Fairgrounds is located west and adjacent to the Gen-Tie Route Study Area. The solar substation is located just south of Alexis Lane, which is also used by visitors to the fairgrounds.

Current views from within the Gen-Tie Route Study Area are largely obstructed by existing electrical infrastructure in the Gen-Tie Study Area and the adjacent existing Pinal Central Substation. Eastward views (**Figure E-1**) consist of existing electrical substations, transmission lines, and riparian vegetation along the Casa Grande Canal in the middle- (1-2 miles) and foreground (0-0.5 mile). The Picacho Mountains are visible in the background (2+ miles). Northward views (**Figure E-2**) include transmission lines and the Pinal County Fairgrounds in the foreground with Signal Peak and Sacaton Peak in the background. Expansive flattened irrigated agriculture parcels dotted with transmission poles can be seen to the west (**Figure E-3**). Southern views (**Figures E-4 and E-5**) are largely blocked by existing electrical infrastructure and Pinal County Fairgrounds in the foreground. Riparian vegetation provides screening for middle ground views, and transmission line are visible into the background.

Visual simulations from key observation points (KOP) of the Gen-Tie line are included as **Figures E-6 through E-11**, which show the Gen-Tie features among the other above ground transmission lines in and around the Pinal Central substation.

Analysis

Gen-Tie Study Area

The Gen-Tie Study Area currently contains existing transmission lines associated with the regional grid with some associated connecting into the Pinal Central Substation (see **Figure E-4**). The Gen-Tie Study Area is largely visible from the north along SR-287. The majority of the Gen-Tie line is below ground. The above ground portions are located within 500 feet west of the existing Pinal Central Substation. Visibility to sensitive viewers in the residential neighborhoods to the south would largely be blocked by existing riparian vegetation and infrastructure. Additional structures required for Gen-Tie line from the Eleven Mile Solar Center Substation would not substantially block or alter views within the analysis area.

Eleven Mile Solar Center Substation

The Eleven Mile Solar Center substation would be mostly visible from the north along SR-287 and from travelers along Eleven Mile Corner Road. The substation would be adjacent to existing

electrical substations and transmission lines. Sensitive viewers in the residential neighborhoods would have views blocked by existing riparian vegetation located along the canal. The substation would not substantially block or alter views within the analysis area. Views of the Eleven Mile Solar Center substation would be visible from the fairgrounds.

Pinal Central Substation

Additions to the Pinal Central Substation will be restricted to its existing footprint. The substation is predominately visible from the north along SR-287 (see **Figure E-5**). Views from sensitive viewers in the residential neighborhoods is mostly blocked by riparian vegetation. The addition of Gen-Tie Transmission Line and associated conduit and structures necessary for connection to the existing Pinal Central Substation would not substantially block or alter views within the analysis area.

Scenic Area Conclusion

Existing conditions within the analysis area generally include expansive views of flat irrigated agricultural parcels and dispersed residences with distant mountains visible in the background. Transmission lines follow the majority of the major roadways within the analysis area. From the north along SR-287 views of the Gen-Tie Study Area are dominated by this existing infrastructure. Views of the substations from the south are largely screened by existing riparian vegetation along canals with only the tops of the largest transmission structures visible. Construction of the Eleven Mile Solar Center substation and the Gen-Tie transmission line is not anticipated to impact views from the residential neighborhood beyond temporary cranes and other construction vehicles during the months of construction. Current views from the fairgrounds include views of the Pinal Central Substation. Future development within the analysis area includes additional utility development and connection to the Pinal Central Substation including proposed transmission lines associated with other projects.

The viewers proximate to the Project features with the highest sensitivity to changes in their views would be recreational viewers from the fairgrounds and along Casa Grande Canal. However, given the lines, forms, colors, textures, and scale of the Project features would repeat those of the existing infrastructure development. The degree of contrast from the fairgrounds and the neighborhood recreation spaces would be weak, and the Project would be subordinate to the features of the existing landscape.

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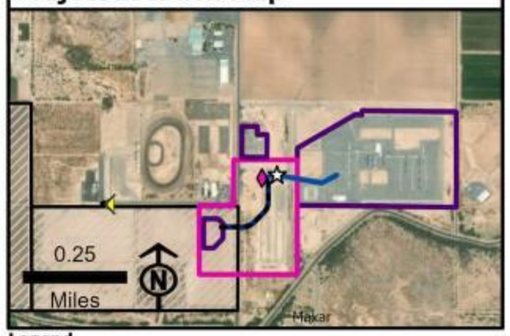
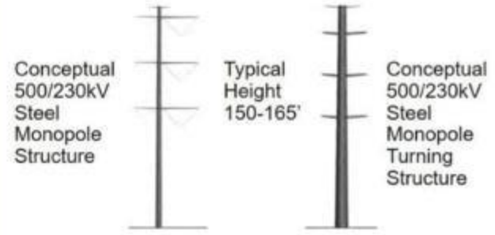
Project Location Map



Legend

- Key Observation Point
- Point of Change of Ownership
- Proposed 230 kV Underground Gen-Tie
- SRP Owned Gen-Tie
- Riser Structure
- Gen-Tie Route Study Area
- Proposed Solar Center Substation
- Eleven Mile Solar Center Project solar panel area
- Pinal Central Substation

Typical Structures



Photograph Information

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Date of Photograph:	6/15/22
Weather Condition:	Clear
Viewing Direction:	East
Latitude:	32.86872909
Longitude:	-111.57300451
Distance to Solar Center Substation:	1300 feet

Existing conditions looking east from the southwest corner of the Pinal County Fairgrounds towards proposed Solar Center Substation

Eleven Mile Solar Center Gen-Tie Transmission Line

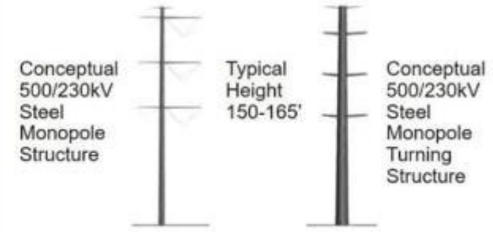
June 2022 Figure E-1

Project Location Map

Legend

- Key Observation Point
- Point of Change of Ownership
- Proposed 230 kV Underground Gen-Tie
- SRP Owned Gen-Tie
- Riser Structure
- Gen-Tie Route Study Area
- Proposed Solar Center Substation
- Eleven Mile Solar Center Project solar panel area
- Pinal Central Substation

Typical Structures



Photograph Information

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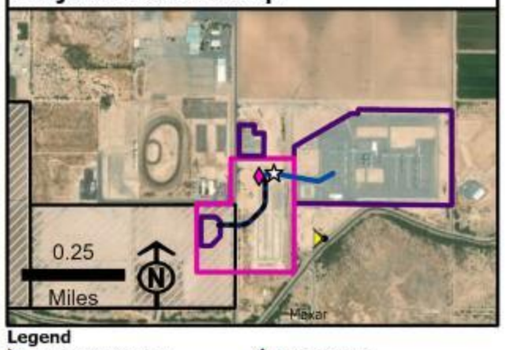
Date of Photograph:	6/15/22
Weather Condition:	Clear
Viewing Direction:	North
Latitude:	32.86508862
Longitude:	-111.56750707
Distance to Solar Center Substation:	900 feet

Existing conditions looking north from the southeast corner of the project parcel towards proposed Solar Center Substation

Eleven Mile Solar Center Gen-Tie Transmission Line

June 2022 Figure E-2

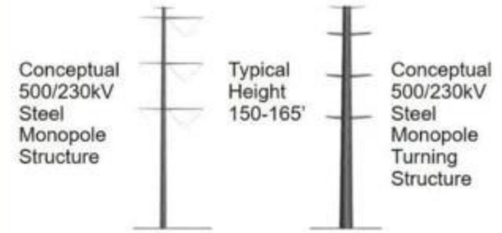
Project Location Map



Legend

- Key Observation Point
- Point of Change of Ownership
- Proposed 230 kV Underground Gen-Tie
- SRP Owned Gen-Tie
- Riser Structure
- Gen-Tie Route Study Area
- Proposed Solar Center Substation
- Eleven Mile Solar Center Project solar panel area
- Pinal Central Substation

Typical Structures



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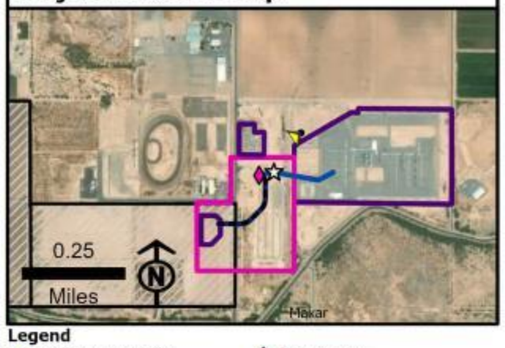
Weather Condition:	Clear
Viewing Direction:	West
Latitude:	32.86742696
Longitude:	-111.56365056
Distance to Solar Center Substation:	1300 feet

Existing conditions looking west from the southeast corner of the Gen-Tie Route Study Area towards proposed Solar Center Substation

Eleven Mile Solar Center Gen-Tie Transmission Line

June 2022 Figure E-3

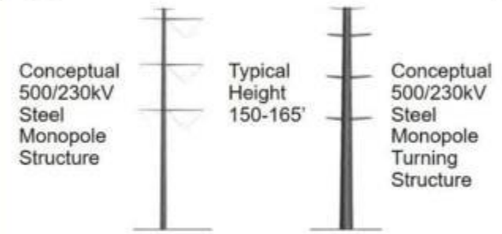
Project Location Map



Legend

- Key Observation Point
- Point of Change of Ownership
- Proposed 230 kV Underground Gen-Tie
- SRP Owned Gen-Tie
- Riser Structure
- Gen-Tie Route Study Area
- Proposed Solar Center Substation
- Eleven Mile Solar Center Project solar panel area
- Pinal Central Substation

Typical Structures



Photograph Information

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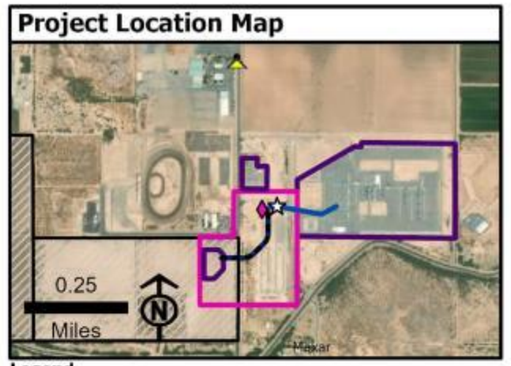
Date of Photograph:	6/15/22
Weather Condition:	Clear
Viewing Direction:	Southwest
Latitude:	32.86742696
Longitude:	-111.56742459
Distance to Solar Center Substation:	1500 feet

Existing conditions looking southwest northeast corner of the Gen-Tie Route Study Area towards proposed Solar Center Substation

Eleven Mile Solar Center Gen-Tie Transmission Line

June 2022 Figure E-4

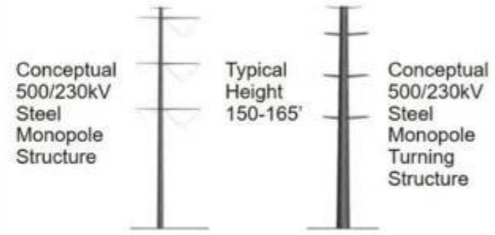
Project Location Map



Legend

- Key Observation Point
- Point of Change of Ownership
- Proposed 230 kV Underground Gen-Tie
- SRP Owned Gen-Tie
- Riser Structure
- Gen-Tie Route Study Area
- Proposed Solar Center Substation
- Eleven Mile Solar Center Project solar panel area
- Pinal Central Substation

Typical Structures



Photograph Information

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Date of Photograph:	6/15/22
Weather Condition:	Clear
Viewing Direction:	South
Latitude:	32.87503676
Longitude:	-111.56742459
Distance to Solar Center Substation:	2500 feet

Existing conditions looking south from the northeast corner of the Pinal County Fairground towards proposed Solar Center Substation

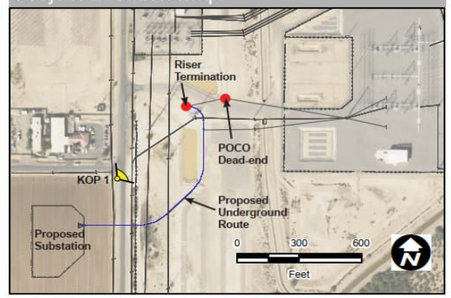
Eleven Mile Solar Center Gen-Tie Transmission Line

June 2022 Figure E-5

Orsted 11 Mile Solar Project
Figure E-6

KOP 1
Existing Conditions
Looking East towards Pinal Central Substation from 11 Mile Road

Project Location Map



Typical Structures

Riser Termination Monopole Typical Height 95'-110'

POCO Dead-end Monopole Typical Height 90'-110'

Photograph Information

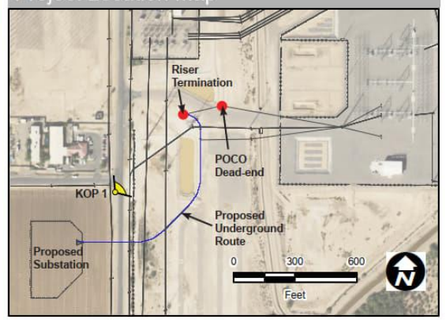
Time of photograph:	11:45 AM
Date of photograph:	9-12-2022
Weather condition:	Partly Cloudy
Viewing direction:	East
Latitude:	32°52'7.05" N
Longitude:	111°34'3.096" W

September 2022

Orsted 11 Mile Solar Project
Figure E-7

KOP 1
Simulated Conditions
Looking East towards Pinal Central Substation from 11 Mile Road

Project Location Map



Typical Structures

Riser Termination Monopole Typical Height 95'-110'

POCO Dead-end Monopole Typical Height 90'-110'

Photograph Information

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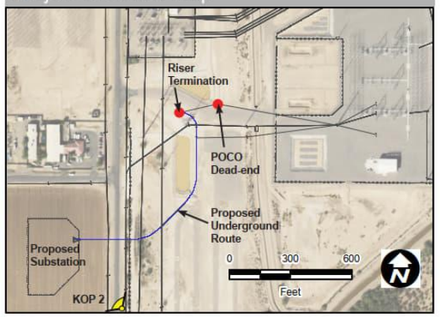
Date of photograph:	9-12-2022
Weather condition:	Partly Cloudy
Viewing direction:	East
Latitude:	32°52'7.05" N
Longitude:	111°34'3.096" W

September 2022

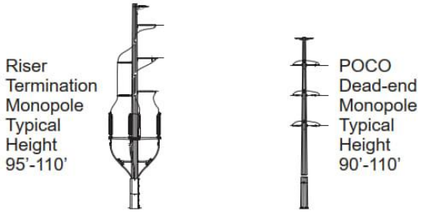
Orsted 11 Mile Solar Project
Figure E-8

KOP 2
Existing Conditions
Looking North along 11 Mile Road

Project Location Map



Typical Structures



Photograph Information

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Date of photograph:	9-12-2022
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Viewing direction:	North
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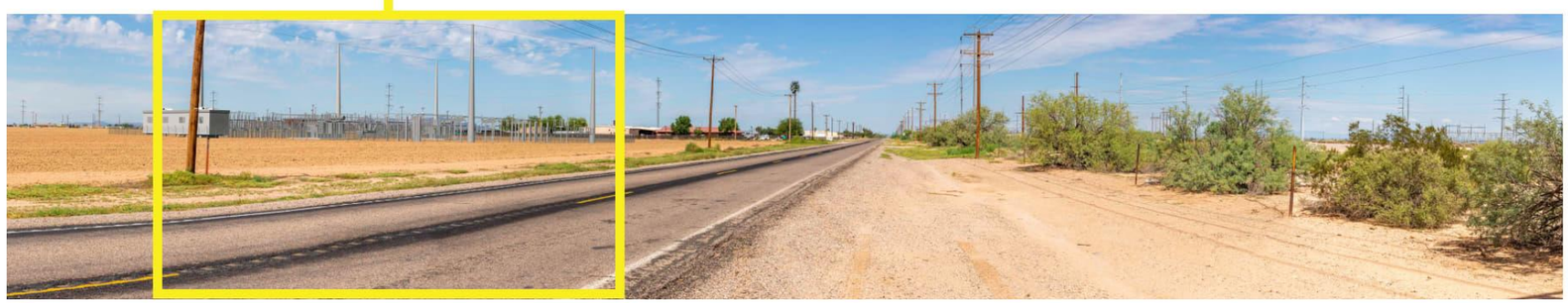
Longitude:	111°34'2.47"W

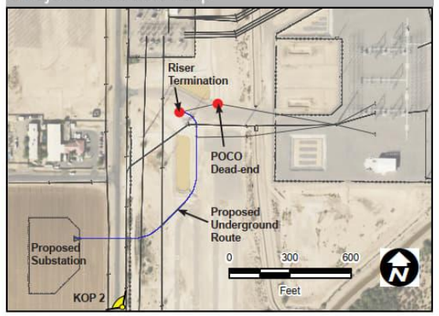
September 2022



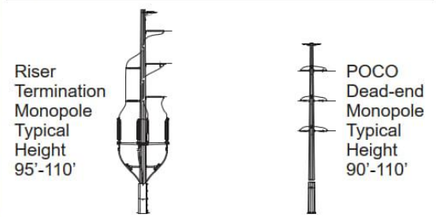
Orsted 11 Mile Solar Project
Figure E-9

KOP 2
Simulated Conditions
Looking North along 11 Mile Road

Project Location Map



Typical Structures



Photograph Information

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Date of photograph:	9-12-2022
Weather condition:	Partly Cloudy
Viewing direction:	North
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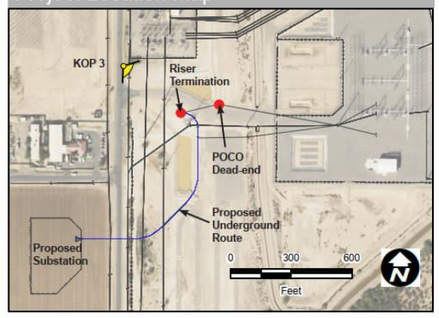
Longitude:	111°34'2.47"W

September 2022

Orsted 11 Mile Solar Project
Figure E-10

KOP 3
Existing Conditions
Looking Southeast along 11 Mile Road

Project Location Map



Typical Structures

Riser Termination Monopole Typical Height 95'-110'

POCO Dead-end Monopole Typical Height 90'-110'

Photograph Information

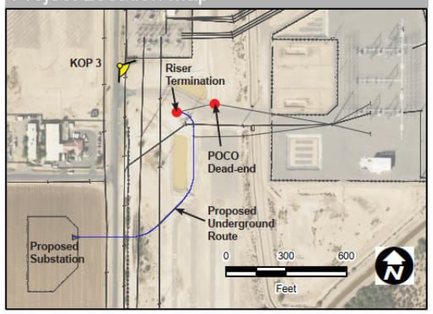
Time of photograph:	11:40 AM
Date of photograph:	9-12-2022
Weather condition:	Partly Cloudy
Viewing direction:	South
Latitude:	32°52'12.83"N
Longitude:	111°34'2.33"W

September 2022

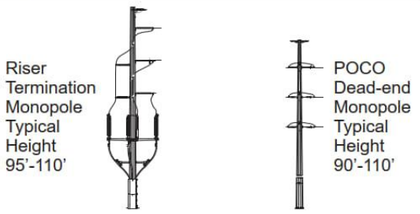
Orsted 11 Mile Solar Project
Figure E-11

KOP 3
Simulated Conditions
Looking Southeast along 11 Mile Road

Project Location Map



Typical Structures



Photograph Information

Time of photograph:	11:40 AM
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Latitude:	32°52'12.83"N
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September 2022

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Historic and Archaeological Sites

A review determined that 10 prior cultural resource surveys conducted between 1982 and 2019 had, in the aggregate, covered the entire Gen-Tie Study Area east of Eleven Mile Corner Road. Most of those surveys were conducted for projects related to transmission lines and construction of the Pinal Central Substation. To support this application, the Gen-Tie Study Area west of Eleven Mile Corner Road and a buffer was surveyed for cultural resources (see Exhibit B for a report that documents the review and field survey).

The prior surveys identified four cultural resources in the eastern part of the Gen-Tie Study Area, including three historical in-use structures and a prehistoric Hohokam archaeological site. The historical in-use structures include Eleven Mile Corner Road and Sublateral 9 of the Casa Grande Canal, which were previously determined to be not eligible for inclusion in the Arizona Register of Historic Places (ARHP).[2] The other historical in-use structure is the Coolidge-Saguaro 115kV transmission line, which has been recommended ineligible for the ARHP. Archaeological data recovery excavations were conducted at the Hohokam archaeological site, AZ AA:2:284 (ASM), to mitigate the impacts of construction of the Pinal Central Substation. The excavations documented 44 buried archaeological features below the plow zone, including 5 pit houses, 27 pits, a cemetery with 11 cremation mortuary features, and a pit with fragmented calcined bone that might have been another disturbed cremation although the bone could not be identified as human. The site was interpreted as a farmstead occupied by one or two extended households sometime between approximately 900 to 1100 C.E. The human remains and funerary objects were recovered and repatriated to the Gila River Indian Community. No further treatment of the site was recommended before the Pinal Central Substation was constructed. Less than 5 percent of that archaeological site overlaps the Gen-Tie Study Area and none of the archaeological features were found in that part of the site.

The review identified 10 other historical resources recorded within 1 mile but outside the Gen-Tie Study Area. They include three historical in-use structures that have been determined to be eligible for the ARHP, including SR-287 and two irrigation canals that are components of the San Carlos Irrigation Project: the Casa Grande Canal and Florence-Casa Grande Canal Extension. Another recorded cultural resource is an archaeological site of a historic homestead that has been recommended eligible for the ARHP. One historic section line road (Sunshine Boulevard) and other Casa Grande Canal sublaterals have been determined to be not eligible, and another in-use maintenance road along the Casa Grande Canal, an in-use transmission line (Coolidge-ED2 #1), an abandoned corral, and a scatter of historic trash have been recommended not eligible.

The review also identified six Hohokam archaeological sites within 1 mile but outside the Gen-Tie Study Area. One was determined to be eligible for the ARHP and archaeological data recovery excavations were conducted to mitigate the impacts of the construction of the Pinal Central Substation. The excavation documented 10 features below the plow zone, including 8 pit houses, 1 pit, and 1 midden. The site was interpreted as a farmstead occupied perhaps by a single extended household at any given time sometime between approximately 1050 and

[2] The criteria for inclusion in the ARHP are identical to those for inclusion in the National Register of Historic Places, and prior evaluations that addressed only eligibility for the National Register of Historic Places are considered applicable for ARHP eligibility.

1150 C.E. Three other scatters of Hohokam artifacts have been recommended eligible for the ARHP and two other Hohokam artifact scatters have been recommended not eligible. The ARHP eligibility of one ambiguous undated archaeological site has not been evaluated.

The cultural resource survey conducted west of Eleven Mile Corner Road identified only one isolated piece of prehistoric flaked stone in the Gen-Tie Study Area and two isolated historical in-use features (an irrigation field ditch and an unimproved dirt road) south of the Gen-Tie Study Area. Those are not the type of historic resources typically considered eligible for the ARHP, and the survey report recommended they be considered ineligible.

In summary, the review and survey concluded the gen-tie and project substation would not alter any archaeological sites, historic sites, or historic structures listed in, determined eligible, or recommended eligible for the ARHP. The State Historic Preservation Office (SHPO) concurred with that finding (see Exhibit J). Eleven tribes also were consulted, including the Ak-Chin Indian Community, Gila River Indian Community, Hopi Tribe, Mescalero Apache Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, Tohono O'odham Nation, Tonto Apache Tribe, White Mountain Apache Tribe, and Yavapai-Apache Nation. The SHPO and three tribes provided comments on the proposed gen-tie and project substation (copies of correspondence are in Exhibit J). The SHPO recommended archaeological monitoring of any ground disturbing construction activities within archaeological site AZ AA:2:284(ASM) and within 100 feet of the site. Although the Gen-Tie Study Area overlaps the southwestern edge of archaeological site AZ AA:2:284(ASM), the preferred gen-tie route is, at its closest, approximately 150 feet south of the site boundary and the closest of the human mortuary features recovered during the prior archaeological data recovery excavations at the site were approximately 450 feet from the preferred gen-tie route.

The Tribal Historic Preservation Officer of the Gila River Indian Community agreed that the gen-tie and project substation would result in no adverse impacts on cultural resources but recommended archaeological monitoring of ground disturbing construction activities near site AZ AA:2:284(ASM), where prior excavations had recovered human remains. If the preferred route is approved, ground disturbance related to construction of the gen-tie would be limited to the underground portion of the line, the riser structure where the buried line would be brought aboveground, and the structure installed at the point of change of ownership, all of which are more than 150 feet from archaeological site AZ AA:2:284(ASM). Hence, archaeological monitoring pursuant to the SHPO recommendation and the comment from the Gila River Indian Community would not be warranted.

The Tribal Historic Preservation Officer of the Salt River Pima- Maricopa Indian Community also provided comments, indicating the tribe wanted to continue to receive information about the project but deferred to the Gila River Indian Community as the lead for the "Four Southern Tribes" for any continuing consultation. The White Mountain Apache Tribe provided the only other comment, indicating the project would have no adverse effect on the tribe's cultural heritage resources and historic properties.

EXHIBIT F

RECREATION RESOURCES INFORMATION

As stated in Arizona Corporation Commission Rules of Practice and Procedure R14-3-219:

"State the extent, if any, the proposed site or route will be available to the public for recreational purposes, consistent with safety considerations and regulations and attach any plans the applicant may have concerning the development of the recreational aspects of the proposed site or route."

For the purposes of the Eleven Mile Solar Center Gen-Tie Transmission Line CEC, this Exhibit analyzes the addition of the Solar Center Substation, modifications within the footprint of the existing Pinal Central Substation, and the segment of transmission lines used for interconnection (Gen-Tie Study Area or Project) on recreational and community resources. The study boundaries for the environmental review of the proposed Project includes areas within 1.5 miles of the project site (including the proposed Solar Center and Pinal Central substations and connecting lines) (collectively called "analysis area") (**Figure F-1)**.

The analysis area for recreation resources is within the City of Coolidge and unincorporated areas of Pinal County. USGS topographic maps generally refer to the analysis area is as Eleven Mile Corner and includes lands south of Arizona State Route 287 (SR-287) and west of Arizona State Route 87 (SR-87). The majority of the land within the analysis area is privately owned and managed.

The Gen-Tie transmission line is not being proposed as a designated trail system. No recreational uses will be allowed in or around the substations. There are no existing, developed recreational resources within the Gen-Tie Study Area. The canal service roads could be used for ad hoc recreational activities.

Existing recreation facilities adjacent to the Gen-Tie Study Area include the Pinal County Fairgrounds directly north of the Solar Center Substation and the Tierra Grande Golf Course 0.5 mile to the southwest. The Pinal County Open Space and Trails Master Plan identifies a planned multi-use trail corridor north of SR-287 and a proposed trail corridor to the south along the Casa Grande Canal. The trails will be 1.6 miles north and 0.9 miles to the south of the Gen-Tie Study Area, respectively.

Due to distance from the Gen-Tie Study Area to current and planned recreational uses, the Project would have no impact on existing or future recreational opportunities.

Reference

Pinal County. 2007. Pinal County Open Space and Trails Master Plan. Available: https://www.pinalcountyaz.gov/openspacetrails/documents/final%20open%20space%20and%20trails%20master%20plan.pdf.

Figure F-1. Project Vicinity

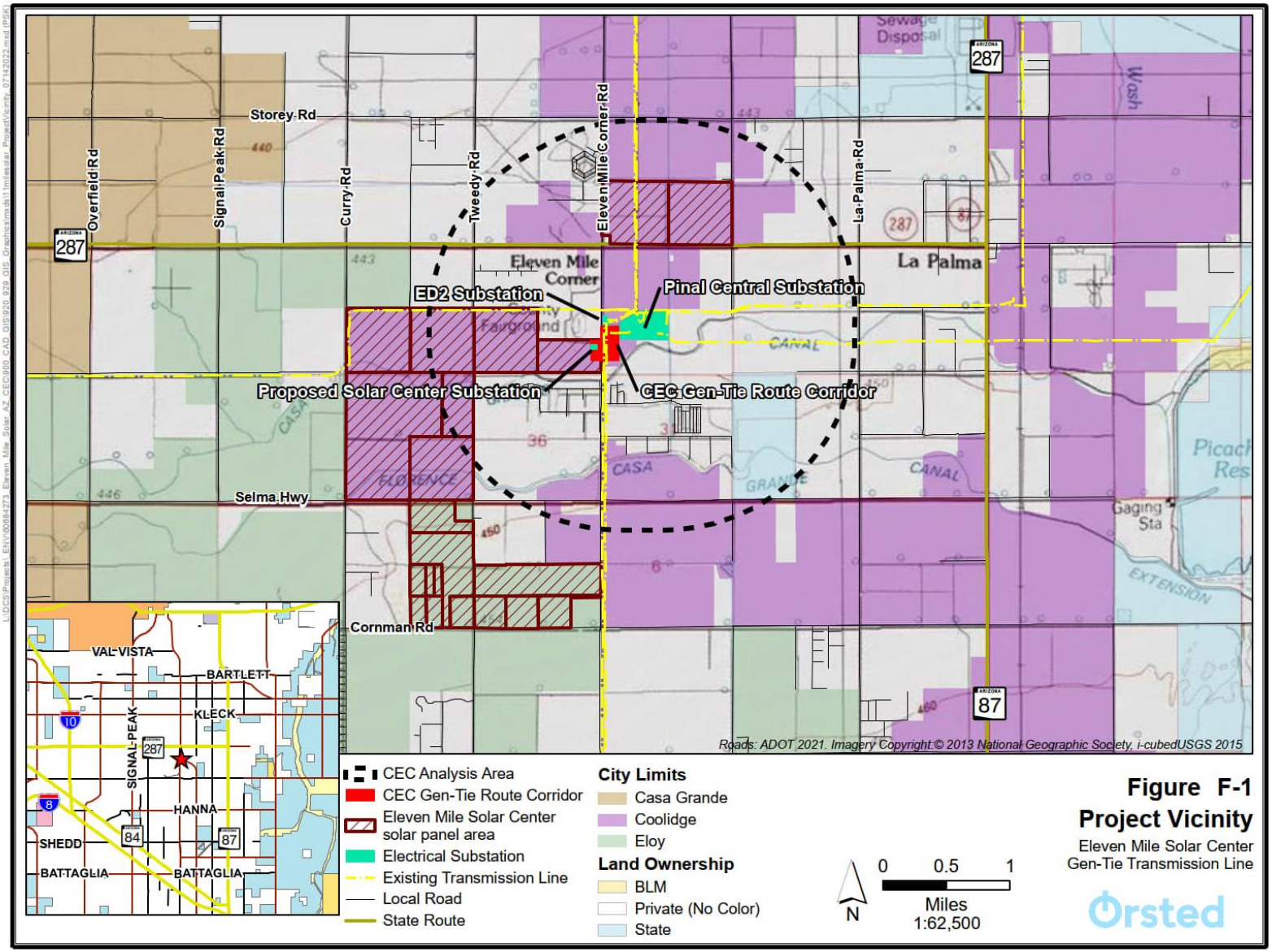

EXHIBIT G

CONCEPTUAL DRAWINGS OF TRANSMISSION FACILITIES

As stated in Arizona Corporation Commission Rules of Practice and Procedure R14-3-220, Ex. G.

"Attach any artist's or architect's conception of the proposed plant or transmission line structures and switchyards, which applicant believes may be informative to the Committee."

The illustrations on the following pages represent conceptual design information for the transmission line structures and substation.

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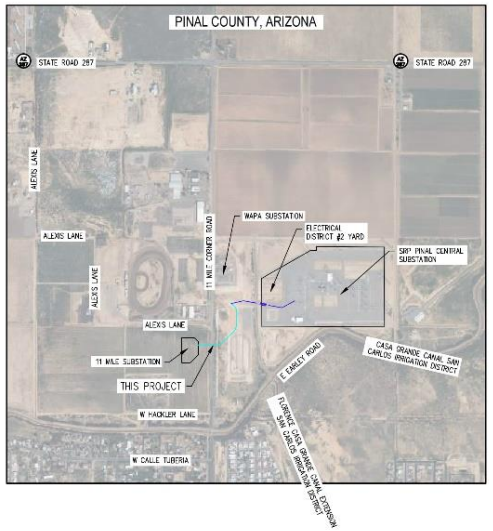
11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
PINAL COUNTY, ARIZONA



PRELIMINARY
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NO	REVISION	DATE	BY	APR
0A	ISSUED FOR REVIEW	10/14/22	JAB	MDZ

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DRAWN	J. BENDOCCHI	08/25/22
DESIGNED	J. BENDOCCHI	08/25/22
CHECKED		
APPROVED		
DWG SCALE: NONE	PLT SCALE: 1:1	

11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
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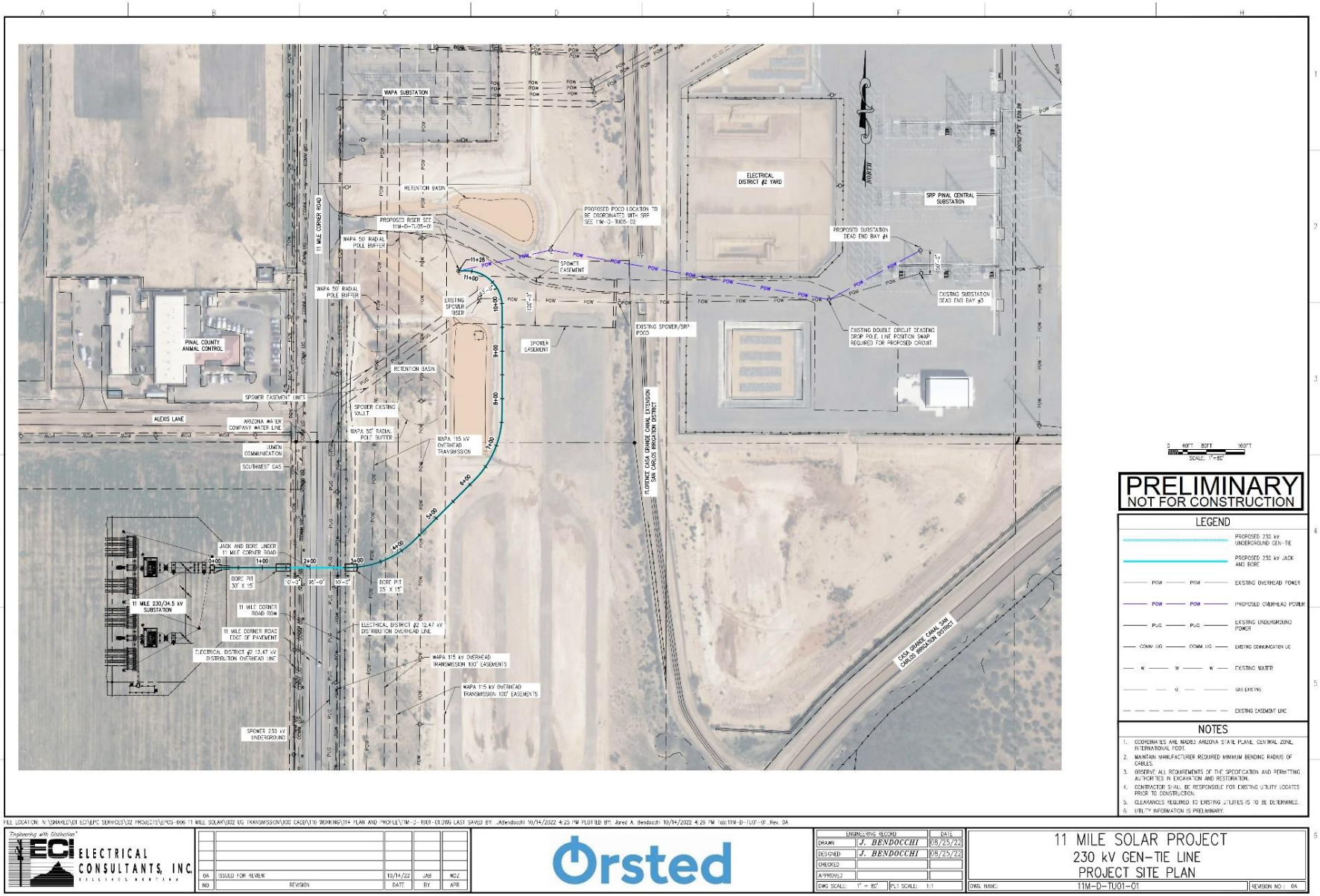

PRELIMINARY
NOT FOR CONSTRUCTION

LEGEND

- PROPOSED 230 kV UNDERGROUND GEN-TIE
- PROPOSED 230 kV JACK AND BORE
- POW — EXISTING OVERHEAD POWER
- POW — PROPOSED OVERHEAD POWER
- PUG — EXISTING UNDERGROUND POWER
- COMM UG — EXISTING COMMUNICATION UG
- W — EXISTING WATER
- G — GAS EXISTING
- EXISTING EASEMENT LINE

NOTES

1. COORDINATES ARE NAD83 ARIZONA STATE PLANE, CENTRAL ZONE, INTERNATIONAL FOOT.
2. MAINTAIN MANUFACTURER REQUIRED MINIMUM BENDING RADIUS OF CABLES.
3. OBSERVE ALL REQUIREMENTS OF THE SPECIFICATION AND PERMITTING AUTHORITIES IN EXCAVATION AND RESTORATION.
4. CONTRACTOR SHALL BE RESPONSIBLE FOR EXISTING UTILITY LOCATES PRIOR TO CONSTRUCTION.
5. CLEARANCES REQUIRED TO EXISTING UTILITIES IS TO BE DETERMINED.
6. UTILITY INFORMATION IS PRELIMINARY.

FILE LOCATION: N:\SHARED\01 ECI\EPC SERVICES\02 PROJECTS\EPCS-806 11 MILE SOLAR\002 UG TRANSMISSION\030 CADD\110 WORKING\114 PLAN AND PROFILE\11M-D-TU01-01.DWG LAST SAVED BY: JABendocchi 10/14/2022 4:25 PM PLOTTED BY: Jared A. Bendocchi 10/14/2022 4:25 PM file:11M-D-TU01-01.dwg Rev. 0A

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0A	ISSUED FOR REVIEW	10/14/22	JAB	WDZ

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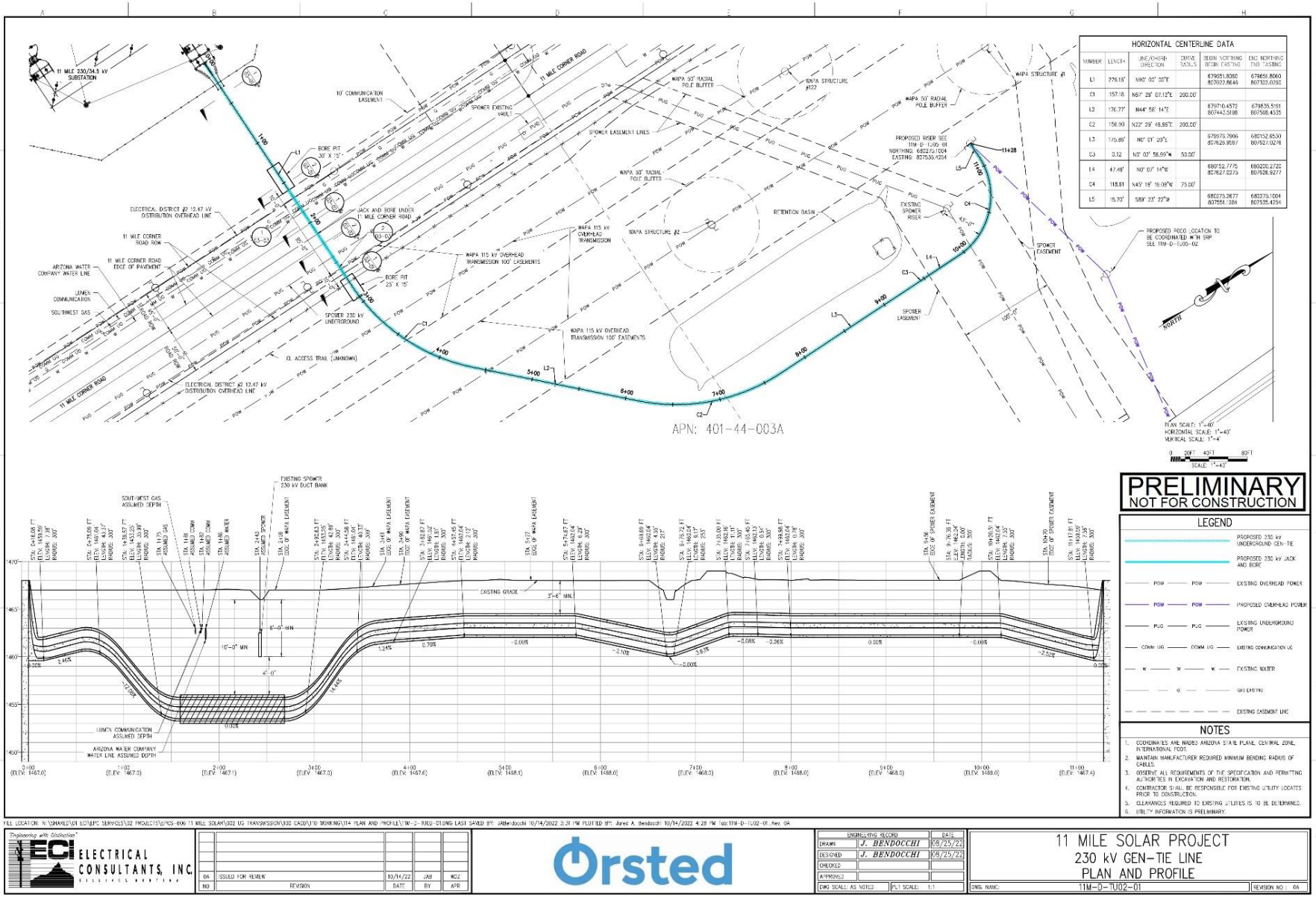
DRAWN	J. BENDOCCHI	08/25/22
DESIGNED	J. BENDOCCHI	08/25/22
CHECKED		
APPROVED		
DWG SCALE: 1" = 80'	PLT SCALE: 1:1	

11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
PROJECT SITE PLAN

DWG NAME: 11M-D-TU01-01 REVISION NO.: 0A


HORIZONTAL CENTERLINE DATA
NUMBER | LENGTH | LINE/CURVE DIRECTION | CURVE RADIUS | BEGIN NORTHING BEGIN EASTING | END NORTHING END EASTING
L1 | 378.18' | N90° 00' 00"E | | 679651.8060 807022.8646 | 679651.8060 807333.0092
C1 | 157.18 | N67° 29' 07.12"E | 200.00' | | |
L2 | 176.77' | N44° 58' 14"E | | 679710.4572 807443.5198 | 679835.5161 807568.4335
C2 | 156.90 | N22° 29' 48.88"E | 200.00' | | |
L3 | 170.89' | N0° 01' 20"E | | 679976.7906 807629.3597 | 680152.6530 807627.0278
C3 | 0.12 | N3° 03' 56.99"W | 50.00' | | |
L4 | 47.48' | N0° 01' 14"W | | 680152.7775 807627.2275 | 680200.2720 807626.9277
C4 | 118.61 | N45° 18' 19.08"W | 75.00' | | |
L5 | 15.70' | S89° 23' 22"W | | 680275.2677 807551.284 | 680275.1004 680535.4254
11 MILE 230/34.5 kV SUBSTATION
10' COMMUNICATION EASEMENT
11 MILE CORNER ROAD
SPOWER EXISTING VAULT
WAPA 50' RADIAL POLE BUFFER
WAPA STRUCTURE #122
WAPA STRUCTURE #1
PROPOSED RISER SEE 11M-D-1U00-08 NORTHING: 680275.1004 EASTING: 807535.4254
BORE PIT 30' X 15'
BORE PIT 25' X 15'
JACK AND BORE UNDER 11 MILE CORNER ROAD
ELECTRICAL DISTRICT #2 12.47 kV DISTRIBUTION OVERHEAD LINE
11 MILE CORNER ROAD ROW
11 MILE CORNER ROAD EDGE OF PAVEMENT
ARIZONA WATER COMPANY WATER LINE
LUMEN COMMUNICATION
SOUTHWEST GAS
SPOWER 230 kV UNDERGROUND
CL ACCESS TRAIL (UNKNOWN)
WAPA 115 kV OVERHEAD TRANSMISSION
WAPA 115 kV OVERHEAD TRANSMISSION 100' EASEMENTS
WAPA STRUCTURE #2
RETENTION BASIN
EXISTING SPOWER RISER
SPOWER EASEMENT
APN: 401-44-003A
PROPOSED POLE LOCATION TO BE COORDINATED WITH SRP SEE 11M-D-1U00-02
NORTH
PLAN SCALE: 1"=40'
HORIZONTAL SCALE: 1"=40'
VERTICAL SCALE: 1"=4'
SCALE: 1"=40'
EXISTING SPOWER 230 kV DUCT BANK
SOUTHWEST GAS ASSUMED DEPTH
EXISTING GRADE
LUMEN COMMUNICATION ASSUMED DEPTH
ARIZONA WATER COMPANY WATER LINE ASSUMED DEPTH
PRELIMINARY
NOT FOR CONSTRUCTION
LEGEND
PROPOSED 230 kV UNDERGROUND GEN-TIE
PROPOSED 230 kV JACK AND BORE
EXISTING OVERHEAD POWER
PROPOSED OVERHEAD POWER
EXISTING UNDERGROUND POWER
EXISTING COMMUNICATION UG
EXISTING WATER
GAS EXISTING
EXISTING EASEMENT LINE
NOTES
1. COORDINATES ARE NAD83 ARIZONA STATE PLANE, CENTRAL ZONE, INTERNATIONAL FEET.
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6. UTILITY INFORMATION IS PRELIMINARY.
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ENGINEERING RECORD
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DESIGNED J. BENDOCCHI 08/25/22
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DWG SCALE: AS NOTED PLT SCALE: 1:1
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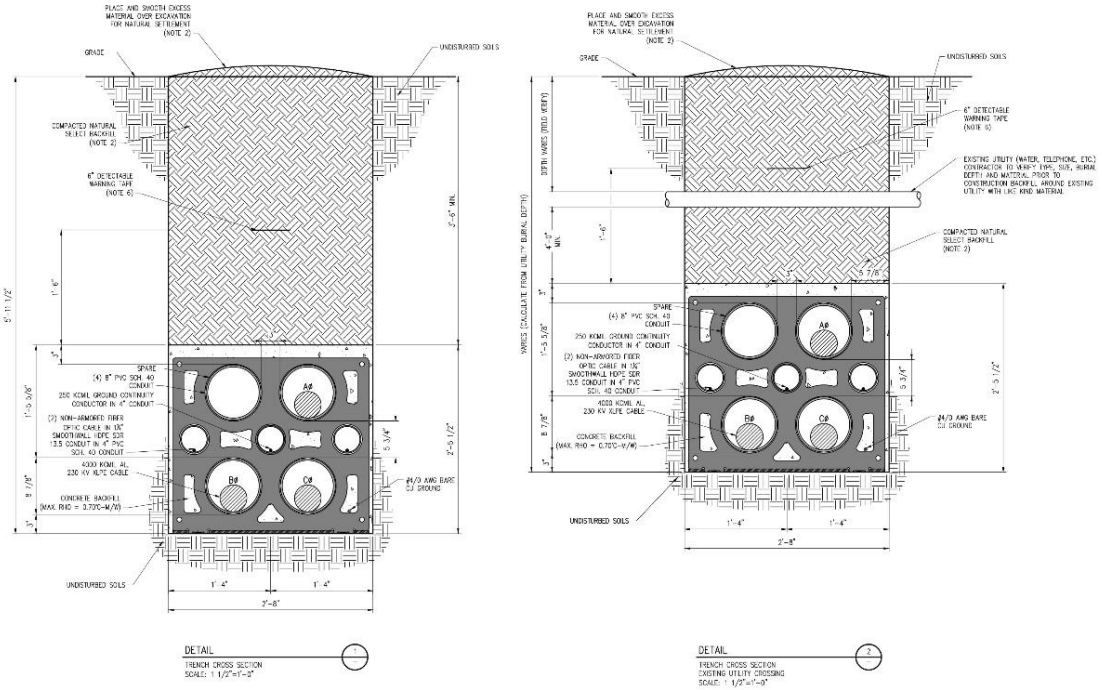

PRELIMINARY
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GENERAL NOTES

1. MAINTAIN MANUFACTURER REQUIRED MINIMUM BENDING RADIUS OF CABLES.
2. CONTRACTOR SHALL ACHIEVE 90 PERCENT STANDARD PROCTOR DENSITY COMPACTION OF SELECT NATIVE BACKFILL THROUGH MECHANICAL MEANS. COMPACT IN LIFTS AS NECESSARY TO ACHIEVE COMPLETED TRENCH WITH REASONABLE EXPECTED FUTURE SETTLEMENT. ALL EXCAVATED MATERIAL REMOVED FROM TRENCH SHALL BE REPLACED IN TRENCH TO PREVENT ANY RUTTING DUE TO EROSION BY WIND OR WATER.
3. OBSERVE ALL REQUIREMENTS OF THE SPECIFICATION AND PERMITTING AUTHORITIES IN EXCAVATION AND RESTORATION.
4. CONTRACTOR SHALL BE RESPONSIBLE FOR EXISTING UTILITY LOCATES PRIOR TO CONSTRUCTION.
5. CONTRACTOR TO REMOVE, STOCKPILE AND REPLACE TOP SOIL EXCAVATED FROM TRENCH. DO NOT MIX WITH SUB-SOILS.
6. DETECTABLE WARNING TAPE SHALL BEAR THE WORDS, "CAUTION-ELECTRIC LINE BURIED BELOW" IN BLACK LETTERS ON A RED BACKGROUND.
7. DETAIL PER MARICOPA ASSOCIATION OF GOVERNMENTS SPECIFICATION SECTION 471.3? AND DETAIL #235-1

FILE LOCATION: N:\SHARED\01 ECI\EPC SERVICES\02 PROJECTS\EPCS-806 11 MILE SOLAR\002 UG TRANSMISSION\100 CADD\110 WORKING\115 DUCT BANK DETAILS\11M-D-TU03-01-04.DWG LAST SAVED BY: JABerdocchi 10/13/2022 11:05 AM PLOTTED BY: Jared A. Berdocchi 10/14/2022 3:50 PM file:11M-D-TU03-01.Rev. 04

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APPROVED		
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11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
DUCT BANK DETAILS

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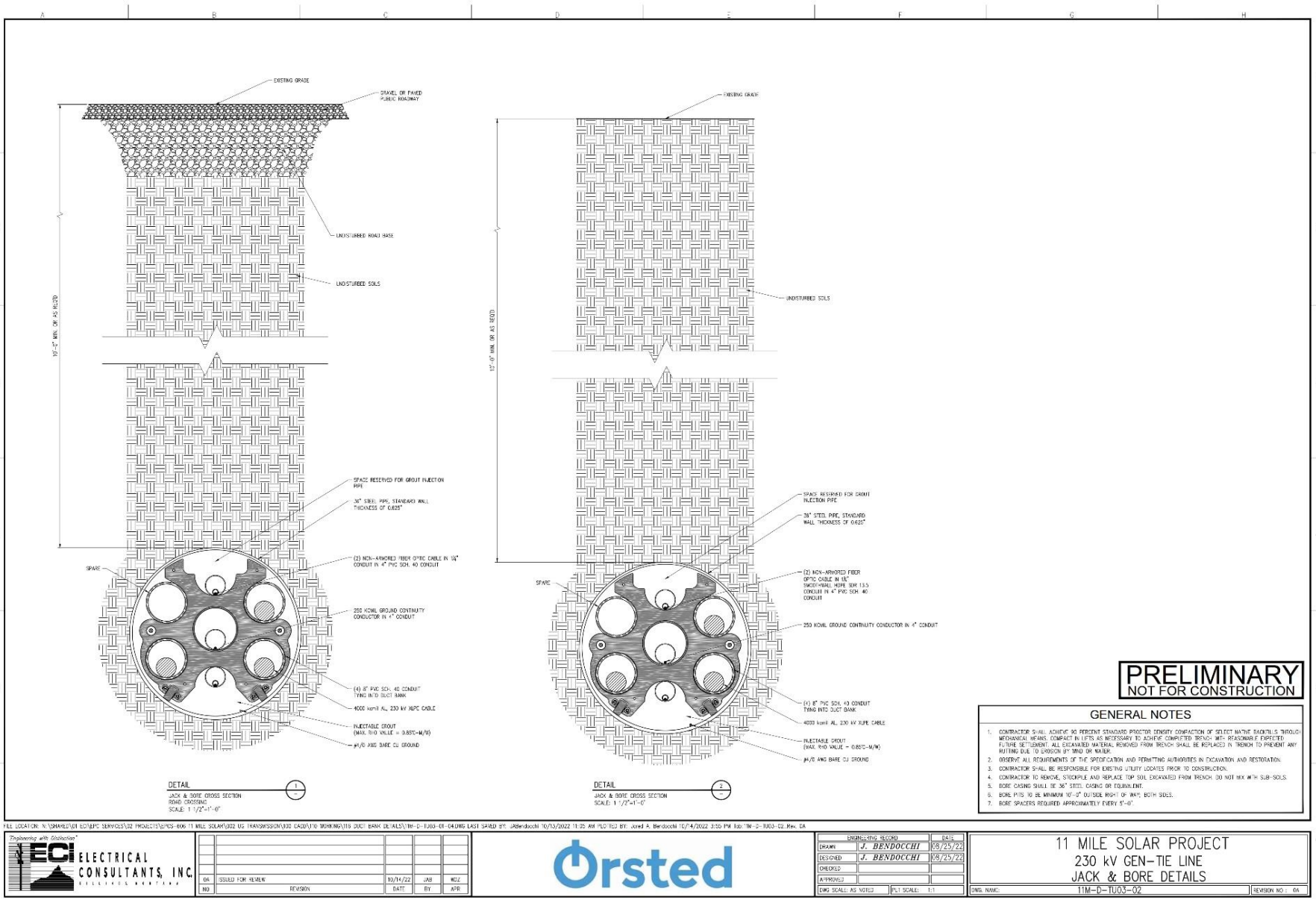

PRELIMINARY
NOT FOR CONSTRUCTION

GENERAL NOTES

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3. CONTRACTOR SHALL BE RESPONSIBLE FOR EXISTING UTILITY LOCATES PRIOR TO CONSTRUCTION.
4. CONTRACTOR TO REMOVE, STOCKPILE AND REPLACE TOP SOIL EXCAVATED FROM TRENCH. DO NOT MIX WITH SUB-SOILS.
5. BORE CASING SHALL BE 36" STEEL CASING OR EQUIVALENT.
6. BORE PITS TO BE MINIMUM 10'-0" OUTSIDE RIGHT OF WAY, BOTH SIDES.
7. BORE SPACERS REQUIRED APPROXIMATELY EVERY 5'-0".

FILE LOCATION: N:\SHARED\01 EOT&PC SERVICES\02 PROJECTS\EPCS-806 11 MILE SOLAR\002 UG TRANSMISSION\000 CADD\110 WORKING\115 DUCT BANK DETAILS\11M-D-TU03-01-04.DWG LAST SAVED BY: JABerdocchi 10/13/2022 11:05 AM PLOTTED BY: Jared A. Berdocchi 10/14/2022 3:50 PM file:11M-D-TU03-02.Rev. 04

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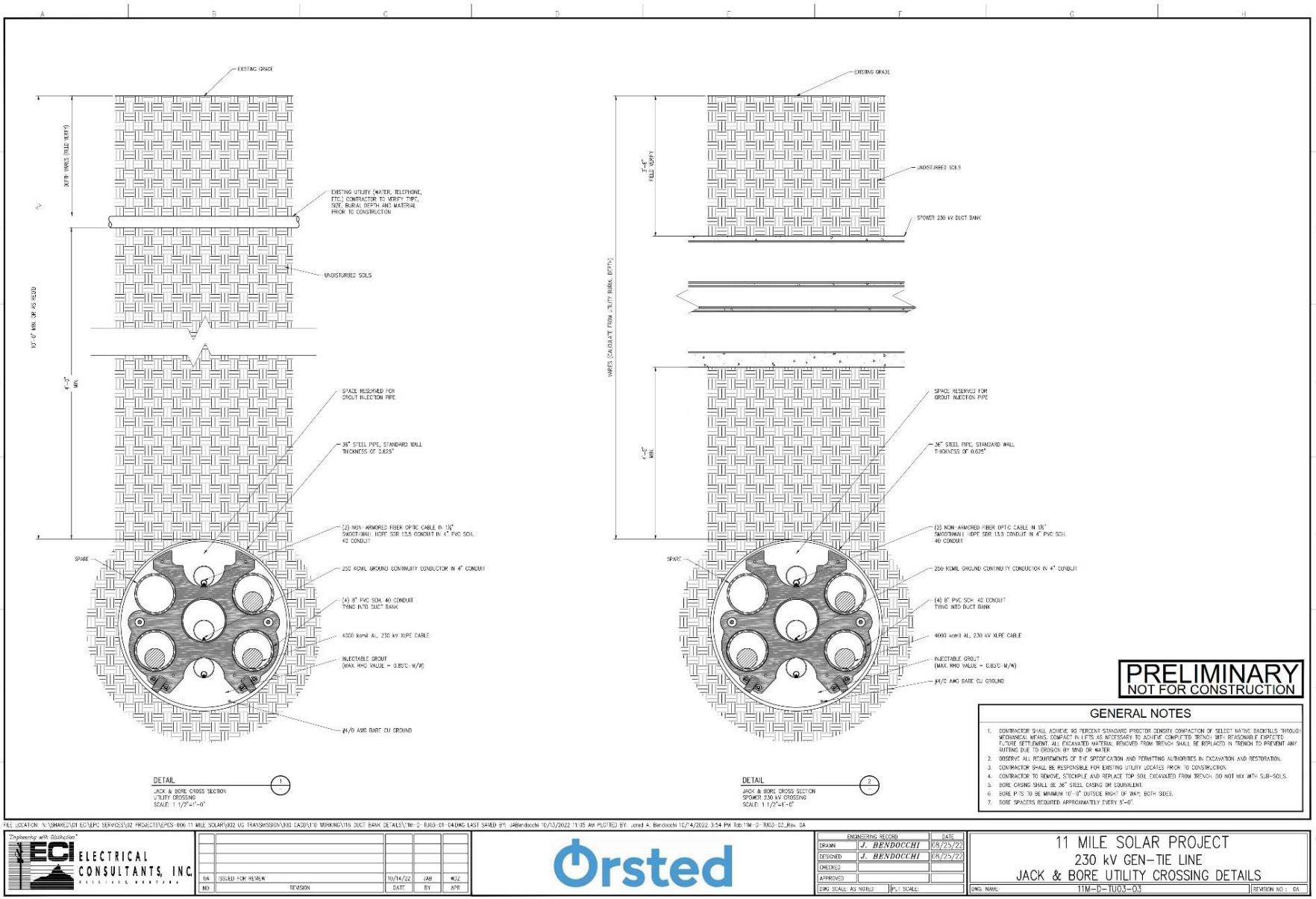
DESIGNED	J. BENDOCCHI	08/25/22
CHECKED		
APPROVED		
DWG SCALE: AS NOTED	PLT SCALE: 1:1	

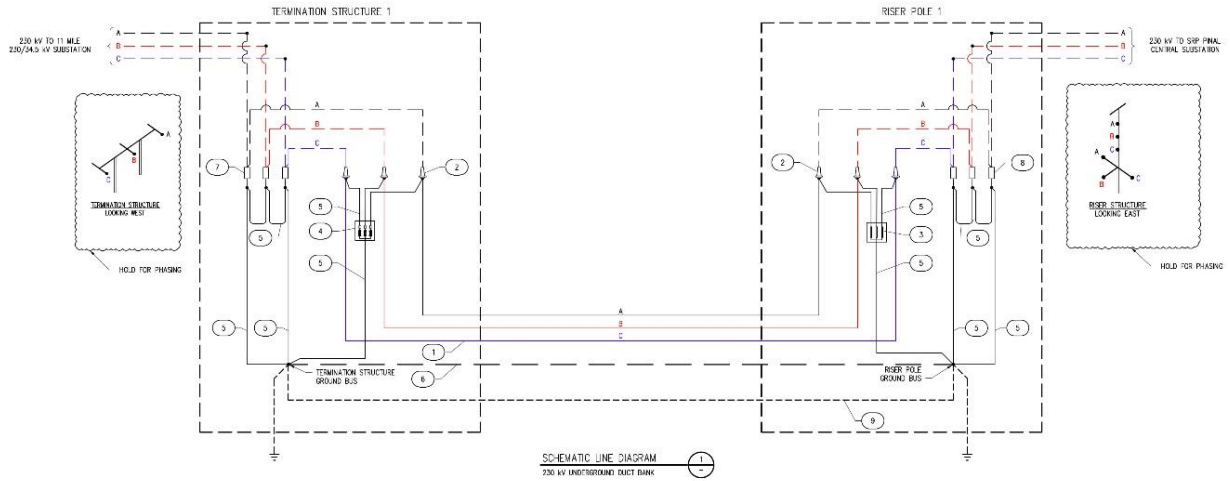
11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
JACK & BORE DETAILS

DWG NAME: 11M-D-TU03-02 | REVISION NO.: 04

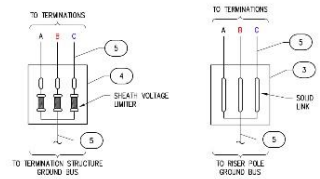

EXISTING GRADE
DEPTH VARIES (FIELD VERIFY)
EXISTING UTILITY (WATER, TELEPHONE, ETC.) CONTRACTOR TO VERIFY TYPE, SIZE, BURIAL DEPTH AND MATERIAL PRIOR TO CONSTRUCTION
UNDISTURBED SOILS
10'-0" MIN. OR AS REQ'D
4'-0" MIN.
SPACE RESERVED FOR GROUT INJECTION PIPE
36" STEEL PIPE, STANDARD WALL THICKNESS OF 0.625"
(2) NON-ARMORED FIBER OPTIC CABLE IN 1¼" SMOOTH-WALL HDPE SDR 13.5 CONDUIT IN 4" PVC SCH. 40 CONDUIT
SPARE
250 KCMIL GROUND CONTINUITY CONDUCTOR IN 4" CONDUIT
(4) 8" PVC SCH. 40 CONDUIT TYING INTO DUCT BANK
4000 kcmil AL, 230 kV XLPE CABLE
INJECTABLE GROUT (MAX. RHO VALUE = 0.85°C-M/W)
#4/0 AWG BARE CU GROUND
DETAIL 1
JACK & BORE CROSS SECTION UTILITY CROSSING
SCALE: 1 1/2"=1'-0"
EXISTING GRADE
3'-6" FIELD VERIFY
UNDISTURBED SOILS
SPOWER 230 kV DUCT BANK
VARIES (CALCULATE FROM UTILITY BURIAL DEPTH)
4'-0" MIN.
SPACE RESERVED FOR GROUT INJECTION PIPE
36" STEEL PIPE, STANDARD WALL THICKNESS OF 0.625"
(2) NON-ARMORED FIBER OPTIC CABLE IN 1¼" SMOOTH-WALL HDPE SDR 13.5 CONDUIT IN 4" PVC SCH. 40 CONDUIT
SPARE
250 KCMIL GROUND CONTINUITY CONDUCTOR IN 4" CONDUIT
(4) 8" PVC SCH. 40 CONDUIT TYING INTO DUCT BANK
4000 kcmil AL, 230 kV XLPE CABLE
INJECTABLE GROUT (MAX. RHO VALUE = 0.85°C-M/W)
#4/0 AWG BARE CU GROUND
DETAIL 2
JACK & BORE CROSS SECTION SPOWER 230 kV CROSSING
SCALE: 1 1/2"=1'-0"
PRELIMINARY
NOT FOR CONSTRUCTION
GENERAL NOTES
1. CONTRACTOR SHALL ACHIEVE 90 PERCENT STANDARD PROCTOR DENSITY COMPACTION OF SELECT NATIVE BACKFILL THROUGH MECHANICAL MEANS. COMPACT IN LIFTS AS NECESSARY TO ACHIEVE COMPLETED TRENCH WITH REASONABLE EXPECTED FUTURE SETTLEMENT. ALL EXCAVATED MATERIAL REMOVED FROM TRENCH SHALL BE REPLACED IN TRENCH TO PREVENT ANY SETTING DUE TO EROSION BY WIND OR WATER.
2. OBSERVE ALL REQUIREMENTS OF THE SPECIFICATION AND PERMITTING AUTHORITIES IN EXCAVATION AND RESTORATION.
3. CONTRACTOR SHALL BE RESPONSIBLE FOR EXISTING UTILITY LOCATES PRIOR TO CONSTRUCTION.
4. CONTRACTOR TO REMOVE, STOCKPILE AND REPLACE TOP SOIL EXCAVATED FROM TRENCH. DO NOT MIX WITH SUB-SOILS.
5. BORE CASING SHALL BE 36" STEEL CASING OR EQUIVALENT.
6. BORE PITS TO BE MINIMUM 10'-0" OUTSIDE RIGHT OF WAY, BOTH SIDES.
7. BORE SPACERS REQUIRED APPROXIMATELY EVERY 5'-0".
FILE LOCATION: N:\SHARED\01 EC\EPC SERVICES\02 PROJECTS\EPES-606 11 MILE SOLAR\002 DC TRANSMISSION\100 CADD\110 WORKING\116 DUCT BANK DETAILS\11M-D-TU03-03-04.DWG LAST SAVED BY: JABerdocchi 10/13/2022 11:05 AM PLOTTED BY: Jared A. Berdocchi 10/14/2022 3:54 PM File:11M-D-TU03-03_Rev. 04
Engineering with Satisfaction
ELECTRICAL CONSULTANTS, INC.
BILLINGS, MONTANA
04 ISSUED FOR REVIEW 10/14/22 JAB MJZ
NO REVISION DATE BY APR
Ørsted
ENGINEERING RECORD DATE
DRAWN J. BENDOCCHI 08/25/22
DESIGNED J. BENDOCCHI 08/25/22
CHECKED
APPROVED
DWG SCALE: AS NOTED PLT SCALE:
11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
JACK & BORE UTILITY CROSSING DETAILS
DWG NAME: 11M-D-TU03-03 REVISION NO.: 04

ITEM	QTY	MATERIAL DESCRIPTION
1	TBD	CABLE, 230 kV 1C x XXXX kcmil CN XX XLPE cable, 1050 kV BIL (1 SPARE REEL, FOOTAGE TBD)
2	10	OUTDOOR TERMINATION, for 230 kV 1C x XXXX kcmil CN, XX XLPE cable, XXXX kV BIL (4 SPARE)
3	2	LINK BOX, for termination earthing (3-1 way without SVL) (1 SPARE)
4	2	LINK BOX, for termination earthing (3-1 way with TBD MCOV SVL) (1 SPARE)
5	TBD	BONDING CONDUCTOR CABLE, (single core type) 250 kcmil Cu, 130 mil insul. MIN.
6	TBD	GROUND CONTINUITY CONDUCTOR CABLE, (single core type) 250 kcmil Cu, 86 mil insul. MIN. (FOOTAGE TBD FOR SPARE)
7	4	ARRESTER, TBD by substation (1 SPARE)
8	4	ARRESTER, 3EQ4 arrester 192 kV MCOV, Siemens 3EQ4 192-4P6S1-4AH1 (1 SPARE)
9	TBD	BARE GROUND CONDUCTOR, #4/0 AWG Cu
10	3	SHEATH VOLTAGE LIMITER, TBD MCOV, SPARE

BASIS OF CABLE LENGTH	
230 kV UNDERGROUND CABLE	FEET
REEL 1 DUCT BANK LENGTH	TBD
TERMINATION BASE HEIGHT (2X)	TBD
TERMINATION LENGTH (2X)	TBD
EXTRA LENGTH AT TERMINATION (2X)	TBD
SUB-TOTAL	TBD
REEL 1 CUT LENGTH	TBD
SUB-TOTAL REEL LENGTHS	TBD
NUMBER OF PHASE CABLES PER CIRCUIT	TBD
NUMBER OF CIRCUITS	TBD
SPARE REEL	TBD
TOTAL	TBD



SCHEMATIC LINE DIAGRAM (1)
230 kV UNDERGROUND DUCT BANK



DETAIL (1) LINK BOX w/ SVL

DETAIL (2) LINK BOX W/OUT SVL

PRELIMINARY
NOT FOR CONSTRUCTION

LEGEND

- LINK BOX FOR JOINT EARTHING (3-1 WAY WITHOUT SVL)
- LINK BOX FOR JOINT EARTHING (3-1 WAY WITH TBD MCOV SVL)
- OUTDOOR TERMINATION FOR 230 kV 1C x XXXX kcmil XX XLPE CABLE
- RISER POLE ARRESTER
- HV UNDERGROUND PHASE CONDUCTOR SHEATHS
- HV OVERHEAD JUMPERS
- GROUND CONTINUITY CONDUCTOR
- BONDING CONDUCTOR
- BARE Cu DUCT BANK CONDUCTOR
- LOCAL GROUND GRID

FILE LOCATION: N:\SHARED\01 EC\EPC SERVICES\02 PROJECTS\EPCS-806 11 MILE SOLAR\002 UG TRANSMISSION\100 CADD\110 WORKING\115 SHEATH BONDING SCHEMATIC\11M-D-TU04-01.DWG LAST SAVED BY: JABendocchi 10/4/2022 3:31 PM PLOTTED BY: Jared A. Bendocchi 10/14/2022 3:52 PM Tab:11M-D-TU04-01_Rev. 0A

ELECTRICAL CONSULTANTS, INC.

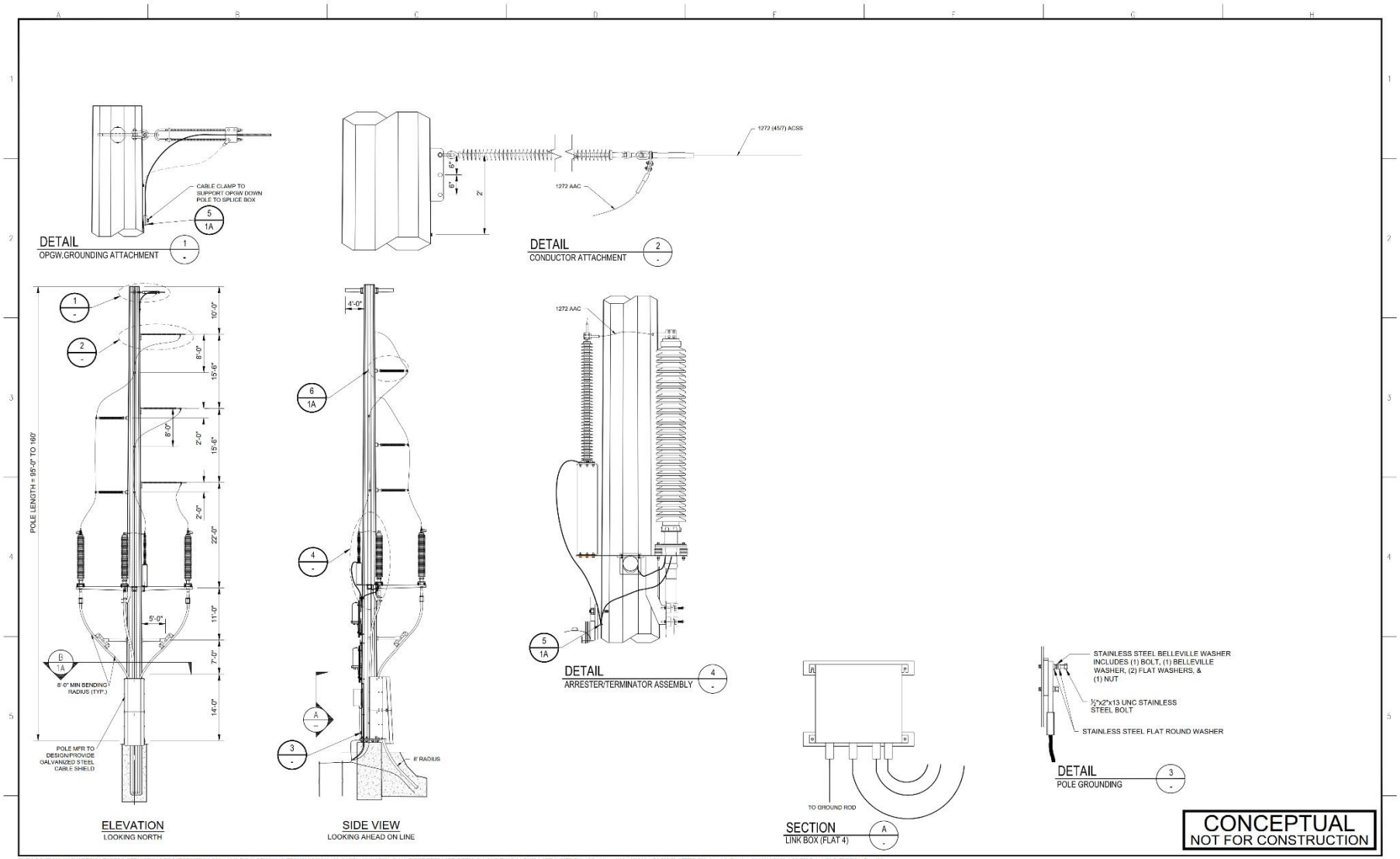
NO	REVISION	DATE	BY	APP
0A	ISSUED FOR REVIEW	10/14/22	JAB	MDZ

Ørsted

ENGINEERING RECORD		DATE
DRAWN	J. BENDOCCHI	08/25/22
DESIGNED	J. BENDOCCHI	08/25/22
CHECKED		
APPROVED		
DWG SCALE: 1" = 80'	PLT SCALE:	

11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
SHEATH BONDING AND PHASING SCHEMATIC

DWG NAME: 11M-D-TU04-01 REVISION NO: 0A



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"Engineering with Distinction"
ECI ELECTRICAL CONSULTANTS, INC.

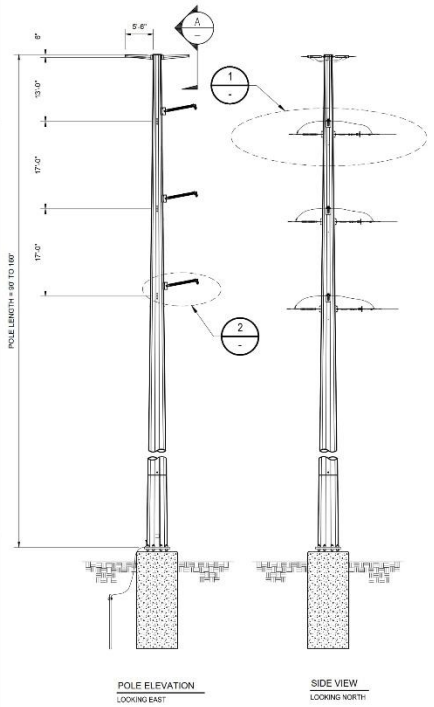
NO	REVISION	DATE	BY	WDZ
0A	ISSUED FOR REVIEW	10/14/22	JAB	APR

Ørsted

ENGINEERING RECORD		DATE
DRAWN	J. BENDOCCHI	08/25/22
DESIGNED	J. BENDOCCHI	08/25/22
CHECKED		
APPROVED		
DWG SCALE: AS NOTED	PLT SCALE: 1:1	

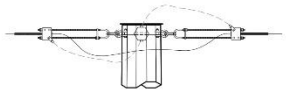
11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
RISER TERMINATION DETAILS

DWG. NAME: 11M-D-TU05-01 | REVISION NO : 0A

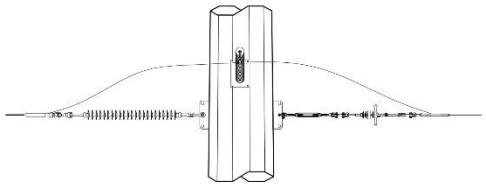


POLE ELEVATION
LOOKING EAST

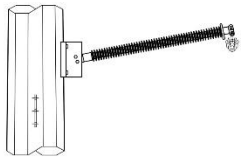
SIDE VIEW
LOOKING NORTH



SECTION
OPGW GROUNDING ATTACHMENT A



DETAIL
CONDUCTOR DEADEND 1



DETAIL
JUMPER POST 2

CONCEPTUAL
NOT FOR CONSTRUCTION

FILE LOCATION: N:\SHARED\01 ECI\PC SERVICES\02 PROJECTS\PCS-406 11 MILE SOLAR\02 UG TRANSMISSION\10E CAD\30 90 WORKING\11M RISER TERM STR DETAILS\11M-D-TU05-02.DWG LAST SAVED BY: JABendocchi 10/14/2022 1:56 PM PLOTTED BY: Jared A. Bendocchi 10/14/2022 4:03 PM Tab:11M-D-TU05-02 Rev. 0A

"Engineering with Distinction"
ECI ELECTRICAL CONSULTANTS, INC.

NO.	REVISION	DATE	BY	APR
0A	ISSUED FOR REVIEW	10/14/22	JAB	WDZ

Ørsted

ENGINEERING RECORD		DATE
DRAWN	J. BENDOCCHI	08/25/22
DESIGNED	J. BENDOCCHI	08/25/22
CHECKED		
APPROVED		
DWG. SCALE: AS NOTED	PLT. SCALE: 1:1	

11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
POCO DEAD END DETAILS

DWG. NAME: 11M-D-TU05-02 REVISION NO: 0A

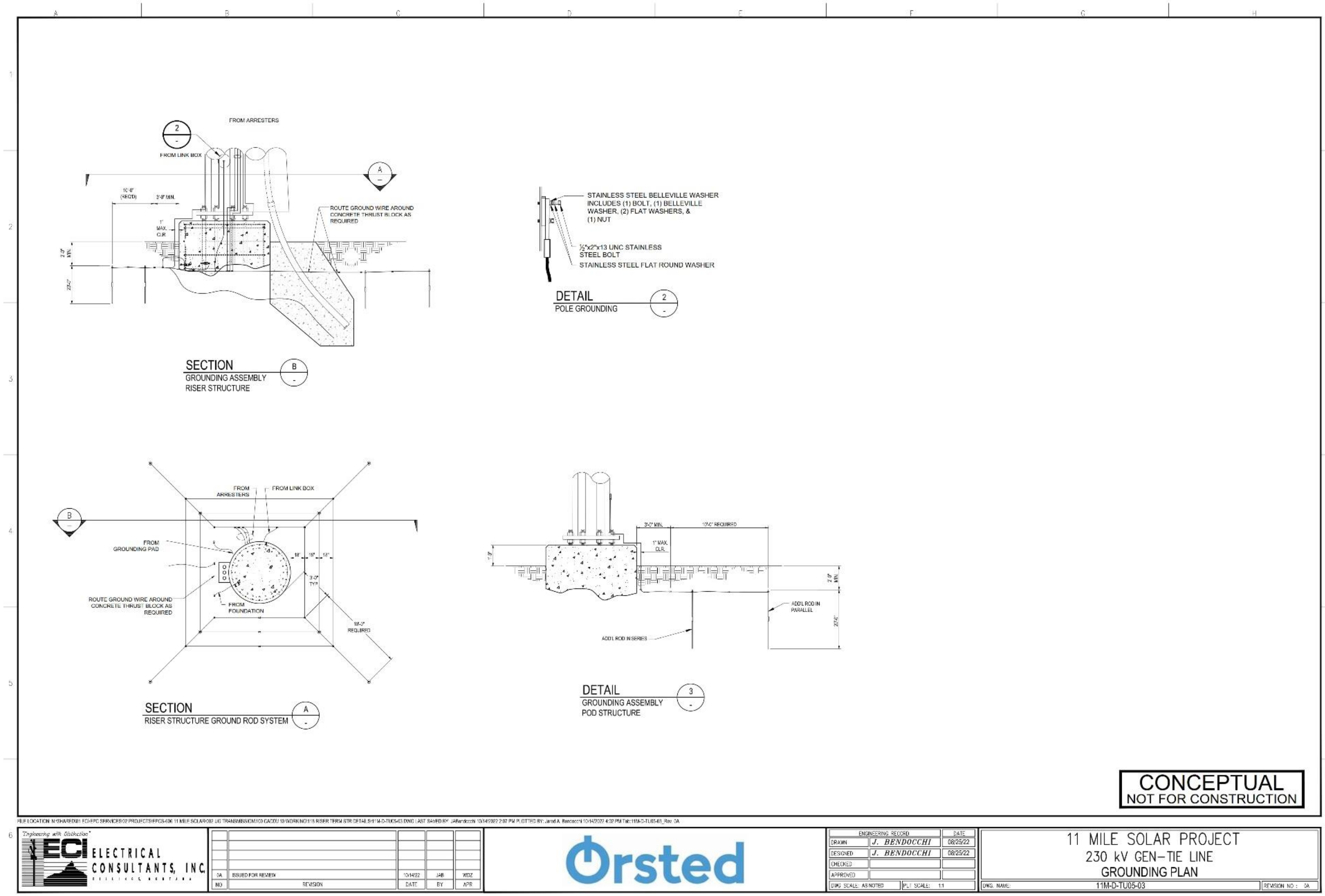

FROM ARRESTERS
FROM LINK BOX
ROUTE GROUND WIRE AROUND CONCRETE THRUST BLOCK AS REQUIRED
SECTION
GROUNDING ASSEMBLY
RISER STRUCTURE
STAINLESS STEEL BELLEVILLE WASHER INCLUDES (1) BOLT, (1) BELLEVILLE WASHER, (2) FLAT WASHERS, & (1) NUT
½"x2"x13 UNC STAINLESS STEEL BOLT
STAINLESS STEEL FLAT ROUND WASHER
DETAIL
POLE GROUNDING
FROM ARRESTERS
FROM LINK BOX
FROM GROUNDING PAD
ROUTE GROUND WIRE AROUND CONCRETE THRUST BLOCK AS REQUIRED
FROM FOUNDATION
SECTION
RISER STRUCTURE GROUND ROD SYSTEM
ADD'L ROD IN PARALLEL
ADD'L ROD IN SERIES
DETAIL
GROUNDING ASSEMBLY
POD STRUCTURE
CONCEPTUAL
NOT FOR CONSTRUCTION
ELECTRICAL CONSULTANTS, INC.
0A ISSUED FOR REVIEW
NO. REVISION DATE BY APR
Ørsted
ENGINEERING RECORD DATE
DRAWN J. BENDOCCHI 08/25/22
DESIGNED J. BENDOCCHI 08/25/22
CHECKED
APPROVED
DWG SCALE: AS NOTED
PLT SCALE: 1:1
11 MILE SOLAR PROJECT
230 kV GEN-TIE LINE
GROUNDING PLAN
DWG. NAME:
11M-D-TU05-03
REVISION NO.: 0A

EXHIBIT H
EXISTING PLANS

As stated in Arizona Corporation Commission Rules of Practice and Procedure R14-3-220, Ex. H.

"To the extent applicant is able to determine, state the existing plans of the state, local governments and private entities for other developments at or in the vicinity of the proposed site or route."

Overview

As part of the land use study (discussed in detail in Exhibit A: Location and Land Use Information), general and site-specific plans were obtained from the respective jurisdictions, landowners, and developers. Furthermore, Ørsted invited representatives from jurisdictional planning departments, local agencies, and developers to provide relevant planning information throughout the siting study process.

Throughout the siting process, Ørsted met with representatives from the local planning departments with the Cities of Coolidge and Eloy and Pinal County. Jurisdictional general plans, agency management plans, site plans from specific developers, and aerial photography were reviewed to identify development plans and constraints to constructing the Gen-Tie Transmission Line connecting the project substation to Pinal Central Substation.

Jurisdictional and Agency General Plans

Existing and future land use information was reviewed for the Project study area and was based on the most recently available data from various local and regional plans relevant to the study area and GIS databases including:

- City of Coolidge 2025 General Plan Land Use Policy (CoC 2017)
- City of Coolidge 2025 General Plan (CoC 2014)
- Pinal County Comprehensive Plan (PC 2021)
- State of Arizona Land Resource Information System (ALRIS 2007)
- Pinal County GIS database (PC 2022)
- U.S. Geological Survey (USGS) National Hydrography Dataset (NHD) (NHD 2020)
- Arizona Department of Transportation (ADOT) GIS database (ADOT 2020)
- Federal Emergency Management Agency (FEMA) GIS database (FEMA 2020).

On August 15, 2022, letters were sent to 42 jurisdictions to provide project information and request new or additional information or plans or planning development (**Table H-1; Exhibit H-1**). Responses were requested by September 15, 2022. No responses have been received as of October 20, 2022. If any responses are received, they will be provided as supplemental exhibits.

Table H-1. Jurisdiction/Agencies Contacted

Contact Name	Title	Jurisdiction/Agency
Mr. Leo Lew	County Manager	Pinal County
Mr. Andrew Smith	Director of Public Works	Pinal County
Mr. Christopher Wanamaker	County Engineer	Pinal County
Mr. Charles Kmet	Emergency Manager	Pinal County
Mr. Mike Goodman	Pinal County Supervisor, District 2	Pinal County
Ms. Jill Broussard	Superintendent	Pinal County School District
Mr. Jon Thompson	Mayor	City of Coolidge
Mr. Steve Hudson	Vice-Mayor	City of Coolidge
Mr. Rick Miller	City Manager	City of Coolidge
Ms. Lynn Parsons	Executive Director, Chamber of Commerce	City of Coolidge
Mr. Michael Flores	President, Coolidge Unified School District #21	City of Coolidge
Mr. Micah Powell	Mayor	City of Eloy
Mr. Daniel Snyder	Vice-Mayor	City of Eloy
Mr. Daniel Malewitz	City Manager	City of Eloy
Mr. Andrew Rodriquez	Executive Director, Chambers of Commerce	City of Eloy
Mr. Roderick Lane	District Engineer, South Central	ADOT
Mr. Floyd Hardin	Owner's Agent	Salt River Project
Mr. Richard Rosales	Relationship Manger Community Affairs	Arizona Public Service
Mr. Eric Bakken	VP Systems Operations and Environmental	Tucson Electric Power
Mr. Jack Murray	Senior VP Regional Manager, Desert Southwest Region	Western Area Power Administration
Mr. Tom Martin	General Manager	Electrical District #2
Mr. Tom Wray	Project Manager	Sunzia Southwest
Mr. Shane Lindstrom	General Manager	San Carlos Irrigation Project
Ms. Ginger Ritter	Project Evaluation Manager	Arizona Game and Fish Department
Ms. Katheryn Leonard	State Historic Preservation Officer	Arizona State Historic Preservation
Mr. Thomas Shope	Representative	Arizona State Legislature
Mr. David Cook	Representative	Arizona State Legislature
Mr. Elijah Abinah	Utilities Division Director	Arizona Corporation Commission
Mr. Jim O'Conner	Commissioner	Arizona Corporation Commission
Mr. Justin Olson	Commissioner	Arizona Corporation Commission
Ms. Lea Marquez Peterson	Commissioner	Arizona Corporation Commission
Ms. Sandra Kennedy	Commissioner	Arizona Corporation Commission
Ms. Anna Tovar	Commissioner	Arizona Corporation Commission
Mr. Kevin Cavanaugh	Supervisor, District 1	Pinal County
Mr. Mike Goodman	Supervisor, District 2	Pinal County

Table H-1. Jurisdiction/Agencies Contacted

Contact Name	Title	Jurisdiction/Agency
Mr. Stephan Miller	Supervisor, District 3	Pinal County
Mr. Jeffrey McClure	Supervisor, District 4	Pinal County
Mr. Jeff Serdy	Supervisor, District 5	Pinal County
Mary C. O'Brien Accommodations District #90		
Mary C O'Brien Elementary School		
Tucson Conservation Center		
Sonoran Institute- Resilient Communities and Watersheds		

References

Arizona Department of Transportation (ADOT). 2020. ADOT GIS Data. Available: https://azdot.gov/tags/gis. Downloaded May 23, 2022.

Arizona Land Resource Information System (ALRIS). 2007. State of Arizona GIS data. Available: https://az.gov/directory/service/land-arizona-land-resource-information-system-alris. Downloaded May 23, 2022.

City of Coolidge. 2014. 2025 General Plan Final Draft. Adopted June 2014. Available: https://www.coolidgeaz.com/index.asp?SEC=62B5BDAF-48FC-48AE-BB3F-87EE09242ECC. Accessed May 23, 2022.

—. 2017. 2025 General Plan Land Use Policy. Updated June 2017. Available: https://www.coolidgeaz.com/vertical/sites/%7BAE188E70-DD7F-47BE-99EF-B58B70641DF9%7D/uploads/2025_General_Plan_Land_Use_Policy(1).pdf. Downloaded May 23, 2022.

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National Hydrography Dataset (NHD). 2020. United States Geological Survey (USGS) NHD GIS Data. Available: https://www.usgs.gov/core-science-systems/ngp/national-hydrography. Downloaded May 23, 2022.

Pinal County. 2021. Pinal County Comprehensive Plan. Adopted November 2019. Available: https://www.pinalcountyaz.gov/communitydevelopment/planning/pages/compplan.aspx. Accessed May 23, 2022.

—. 2022. Pinal County GIS data. Available: https://www.pinalcountyaz.gov/informationtechnology/pages/gis.aspx. Accessed May 23, 2022

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Exhibit H-1. Example Letters

AECOM
7720 N. 16th Street
Suite 100
Phoenix, Arizona 85020
www.aecom.com

602 371 1100 tel
602 371 1615 fax

August 15, 2022

Mr. Andrew Smith
Director of Public Works
Pinal County
85 N. Florence St
Florence, AZ 85132

RE: Proposed Eleven Mile Solar Project 230kV Generation Intertie Line Project

Dear Mr. Andrew Smith:

Eleven Mile Solar Center, LLC (Eleven Mile Solar) plans to file an application for a Certificate of Environmental Compatibility (CEC) for the Eleven Mile Solar 230-kilovolt (kV) Generation Intertie Line Project with the Arizona Power Plant and Transmission Line Siting Committee (Siting Committee) in January 2023. The proposed project involves the development of a new 230kV electrical generation intertie transmission line (gen-tie) that will connect the future Eleven Mile Solar Project, a solar generation and battery storage facility, to the adjacent existing Pinal Central 230/500kV Substation. Eleven Mile Solar and its consultant, AECOM Technical Services, Inc. (AECOM), developed and implemented a comprehensive planning process, including environmental studies to identify and evaluate suitable locations for proposed transmission line routes. The result was the identification of a proposed route, which will be brought before the Siting Committee (see attached map). Eleven Mile Solar will request Siting Committee approval for a CEC for the proposed gen-tie route.

Arizona Administrative Code Rule R14-3-219 directs an applicant to include in its application an Exhibit H addressing the following: "To the extent the applicant is able to determine, state the existing plans of the state, local government, and private entities for other developments at or in the vicinity of the proposed site or route."

This letter is an opportunity for your department to provide any information or comments regarding development plans for inclusion in the application. Specifically, please advise us of any existing or future plans that you can identify at this time. We respectfully request your responses in writing. To allow your information to be included in the CEC application, please forward it to me by September 15, 2022, at the address above. Thank you for your cooperation

Sincerely,

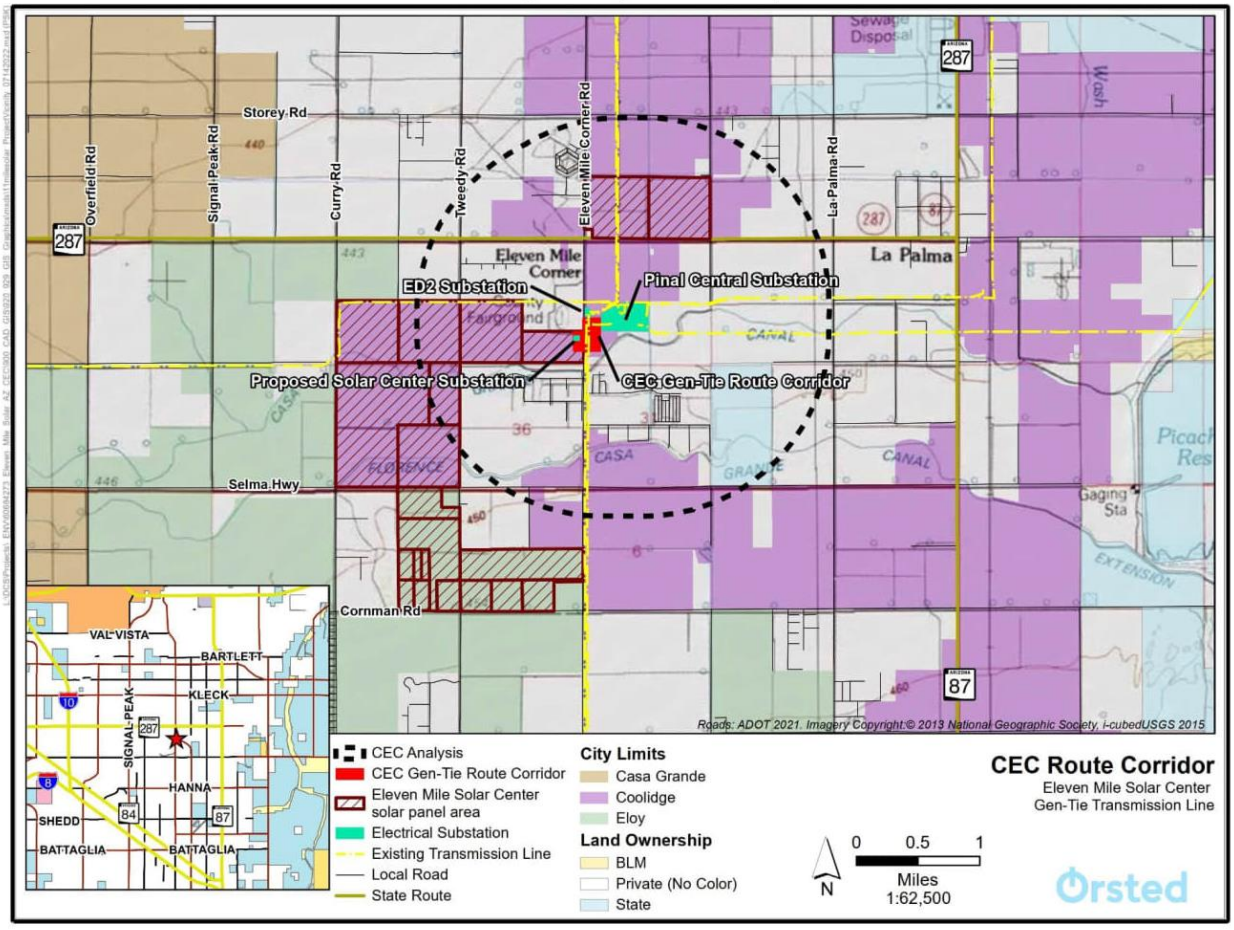
Mark Turner, Sr. Planner
AECOM Technical Services, Inc.

cc: Donnie Joe (DJ) Worth, Eleven Mile Solar Project Manager

Attachment: project location map

AECOM

Figure 1. Project Location Map



AECOM
7720 N. 16th Street
Suite 100
Phoenix, Arizona 85020
www.aecom.com

602 371 1100 tel
602 371 1615 fax

August 15, 2022

Mr. Leo Lew
County Manager
Pinal County
135 N Pinal St
Florence, AZ 85132

RE: Proposed Eleven Mile Solar Project 230kV Generation Intertie Line Project

Dear Mr. Leo Lew:

Eleven Mile Solar Center, LLC (Eleven Mile Solar) plans to file an application for a Certificate of Environmental Compatibility (CEC) for the Eleven Mile Solar 230-kilovolt (kV) Generation Intertie Line Project with the Arizona Power Plant and Transmission Line Siting Committee (Siting Committee) in January 2023. The proposed project involves the development of a new 230kV electrical generation intertie transmission line (gen-tie) that will connect the future Eleven Mile Solar Project, a solar generation and battery storage facility, to the adjacent existing Pinal Central 230/500kV Substation. Eleven Mile Solar and its consultant, AECOM Technical Services, Inc. (AECOM), developed and implemented a comprehensive planning process, including environmental studies to identify and evaluate suitable locations for proposed transmission line routes. The result was the identification of a proposed route, which will be brought before the Siting Committee (see attached map). Eleven Mile Solar will request Siting Committee approval for a CEC for the proposed gen-tie route.

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Sincerely,

Mark Turner, Sr. Planner
AECOM Technical Services, Inc.

cc: Donnie Joe (DJ) Worth, Eleven Mile Solar Project Manager

Attachment: project location map

AECOM

Figure 1. Project Location Map

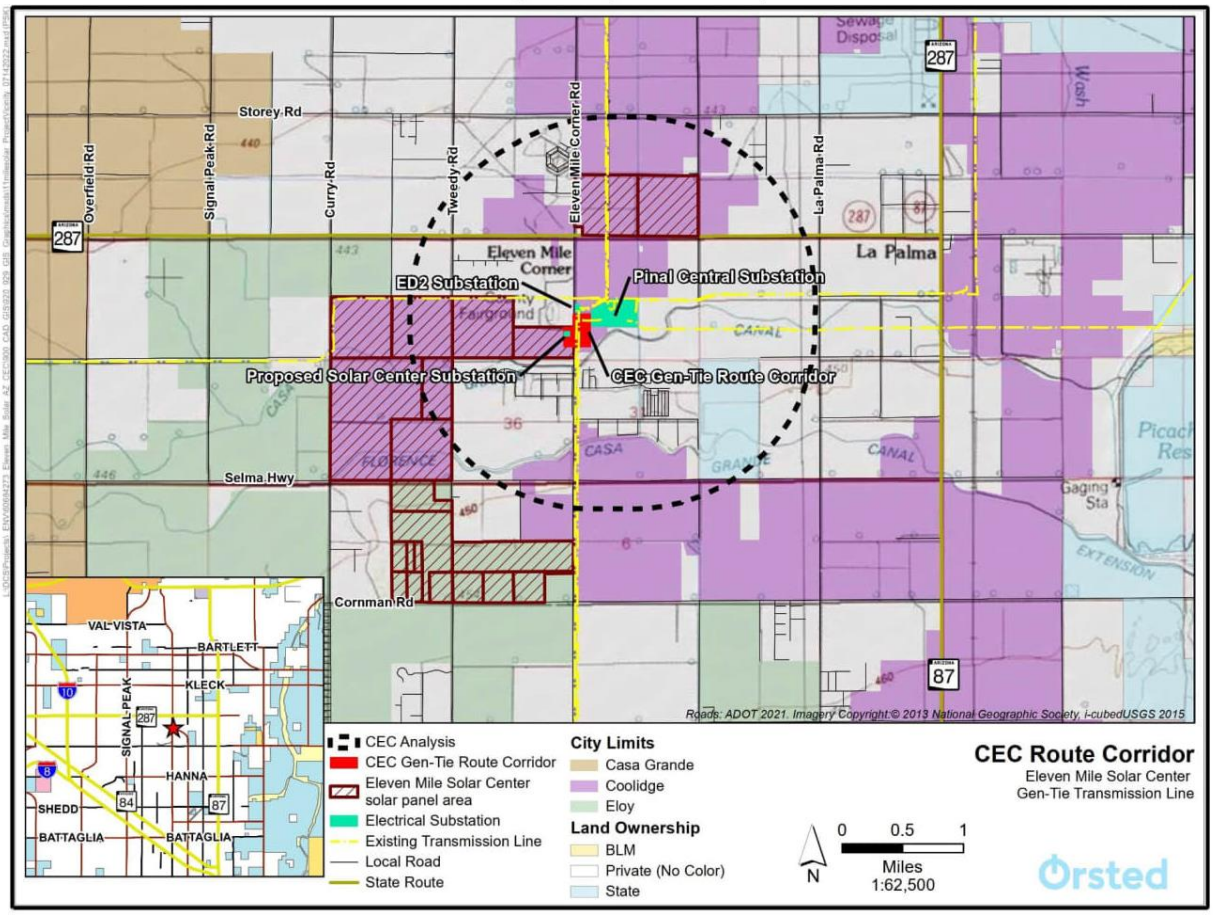

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EXHIBIT I

ANTICIPATED NOISE EMISSION LEVELS AND POTENTIAL INTERFERENCE WITH COMMUNICATION SIGNALS

As stated in Arizona Corporation Commission Rules of Practice and Procedures R14-3-219:

"Describe the anticipated noise emission levels and any interference with communication signals which will emanate from the proposed facilities."

The following analysis describes typical audible noise emissions and radio noise levels during construction and operation of the above-ground Gen-Tie transmission line and the solar project substation (collectively called "Project", and generally acceptable thresholds for emissions and radio noise levels). Typical television broadcast level (in megahertz [MHz]) compatibility is also evaluated.

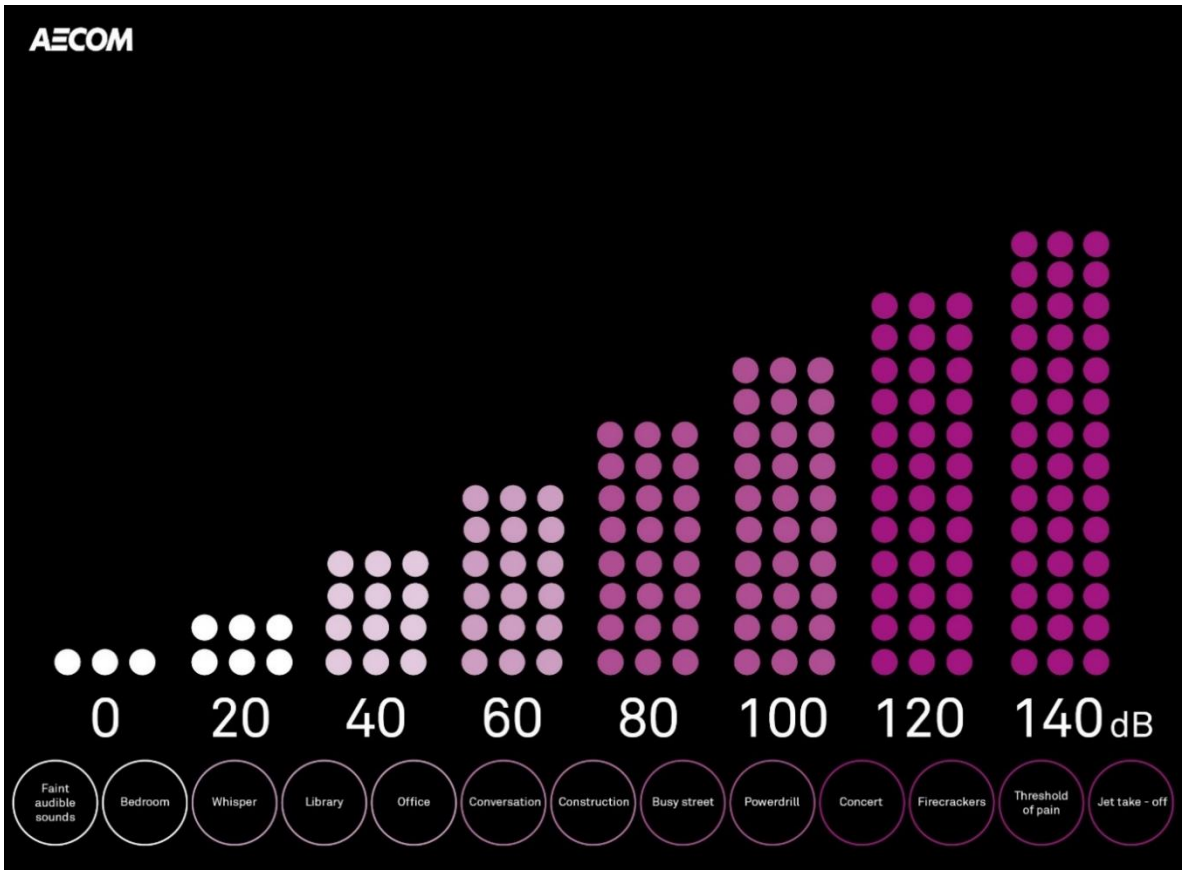
Noise is defined as unwanted sound. Sound travels in waves from a specific source and exerts a sound pressure level (referred to as sound level) which is measured in decibels (dB). Zero dB corresponds roughly to the threshold of average human hearing and 120 to 140 dB corresponds to the threshold of pain. Human response to noise is subjective and can vary from person to person. Factors that can influence individual response include intensity, frequency, and time pattern of the noise; the amount of background noise prior to the intruding noise; and the nature of work or human activity that is exposed to the noise. **Figure I-1** depicts average decibel levels for everyday sounds.

Ambient noise in the Project study area (1.5 miles buffer around project site) is typical of rural areas where agricultural activities and transportation are the primary contributors to the acoustic environment. The Project study area is comprised of privately owned land. Overall, the Project study area is a semi-developed rural area with existing utility infrastructure along with scattered agricultural and residential uses. Industrial and utility development is clustered around the Pinal Central Substation. The closest residences to the project's above ground features are located approximately 1,250 feet (0.24 mile) south of the solar substation and approximately 1,800 feet (0.36 mile) south of the above-ground features near the point of connection before entering the Pinal Central Substation.

During construction, equipment used for assembly and erection of structures, wire pulling and splicing, will generate noise. Noise from construction activities would be audible to nearby users, however, because the Project is surrounded by private property, users in the area are limited to a small number of people, and because construction would occur during daytime hours when tolerance to noise is higher, it would not be considered a major impact. Noise from construction would be temporary, lasting only a few months between the start of construction and operation. Anticipated noise associated with the Project would primarily be temporary and construction related. However, certain electromagnetic effects are inherently associated with substations and overhead transmission facilities. The primary effect of electric and magnetic fields is corona discharge. Corona effects are manifest as audible noise, radio interference, and

television interference. These particular effects are minimized by line location, line design, and construction practices.

Figure I-1 Summary of Common Environments and Noise Sources in Terms of Decibel Sound Level



CORONA

Certain electromagnetic effects are inherently associated with overhead transmission of electrical power. These effects are produced by the electric and magnetic fields of the transmission line with one of the effects being corona discharge. Corona effects manifest as audible noise (AN), radio interference (RI), and television interference (TVI). These particular effects are minimized by line location, line design, and construction practices.

Corona is a discharge due to ionization of the air surrounding a conductor and is caused by a voltage gradient, which exceeds the breakdown strength of air. Corona is a function of the voltage gradient at the conductor surface. This voltage gradient is controlled by engineering design and is a function of voltage, phase spacing, height of conductors above ground, phase geometry, and meteorological conditions. In particular, irregularities on the surface of the conductor such as nicks, scratches, contamination, insects, and water droplets, increase the amount of corona discharge. Consequently, during periods of rain and foul weather, corona discharges increase. Corona represents power loss on the transmission line and creates transmission line noise.

TRANSMISSION LINE AUDIBLE NOISE

Audible noise is created by corona discharge along the transmission line. As a result, the amount of audible noise is directly related to the amount of corona, which is in turn affected by meteorological conditions (most notably, rain). Transmission line audible noise is characterized by what can be described as hissing or crackling sound, and sometimes as a low-frequency hum.

Because power loss is uneconomical, and noise is undesirable, corona on transmission lines has been studied by engineers since the early part of the last century. Historical measurements along transmission corridors of similar makeup (rural communities and open desert) have shown typical ambient audible noise levels in the range of 43 to 52 dBA with an average value of 50 dBA (EPRI 2005). Corona is not usually a design issue for power lines rated at 230kV and lower.

RADIO INTERFERENCE

Radio interference is the reception of spurious energy not generated by the transmitting station. This energy affects the amplitude modulated (AM) radio band, but not the frequency modulated (FM) radio band. Transmission line radio interference is caused by corona and by gap discharges. Gap discharges are electrical discharges across a small gap with the most common cause being loose hardware. Gap discharges comprise a large percentage of all interference problems and are easily remedied. Experience shows that gap discharges are not a problem with steel structures but are more prevalent with wood structures due to the expansion and contraction of the wood causing hardware to loosen.

Corona caused radio interference impact is dependent on various factors including distance from the line to the receiver, radio signal strength, ambient radio noise level, receiving antenna orientation, and weather conditions. A common practice of determining the expected level of radio interference is to calculate the transmission line radio interference at a frequency of 1 MHz. As the frequency of interest increases, corona produced radio noise reduces with typical reductions in the range of 20 – 40 dB for a frequency increase from 1 MHz to 100 MHz depending on the distance to the conductor (EPRI 2005).

There are eight active radio towers within ten miles of the Project. The closest is located approximately three miles south of the Project. The remaining seven towers are located west of the Project and vary from approximately four and eight miles away. Experience shows that there are generally no problems with radio interference when calculated noise interference levels are below 40 dB at 100 feet from the outside phase (IEEE 1980). This is not a precise value as the interference is a function of radio signal strength and other factors so the fact that calculated interference levels for this line are above 40 dB at the prescribed distance does not mean that unacceptable interference will occur. During inclement weather, transmission line noise levels increase to levels in the range of 65 – 69 dB, 100 feet from the outside phase (average stable foul weather values). Although radio reception quality is reduced near transmission lines during precipitation events, the impact is expected to be de minimis based on the low frequency of inclement weather in the area and the existence of numerous high voltage lines and substation equipment already present in immediate vicinity.

TELEVISION INTERFERENCE

Television interference effects are similar to radio interference. Traditional analog television broadcasts occur in three ranges:

- 54 - 88 MHz (Channels 2 - 6)
- 174 - 216 MHz (Channels 7 - 13)
- 470 - 890 MHz (Channels 14 - 83)

Transmission line interference reduces with increasing frequency above 100 MHz. Consequently, television interference (TVI) only affects the lower Very High Frequency (VHF) band (Channels 2 through 6) and no interference will be experienced in the upper VHF (Channels 7 - 13) and Ultra High Frequency (UHF) bands (Channels 14 - 83) even during foul weather.

No transmission line generated television interference is expected along the Gen-Tie lines, even during periods of inclement weather since expected TVI levels at the edge of the right-of-way are expected to be the same as the existing 500 kV/230 kV lines at their current locations.

In cases where transmission line generated television interference has been found to be a problem, it is generally the result of induced voltage on fences, conductors, and hardware, which are adjacent to the right-of-way. In these situations, the interference can be easily corrected by grounding the objects, or by realigning, relocating, or providing higher gain television antennas. However, with the increasing popularity of newer technologies such as cable, satellite, and internet-based television, transmission line television interference problems warranting any sort of corrective action are even more unlikely.

CONCLUSIONS

Construction

Construction noise generated by the Project would be intermittent in nature and would be temporary—only during the construction period. During construction, equipment used for clearing and grading (substation, access roads, and structure sites), assembly and erection of structures, conduit pulling and splicing will generate noise. This heavy equipment will include cranes, trucks, and tractor graders. **Table I-1** identifies typical construction equipment noise levels at a distance of 50 feet. These values assume the equipment is operating at full power. The typical noise 50 feet from a construction site would be 85 dBA. There would be a temporary increase in ambient noise that would be limited to the construction phase of the Project. The propagation of noise depends on many factors including atmospheric conditions, ground cover, and the presence of any natural or man-made barriers. As a general rule, noise decreases by approximately six dBA with every doubling of the distance from the source. The maximum noise levels at various distances from the construction site and at the closest noise-sensitive receptors are shown in **Table I-2**.

Table I-1 Typical Construction Equipment Noise Levels

Equipment Type	Noise Level (L_{max}, dBA) at 50 Feet
Backhoe, Generators	80-82
Crane, Scrapers	83-85
Backhoe, Front-end Loader, Concrete Truck/Mixer	80-85

Source: Federal Transit Administration, 2018

Table I-2 Predicted Noise Near Construction Activities

Distance from Construction Site	Predicted Maximum Noise Level (L_{max}, dBA)
50 feet	85
100 feet	79
200 feet	73
400 feet	67
800 feet	61
1,300 feet *(closest residence to substation construction work area)*	57
1,800 feet *(closest residence to above-ground segment of gen-tie line)*	54

Source: AECOM 2022.

Construction of the Gen-Tie Project is expected to take seven to nine months. Noise from construction activities would be audible, particularly to the closest residents (1,800 feet) to the Gen-Tie line and Project Substation south of the Casa Grande Canal. However, this construction noise would not be considered a major impact because nearly all construction activities would occur during daylight hours when tolerance to noise is higher.

Operation

The operational noise of the Project would be consistent with the existing noise-generating sources in the Project area, including the existing Pinal Central Substation. During operation, noise from the Gen-Tie would be largely inaudible during typical (dry) meteorological conditions. Noise from the Gen-Tie line would be generated during precipitation events, dense fog events, or major windstorms that would deposit debris onto the conductor. Noise during these periods can best be described as a crackling or hissing sound that would cease once the conductors are dry. During maintenance activities, momentary noise could be generated from vehicles driving along the access roads for structure and line inspection or equipment and crews conducting maintenance or repairs.

Noise from the operation of the proposed Project Substation is generally described as a low hum and would increase in hot-weather conditions when transformer cooling fans and pumps are more likely to be in operation. Noise levels generated by substation transformers are standardized to range from 57 to 91 dBA at 3 feet from the unit (NEMA 2019). Assuming an

absolute worst-case noise level transformer (91 dBA at 3 feet), operational noise levels at the nearest noise-sensitive receptor approximately 1,300 feet south of the substation site would attenuate to 38 dBA.

Radio and Television Interference

Transmission lines do not materially impact radio communications. Frequency modulation (FM) radio is rarely affected by transmission lines. Radio interference may potentially impact the amplitude modulation (AM) broadcast band. Only AM receivers located immediately adjacent to the transmission line have the potential to be affected by the Project, and the effect may only be noted during rainy weather which is uncommon in this region. Overall, no material radio interference is expected to be caused by the Project due to the electrical characteristics of the line, the remote nature of the proposed Project location, and the existing electrical infrastructure in the area.

No significant impacts to radio or television reception are anticipated as a result of constructing and operating the Project Substation and Gen-Tie. Cellular phone antennae and microwave receivers are commonly mounted on transmission structures to take advantage of the added height afforded by the structures, which demonstrates that transmission lines do not interfere with cellular phone tower operations or microwave communication paths.

REFERENCES

Electric Power Research Institute (EPRI). 2005. EPRI Transmission Line Reference Book, 3rd Edition, 2005, The Electric Power Research Institute.

Federal Transit Administration. 2018. Transit Noise and Vibration Impact Assessment Manual (FTA-Report No 0123).

IEEE 1980. "Review of Technical Considerations on Limits to Interference from Power Lines and Stations", IEEE Radio Noise and Corona Subcommittee Report, RI Limits Task Force, Working Group #3, IEEE Transactions on Power Apparatus and Systems, Vol. PAS-99, No. 1, Jan./Feb. 1980, pages 365-388.

National Electrical Manufacturers Association (NEMA). 2019. Standards for Transformers, Step Voltage Regulators and Reactors - NEMA Standard TR 1-2013 (R2019).

EXHIBIT J
SPECIAL FACTORS

As stated in Arizona Corporation Commission Rules of Practice and Procedure R14-3-219:

"*Describe any special factors not previously covered herein, which applicant believes to be relevant to an informed decision on its application."*

This exhibit includes information regarding the public and agency involvement program that has been conducted for the Project. The outreach efforts provided information to agencies and individuals, solicited feedback on the proposed Project and information on the Project study area, and helped to identify potential issues relative to the Project.

The public involvement program was initiated to provide local jurisdictions, relevant agencies, and community residents with the opportunity to relay information or potential concerns relevant to the Project. To reach the affected residents and agencies, Ørsted and AECOM (as consultant to Ørsted) instituted multiple public participation activities, including a project newsletter, a project website, an in-person open house, newspaper advertisements, social media, and email.

Project Newsletters

One newsletter was prepared during the public involvement process to provide technical information to the public, the Project webpage address, CEC hearing dates, information about the various methods to comment on the Project (e.g., in email or by telephone) and otherwise become involved in the process (**Exhibit J-1**). The newsletter was mailed on July 21, 2022 and was circulated to residences and business within 0.5 miles of the Project, approximately 530 were mailed. A second newsletter was mailed on September 29, 2022, and a third newsletter was mailed on October 26, 2022. As of October 26, 2022, one comment has been received through the newsletter. A summary of all comments received are included in **Exhibit J-2**.

Website

A Project website (http://transmissionelevenmile.com) was created and maintained to provide access to Project information. Through the website, viewers can access project information, view maps, leave comments, and access a link to the Project's virtual public open house. Viewers can provide their comments or questions on the Project through an embedded comment form on the website. The website address was advertised in the newsletter, in the virtual open house, and in paid newspaper advertisements. The Project website went live on July 21, 2022, and was updated several times to coincide with the beginning of the virtual open house along with other updated Project information. According to Google analytics, the site has been viewed by 90 visitors with a total of 593 page views since its launch on June 21, 2022, to September 12, 2022. There have been 64 engaged visits (i.e., Active > 10 seconds, > 1 page view) and 22 highly engaged visits (i.e., Active > 60 seconds, > 2 page views). As of October 12, 2022, one comment has been received through the webpage. A screenshot of the website and visitor analytics chart are provided in **Exhibit J-3**. A summary of all comments received are included in **Exhibit J-2**.

Virtual Open House

An online Project virtual open house (https://webapps.dnv.com/virtual-exhibit/orsted-elevenmiletransmission/) for the Project was made available on July 11, 2022. The virtual open house was linked through the Project webpage and announced through paid newspaper advertisements.

The virtual open house is an interactive website, with Project information provided in clickable modules allowing interested parties to visit and review the materials at their convenience, and ask questions, request information, or provide comment through embedded comment forms. The clickable modules include large maps and text displays with highlighted details of the Project, including the Project's purpose and need, proposed facilities, facility siting criteria and process, environmental data, and images simulating what the Project would look like after construction, as proposed. Following the online publishing of the virtual open house, Ørsted opened the comment period, requesting that stakeholder comments or questions. As of October 26, 2022, 38 visitors have viewed the site. No comments have been received.

A copy of the comment form provided through the webpage and virtual open house is included in **Exhibit J-4**. Images of the virtual open house including the informational display boards are included in **Exhibit J-5**

In Person Open House

Ørsted hosted an in-person open house at the Pinal County Education Service Agency located at 1400 N Eleven Mile Road Casa Grande, Arizona 85194 on November 9, 2022, from 3:30 PM to 6:30 PM. During the open house, Ørsted provided display boards with Project maps and Project details, and Ørsted staff attended the event to address public comments. The sign-in sheet and photographs of the in-person open house are included in **Exhibit J-6.** Comment sheets were provided and two written comments were received A summary of all comments received are included in **Exhibit J-2**.

Media Relations

Ørsted placed paid advertisements in the *Pinal County Arizona Dispatch,* which has a distribution territory that encompasses the study area. These advertisements introduced the Project and announced the project webpage and virtual open house. Advertisements were published in the *Pinal County Arizona Dispatch* on August 4 and September 22, 2022. Copies of the advertisements are included in **Exhibit J-7.** An advertisement will be published in the *Pinal County Arizona Dispatch* in mid-December 2022 announcing the location and time of the ACC Open House Hearing.

Social Media

Ørsted placed an advertisement through Instagram and Facebook targeted to users in the public outreach area identified for the Project, encompassing the study area and adjacent neighborhoods. The advertisement provided brief information on the Project and directed users to the virtual open house for more information about the Project. Between July 20, 2022, and October 26, 2022, the Instagram site posted 9 times and received 22 likes and no comments received. Between July 20, 2022, and October 26, 2022, the Facebook site posted 9 times. No comments were received. Examples of Instagram content is included in **Exhibit J-8**.

Public Outreach/Education

In addition to the in-person open house, Ørsted also hosted an informational booth at the following community events:

- Fiestas Patrias (September 17, 2022; audience included Eloy residents and surrounding Pinal County community)
- Coolidge Days 5K (October 1, 2022; audience included residents of Coolidge and surrounding Pinal County community)
- Coolidge Days (September 30-October 1, 2022; audience included residents of Coolidge and surrounding Pinal County community)
- Eloy Glow Fest (November 12, 2022; audience included Eloy residents, surrounding Pinal County community, and citizens from across the state of Arizona)
- KidWind Workshop (November 14, 2022; audience included 4th- to 12th-grade educators from schools in the Project vicinity.

Photographs from these events are included in **Exhibit J-8** and **Exhibit J-9**.

Agency and Local Officials Briefings

During the Project process, Ørsted coordinated with representatives of the Cities of Coolidge and Eloy and Pinal County, including elected officials and planning staff, to relay information on the Project, better understand landowner development plans, answer questions, and request feedback. These meetings enabled the Project team to identify stakeholder issues, consider suggestions during the planning process, and relay information on developments in the Project.

Cultural resources studies of the Gen-Tie Study area were conducted. A report documenting a cultural resources survey west of Eleven Mile Corner Road and Section 106 consultation documentation are included in **Exhibit J-10 and Exhibit J-11.**

Public Comment

Throughout the public involvement program, comments from the public were solicited and considered in the planning process. As the virtual open house and public comment period opens following the submittal of the Application, the number of comments and copies of the comments received will be provided in a supplemental Exhibit J-2. Comments from agency and jurisdiction representatives were also received and considered in the planning process. Two letters of support were received and are included in **Exhibit J-2.**

Signs announcing CEC Hearing

Ørsted developed and paid to install five signs announcing the time and location of the CEC hearing. One sign was posted near the intersection of Eleven Mile Road and State Route 287, another sign was located on the site of the Solar Substation, and a third was placed along Eleven Mile Road at the access for the Pinal Central Substation where the Gen-Tie line will be located. The fourth sign is located along Eleven Mile Corner Road at the Casa Grande Canal, and the fifth sign is located further south at the intersection of E Selma Highway and Eleven Mile Corner Road. The sign text and a sign location map are included in **Exhibit J-12**.

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Exhibit J-1. Project Newsletter

Transmission Line for Eleven Mile Solar Center

Project Overview

Ørsted is planning and designing a new quarter-mile transmission line (gen tie) that will connect the Eleven Mile Solar Center to the Pinal Central Substation. Through this electrical line, electricity generated by solar energy will be transmitted onto the Arizona grid. An estimated 900,000 MWh of energy will be generated annually, or enough to power 63,800 Arizona homes each year. The Eleven Mile Solar Center will help meet the energy needs of the state by providing clean, flexible, solar-powered electricity.

Location:	Pinal County, AZ
Line Voltage:	235 kV
Distance:	Approx. 0.25 mile (1/4 mile)
Owner & Developer:	Ørsted Onshore
Operations:	Estimated 2024

Proposed Structures

The gentie line will be constructed mostly underground and will connect into the existing SRP infrastructure. The proposed scope will include the construction of up to five aboveground structures, including two steel poles anticipated to be up to 110' in height.

Project Planning

Ørsted has been actively communicating with the public and agencies about the Eleven Mile Solar Center Project for several years and has secured the necessary zoning to construct and operate the facility. Now we are studying various factors relating to the siting of the gen-tie line and gathering input from the community, property owners, and stakeholders concerning the most appropriate route for the new line. These efforts will continue over the next several months and culminate in the filing of an application for a Certificate of Environmental Compatibility (CEC). The CEC application will be considered by the Arizona Power Plant and Line Siting Committee at a hearing that will commence on January 17, 2023.

Investment in Pinal County

The Eleven Mile Solar Center is a long-term asset for Pinal County. Located on over 2000 acres, the Center will create long-term value for landowners hosting the project while stimulating the local economy. The project will generate tens of millions in new tax revenue over the project life without adding new costs for services. Tax revenue will benefit Coolidge USD, Casa Grande ESD, Casa Grande UHS, the Central Arizona College, the City of Coolidge, the City of Eloy, and Pinal County. In addition, the project will create at least 300 jobs during construction and will require ongoing support for operations and maintenance over the 30-year estimated life of the project.

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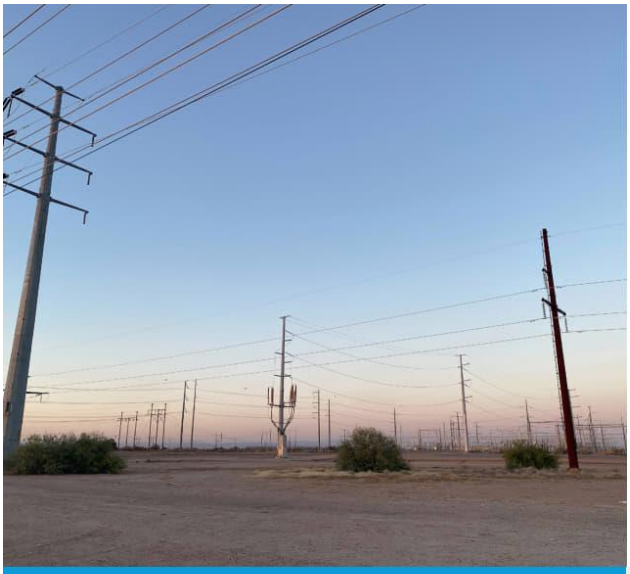


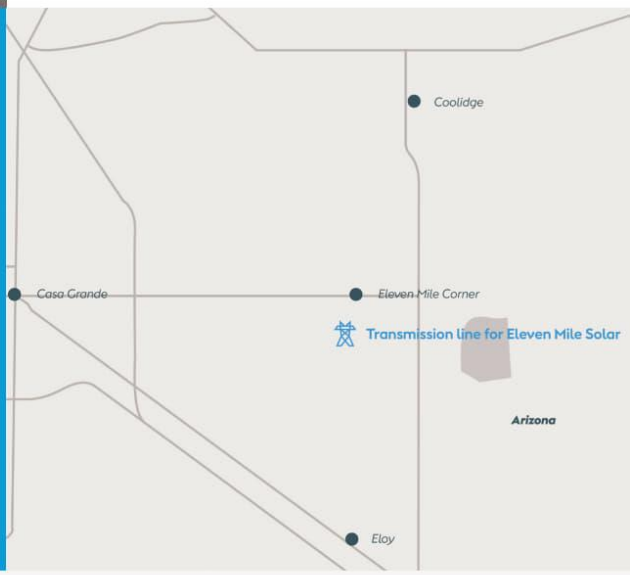
Good Neighbors

Eleven Mile Solar Center is committed to listening to the Pinal County community and to being a good neighbor for years to come. Throughout the construction and operation of the project, Ørsted will meet with officials to ensure a direct line of communication for any concerns that arise during and after construction. We are available to meet directly with nearby neighbors to address their concerns. To learn more about the gentie line, please visit the Eleven Mile Solar Center Transmission Line website at transmissionelevenmile.com. Comments and questions may be submitted by phone or email:

Amy Shanahan
Ørsted Onshore North America, LLC
(458) 600-2031
amysh@orsted.com

Benefits of Partnering with Ørsted

As a long-term operator of renewable energy facilities, Ørsted is committed to the highest quality standards of project construction and safety, and we have the financial strength to ensure execution. This starts with the first steps of development and lasts until the project is decommissioned.



About Ørsted

Ørsted develops, constructs, and operates offshore and onshore wind farms, solar farms, energy storage facilities, renewable hydrogen and green fuels facilities, and bioenergy plants. Moreover, Ørsted provides energy products to its customers. Ørsted is the only energy company in the world with a science-based net-zero emissions target as validated by the Science Based Targets initiative (SBTi). Ørsted ranks as the world's most sustainable energy company in Corporate Knights' 2022 index of the Global 100 most sustainable corporations in the world and is recognized on the CDP Climate Change A List as a global leader on climate action. Headquartered in Denmark, Ørsted employs 6,836 people. Ørsted's shares are listed on Nasdaq Copenhagen (Orsted). In 2021, the group's revenue was DKK 77.7 billion (EUR 10.4 billion).

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Transmission line for Eleven Mile Solar

Introduction

Ørsted has started the process of planning and designing a new 230kV transmission line that will interconnect the Eleven Mile Solar Center to the nearby Pinal Central Substation. An important part of the process of siting the new transmission line or "gentie line" is to seek and gain input from residents, landowners, businesses, local governments, and agencies. This newsletter is intended to provide general information about the new gentie line as a first step in our public outreach process.

About the project

The new 230kV gentie line will allow the Eleven Mile Solar Center to transmit an estimated 900,000 MWh of energy that will be generated annually from the Solar Center -- enough to power 63,800 Arizonan homes each year – to the electricity grid. The Eleven Mile Solar Center will help meet the energy needs of the State of Arizona by providing clean, flexible, solar-powered electricity.

At this early stage, it is anticipated that the gentie line will need to be .25 miles in length to interconnect the solar project to the Pinal Central Substation by crossing the Eleven Mile Corner Road. The above ground portions of the line will be constructed on steel monopoles that will range in height depending on the need to cross or go under other transmission lines in the area. The preliminary routes for connecting the solar project to the Pinal Central Substation are shown on the map below.

Project Planning

Ørsted has been actively communicating with the public and agencies about the Eleven Mile Solar Center Project for several years and has secured the necessary zoning to construct and operate the facility. Now the process is underway to study various factors relating to the siting of the gen-tie line and to gather input from the community, property owners, and stakeholders concerning the most appropriate route for the new line. The environmental studies and public outreach will continue over the next several months and culminate in the filing of an application for a Certificate of Environmental Compatibility (CEC). The CEC application will be considered by the Arizona Power Plant and Line Siting Committee at a hearing that will commence on January 17, 2023. More details concerning the time and location of the hearing will be provided in future communications concerning the project as well as on the project website.

Eleven Mile Solar Center is committed to listening to the Pinal County community and being a good neighbor for years to come. Throughout the construction and operation of the project, Ørsted will meet with officials to ensure a direct line of communication for any concerns that arise during and after construction. We are available to meet directly with neighbors to address their concerns.

Location:	Pinal County, AZ
Line Voltage:	235 kV
Distance:	Approx. 0.25 mile
Operations:	Estimated 2024

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Ørsted develops, constructs, and operates offshore and onshore wind farms, solar farms, energy storage facilities, renewable hydrogen and green fuels facilities, and bioenergy plants. Moreover, Ørsted provides energy products to its customers. Ørsted is the only energy company in the world with a science-based net-zero emissions target as validated by the Science Based Targets initiative (SBTi). Ørsted ranks as the world's most sustainable energy company in Corporate Knights' 2022 index of the Global 100 most sustainable corporations in the world and is recognized on the CDP Climate Change A List as a global leader on climate action. Headquartered in Denmark, Ørsted employs 6,836 people. Ørsted's shares are listed on Nasdaq Copenhagen (Orsted). We welcome your feedback. To learn more about the gentie line, please visit the Eleven Mile Solar Center Transmission Line website at transmissionelevenmile.com. Comments and questions may be submitted by phone or email:

Amy Shanahan
Ørsted Onshore North America, LLC
(458) 600-2031
amysh@orsted.com

Transmission Line for Eleven Mile Solar Center

IN THIS ISSUE

Project Overview

Ørsted is planning and designing a new quarter-mile transmission line (gen tie) that will connect the Eleven Mile Solar Center to the Pinal Central Substation. Through this electrical line, electricity generated by solar energy will be transmitted onto the Arizona grid. An estimated 900,000 MWh of energy will be generated annually, or enough to power 63,800 Arizona homes each year. The Eleven Mile Solar Center will help meet the energy needs of the state by providing clean, flexible, solar-powered electricity.

Location:	Pinal County, AZ
Line Voltage:	235 kV
Distance:	Approx. 0.25 mile (1/4 mile)
Owner & Developer:	Ørsted Onshore

Proposed Structures

The gentie line will be constructed mostly underground and will connect into the existing SRP infrastructure. The proposed scope will include the construction of up to five aboveground structures, including two steel poles anticipated to be up to 110' in height.

Project Planning

Ørsted has been actively communicating with the public and agencies about the Eleven Mile Solar Center Project for several years and has secured the necessary zoning to construct and operate the facility. Now we are studying various factors relating to the siting of the gen-tie line and gathering input from the community, property owners, and stakeholders concerning the most appropriate route for the new line. These efforts will continue over the next several months and culminate in the filing of an application for a Certificate of Environmental Compatibility (CEC). The CEC application will be considered by the Arizona Power Plant and Line Siting Committee at a hearing that will commence on January 17, 2023.

Project Design

The Eleven Mile Solar Center's proposed transmission line (also referred to as a gen-tie line) would be constructed within a new dedicated utility right-of-way. The project area is currently heavily developed with transmission lines, and portions of the quarter-mile gen-tie line may consist of both underground and above ground segments.

Key considerations used in designing the preliminary layout include:

- Minimizing impacts to wildlife and natural resources through consideration of relevant environmental studies and avoiding environmentally sensitive features
- Working directly with civic leaders, landowners, and neighbors
- Ensuring public safety

Investment in Pinal County

The Eleven Mile Solar Center is a long-term asset for Pinal County. Located on over 2000 acres, the Center will create long-term value for landowners hosting the project while stimulating the local economy. The project will generate tens of millions in new tax revenue over the project life without adding new costs for services. Tax revenue will benefit Coolidge USD, Casa Grande ESD, Casa Grande UHS, the Central Arizona College, the City of Coolidge, the City of Eloy, and Pinal County. In addition, the project will create at least 300 jobs during construction and will require ongoing support for operations and maintenance over the 30-year estimated life of the project.

Ørsted in the Community

Supporting communities that host our projects is an important part of what we do. We have proudly sponsored several events and organizations in an around the Cities of Eloy and Coolidge this year:

- Mary C. Obrien Elementary
- Imagine School Cambridge
- Casa Grande ESD
- Casa Grande High School
- Coolidge USD
- Eloy Elementary
- Santa Cruz Valley Union HS
- Pita Patio Monthly Farmers' Market
- Coolidge Days
- Fiestas Patrias
- Pinal County Fair
- KidWind workshop for Pinal County Schools
- Coolidge Cotton Days
- Christmas in Eloy

Orsted looks forward to continuing to be an active Pinal County community member through outreach and sponsorship activities. If there are any local events or organizations we should get involved with, please let us know.

You're Invited!

Orsted is holding an open house to discuss the transmission portion of the Eleven Mile Solar Center.

Date: Wednesday, November 9, 2022
Time: 3:30 to 6:30 pm
Location: Near the project location in the Eleven Mile Corner area - between Coolidge, Eloy, and Casa Grande

For additional details, please RSVP to **Amy Shanahan** via email at amysh@orsted.com or by phone at (458) 600-2031.

Good Neighbors

Eleven Mile Solar Center is committed to listening to the Pinal County community and to being a good neighbor for years to come. Throughout the construction and operation of the project, Ørsted will meet with officials to ensure a direct line of communication for any concerns that arise during and after construction. We are available to meet directly with nearby neighbors to address their concerns. To learn more about the gentie line, please visit the Eleven Mile Solar Center Transmission Line website at transmissionelevenmile.com. Comments and questions may be submitted by phone or email:

Amy Shanahan
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Benefits of partnering with Ørsted

As a long-term operator of renewable energy facilities, Ørsted is committed to the highest quality standards of project construction and safety, and we have the financial strength to ensure execution. This starts with the first steps of development and lasts until the project is decommissioned.

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Exhibit J-2. Summary of Public Comments

No.	Date	Method of Communication	Commenter	Comments	Response Date	Response
1	10/10/2022	Phone call	Public Citizen	The citizen expressed concern about solar changing the landscape. He did not mention a specific issue relating to the transmission project. He became aware of the project after receiving a newsletter mailed from Ørsted to neighbours informing them of the transmission project.	10/10/2022	Ørsted representative responded with a phone call and email, explaining the project and providing a copy of the project maps and link to the project website. Ørsted also called and emailed several times after the initial call to follow up. No response was received.
2	7/25/2022	Email from the website contact form	Public citizen	The citizen expressed difficulty in identifying who would be impacted by the project.	7/25/2022	Ørsted representative responded with an email offering to provide additional information about the project and to talk. No response was received.
3	11/1/2022	Phone call (two)	Public citizen	The citizen called to RSVP to the in person open house after receiving a newsletter about the project. He had questions about private land agreements relating to the solar project, and also asked about timing of the solar project activities. He expressed strong opposition to solar projects in the area but didn't identify any specific issues relating to the transmission project.	11/1/2022	Ørsted representative took the phone call, answering questions to the extent possible. The representative followed up with an additional phone call the same afternoon to answer questions that needed more research.
4	11/7/2022	Phone call (two)	Public citizen	The citizen called to RSVP to the in person open house after receiving a newsletter about the project.	11/7/2022	Ørsted representative responded to the initial phone call within the hour and left a message, but the citizen didn't answer. The citizen left a second message indicating frustration that she didn't receive a call back. Ørsted responded with four additional phone calls and messages the following two days confirming the date, time, and location of the open house, and offering to talk or meet to discuss the project. The citizen didn't attend the open house or respond further.

No.	Date	Method of Communication	Commenter	Comments	Response Date	Response
5	11/9/2022	In person open house attendee	Public citizen	The citizen expressed opposition to solar projects in the area. He had numerous questions relating to taxes and about private land agreements relating to the solar project. He expressed strong opposition to solar projects in the area but didn't identify any specific issues relating to the transmission project.	11/9/2022	Ørsted representatives answered questions to the extent possible.
6	11/9/2022	In person open house attendee	Public citizens (three members of a family)	The family asked about where electricity would be distributed and mentioned general opposition to the solar project.	11/9/2022	Ørsted representative answered questions and offered to take recommendations on landscaping that would provide a buffer between their residence and the solar project.
7	11/19/2022	Email from the website contact form	Public citizen	Expressed opposition to the project due to proximity to her home.	11/19/2022	Ørsted representative responded to the email, setting up a time to discuss the citizen's concern the following Monday morning.

November 16, 2022

Re: Orsted Eleven Mile Corner Solar Center

To the Arizona Corporation Commission,

Insight Land & Investments was formed over two decades ago to facilitate investments in Arizona, including Pinal County, through real estate transactions. One of my company's core tenets is integrity, and we work every day to provide our clients with service that is honest and transparent.

My partners and I have met with and spoken with Orsted representatives many times since 2019 regarding the Eleven Mile Solar Center, and I was struck by how their values align so closely with Insight Land's. They have gone above and beyond with community outreach, holding multiple rounds of meetings, talking with landowners one-on-one, and integrating themselves into the community by participating in and attending local events.

As someone who puts great stock in seeing Pinal County thrive, I/we support the Eleven Mile Solar Center and Orsted's investment in this area. The project will provide significant tax contributions that can be put towards the betterment of Pinal County schools, infrastructure, and emergency services. Additionally, this will pull approximately 1,500 acres out of Agricultural Production in the Pinal County AMA. Further, Orsted representatives treat landowners and other stakeholders with the respect and transparency they deserve. The Eleven Mile Solar Center is a win-win for Pinal County.

Sincerely,

Kenneth Reycraft
Insight Land and Investments

November 16, 2022

To the Arizona Corporation Commission:

We are writing to you to express our support for the Eleven Mile Solar Center, currently under development by Orsted in Pinal County. We are neighbors to the project and have been working with Orsted for several years. They contacted us to share information on the project and receive feedback from neighbors. To date, they have been honest, transparent, have kept us in the loop about the project development activities and have been available for us and all neighbors to answer questions and to make sure the project works for all parties involved, including our suggested modification to the border landscaping. We have learned from Orsted that the solar projects like this will offer steady income for the nearby community through job growth and years of tax payments to our cities and schools, allowing for meaningful investment without the need to raise taxes. Orsted's actions have shown they practice what they preach – doing the right thing. This is the kind of company we should be welcoming into Pinal County.

Sincerely,

James and Kristi Passig

James and Kristi Passig

Exhibit J-3. Project Website

Ørsted About the project Project planning Benefits of partnering with Ørsted About us Contact us

About the project

Location: Pinal County, AZ
Line voltage: 235 kV
Distance: Approx. 0.25 mile
Owner & Developer: Ørsted Onshore
Operations: Estimated 2024

Located in Pinal County, Arizona, a 0.25 mile transmission line will connect the Eleven Mile Solar Center to the Pinal Central Substation. Through this 235 kV electrical line, electricity generated by solar energy will be transmitted onto the Arizona grid. An estimated 900,000 MWh of energy will be generated annually, or enough to power 63,800 Arizona homes each year. The Eleven Mile Solar Center will help meet the energy needs of the state by providing clean, flexible, solar-powered electricity

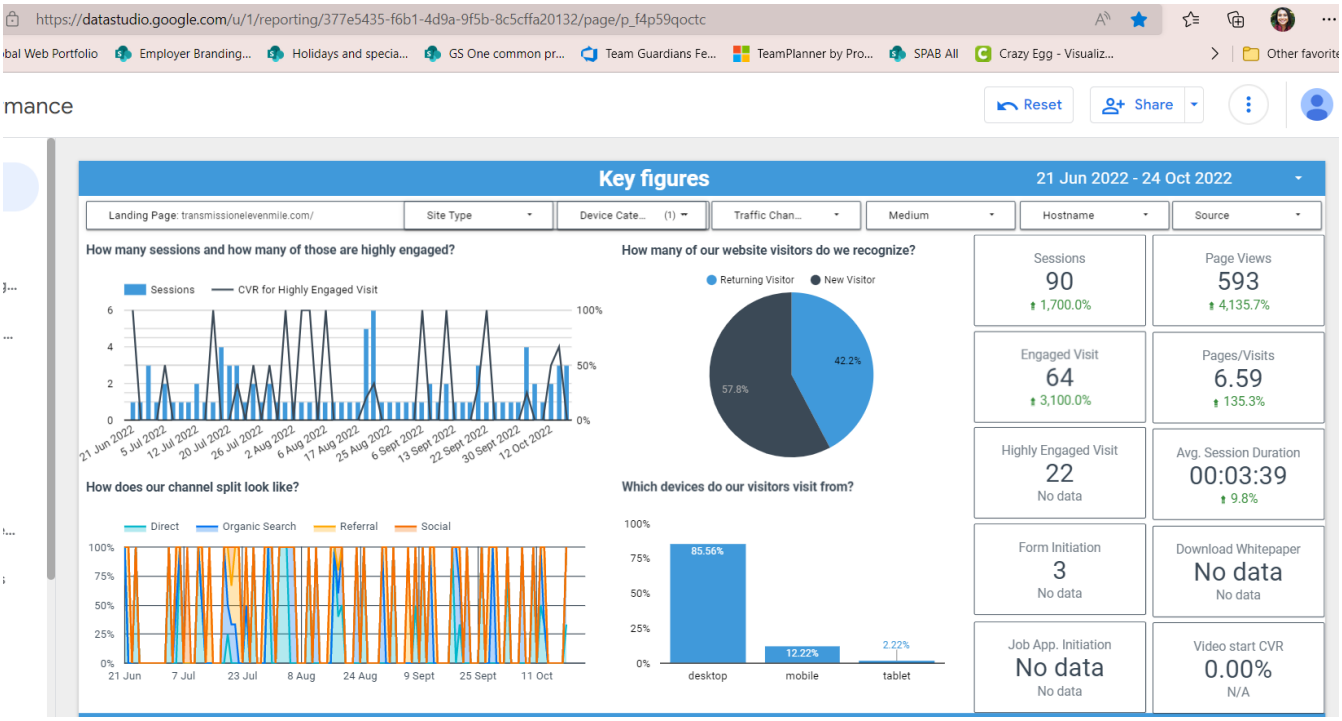
Eleven Mile Solar Center LLC is seeking a Certificate of Environmental Compatibility (CEC) from the Arizona Corporation Commission (ACC) for the proposed transmission line (also referred to as a gen-tie line), which would be constructed within a new dedicated utility ROW. The project area is currently heavily developed with transmission lines, and portions of the 0.25-mile-long gen-tie line may consist of both underground and above ground segments.

You're Invited!

Ørsted is holding an open house to discuss the transmission portion of the Eleven Mile Solar Center.

Date: Wednesday, November 9, 2022
Time: 3:30 to 6:30 pm
Location: Near the project location in the Eleven Mile Corner area between Coolidge, Eloy, and Casa Grande

For additional details, please RSVP to Amy Shanahan via email at amysh@orsted.com or by phone at (458) 600-2031



Project Webpage Visitor Analytics.

Exhibit J-4. Copy of Comment Form

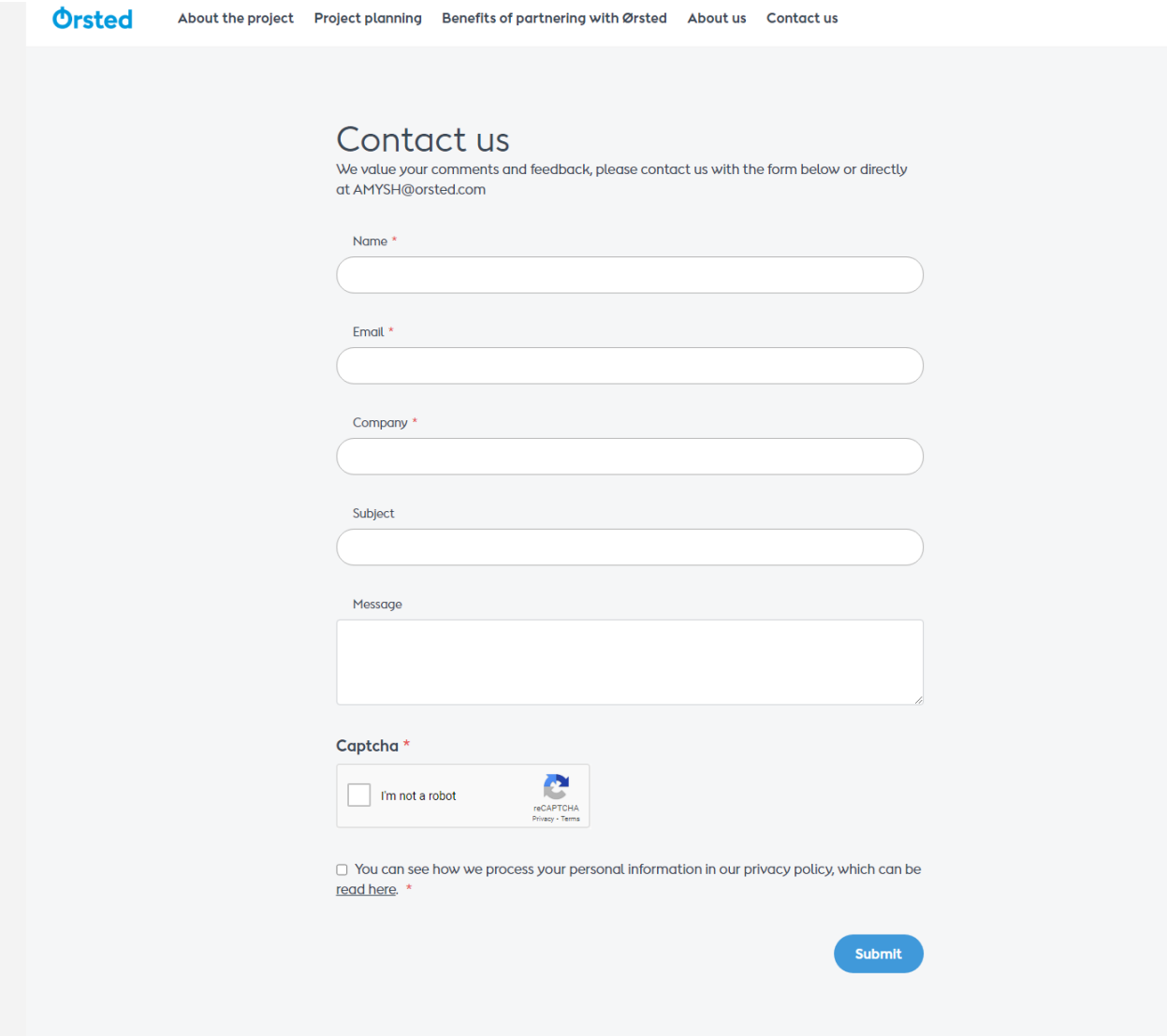


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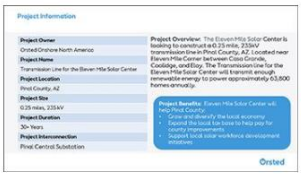
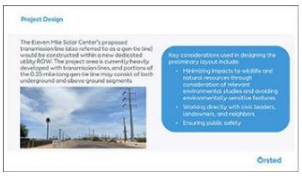
Exhibit J-5. Virtual Open House

Ørsted

Project Details



Project Information

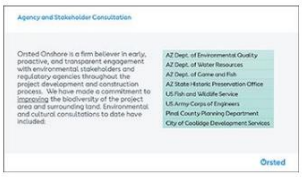


Project Design

Project Area

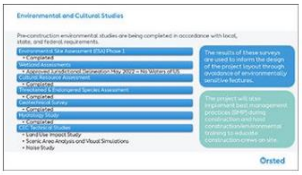
Project Schedule

Regulatory Process



Agency & Stakeholder Consultation

Community Engagements



Environmental & Cultural Studies

Energization of Transmission Line for Eleven Mile Solar

Resources

Transmission Project Website

Solar Project Website

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Exhibit J-6. Newspaper Advertisements

Coolidge Examiner

Pinal County, Ariz. DISPATCH Thursday, August 4, 2022 — 2B

2 performing companies hold auditions this week

By TAYLOR GRIFFITH
Staff Writer

COOLIDGE — Local performers of all ages will be putting their talents to the test in auditions for both the Arizona Community Theatre and United Dance Company this week.

First, on Thursday, young thespians ages 7 to 16 years old will be vying for their role in the Arizona Community Theatre's production of "Peter Pan Jr." Directed by Logan Keiser and assisted by Jada Dooley, the "Peter Pan Jr." play will hit the stage for just two performances, beginning Oct. 22.

Twenty-four roles, plus the ensemble, are up for grabs in this musical, though it is uncertain if ACT is looking to fill the entire roster. The production is based on the original 1911 Peter Pan musical by J.M. Barrie.

It will feature all of the famed songs from the original score, such as "Neverland," "I'm Flying" and "Hook's Tango." The cast will also include the beloved cast of characters widely popularized in the 1953 Disney film, including, Peter Pan, Captain Hook, Tiger Lily, Nana, Wendy, Michael and John, and of course, Tinkerbell.

Audiences will travel from London to Neverland on the winds of pixie dust. On a pirate ship, they will dodge the jaws of a vicious crocodile and battle Captain Hook and his mates. Finally, they will return to the safety of the Darling nursery with an awakened fervor for the magic of youth.

Then, on Saturday, another production goes underway with auditions for "The Radio Play Disaster." The 2020 play written by Don Zolidis centers on Harlan Bean, "a self-proclaimed genius" who sets out to impress audiences with his science fiction radio play entitled "Battle of the Planets." However, things quickly turn for the worse when a set of creative minds on the production vie for their voices to be heard the loudest — from an ambitious actress to a resentful sound engineer. The production reaches a state of comedic chaos.

There are 13 to 20 roles available to actors ages 14 or older for this ACT production that will perform two shows beginning Oct 1.

Finally, a Coolidge-based dance company that appeared on NBC's "World of Dance" in 2019 and has toured national stages since 2013 will be holding auditions for their Varsity Company and United Company on Aug. 7. Makeup auditions will be held on Aug 14.

The Varsity crew is for 13- to 17-year-olds, while the United Company welcomes anyone 15 years or older. The company, directed by Anthony Cordova, was the runner-up at the 2017 USA Hip-Hop Dance Championship.

Cordova is both instructing and performing at a dance workshop in California all week, up until the auditions on Sunday evening.

Bagnall, Murrieta headed toward council seats; November runoff for 3rd spot likely

By TAYLOR GRIFFITH
Staff Writer

COOLIDGE — With over two hours of delays in Pinal County results, some candidates for Coolidge City Council had already gone to bed when their big leads were announced.

Tom Bagnall with 760 votes and Tatiana Murrieta coming in at 632 were well on their way to securing their seats with a comfortable margin in Tuesday night's results, with a November runoff likely for the final seat. Tina Kaufman and Shane Leonard were in position to make that runoff, but two other candidates are close behind.

Bagnall, who ran with previous experience on the Coolidge Unified School District Governing Board and leadership in both the Coolidge Lions Club and the Sons of the American Legion, consistently led in the counting. When initial results came in, he had gone to sleep anticipating further delays from the county on tabulations. However, when PinalCentral called, he was more than happy to celebrate the news.

"That's great,I'm glad to hear that; I got tired of watching a blank website that never came so I went to sleep," said Bagnall. "I'm very happy about that and if that holds and everything and we move forward, I'm looking forward to serving on the City Council."

Murrietta looked poised to enter her third term as a councilmember according to Tuesday night's preliminary counts. Like Bagnall, she too had gone to bed anticipating a long night with little confirmation of results.

Answering the phone, she was reserved yet excited about her chances for re-election, with a strong second place lead among the six candidates.

"I guess I just really enjoy being there for the people," Murrieta said. "You know, I don't do it for me; it's just a humbling feeling to know that the people trust and believe in me to do right for them. So, I continue to look forward to serving them."

Kaufman, who appeared to be in a tight race to enter a run-off election for the final spot at 467 votes, sounded content but in great anticipation for a sure result. This would be her second term as a councilmember, and she is no stranger to a run-off, having won against an incumbent in the 2018 general election.

She said on Tuesday night that she was feeling "good — hopefully there will be more updates shortly.

"But, so far just the two folks that you mentioned that have enough votes (Bagnall and Murrieta); I'm pleased to hear that they're in that position. I think they'll both serve the city well."

Another contender for a run-off race is Coolidge Planning and Zoning Commissioner Shane Leonard, who had 457 votes. When PinalCentral called Tuesday night, he also hadn't had a chance to view the results due to ballot tabulation and reporting delays.

He said he was content with the results of his first race, "and excited about all the fun we've had during the campaign. I haven't seen the numbers, just like I mentioned, because I'm getting off of my NICU volunteer position, but it sounds like we got a lot of engagement and I think the candidates out front make a lot of sense, so I'm just happy to still be in the mix."

However, Leonard had much to say about the difficulties Pinal County faced in this primary election cycle.

"Well, to be pretty blunt; I'll quote my grandfather and say I think it's a hot bag of crap," he said. "This whole Pinal County elections deal has basically been a fiasco from the get-go and you can feel free to quote me on that.

"I think we've heard a lot of excuses; we haven't heard a lot of reasons and my biggest concern is that we really haven't heard anything out of the Board of Supervisors relative to everything that's gone on. We keep hearing from the county attorney and from the county sheriff, neither of which were elected to help run elections.

"So, I've got some serious concerns about who's taking responsibility — but, I do not believe at the end of the day that there's been any impropriety. I just have a big issue with the process and how responsibility and accountability are going to be addressed."

In fifth place was Adriana Saucedra at 427 votes and in sixth place was Ryan Bentz with 422 votes. Neither candidate could be reached on election night.

City of Coolidge

A detour map above shows all of the possible traffic detours for when construction takes place on Randolph Road.

Randolph Road work to start Monday

By TAYLOR GRIFFITH
Staff Writer

COOLIDGE — Two miles of reconstruction on Randolph Road previously approved by the City Council on July 11 are set to begin Monday.

Randolph Road will be repaved from La Palma Road to Eleven Mile Corner Road and construction is expected to last until Aug. 22 or 23.

The city advises, "emergency services and local residents will still be able to access this road, but understand the condition may be undesirable until it is paved."

Randolph Road has already received "countless hours of pothole repair and maintenance," according to the July 11 council meeting agenda, however these improvements, valued at $1.6 million, are the product of two years of planning according to Mayor Jon Thompson.

The road is highly traveled by commercial and local traffic, including semis, so a new surface is desired by the city and residents to limit the kicking up of debris due to increased traffic as the city continues to grow.

While improvements take place, a speed limit of 25 mph will be marked throughout the section of repair, with 13 different detours marked on surrounding roadways on the city's project detour map.

CAVIT cosmetology students wow crowd with their spooky designs

By TAYLOR GRIFFITH
Staff Writer

Taylor Griffith/PinalCentral

The following students went home with the "Crowd Favorite" trophy: Abiam Fernandez, third from left, Destiny Sanchez, center, and Ana Rivera, third from right.

SIGNAL PEAK — It was a full crowd at Pence Center for the first Central Arizona Valley Institute of Technology Cosmetology Student Showcase of the season on Monday.

A student-selected "spooky" theme for fall brought many ghoulish and familiar character renditions to the stage.

Eighty-four students from the first-, second- and third-year cosmetology programs spent weeks designing intricate hair and makeup concepts for their brave models to don as they walked through a balloon archway in front of a full auditorium. Each model carried a number with them as they did a waltz through the auditorium so viewers could take it down and vote for their favorite look later in the "Fan Favorite" category.

Xeria Cabral, a second-year cosmetology student who won in the professionalism category, explained they could not solidify their model design until a theme for the show was chosen, which was only a few weeks before the event.

That time to prepare was shortened even further due to the fact that each student was prejudged prior to the show by five guest judges. Cabral said during the prejudging, she made sure to shake each judge's hand and personally introduce herself. In doing so, she solidified her professionalism category win and went home with $230 professional shears to kick-start her dreams of owning a full-service salon one day.

The guest judges were local hair styling professionals and salon owners. The cosmetology teachers prefer to bring in professionals from the field rather than assessing the designs themselves, so that there is no student-teacher bias, according to second-year teacher Amanda Diesing.

There was much praise for the first-year students, who started in the program only eight weeks ago, and "they've just barely started using curling irons within the first few weeks, so it's pretty amazing what they can come up with in that amount of time," said Diesing, as many created looks up to par with the seasoned second- and third-years.

One of those first-years, Lillian Wilson, said she only had two full weeks to purchase supplies and complete the design for the costume, hair and makeup for her concept of Frankenstein's Bride. And as first-year teacher Stephanie Figueroa explained, "a lot of our first-year students haven't even had makeup curriculum yet, and that was just some of their own raw talent."

Wilson displayed a bit of this raw talent for her design, which included full body paint and intricate line work in order to convey the undead appearance of the famous zombie bride from the stage to the audience. She said she and her model looked at images on Pinterest and Instagram to gather ideas.

Being that it was their second time around, cosmetology II and III instructor Jessica Sepeda was really proud of some of her second-year students who went above and beyond what they produced last year. Sepeda gave praise to Destiny Sanchez, who won in two categories — hair design and fan favorite — "she put in a lot of effort last year, but really was polished this year," she said.

Figueroa was a rookie at the CAVIT showcase along with her students as she just started her first year at the school. Though she worked at Empire Beauty School before coming to CAVIT, "this is my first time doing a big show like this. It's exciting."

To add to the excitement and to get the students in the crowd involved, it was Diesing's idea that the three teachers perform a dance routine to the "GhostBusters Theme Song," with blow dryers strapped to their person in the place of proton packs. They received some of the loudest cheers of the afternoon for their opening act to the show.

Though they try to do something to support the festivities, "this is the first time we've done like a full performance," said Sepeda.

"It was fun to get the students amped up," Diesing said.

Now, preparations and ideas are already floating around for their next showcase, which should take place right before the school's winter break. Diesing can't confirm if the theme will follow the season as this show's did, because, "we've done everything from 'circus' to 'winter wonderland,'" she said.

*For a complete list of award winners, visit **PinalCentral.com**.*

Delbridge

Continued from Page 11B

feet his life. "It took almost half my head off," he said, exempting him from participating in football once he entered high school and slightly crossing his eyes.

It is a Jimmy Dell signature, however, to find humor and joy in everything — from going to church, to talking about this incident. He said, "I tell people, 'you know the car wreck not only took half of my head off. It messed my eyes up and I was so cross-sighted, if I were to ask a girl on a date, the girl next to her would accept!'"

This indomitable spirit is partly what makes Delbridge such an infectious preacher and also what brought him to record three hit singles with RCA Victor in the 1950s: "Teeny Weeny," "I've Got a Dollar" and "Cool it Baby."

These singles brought the Coolidge boy enough fame to be invited on an 11-week tour of 44 states and much of Canada, with some of the biggest names in the music scene in 1958, including Paul Anka, Sam Cooke, The Everly Brothers, LaVern Baker and more.

Delbridge's songs are still beloved in many parts of Europe and the States, even though he left the music scene decades ago. Occasionally, he will leave his ministerial duties to perform at a rockabilly festival abroad with all expenses paid.

Music also brought Delbridge a lifelong friendship with Rock and Roll Hall of Famer Duane Eddy of Coolidge and an opportunity to compose with Lee Hazelwood, the man behind Nancy Sinatra's "These Boots are Made for Walking."

However, on July 19, 1964, everything changed. As he explained, "the Delbridges have always been kind of Godly people," and while his mother Edna did not prohibit Delbridge from leaving to pursue a career in entertainment when he was 21 years old, she wasn't always supportive of the temptations to be found in that world.

"My mother was the only person, really from 10 years old, that I had as my right hand," he said. "She was the greatest mother in the world, and as I got ready to leave, she grabbed my hand and said, 'I'm going to let you go if you promise me you won't drink or you won't take drugs,'" he said.

To this day, Delbridge said he does not know what a beer tastes like, "because I had so much respect for my Godly mother."

Just a year after his family moved from Michigan to Coolidge for his father's new position at a Casa Grande alfalfa mill, the Delbridge patriarch, Oscar Delbridge, was killed in a work accident, leaving Edna to care for their eight young sons all alone. The first three Delbridge children who were already old enough to be on their own, including Jimmy's only two sisters, stayed in Michigan prior to the move.

Though it was the second tragedy to strike the family in just eight years, Delbridge still recalls his childhood fondly and holds a tremendous amount of respect for his mother, who worked full-time caring for the Delbridge boys and their community.

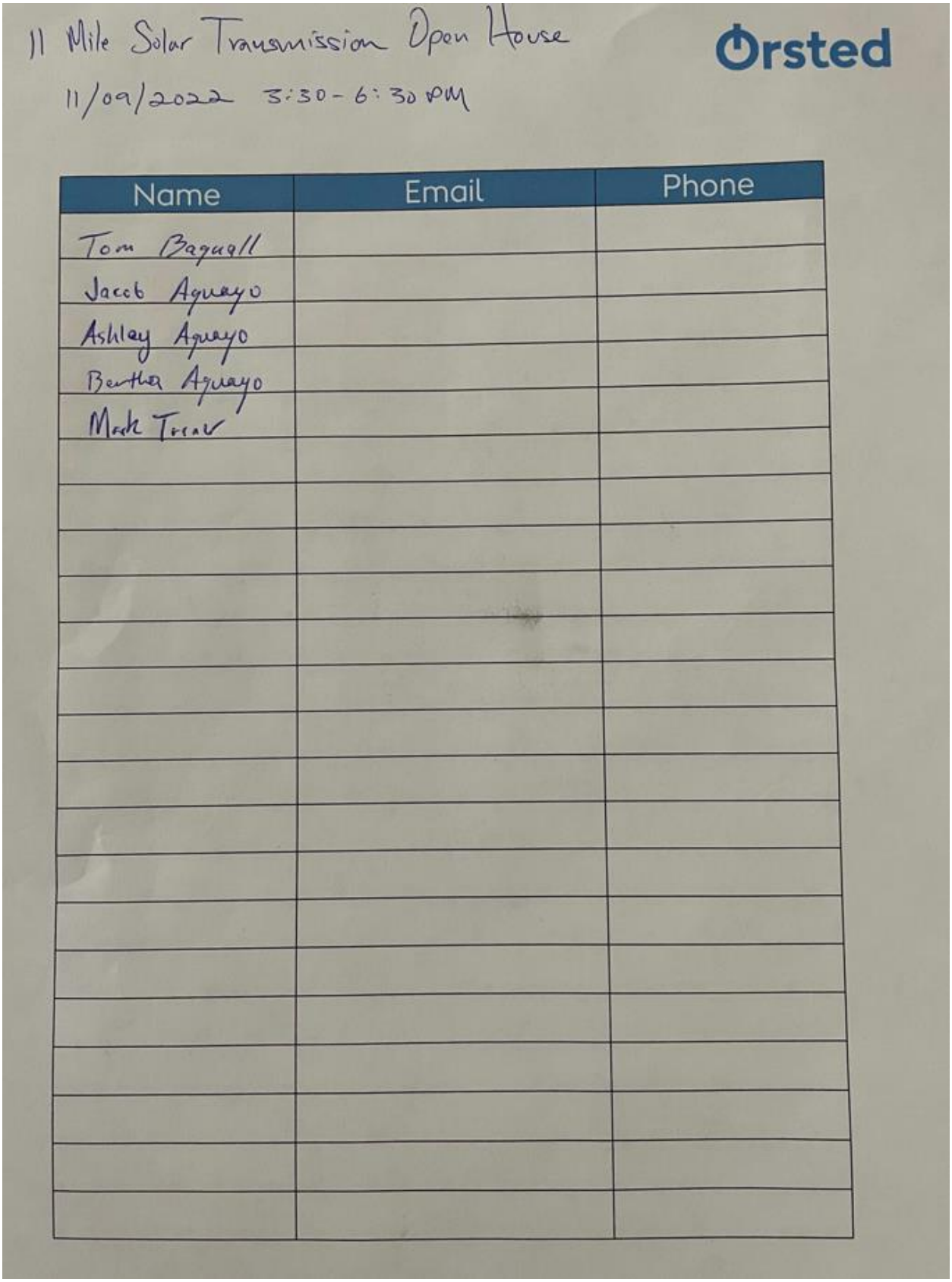
Those neighborhood concerts and gatherings are where the musical virtuoso, who learned to play nearly any song by ear, found his start in music. Though Jimmy was the only Delbridge to rise to fame with his musical talents, they were a family band in his early Coolidge days.

Through his love of music, he discovered Eddy, another Coolidge local at the time, on the local radio station KCKY and invited him over to his house to jam. After that, the two were rather inseparable until Delbridge decided to switch paths to evangelistic ministry.

Jimmy "Dell" Delbridge will enter the CHS Hall of Fame on Oct. 14, joining his good friend Duane Eddy in the honor.

*Read more online at **PinalCentral.com**.*

Exhibit J-7. In Person Open House



11 Mile Solar Transmission Open House

11/09/2022 3:30 - 6:30 PM

Ørsted

Name	Email	Phone
Tom Bagwell		
Jacob Aguayo		
Ashley Aguayo		
Bertha Aguayo		
Mark Trevi		


Ørsted

Exhibit J-8. Instagram Content


ELEVEN_MILE_SOLAR_TRANSMISSION
Posts
eleven_mile_solar_transmission
Eloy, Arizona
1/5
Ørsted
6 likes
eleven_mile_solar_transmission We had so much fun sponsoring the Family Fun Zone at the Eloy Glow Festival last weekend! Chatting with community... more
2 days ago

ELEVEN_MILE_SOLAR_TRANSMISSION

Posts

eleven_mile_solar_transmission

Eleven Mile Corner, Arizona

4 likes

eleven_mile_solar_transmission This past weekend, we had a wonderful time participating in the Coolidge Days! It was our second year in a row to... more

October 11


ELEVEN_MILE_SOLAR_TRANSMISSION
Posts
eleven_mile_solar_transmission
Ørsted
Love your home
You're Invited!
2 likes
eleven_mile_solar_transmission Orsted is holding an open house to discuss the transmission portion of the Eleven Mile Solar Center.
Date: Wednesday, November 9, 2022
Time: 3:30 to 6:30 pm
Location: Near the project location in the Eleven Mile Corner area - between Coolidge, Eloy, and Casa Grande
For additional details, please RSVP to Amy Shanahan via email at amysh@orsted.com or by phone at (458) 600-2031
October 6

ELEVEN_MILE_SOLAR_TRANSMISSION

Posts

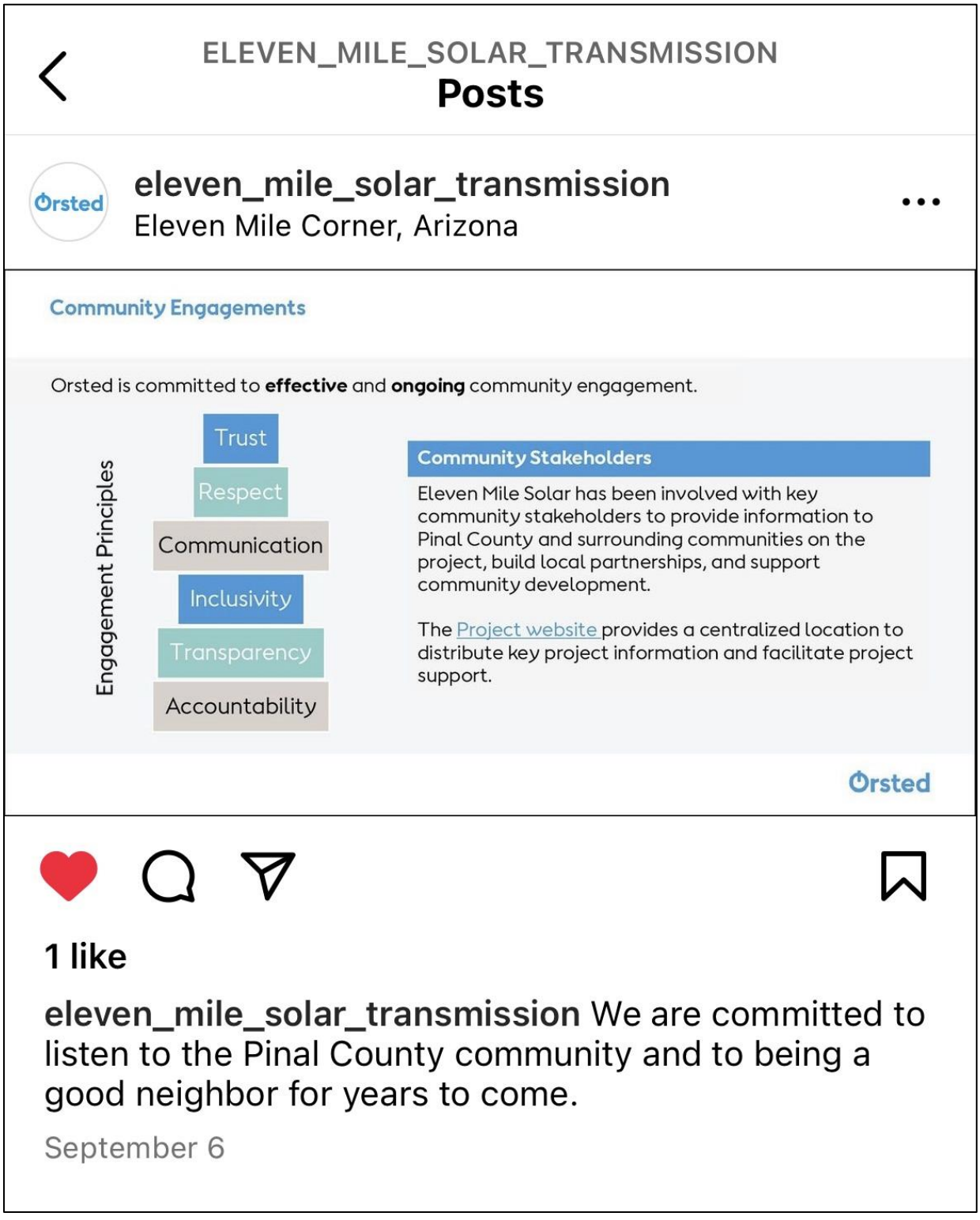
eleven_mile_solar_transmission

Eleven Mile Corner, Arizona

7 likes

eleven_mile_solar_transmission Recently, we had a wonderful time participating in an Eloy tradition – Fiestas Patrias! We are so grateful to be a sponsor for and take part in the celebration of Eloy's vibrant Hispanic culture and see the community come together to enjoy the incredible music, dancing, and food.

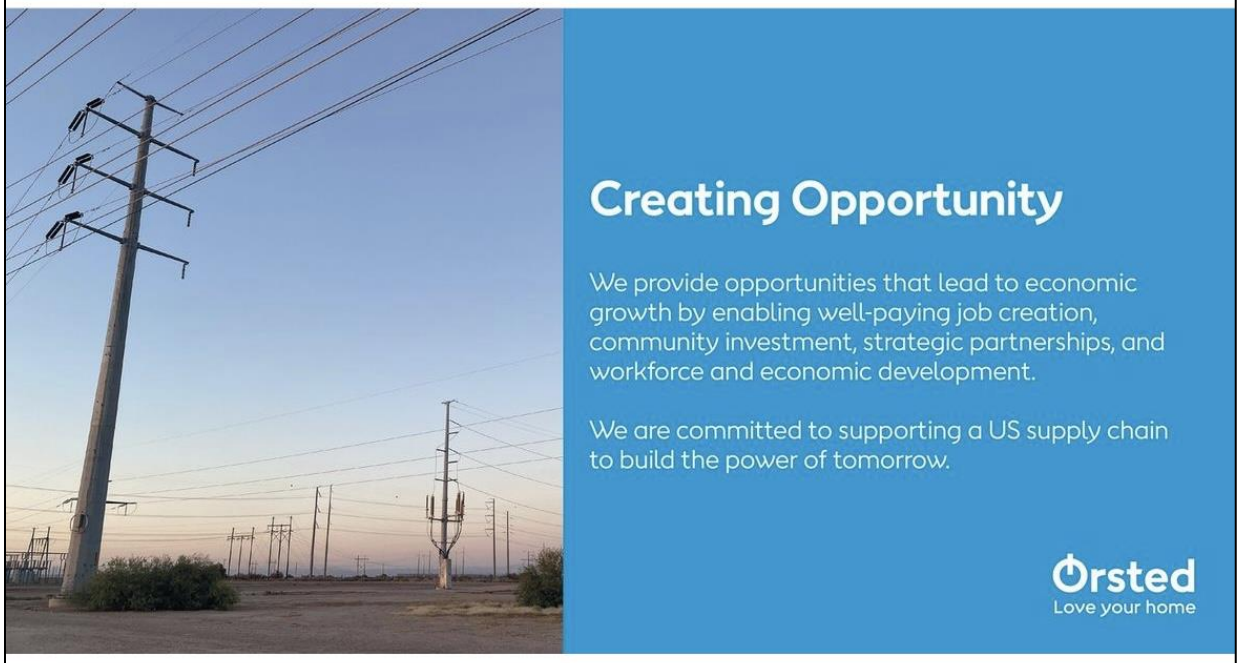
September 26


ELEVEN_MILE_SOLAR_TRANSMISSION
Posts
eleven_mile_solar_transmission
Eleven Mile Corner, Arizona
Community Engagements
Orsted is committed to effective and ongoing community engagement.
Engagement Principles
Trust
Respect
Communication
Inclusivity
Transparency
Accountability
Community Stakeholders
Eleven Mile Solar has been involved with key community stakeholders to provide information to Pinal County and surrounding communities on the project, build local partnerships, and support community development.
The Project website provides a centralized location to distribute key project information and facilitate project support.
Orsted
1 like
eleven_mile_solar_transmission We are committed to listen to the Pinal County community and to being a good neighbor for years to come.
September 6

ELEVEN_MILE_SOLAR_TRANSMISSION

Posts

eleven_mile_solar_transmission
Eleven Mile Corner, Arizona



1 like

eleven_mile_solar_transmission Visit our website for more information on both Orsted and the Eleven Mile Solar Transmission Project! https://transmissionelevenmile.com/

August 18

ELEVEN_MILE_SOLAR_TRANSMISSION

Posts

eleven_mile_solar_transmission

Eleven Mile Corner, Arizona

Project Design

The Eleven Mile Solar Center's proposed transmission line (also referred to as a gen-tie line) would be constructed within a new dedicated utility ROW. The project area is currently heavily developed with transmission lines, and portions of the 0.25-mile-long gen-tie line may consist of both underground and above ground segments

Key considerations used in designing the preliminary layout include:

- Minimizing impacts to wildlife and natural resources through consideration of relevant environmental studies and avoiding environmentally-sensitive features
- Working directly with civic leaders, landowners, and neighbors
- Ensuring public safety

Ørsted

1 like

eleven_mile_solar_transmission We're taking a lot of considerations into account in designing the preliminary project layout - check them out!

August 2

ELEVEN_MILE_SOLAR_TRANSMISSION

Posts

eleven_mile_solar_transmission
Eleven Mile Corner, Arizona

1 like

eleven_mile_solar_transmission Orsted is a global renewable energy leader empowering local communities.

July 20

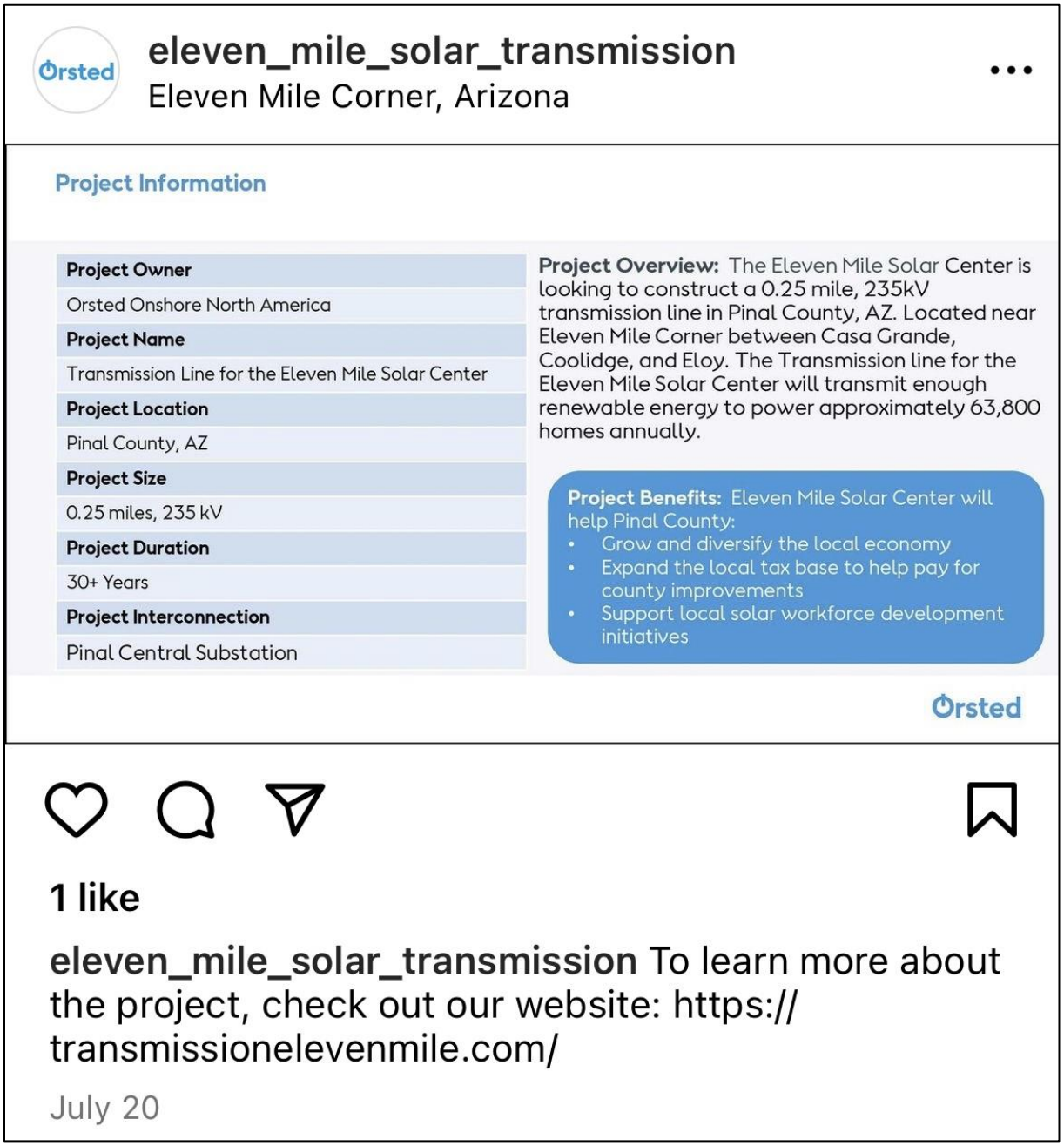

eleven_mile_solar_transmission
Eleven Mile Corner, Arizona
Project Information
Project Owner
Orsted Onshore North America
Project Name
Transmission Line for the Eleven Mile Solar Center
Project Location
Pinal County, AZ
Project Size
0.25 miles, 235 kV
Project Duration
30+ Years
Project Interconnection
Pinal Central Substation
Project Overview: The Eleven Mile Solar Center is looking to construct a 0.25 mile, 235kV transmission line in Pinal County, AZ. Located near Eleven Mile Corner between Casa Grande, Coolidge, and Eloy. The Transmission line for the Eleven Mile Solar Center will transmit enough renewable energy to power approximately 63,800 homes annually.
Project Benefits: Eleven Mile Solar Center will help Pinal County:
• Grow and diversify the local economy
• Expand the local tax base to help pay for county improvements
• Support local solar workforce development initiatives
Orsted
1 like
eleven_mile_solar_transmission To learn more about the project, check out our website: https://transmissionelevenmile.com/
July 20

Exhibit J-9. Photographs of Outreach at Local Events

Ørsted Booth at Fiestas Patrias, September 17, 2022

Ørsted Booth at Coolidge Days 5K, October 1, 2022

Ørsted Booth at the Eloy Glow Fest, November 12, 2022

Ørsted Presentation at the KidWind Workshop, November 14, 2022

Exhibit J-10. Cultural Resource Assessment and Survey for the Eleven Mile Solar Generation Tie-Line and Substation, Pinal County, Arizona

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STATE HISTORIC PRESERVATION OFFICE
SURVEY REPORT SUMMARY FORM

1. REPORT TITLE

1a. Report Title:
Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.

1b. Report Author(s): Chad V. Kirvan and A.E. (Gene) Rogge

1c. Date: 7 September 2022 **1d. Report No.:** Cultural Resource Report 2022-14(AZ)

2. PROJECT REGISTRATION/PERMITS

2a. ASM Accession Number: none

2b. AAA Permit Number: none

2c. ASLD Lease Application Number(s): none

2d. Other Permit Number(s): none

3. ORGANIZATION/CONSULTING FIRM

3a. Name: AECOM

3b. Internal Project Number: 60658159

3c. Internal Project Name: Eleven Mile Solar Center Generation Tie-Line

3d. Contact Name: Chad Kirvan

3e. Contact Address: 7720 N 16th Street, Suite 100, Phoenix, Arizona, 85020

3f. Contact Phone: 602-751-5345

3g. Contact Email: chad.kirvan@aecom.com

4. SPONSOR/LEAD AGENCY

4a. Sponsor: Eleven Mile Solar Center, LLC.

4b. Lead Agency: Arizona Corporation Commission (ACC)

4c. Agency Project Number(s): to be determined

4d. Agency Project Name: Eleven Mile Solar Center Generation Tie-Line

4e. Funding Source(s): private

4f. Other Involved Agencies: none

4g. Applicable Regulations:
State Historic Preservation Act (ARS 41-861 to 41-864)
ACC Rules of Practice and Procedure (Arizona Administrative Code R14-3-219)

5. DESCRIPTION OF PROJECT OR UNDERTAKING:

Eleven Mile Solar Center, LLC., a wholly owned indirect subsidiary of Ørsted North America Onshore, LLC., plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) generation transmission tie-in line (gen-tie) and associated substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The project substation would occupy approximately 1.5 acres in the Eleven Mile Solar Center and be used exclusively to step up the electrical energy from 34.5kV to 230kV. The design of the gen-tie has yet to be completed but would be approximately 0.3 mile long and is likely to require no more than two structures. Part of

the gen-tie might be installed underground. Eleven Mile Solar Center, LLC. will transfer ownership of the electrical energy to SRP at a point along the gen-tie line between Eleven Mile Corner Road and the Pinal Central Substation. Eleven Mile Solar Center, LLC. will own the project substation and the part of the gen-tie west of the point of change of ownership. SRP will own the gen-tie east of the point of change of ownership.

Eleven Mile Solar Center, LLC. retained AECOM to assist in preparing an application to be submitted to the ACC Arizona Power Plant and Transmission Siting Committee for Certificates of Environmental Compatibility (CECs) for the gen-tie and project substation. Two CECs are required—one for the project substation and segment of the gen-tie west of the point of change of ownership that will be owned by Eleven Mile Solar Center, LLC., and another for the eastern part of the gen-tie that will be owned by SRP.

A cultural resource records review and intensive pedestrian cultural resource survey were completed to describe any historic sites and structures, or archaeological sites in the vicinity of the proposed facilities and discuss the effects the proposed facilities will have on them, as required by Exhibit E of the application for the CECs. The cultural resource study also supports ACC compliance with the State Historic Preservation Act by evaluating whether issuance of the CECs could result in substantial alteration or demolition of any properties listed in or eligible for the Arizona Register of Historic Places (ARHP).

6. PROJECT AREA/AREA OF POTENTIAL EFFECTS (APE):

The term *project area* is used in this report to refer to the gen-tie siting area, which includes part of the Eleven Mile Solar Center where the project substation would be located and the area in which alternatives for the gen-tie were considered. (The term *area of potential effects*, which is defined by regulations implementing Section 106 of the National Historic Preservation Act, is not used in this report because the gen-tie and project substation have no nexus requiring compliance with federal cultural resource/historic preservation regulations.) The project area encompasses 36.4 acres of privately owned land. The Pinal County Assessor website does not show any publicly owned right-of-way for Eleven Mile Corner Road in the project area, indicating that Pinal County apparently holds only an easement across privately-owned land for the road.

7. PROJECT LOCATION

7a. Address: not applicable

7b. Route: not applicable **7c. Mileposts Limits:** not applicable

7d. Nearest City/Town: Coolidge[1] (**Figure 1**) **7e. County:** Pinal

7f. Project Locator UTM: 446,713 Easting, 3,636,462 Northing **7g. NAD** 83 **7h. Zone:** 12 North

7i. Baseline & Meridian: Gila and Salt River

7j. USGS Quadrangle(s): Eloy North, Arizona, 7.5-minute (32111H5 / AZ AA:2:SE)

7k. Legal Description:
Section 25, Township 6 South, Range 7 East, and Section 30, Township 6 South, Range 8 East (**Figure 2**)

8. SURVEY AREA

8a. Total Acres: 46.3 acres
The project area east of Eleven Mile Corner Road (27.5 acres) was not surveyed because prior surveys had adequately covered the area. The project area west of Eleven Mile Corner Road (8.9 acres) was surveyed along with a buffer to the west and south covering an entire field that had been recently plowed (9.9 acres). Eleven Mile Corner Road was previously recorded as a historic structure and because it was determined to be ineligible for the ARHP it was not recorded again.

8b. Survey Area

1. Land Jurisdiction	2. Total Acres Surveyed	3. Total Acres Not Surveyed	4. Justification for Areas Not Surveyed
private	18.8	27.5	covered by prior surveys

[1] The project area is in an area annexed by the City of Coolidge.

9. ENVIRONMENTAL CONTEXTS

9a. Landform:
The project is on basin floor deposits in the Gila/Salt Intermediate Basins ecoregion of central Arizona (Griffith and others 2014).

9b. Elevation: 1,465 feet

9c. Surrounding Topographic Features:
The project is at the northern margin of an area known as the Santa Cruz Flats with the Picacho Mountains to the southeast, Casa Grande Mountains to the southwest, and Sacaton Mountains to the northwest.

9d. Nearest Drainage:
Natural drainages have been obliterated by agricultural development but were likely shallow unnamed ephemeral tributary washes of McClellan Wash, which is a tributary of the Gila River.

9e. Local Geology: The local geology is Quaternary surficial deposits (Richard and others 2000).

9f. Vegetation:
Natural vegetation has been eradicated by agricultural development (**Photo 1**), but is likely to have been typical of the Lower Colorado River subdivision of the Sonoran desertscrub biome (Turner and Brown 1994)

Photo 1. Survey Area (view south)

9g. Soils/Deposition:
Soils in the project area are classified as Casa Grande fine sandy loam with 0 to 3 percent slopes and consist of fine sandy loam overlying sandy clay loam (Natural Resource Conservation Service 2022).

9h. Buried Deposits: likely possible

9i. Justification:
The landform where the project area is located has potential for alluvial deposition. Despite extensive disturbance, buried archaeological deposits could be present but are likely to be indicated by artifacts scattered on the ground surface.

I0. BUILT ENVIRONMENT:
Eleven Mile Corner Road bisects the project area, with a plowed field west of the road and a parcel to the east that was used as a construction staging yard about 10 years ago, probably for construction of the Pinal Central Substation. The area includes areas of imported gravel for travel lanes and material storage (NETROnline 2022). Transmission lines and Sublateral SL 9 of the Casa Grande Canal, a component of the San Carlos Irrigation Project (SCIP), cross the project area east of Eleven Mile Corner Road. The Casa Grande Canal is adjacent to but outside the project area.

11. INVENTORY CLASS COMPLETED

11a. Class I Inventory: ☐

11b. Researcher(s):

11c. Class II Survey: ☐

11d Sampling Strategy:

11e. Class III Inventory: ☒

12. BACKGROUND RESEARCH SOURCES

12a. AZSITE: ☒

12b. ASM Archaeological Records Office: ☒

12c. SHPO Inventories and/or SHPO Library: ☐

12d. NRHP Database: ☒

12e. ADOT Portal: ☐

12f. GLO Maps:
The General Land Office (GLO) made the first cadastral survey of Township 6 South, Range 7 East in 1888 and of Township 6 South, Range 8 East in 1889, and filed the resulting plats in 1890. Cultural features depicted on these plats within the review area, which included the project area and a surrounding buffer 1 mile wide, include the Florence Canal (now designated as the Casa Grande Canal), the residence of John Loss, and at least two roads (**Figure 3**). One of the roads is labeled as the Old Overland Stage Road and Old Sacaton Road and mapped as crossing the eastern part of the project area on an alignment similar to the Casa Grande Canal Sublateral SL 9. The other road is labeled as Old Road and is located about a half mile east of the project area. The Florence Canal is depicted as intersecting the southeastern corner of the project area. It is unclear whether a line on the plat extending west from the project area represents a road or the Florence Canal, but if it represents the canal, the placement is offset by half a mile in the vicinity of the project area. The discrepancy might be due to the fact that the canal was just being constructed in the late 1880s.

The GLO resurveyed Township 6 South, Range 7 East in 1928 and filed the resulting plat in 1930 (**Figure 4**). Cultural features depicted within the review area include the Casa-Grande-Florence Canal (now designated as the Casa Grande Canal), a structure in the southwest quarter of Section 25, an agricultural field in the southeast quarter of Section 24, some fence lines, and a network of roads following section lines and half-section lines. None of these features intersect the project area.

12g. Land- Managing Agency Files: none

12h. Tribal Cultural Resources Files: none

12i. Local Government Websites: none

12j. Other:
Historic aerial photos (NETROnline 2022; USGS 2022a) and historic USGS (2022b) maps (Tucson 1:250,000 quadrangle [1956, 1959, 1962], Signal Peak 1:62,500 quadrangle [1922, 1924], Coolidge 1:24,000 [1965], Eloy North [1965]) were reviewed for cultural resources that could be present in the project area. The earliest identified historic aerial dates to 1956 and depicts the review area as being within an agricultural landscape divided into square and rectangular farm fields. Due to the resolution of the photograph, specific cultural features such as structures or well pumps are not discernible, but the Casa Grande Canal and the Florence-Casa Grande Canal Extension are both visible south of the project area and surveyed area. A 1961 aerial clearly shows Eleven Mile Corner Road, an oval track within the country fairgrounds to the north of the survey area, and an electrical substation (Electrical District No. 2) east of Eleven Mile Corner Road and northwest of the project area.

The 1922 and 1924 USGS Signal Peak 1:62,500 quadrangles depict a network of roads that typically follow section lines. Other features depicted in the review area are the Casa Grande-Florence Canal (now Casa Grande Canal), and approximately six wells and five structures. The road following the alignment of Eleven Mile Corner Road is the only cultural feature in the project area. The noteworthy addition to the items depicted in the review area on the 1956, 1959, and 1962 Tucson 1:250,000 quadrangles is the Florence-Casa Grande Canal Extension to the south of the previously identified canal. The 1965 1:24,000 quadrangles are more detailed and include more structures identified as residential buildings, outbuildings, wells, and roads. An airstrip is depicted northwest of Eleven Mile Corner and the county fairgrounds is depicted west of Eleven Mile Corner Road and extending south to abut the project area. An electrical power substation is mapped along the east side of Eleven Mile Corner Road just north the project area with transmission lines extending to the east and turning northward. A road in the southern edge of the survey area is first depicted on the 1965 North Eloy 1:24,000 quadrangle. The road apparently provided access to a residence mapped west of the southwest corner of the surveyed area.

13. BACKGROUND RESEARCH RESULTS [2]

The review identified 21 cultural resource surveys conducted in or overlapping the review area. Evaluation of the 10 surveys that intersect the project area, in accordance with SHPO (2004) guidance, concluded they provided adequate coverage for about 75 percent of the project area (see Figure 2).

13a. Previous Projects Within or Adjacent to the Project Area and Surveyed Area(1)

	Project Number	Project Name	Author(s)	Year
1	1982-200.ASM	Coolidge-Saguaro 115 kV transmission line	Hammack	1982
2	2007-175.ASM	Pinal South Substation Survey	Clark	2007
3	2008-763.ASM	Coolidge-ED2 #1 115kV transmission line	Schilling and others	2009
4	2009-434.ASM	Sundance-Pinal Central 230kV transmission line	Ellison	2009
5	2011-484.ASM	ED2-ED4/ED5-SRG1 pole replacement	Cook and Whitney	2011
6	2012-363.ASM	Tucson Electric Power Pinal Central to Tortolita transmission line	White and others	2012
7	2014-126.ASM	ED2 SGR transmission line survey	Teeter and others	2014a, 2014b
8	2015-603.ASM	San Carlos Irrigation and Drainage District Reach 4 rehabilitation	Rich and Jones	2017
9	2019-218.ASM	East Line solar project	Hayden and others	2019
10	2019-285.ASM	East Line Solar Project, Generation-Tie Route Options C,D, and E	Peterson	2019

NOTE: (1) Pursuant to SHPO and ASM (2019) guidance, projects that did not intersect and are not adjacent to the project area and survey buffer are not included in the table or references section and are not mapped on Figure 2.

The review identified four cultural resources in the project area, including three historical in-use structures and a Hohokam archaeological site. The historical structures are (1) Eleven Mile Corner Road, (2) the Coolidge-Saguaro 115kV transmission line, and (3) the Casa Grande Canal Sublateral SL 9. The Eleven Mile Corner Road and Sublateral SL 9 have been determined to be ineligible for the ARHP and the Coolidge-Saguaro 115kV transmission line has been recommended ineligible. The Hohokam site was determined eligible under Criterion D for its potential to yield important information. Archaeological data recovery excavations conducted to mitigate impacts of the construction of the Pinal Central Substation identified 44 buried archaeological features below the plow zone, including a cemetery with 11 cremation mortuary features and possibly one additional partial cremation (Foster and North 2013). No additional treatment was recommended after the data recovery studies were completed, and the Pinal Central Substation was constructed.

Ten historical resources recorded in the review area outside the project area include two SCIP canals and State Route 287 that have been determined eligible for the ARHP. An archaeological site of a historic homestead has been recommended eligible. One historic section line road and other Casa Grande Canal sublaterals have been determined to be not eligible, and another road, an in-use transmission line, abandoned corral, and scatter of historic trash have been recommended not eligible. Six Hohokam archaeological sites have been recorded in the review area outside the project area. One was determined to be ARHP eligible and data recovery excavations determined it was a farmstead with eight pit houses. Three other scatters of Hohokam artifacts have been recommended eligible for the ARHP and two other Hohokam artifact scatters have been recommended not eligible. The ARHP eligibility of one ambiguous undated archaeological site has not been evaluated.

[2] In preparing this report, AECOM used background information compiled by prior studies in the project vicinity, and relied on the information as furnished and is not responsible and has not confirmed the accuracy of the information.

13b. Previously Recorded Cultural Resources Review Area(1)

	1. Site Name/Number(2)	2. Affiliation	3. Site Type	4. Eligibility Status	5. Associated Reference(s)
Cultural Resources in the Project Area and Surveyed Buffer					
1	AZ AA:2:284(ASM)	prehistoric, Hohokam	farmstead, 44 buried features (8 thermal pits, 19 nonthermal pits, 5 pit houses, 11 cremations, 1 possible partial cremation)	determined eligible, Criterion D (SHPO-2001-0737); data recovery studies completed	Clark 2007; Foster and North 2013
2	Eleven Mile Corner Road	historic, Euro-American	in -use section line road	determined not eligible (SHPO-2009-0835)	Stone 1998, Marshall 2003, Hart 2004, Twilling 2006
3	Coolidge-Saguaro 115kV transmission line	historic, Euro-American	in-use transmission line	recommended not eligible	Cook and Whitney 2011
4	Casa Grande Canal Sublateral SL 9	historic, Euro-American	in-use irrigation sublateral canal	determined not eligible (SHPO, 14 Feb 2022)	Davidson and Davis 2015; Pfaff 1996
Other Cultural Resources in the Review Area					
5	AZ AA:2:285(ASM)	prehistoric, Hohokam	farmstead,10 buried features (8 pit houses, 1 pit, 1 sheet midden)	determined eligible (SHPO-2004-1973), data recovery studies completed	Clark 2007; Foster and North 2013
6	AZ AA:2:295(ASM)	prehistoric, Hohokam	artifact scatter	recommended eligible, Criterion D	Darby 2008
7	AZ AA:2:346(ASM)	prehistoric, Hohokam	artifact scatter	recommended eligible, Criterion D	Cook and Whitney 2011; Teeter and others 2014b
8	AZ AA:2:347(ASM)	historic, Euro-American	homestead site	recommended eligible, Criterion D	Cook and Whitney 2011; Teeter and others 2014b
9	AZ AA:2:360(ASM)	historic, Euro-American	in-use road along Casa Grande Canal	recommended not eligible	Teeter and others. 2014b
10	AZ AA:2:364(ASM)	historic, Euro-American	trash scatter	recommended not eligible	Rich and Jones 2017
11	AZ AA:2:366(ASM)	prehistoric, Hohokam	artifact scatter	recommended not eligible	Hayden and others 2019
12	AZ AA:2:367(ASM)	prehistoric, Hohokam	artifact scatter with burned rock	recommended eligible, Criterion D	Hayden and others 2019
13	AZ AA:2:368(ASM)	prehistoric, Hohokam	artifact scatter with burned rock	recommended not eligible	Hayden and others 2019
14	AZ AA:2:370(ASM)	historic, Euro-American	abandoned corral and possible collapsed shed with trash dump	recommended not eligible	Hayden and others 2019
15	Casa Grande Canal	historic, Euro-American	in-use irrigation canal	determined eligible, Criteria A and D (SHPO-2009-0835)	Neal 2005, Caldwell 2008a, 2008b
16	Florence-Casa Grande Canal Extension	historic, Euro-American	in-use Irrigation canal converted to drainage ditch	determined eligible, Criteria A and D (SHPO-2008-1777)	Bilsbarrow 1996
17	State Route 287	historic, Euro-American	in-use state highway	determined eligible, Criterion D (SHPO-2008-0493))	Federal Highway Administration and others 2002; Lindly and others 2002; Marshall 2003
18	Sunshine Boulevard	historic, Euro-American	in-use section line road	determined not eligible (SHPO-2009-0835)	Stone 1998, Hesse 2001, Twilling 2006
19	Coolidge-ED2 #1 Transmission Line	historic, Euro-American	in-use transmission line	recommended not eligible	Schilling and others 2009
20	Casa Grande Canal Sublaterals SL 7, SL 11, SL 13, and SL 14	historic, Euro-American	in-use irrigation sublateral canal	determined not eligible (SHPO, 14 Feb 2022)	Moreno and Rogge 2021; Pfaff 1996
21	11-Mile-1	undetermined	four organic stain features with two possible flaked stone cores, a possible flaked stone scraper, and a possibly fire-cracked rock	unevaluated	Rogge and Moreno 2021

NOTES: The review area included the project area and surveyed area and a surrounding buffer 1 mile wide.

13c. Historic Buildings/Districts/Neighborhoods

1. Property Name or Address	2. Year	3. Eligibility Status
none		

There are no historic buildings, districts, or neighborhoods in the survey area, but a concrete-lined irrigation field ditch and an adjacent dirt road cross the survey area. Historic maps and aerial photos indicate these probably date to the mid-twentieth century (NETROnline 2022; USGS 2022a, 2022b).

14. CULTURAL CONTEXTS

14a. Prehistoric Culture: Paleoindian, Archaic, Hohokam

14b. Protohistoric Culture: O'odham

14c. Indigenous Historic Culture: O'odham

14d. Euro-American Culture: Euro-American, late-1800s to present

15. FIELD SURVEY PERSONNEL

15a. Principal Investigator: Chad Kirvan and A.E. (Gene) Rogge

15b. Field Supervisor: Chad Kirvan

15c. Crew: Chad Kirvan

15d. Fieldwork Date(s): 23 July 2022

16. SURVEY METHODS

16a. Transect Intervals: no more than 20 meters apart

16b. Coverage (%): 100

16c. Site Recording Criteria: ASM (1995) Guidelines

16d. Ground Surface Visibility: approximately 95 percent

16e. Observed Disturbances:
The surveyed area was a recently plowed agricultural field with a small amount of chaff on the ground surface. The surveyed area is bounded by paved roads to the north (Hackler Lane) and east (Eleven Mile Corner Road). There are overhead power lines along both roads and a gas line and perhaps one or more other utility lines are buried between the plowed field and the paved lanes of Eleven Mile Corner Road. Construction of the roads and adjacent drainage ditches resulted in substantial disturbance (**Photo 2**). A concrete-lined field irrigation ditch, an overhead powerline, and a dirt road cross through the southern end of the surveyed area, south of the project area (**Photo 3**).

17. FIELD SURVEY RESULTS

17a. No Cultural Resources Identified: ☐

17b. Historical In-Use Structures Identified: ☐; **Form(s) Attached:** ☐

17c. Table of Historical In-Use Features (Figure 5)

1. Number	2. Description	3. Date Range	4. UTMs
1	irrigation field ditch, 580 feet long in the surveyed area; 75 inches across, 32 inches deep; what must originally have been an unlined field ditch has been upgraded to a modern concrete-lined ditch with 22 metal slide gates connected to plastic outlet pipes(1)	mid-twentieth century - present	446,802 mE; 3,636,474 mN
2	dirt road, 580 feet long and 16 feet wide in the survey area(2)	mid-twentieth century - present	446,802 mE; 3,636,466 mN

NOTES: (1) Because this field ditch has not been determined eligible for the ARHP and is not part of a listed or nominated district, it was recorded as an isolated feature exempt from Historical In-use Structure Form documentation pursuant to SHPO (2020) guidance.
(2) Because this unimproved road is not named in any resources reviewed, has not been determined eligible for the ARHP, and is not part of a listed or nominated district, it was recorded as an isolated feature exempt from Historical In-use Structure Form documentation pursuant to SHPO (2020) guidance.

It is recommended that these isolated historical in-use features be considered ineligible for the ARHP.

Photo 2. Disturbance along Eleven Mile Corner Road (view northeast)

Photo 3. Isolated Historical In-Use Features 1 and 2 in the Survey Area (view east)

17d. Number of IOs Recorded: 1

17e. Table of IOs

1. IO Number	2. Description	3. Date Range	4. UTMs
1	fine-grain basalt secondary flake	prehistoric	446,876 mE; 3,636,633 mN

It is recommended that this isolated artifact be considered ineligible for the ARHP.

18. COMMENTS:

The records review identified 21 prior cultural resource surveys, and 10 of those were evaluated, in the aggregate, as providing adequate coverage of the project area east of Eleven Mile Corner Road (about 75 percent of the 36.4-acre project area). An intensive pedestrian survey covered the part of the project area west of Eleven Mile Corner Road.

The review identified four cultural resources in the eastern part of the project area, including three historical in-use structures and an archaeological site. The historical in-use structures include Eleven Mile Corner Road and Sublateral SL 9 of the Casa Grande Canal, which were previously determined to be not eligible for the ARHP. The other historical in-use structure is the Coolidge-Saguaro 115kV transmission line, which has been recommended ineligible. Data recovery excavations were conducted at the Hohokam archaeological site, AZ AA:2:284(ASM), to mitigate the impacts of construction of the Pinal Central Substation, and 44 buried archaeological features were found and documented below the plow zone, including a cemetery with 11 cremation mortuary features and possibly one additional partial cremation (Foster and North 2013). Less than 5 percent of the site overlaps the project area and none of the archaeological features were found in that part of the site. The human remains and funerary objects were recovered and repatriated to the Gila River Indian Community. No further treatment of the site was recommended before the Pinal Central Substation was constructed.

The review identified 10 other historical resources recorded within 1 mile but outside the project area. They include two SCIP canals and State Route 287 that have been determined eligible for the ARHP. Another is an archaeological site of a historic homestead that has been recommended eligible. One historic section line road and other Casa Grande Canal sublaterals have been determined to be not eligible, and another in-use canal maintenance road, an in-use transmission line, abandoned corral, and scatter of historic trash have been recommended not eligible.

The review identified six Hohokam archaeological sites within 1 mile but outside the project area. One was determined to be ARHP eligible and data recovery excavations conducted to mitigate the impacts of the construction of the Pinal Central Substation determined it was a farmstead with eight pit houses. Three other scatters of Hohokam artifacts have been recommended eligible for the ARHP and two other Hohokam artifact scatters have been recommended not eligible. The ARHP eligibility of one ambiguous undated archaeological site has not been evaluated.

The cultural resource survey conducted west of Eleven Mile Corner Road identified one isolated occurrence of prehistoric flaked stone in the project area and two isolated historical in-use features (an irrigation field ditch and a dirt road) south of the project area, which are not the type of resources typically considered eligible for the ARHP. Because they have no known historic associations or characteristics worthy of preservation it is recommended that they be considered ineligible for the ARHP.

The gen-tie and project substation would not substantially alter the setting of the ARHP-eligible or recommended eligible historical in-use structures that have been recorded within 1 mile but outside the project area. Nor would the gen-tie and project substation affect the potential of any of the archaeological sites recorded within 1 mile of the project area. In summary, the results of the records review and field survey indicate that construction of the gen-tie and project substation would not substantially alter or demolish any properties listed in or eligible for the ARHP and no further consideration of cultural resources is recommended.

19. ATTACHMENTS

19a. Project Location Map: ☒ (Figures 1, 2, and 5)
19b. Land Jurisdiction Map: ☒ (Figure 2)
19c. Background Research Map(s): ☒ (Figure 2)
19d. GLO Map(s): ☒ (Figures 3 and 4)
19e. References: ☒

SECTION 20. CONSULTANT CERTIFICATION

I certify the information provided herein has been reviewed for content and accuracy and all work meets applicable agency standards.

Signature

Principal Investigator

Title

SECTION 21. DISCOVERY CLAUSE

In the event that previously unreported cultural resources are encountered during ground disturbing activities, all work must immediately cease within 30 meters (100 feet) until a qualified archaeologist has documented the discovery and evaluated its eligibility for the Arizona or National Register of Historic Places in consultation with the lead agency, the SHPO, and Tribes, as appropriate. Work must not resume in this area without approval of the lead agency.

If human remains are encountered during ground-disturbing activities, all work must immediately cease within 30 meters (100 feet) of the discovery and the area must be secured. The Arizona State Museum, lead agency, SHPO, and appropriate Tribes must be notified of the discovery. All discoveries will be treated in accordance with NAGPRA (Public Law 101-601; 25 U.S.C. 3001-3013) or Arizona Revised Statutes (A.R.S. § 41-844 and A.R.S. 41-865), as appropriate, and work must not resume in this area without authorization from ASM and the lead agency.

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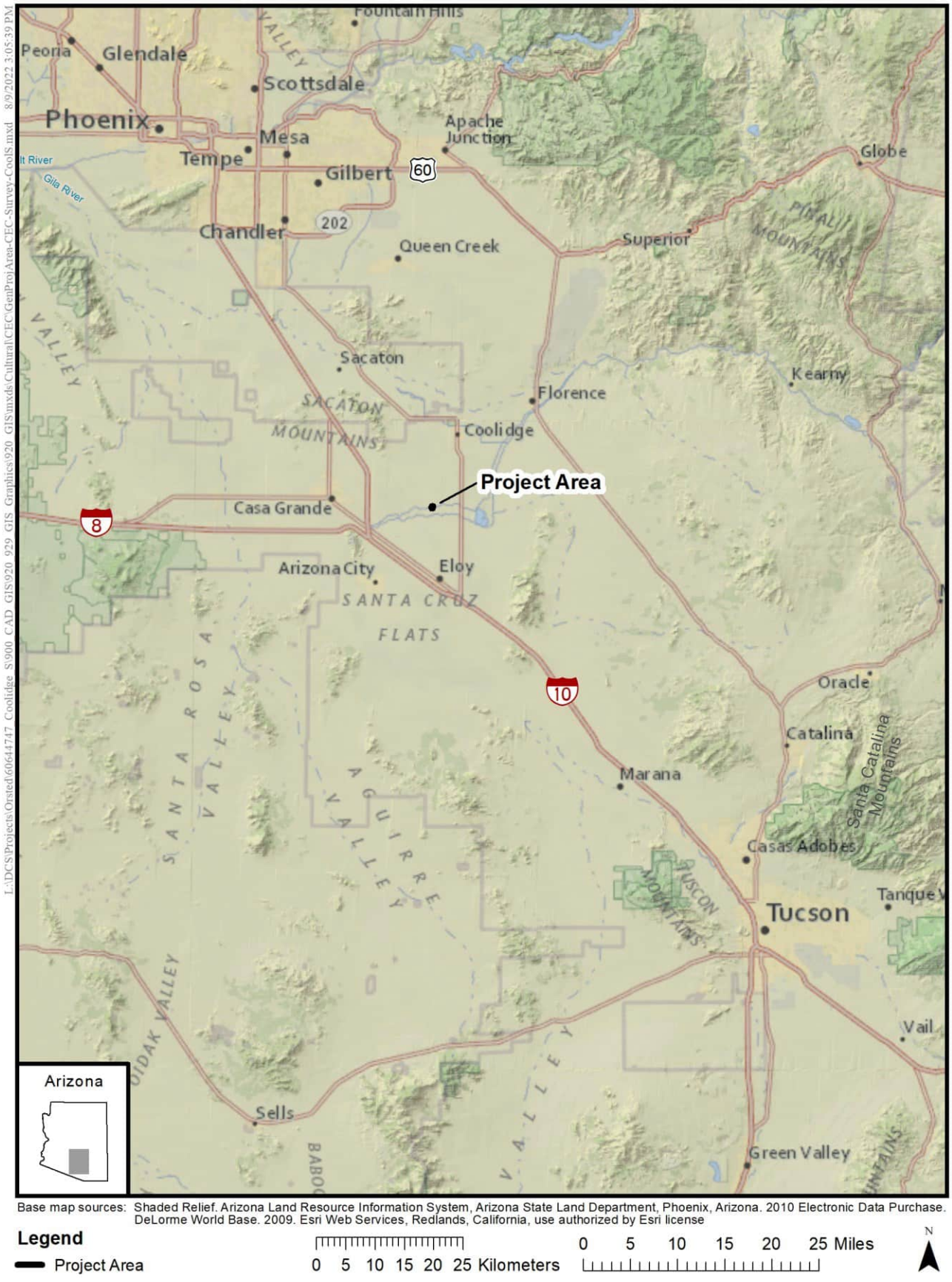
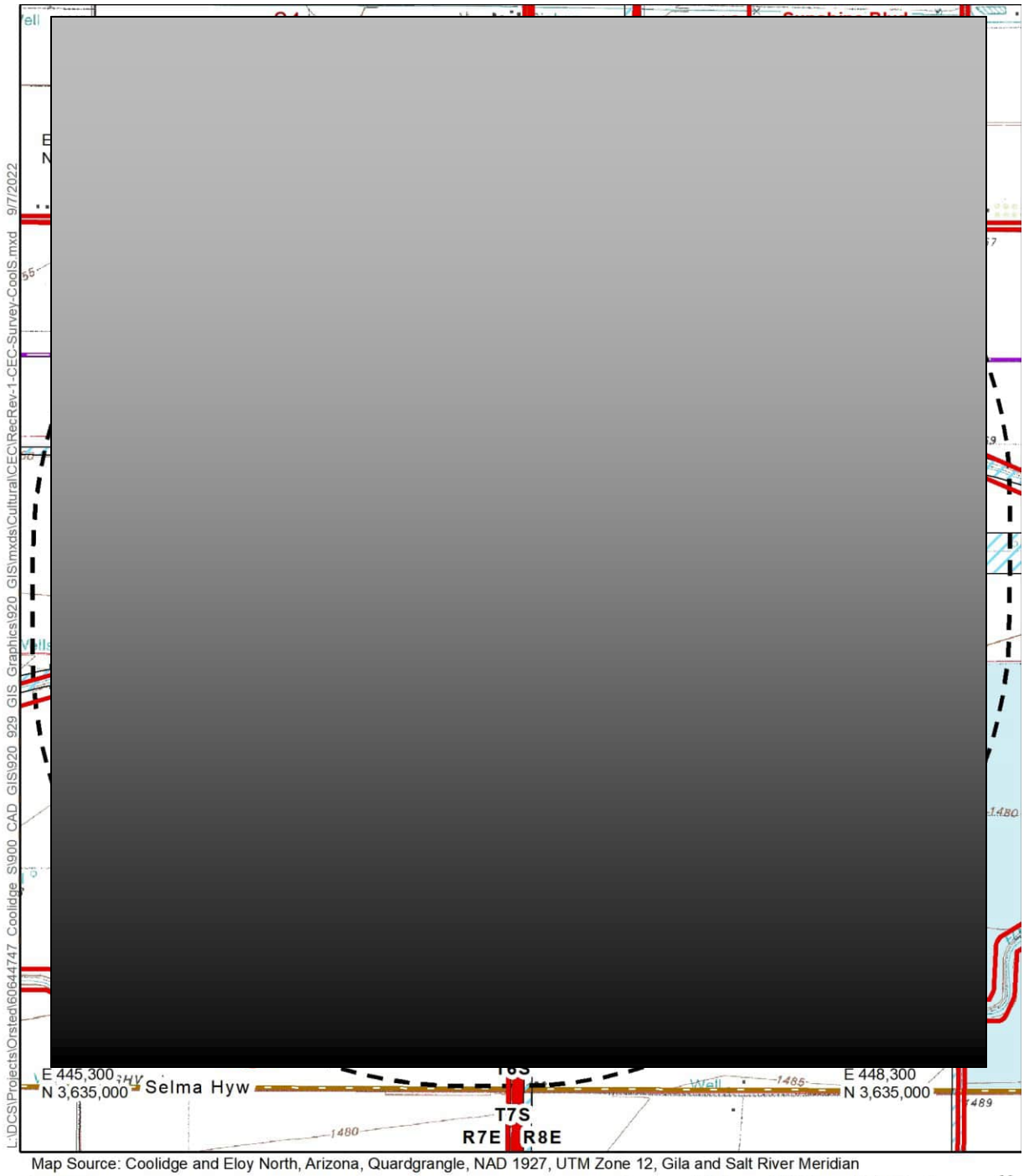


Figure 1. General Project Location



Note: Road rights-of-way are not shown at this small scale. The Pinal County Assessor website indicates the right-of-way at the intersection of State Route 287 and Eleven Mile Corner Road is public land and rights-of-way for some other parts of Eleven Mile Corner Road, Sunshine Road, and Selma Highway are owned by Pinal County, but the county apparently holds only easements for other section line roads in the review area, including Eleven Mile Road in the project area.

Figure 2. Records Review (confidential information redacted)

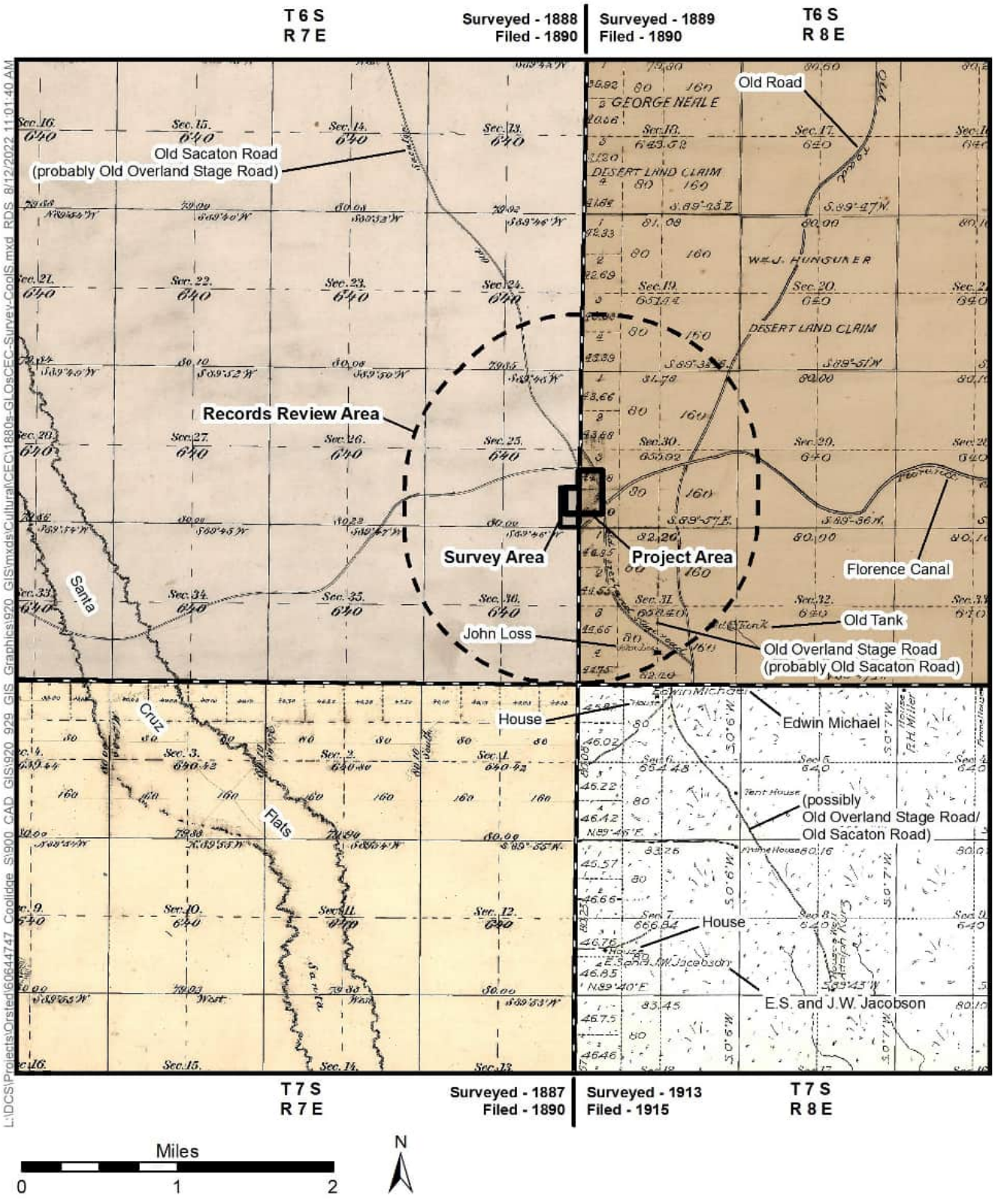


Figure 3. Initial General Land Office Plats

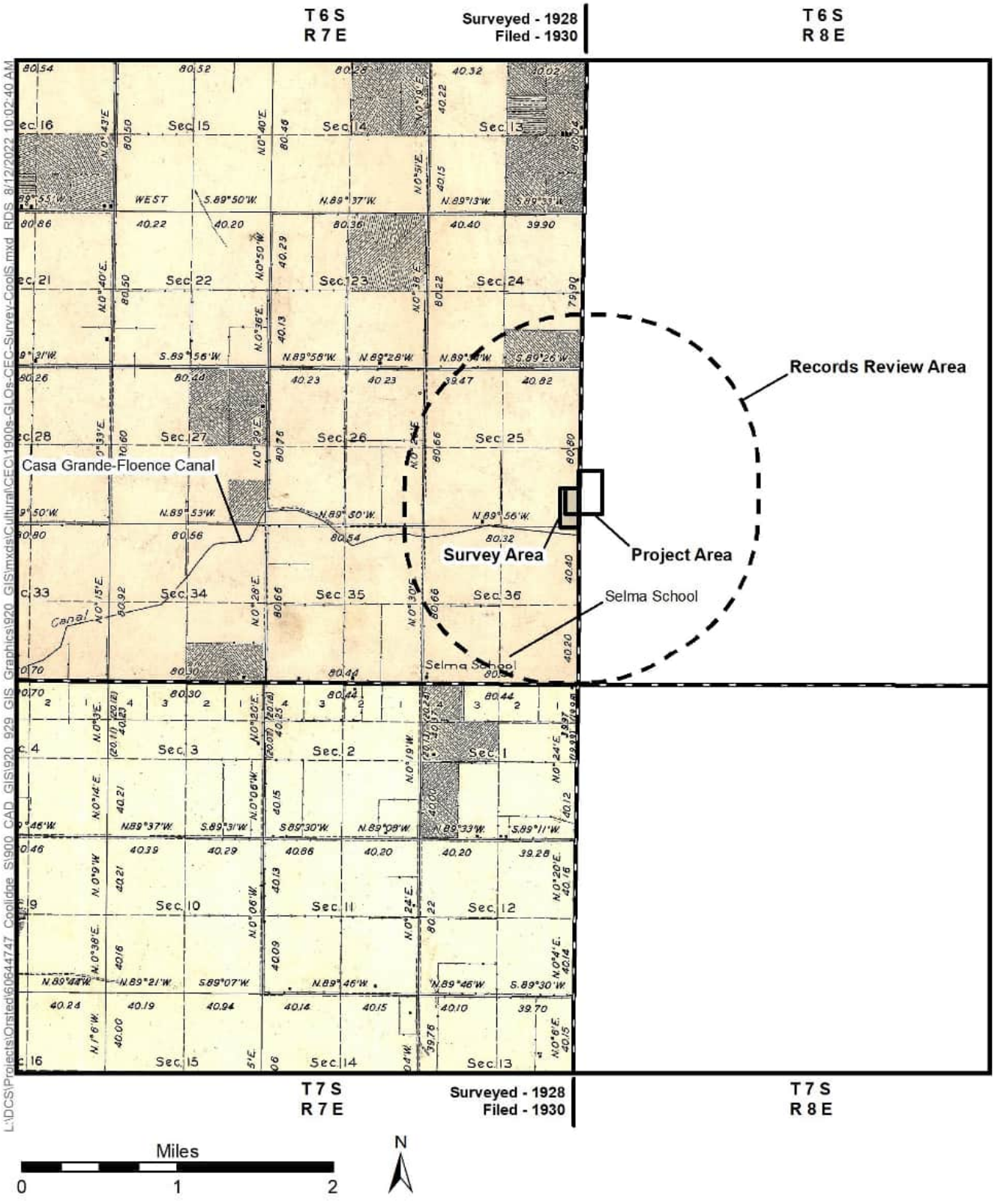


Figure 4. General Land Office Resurvey Plats

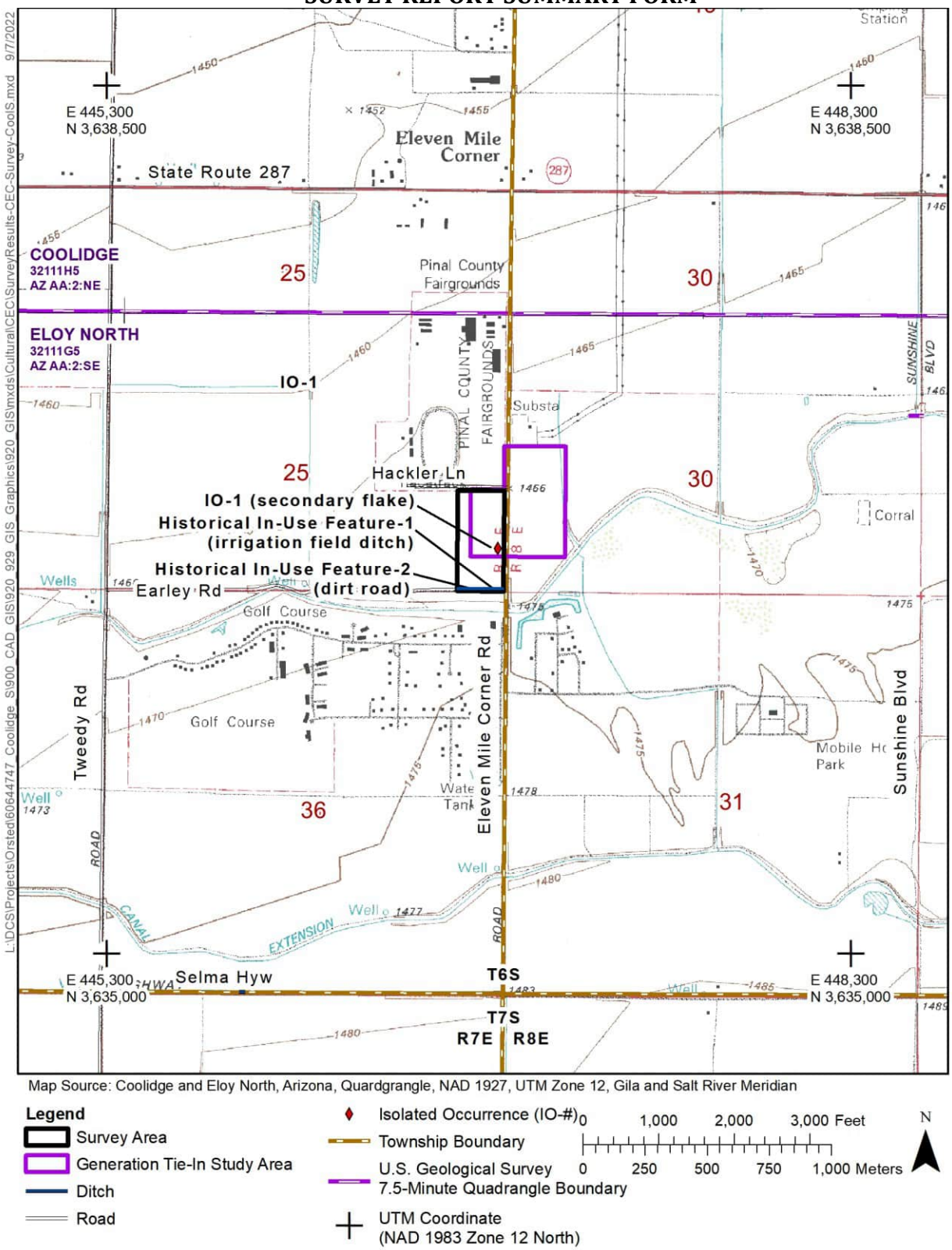


Figure 5. Survey Results

Exhibit J-11. SHPO Section 106 Correspondence

Ørsted

September 16, 2022

Ms. Kathryn Leonard
State Historic Preservation Officer
Arizona State Historic Preservation Office
1100 W. Washington Street, Suite 100
Phoenix, Arizona 85007

Via email: azshpo@azstateparks.gov

Subject: Eleven Mile Solar Center

Dear Ms. Leonard:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar will own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

To support these applications, Eleven Mile Solar sponsored a cultural resource records review and intensive pedestrian survey of the CEC project area to identify any historic sites and structures or archaeological sites in the vicinity of the proposed facilities and to assess the effects the proposed facilities will have on them, as required by Exhibit E of the application for the CECs. The cultural resource studies also support ACC compliance with the State Historic Preservation Act by evaluating whether issuance of the CECs could result in substantial alteration or demolition of any properties listed in or eligible for the Arizona Register of Historic Places (ARHP). I have enclosed a report of the cultural resource studies for your review.

Gen-Tie Project Area and Description

The project substation would occupy approximately 1.5 acres in Eleven Mile Solar and be used exclusively to step up the electrical energy from 34.5 kV to 230 kV. The design of the gen-tie has yet to be completed but would be approximately 0.3 mile long and is likely to require no more than three structures outside the substations. Part of the gen-tie line might be installed underground.

The gen-tie siting area ("Gen-Tie Project Area")includes part of Eleven Mile Solar where the project substation would be located and the area in which alternatives for the gen-tie were considered. The Gen-Tie Project Area encompasses 36.4 acres of privately owned land on the east and west sides of Eleven Mile Corner Road, south of Hackler Lane. The Gen-Tie Project Area east of Eleven Mile Corner Road (27.5 acres) was not surveyed because prior surveys had adequately covered that area. The Gen-Tie Project Area west of Eleven Mile Corner Road (8.9 acres) was surveyed, along with a buffer to the west and south covering an entire field that had been recently plowed (9.9 acres).

Study Results

The review identified four cultural resources in the eastern part of the Gen-Tie Project Area, including three historical in-use structures and an archaeological site. The historical in-use structures include Eleven Mile Corner Road and Sublateral SL 9 of the Casa Grande Canal, which were previously determined to be not eligible for the ARHP. The other historical in-use structure is the Coolidge-Saguaro 115kV transmission line, which has been recommended ineligible. Data recovery excavations were conducted at the Hohokam archaeological site, AZ AA:2:284(ASM), to mitigate the impacts of construction of the Pinal Central Substation, and 44 buried archaeological features were found and documented below the plow zone, including a cemetery with 11 cremation mortuary features and possibly one additional partial cremation. Less than 5 percent of that site overlaps the Gen-Tie Project Area and none of the archaeological features were found in that part of the site. The human remains and funerary objects were recovered and repatriated to the Gila River Indian Community. No further treatment of the site was recommended before the Pinal Central Substation was constructed.

The review identified 10 other historical resources recorded within 1 mile but outside the Gen-Tie Project Area. They include two SCIP canals and State Route 287 that have been determined eligible for the ARHP. Another is an archaeological site of a historic homestead that has been recommended eligible. One historic section line road and other Casa Grande Canal sublaterals have been determined to be not eligible, and another in-use canal maintenance road, an in-use transmission line, abandoned corral, and scatter of historic trash have been recommended not eligible.

The review also identified six Hohokam archaeological sites within 1 mile but outside the Gen-Tie Project Area. One was determined to be ARHP eligible and data recovery excavations conducted to mitigate the impacts of the construction of the Pinal Central Substation determined it was a farmstead with eight pit houses. Three other scatters of Hohokam artifacts have been recommended eligible for the ARHP and two other Hohokam artifact scatters have been recommended not eligible. The ARHP eligibility of one ambiguous undated archaeological site has not been evaluated.

The cultural resource survey conducted west of Eleven Mile Corner Road identified one isolated piece of prehistoric flaked stone in the Gen-Tie Project Area and two isolated historical in-use features (an irrigation field ditch and a dirt road) south of the Gen-Tie Project Area, which are not the type of resources typically considered eligible for the ARHP. Because they have no known historic associations or characteristics worthy of preservation it is recommended that they be considered ineligible for the ARHP.

The gen-tie and project substation would not substantially alter the setting of the ARHP-eligible or recommended eligible historical in-use structures that have been recorded within 1 mile, but outside, the Gen-Tie Project Area. Nor would the gen-tie and project substation affect the potential of any of the archaeological sites recorded within 1 mile of the Gen-Tie Project Area. In summary, the results of the records review and field survey indicate that construction of the gen-tie and project substation would not substantially alter or demolish any properties listed in or eligible for the ARHP and no further consideration of cultural resources is recommended.

Eleven Mile Solar is contacting tribes that have traditional cultural affiliation with the Gen-Tie Project Area to provide information about the project and to provide an opportunity to express concerns they might have. The contacted tribes include the Ak-Chin Indian Community, Gila River Indian Community, Hopi Tribe, Mescalero Apache Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian

Community, Tohono O'odham Nation, Tonto Apache Tribe, White Mountain Apache Tribe, and Yavapai-Apache Nation. We would inform you about a concerns the tribe might have.

Please review the information in this letter and the enclosed report and provided and any comments you have so we can include them in our CEC applications. If you have questions, please contact me at amysh@orsted.com or (458) 600-2031.

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Doug Ducey
Governor

ARIZONA
STATE PARKS & TRAILS

Bob Broscheid
Executive Director

October 26, 2022

Amy Shanahan, Senior Development Manager
Orsted Onshore North America
812 San Antonio St., Suite 500
Austin, TX 78701

RE: Pinal County; Eleven Mile Solar Center; State Historic Preservation Act (SHPA) Review; Continuing Consultation; Arizona Corporation Commission (ACC); SHPO-2021-1322(165825)

Dear Ms. Shanahan:

Thank you for continuing consultation with our office for review of the technical report, *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona* (Kirvan and Rogge 2022). AECOM prepared the report in support of two Certificates of Environmental Compatibility (CECs) to be issued by the ACC for (1) a project substation and western segment of the gen-tie that Eleven Mile Solar will own and (2) the eastern segment that will be owned by the Salt River Project (SRP). The report investigated the gen-tie siting area which includes the area where the project substation and potential gen-tie lines will be located and consists of 36.4 acres of privately owned land. A total of 18.8 acres was surveyed, while the remaining 27.5 acres were previously surveyed. The survey resulted in documentation of a historic ranch road and canal, both recorded as isolated features (IF); one archaeological site, three historic in-use structures, and one isolated occurrence (IO).

SHPO has determined the two IFs and the IO are ineligible for inclusion in the Arizona and National Registers of Historic Places (A/NRHP). According to SHPO records, all three of the historic in-use structures have been previously determined ineligible. No further investigations or treatment is recommended.

The archaeological site, AZ AA:2:284(ASM), was previously determined eligible for inclusion in the A/NRHP under Criterion D, and it was data recovered as mitigation for the Pinal Central Substation, which resulted in the identification of human remains, as well as other features. The report postulates that the project "would not substantially alter or demolish" historic properties listed or eligible for listing in the A/NRHP and recommends no further "consideration of cultural resources. SHPO does not concur. Since human remains have been recovered from AZ AA:2:284(ASM), we recommend the portion of the site within the project area be avoided by ground disturbance. If the site cannot be avoided, archaeological monitoring should be conducted during any ground disturbance within the site boundary or within 100 feet of its boundary. If archaeological monitoring is necessary, please provide our office with a draft of the monitoring and discovery plan for continuing consultation.

We remind you that the views of Indian tribes are based on expertise and information not available and/or possessed by our staff, but are critical to informing on the concerns of Indian tribes, in particular, the identification of traditional cultural properties. The ACC remains responsible for consulting with and considering the views of Indian tribes pursuant to Arizona Revised Statute § 41-2051. We request that you provide our office with a summary of any views conveyed by Indian tribes that are not in agreement with SHPO's response, and in so doing SHPO reserves the right to exercise our responsibility to respond to new information and modify our findings, as necessary.

We appreciate Orsted's cooperation, on behalf of the ACC, in complying with historic preservation requirements for state agencies. Please contact me by telephone at 602.542.7140, or via e-mail at cklebacha@azstateparks.gov, if you have any questions or concerns.

Sincerely,

Mary-Ellen Kelly

for

Caroline Klebacha, M.A.
Archaeological Compliance Specialist
State Historic Preservation Office

October 31, 2022

Ms. Kathryn Leonard
State Historic Preservation Officer
Arizona State Historic Preservation Office
1100 W. Washington Street, Suite 100
Phoenix, Arizona 85007

Attn: Caroline Klebacha

Via email: azshpo@azstateparks.gov

Subject: Eleven Mile Solar Center

Dear Ms. Klebacha:

On October 26, 2022, you sent a letter responding to our letter regarding the 230-kilovolt (kV) transmission generation tie-in line (gen-tie) that Eleven Mile Solar Center, LLC, plans to construct in conjunction with development of the Eleven Mile Solar Center. The gen-tie would connect a project substation to be built within the footprint of the Solar Center on the west side of Eleven Mile Road to the existing Pinal Central Substation on the east side of Eleven Mile Road. The gen-tie is needed to deliver the generated electricity to the regional transmission line grid and would be only about one-quarter mile long.

Your letter acknowledged that archaeological excavations had been conducted at archaeological site AZ AA:2:284(ASM) about a decade ago to mitigate impacts of the construction of the Pinal Central Substation but recommended that the part of the site overlapping the gen-tie siting area be avoided. If avoidance was not possible, you recommended archaeological monitoring be conducted within the site and a surrounding buffer 100 feet wide. In a letter commenting on the planned gen-tie, Barnaby Lewis, the Gila River Indian Community Tribal Historic Preservation Officer, also acknowledged the prior excavations at site AZ AA:2:284(ASM) but similarly recommended archaeological monitoring of construction activities near site AZ AA:2:284(ASM).

We have refined the design of the gen-tie as we work to complete our application for a Certificate of Environmental Compatibility that we will submit to the Arizona Power Plant and Transmission Line Siting Committee of the Arizona Corporation Commission. The attached Figure 1 shows the route we are proposing for the gen-tie. The western part of the gen-tie would be buried to cross beneath Eleven Mile Corner Road and other electrical transmission and distribution lines and the eastern part would be aboveground to connect with the Pinal Central Substation. It is anticipated that only two aboveground structures would be installed to support the overhead part of the gen-tie, including a riser to bring the buried segment of the gen-tie aboveground and another structure to the east where ownership of the generated electricity would be transferred.

Our proposed gen-tie route avoids archaeological site AZ AA:2:284(ASM) by approximately 150 feet at its nearest point to the site boundary (see the attached Figure 2). The prior archaeological investigations found no buried features within the part of the site that overlaps the gen-tie siting area and the closest of the human mortuary features recovered

during prior excavations at the site (Feature 30) is approximately 450 feet from the proposed gen-tie route. If the Arizona Corporation Commission issues a Certificate of Environmental Compatibility for the gen-tie route as proposed, we conclude that the two structures to support the overhead conductors of the gen-tie are far enough from site AZ AA:2:284(ASM) that the structures and conductors can be installed without disturbing ground within 100 feet of the site boundary and would not warrant archaeological monitoring.

Please let me know if you have any concerns about that conclusion. We anticipate the Arizona Corporation Commission will include a condition in a Certificate of Environmental Compatibility stipulating that any inadvertent discovery of archaeological resources during installation of the gen-tie would have to be protected in place while your office and other interested parties are notified and arrangements are made to evaluate and appropriately treat the discovery. If an inadvertent discovery included human remains, we would comply with Arizona Revised Statute 41-865.

For your information, the only other comments we received in response to our consultation letters were from Shane Antone, the Salt River Pima-Maricopa Indian Community Tribal Historic Preservation Officer, who deferred to the Gila River Indian Community as the lead for the Four Southern Tribes in the consultations for the proposed gen-tie, and from Mark Altaha, the Tribal Historic Preservation Officer for the White Mountain Apache Tribe, who indicated the proposed gen-tie would have no adverse effect on any heritage resources or historic properties of the White Mountain Apache Tribe.

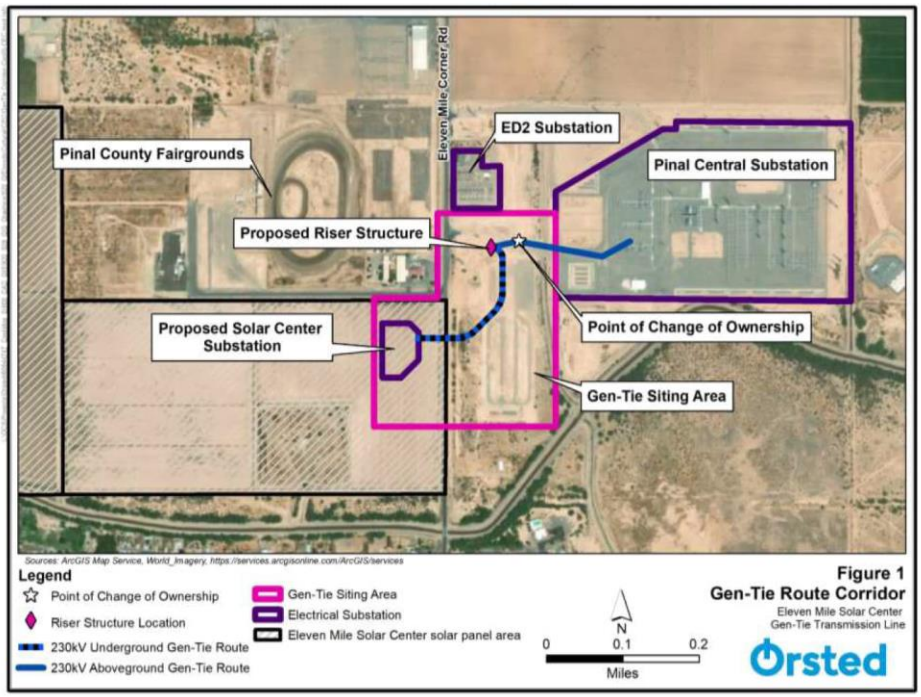
Please contact me if you have additional comments, questions, or would like additional information.

Sincerely,

Amy Shanahan

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosures: Figure 1. Gen-Tie Route Corridor
Figure 2. Archaeological Site AZ AA:2:284(ASM) North of Gen-Tie Route



[redacted]

Figure 2 (confidential information redacted)

Ørsted

October 31, 2022 SHPO-2021-1322 (166375) Rec: 10-31-22

Ms. Kathryn Leonard
State Historic Preservation Officer
Arizona State Historic Preservation Office
1100 W. Washington Street, Suite 100
Phoenix, Arizona 85007

Attn: Caroline Klebacha

Via email: azshpo@azstateparks.gov

Subject: Eleven Mile Solar Center

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Please contact me if you have additional comments, questions, or would like additional information.

Sincerely,

Amy Shanahan

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosures: Figure 1. Gen-Tie Route Corridor
Figure 2. Archaeological Site AZ AA:2:284(ASM) North of Gen-Tie Route

Given the changes cited herein,
SHPO finds there will be no impact to historic properties and no need for an archaeological monitor during ground-disturbing activities.
The presence of a Tribal monitor should be addressed in consultation with the Gila River Indian Community.

Mary-Ellen Dahl 11/8/22

Arizona State Historic Preservation Office

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Ørsted

September 16, 2022

Mr. Robert Miguel
Chairman
Ak-Chin Indian Community
42507 W. Peters and Nall Road
Maricopa, Arizona 85138

Via email: RMiguel@ak-chin.nsn.us

Subject: Eleven Mile Solar Center

Dear Chairman Miguel:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Center will own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

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Study Results

The review identified four cultural resources in the eastern part of the Gen-Tie Project Area, including three historical in-use structures and an archaeological site. The historical in-use structures include Eleven Mile Corner Road and Sublateral SL 9 of the Casa Grande Canal, which were previously determined to be not eligible for the ARHP. The other historical in-use structure is the Coolidge-Saguaro 115kV transmission line, which has been recommended ineligible. Data recovery excavations were conducted at the Hohokam archaeological site, AZ AA:2:284(ASM), to mitigate the impacts of construction of the Pinal Central Substation, and 44 buried archaeological features were found and documented below the plow zone, including a cemetery with 11 cremation mortuary features and possibly one additional partial cremation. Less than 5 percent of that site overlaps the Gen-Tie Project Area and none of the archaeological features were found in that part of the site. The human remains and funerary objects were recovered and repatriated to the Gila River Indian Community. No further treatment of the site was recommended before the Pinal Central Substation was constructed.

The review identified 10 other historical resources recorded within 1 mile but outside the Gen-Tie Project Area. They include two SCIP canals and State Route 287 that have been determined eligible for the ARHP. Another is an archaeological site of a historic homestead that has been recommended eligible. One historic section line road and other Casa Grande Canal sublaterals have been determined to be not eligible, and another in-use canal maintenance road, an in-use transmission line, abandoned corral, and scatter of historic trash have been recommended not eligible.

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The cultural resource survey conducted west of Eleven Mile Corner Road identified one isolated piece of prehistoric flaked stone in the Gen-Tie Project Area and two isolated historical in-use features (an irrigation field ditch and a dirt road) south of the Gen-Tie Project Area, which are not the type of resources typically considered eligible for the ARHP. Because they have no known historic associations or characteristics worthy of preservation it is recommended that they be considered ineligible for the ARHP.

The gen-tie and project substation would not substantially alter the setting of the ARHP-eligible or recommended eligible historical in-use structures that have been recorded within 1 mile, but outside, the Gen-Tie Project Area. Nor would the gen-tie and project substation affect the potential of any of the archaeological sites recorded within 1 mile of the Gen-Tie Project Area. In summary, the results of the records review and field survey indicate that construction of the gen-tie and project substation would not substantially alter or demolish any properties listed in or eligible for the ARHP and no further consideration of cultural resources is recommended.

We are contacting you to provide information about Eleven Mile Solar Gen-Tie Project Area and provide an opportunity for you to express any concerns your community might have about the Gen-Tie Project. We would appreciate any comments you care to offer so we can include them in our CEC applications.

If you have questions, please contact me at amysh@orsted.com or (458) 600-2031.

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

cc: Ms. Elaine Peters, Him-Dak Museum Director, 42507 W. Peters and Nall Road, Maricopa, Arizona 85138, via email: EPeters@ak-chin.nsn.us (w/ enclosure)

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Ørsted

September 16, 2022

Mr. Stephen Roe Lewis
Governor
Gila River Indian Community
P.O. Box 97
Sacaton, Arizona 85147

Via email: executivemail@gric.nsn.us

Subject: Eleven Mile Solar Center

Dear Governor Lewis:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Centerwill own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

To support the application for CECs that we will submit to the Arizona Power Plant and Transmission Line Siting Committee of the ACC, Eleven Mile Solar sponsored a cultural resource records review and intensive pedestrian survey of the CEC project area to identify any historic sites and structures or archaeological sites in the vicinity of the proposed facilities and to assess the effects the proposed facilities will have on them, as required by Exhibit E of the application for the CECs. The cultural resource studies also support ACC compliance with the State Historic Preservation Act by evaluating whether issuance of the CECs could result in substantial alteration or demolition of any properties listed in or eligible for the Arizona Register of Historic Places (ARHP). I have enclosed a report of the cultural resources studies for your review.

Gen-Tie Project Area and Description

The project substation would occupy approximately 1.5 acres in Eleven Mile Solar and be used exclusively to step up the electrical energy from 34.5 kV to 230 kV. The design of the gen-tie has yet to be completed but would be approximately 0.3 mile long and is likely to require no more than three structures outside the substations. Part of the gen-tie line might be installed underground.

The gen-tie siting area ("Gen-Tie Project Area")includes part of Eleven Mile Solar where the project substation would be located and the area in which alternatives for the gen-tie were considered. The Gen-Tie Project Area encompasses 36.4 acres of privately owned land on the east and west sides of Eleven Mile Corner Road, south of Hackler Lane. The Gen-Tie Project Area east of Eleven Mile Corner Road (27.5 acres) was not surveyed because prior surveys had adequately covered that area. The Gen-Tie Project Area west of Eleven Mile Corner Road (8.9 acres) was surveyed, along with a buffer to the west and south covering an entire field that had been recently plowed (9.9 acres).

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Study Results

The review identified four cultural resources in the eastern part of the Gen-Tie Project Area, including three historical in-use structures and an archaeological site. The historical in-use structures include Eleven Mile Corner Road and Sublateral SL 9 of the Casa Grande Canal, which were previously determined to be not eligible for the ARHP. The other historical in-use structure is the Coolidge-Saguaro 115kV transmission line, which has been recommended ineligible. Data recovery excavations were conducted at the Hohokam archaeological site, AZ AA:2:284(ASM), to mitigate the impacts of construction of the Pinal Central Substation, and 44 buried archaeological features were found and documented below the plow zone, including a cemetery with 11 cremation mortuary features and possibly one additional partial cremation. Less than 5 percent of that site overlaps the Gen-Tie Project Area and none of the archaeological features were found in that part of the site. The human remains and funerary objects were recovered and repatriated to the Gila River Indian Community. No further treatment of the site was recommended before the Pinal Central Substation was constructed.

The review identified 10 other historical resources recorded within 1 mile but outside the Gen-Tie Project Area. They include two SCIP canals and State Route 287 that have been determined eligible for the ARHP. Another is an archaeological site of a historic homestead that has been recommended eligible. One historic section line road and other Casa Grande Canal sublaterals have been determined to be not eligible, and another in-use canal maintenance road, an in-use transmission line, abandoned corral, and scatter of historic trash have been recommended not eligible.

The review also identified six Hohokam archaeological sites within 1 mile but outside the Gen-Tie Project Area. One was determined to be ARHP eligible and data recovery excavations conducted to mitigate the impacts of the construction of the Pinal Central Substation determined it was a farmstead with eight pit houses. Three other scatters of Hohokam artifacts have been recommended eligible for the ARHP and two other Hohokam artifact scatters have been recommended not eligible. The ARHP eligibility of one ambiguous undated archaeological site has not been evaluated.

The cultural resource survey conducted west of Eleven Mile Corner Road identified one isolated piece of prehistoric flaked stone in the Gen-Tie Project Area and two isolated historical in-use features (an irrigation field ditch and a dirt road) south of the Gen-Tie Project Area, which are not the type of resources typically considered eligible for the ARHP. Because they have no known historic associations or characteristics worthy of preservation it is recommended that they be considered ineligible for the ARHP.

The gen-tie and project substation would not substantially alter the setting of the ARHP-eligible or recommended eligible historical in-use structures that have been recorded within 1 mile, but outside, the Gen-Tie Project Area. Nor would the gen-tie and project substation affect the potential of any of the archaeological sites recorded within 1 mile of the Gen-Tie Project Area. In summary, the results of the records review and field survey indicate that construction of the gen-tie and project substation would not substantially alter or demolish any properties listed in or eligible for the ARHP and no further consideration of cultural resources is recommended.

We are contacting you to provide information about Eleven Mile Solar Gen-Tie Project Area and provide an opportunity for you to express any concerns your community might have about the Gen-Tie Project. We would appreciate any comments you care to offer so we can include them in our CEC applications.

If you have questions, please contact me at amysh@orsted.com or (458) 600-2031.

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

cc: Mr. Barnaby Lewis, Tribal Historic Preservation Officer, P.O. Box 2193, Sacaton, Arizona 85147, via email: Barnaby.lewis@gric.nsn.us (w/ enclosure)

Mr. Larry Benallie, Jr., Archaeological Compliance Specialist, P.O. Box 2193, Sacaton, Arizona 85147, via email: Larry.BenallieJr@gric.nsn.us (w/ enclosure)

Dr. Kyle Woodson, Director, Cultural Resource Management Program, P.O. Box 2193, Sacaton, Arizona 85147, via email: kyle.woodson@gric.nsn.us (w/ enclosure)

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

GILA RIVER INDIAN COMMUNITY
POST OFFICE BOX 2193, SACATON, AZ 85147

TRIBAL HISTORIC PRESERVATION OFFICE

(520) 562-7162
Fax: (520) 562-5083

September 30, 2022

Amy Shanahan
Senior Development Manager
Ørsted Onshore North America
812 San Antonio Street, Suite 500
Austin, Texas 78701

RE: Ørsted Onshore North America, Eleven Mile Solar Center, Coolidge, Pinal County, Arizona

Dear Manager Shanahan,

The Gila River Indian Community Tribal Historic Preservation Office (GRIC-THPO) has received your consultation documents dated September 16, 2022. The Eleven Mile Solar Center, LLC, a subsidiary of Ørsted North America Onshore, LLC plans to construct a 300-megawatt solar generation facility at Eleven Mile Corner, Pinal County, Arizona.

The project area has been archaeologically surveyed and identified four archaeological sites\historic properties within the east portion of the project area and two in-use historic features within the west portion of the project area: 1) Eleven Mile Corner Road which is considered not Register eligible; 2) Sub-lateral SL 9 canal which is associated with the Casa Grande Canal. The sub-lateral canal is not Register eligible and Casa Grande Canal will not be affected by this undertaking; 3) the Coolidge-Saguaro 115 kV transmission line which is not a Register eligible property; 4) AZ AA:2:284(ASM) is identified as a Hohokam habitation which was subject to archaeological data recovery in 2013. AZ AA:2:284(ASM) is considered a Register eligible property which will not be affected by this undertaking. Ancestral human remains were recovered during the excavations and the Ancestors have been repatriated to the Gila River Indian Community; 5) Irrigation field ditch which is not considered Register eligible; and 6) unnamed dirt road which is not considered a Register eligible property. The Eleven Mile Solar Center, LLC has not provided a formal finding of project effect. They advise that no Register eligible historic properties and no Arizona Register of Historic Places eligible properties will be affected by this undertaking.

The GRIC-THPO recommends that a finding of no adverse impacts/no adverse effect is appropriate for this undertaking. We do disagree with the statement that no further consideration of cultural resources is recommended. The presence of AZ AA:2:284(ASM) on the edge of the project area justifies consideration of archaeological site monitoring during ground disturbing activities near the site. Please feel free to contact our office to discuss archaeological site monitoring. The GRIC-THPO will continue to participate in the consultation process for this

undertaking. The proposed project area is within the ancestral lands of the Four Southern Tribes (Gila River Indian Community; Salt River Pima-Maricopa Indian Community; Ak-Chin Indian Community and the Tohono O'Odham Nation).

Thank you for consulting with the GRIC-THPO on this project. If you have any questions please do not hesitate to contact me or Archaeological Compliance Specialist Larry Benallie, Jr. at 520-562-7162.

Respectfully,

Barnaby V. Lewis
Tribal Historic Preservation Officer
Gila River Indian Community

October 31, 2022

Mr. Barnaby Lewis
Tribal Historic Preservation Officer
Gila River Indian Community
P.O. Box 2193
Sacaton, Arizona 85147

Via email: barnaby.lewis@gric.nsn.us

Subject: Eleven Mile Solar Center

Dear Mr. Lewis:

On September 30, 2022, you sent a letter responding to our letter regarding the 230-kilovolt (kV) transmission generation tie-in line (gen-tie) that Eleven Mile Solar Center, LLC, plans to construct in conjunction with development of the Eleven Mile Solar Center. The gen-tie would connect a project substation to be built within the footprint of the Solar Center on the west side of Eleven Mile Road to the existing Pinal Central Substation on the east side of Eleven Mile Road. The gen-tie is needed to deliver the generated electricity to the regional transmission line grid and would be only about one-quarter mile long.

Your letter indicated that your review indicated the proposed gen-tie would result in no adverse impacts on cultural resources, but you recommended archaeological monitoring of any construction activities near archaeological site AZ AA:2:284(ASM), where archaeological data recovery excavations had been conducted about a decade ago to mitigate impacts of the construction of the Pinal Central Substation. In a letter commenting on the planned gen-tie, the State Historic Preservation Office also acknowledged that prior excavations had been conducted at site AZ AA:2:284(ASM) but similarly recommended archaeological monitoring of any construction activities within 100 feet of the boundary of site AZ AA:2:284(ASM).

We have refined the design of the gen-tie as we work to complete our application for a Certificate of Environmental Compatibility that we will submit to the Arizona Power Plant and Transmission Line Siting Committee of the Arizona Corporation Commission. The attached Figure 1 shows the route we are proposing for the gen-tie. The western part of the gen-tie would be buried to cross beneath Eleven Mile Corner Road and other electrical transmission and distribution lines and the eastern part would be aboveground to connect with the Pinal Central Substation. It is anticipated that only two aboveground structures would be installed to support the overhead part of the gen-tie, including a riser to bring the buried segment of the gen-tie aboveground and another structure to the east where ownership of the generated electricity would be transferred.

Our proposed gen-tie route avoids archaeological site AZ AA:2:284(ASM) by approximately 150 feet at its nearest point to the site boundary (see the attached Figure 2). The prior archaeological investigations found no buried features within the part of the site that overlaps the gen-tie siting area and the closest of the human mortuary features recovered during prior excavations at the site (Feature 30) is approximately 450 feet from the proposed gen-tie route. If the Arizona Corporation Commission issues a Certificate of

Environmental Compatibility for the gen-tie route as proposed, we conclude that the two structures to support the overhead conductors of the gen-tie are far enough from site AZ AA:2:284(ASM) that the structures and conductors can be installed without disturbing ground within 100 feet of the site boundary and would not warrant archaeological monitoring.

Please let me know if you have any concerns about that conclusion. We anticipate the Arizona Corporation Commission will include a condition in a Certificate of Environmental Compatibility stipulating that any inadvertent discovery of archaeological resources during installation of the gen-tie would have to be protected in place while the State Historic Preservation Office and other interested parties are notified and arrangements are made to evaluate and appropriately treat the discovery. If an inadvertent discovery included human remains, we would comply with Arizona Revised Statute 41-865.

As you requested, we are providing this information to your archaeological compliance specialist Larry Benallie, Jr., by copy of this letter. We are also providing a copy of this letter to Shane Antone, the Salt River Pima-Maricopa Indian Community Tribal Historic Preservation Officer, who deferred to the Gila River Indian Community as the lead for the Four Southern Tribes in the consultations for the proposed gen-tie, but asked for information about any updates to the project.

If you have questions, please contact me.

Sincerely,

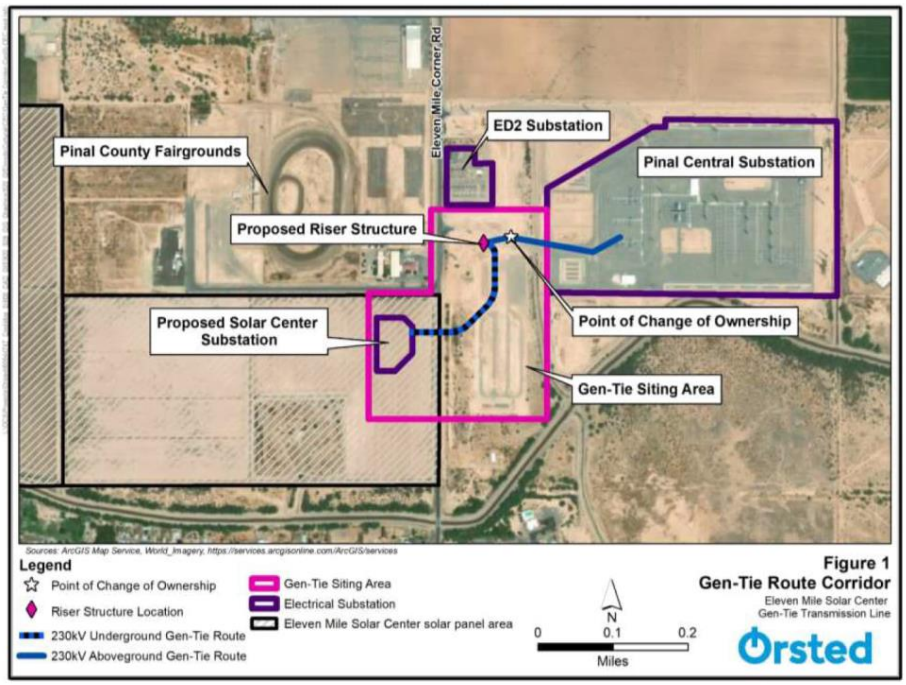
Amy Shanahan

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosures: Figure 1, Gen-Tie Route Corridor
Figure 2, Archaeological Site AZ AA:2:284(ASM) North of Gen-Tie Route

cc: Mr. Larry Benallie, Jr., Archaeological Compliance Specialist, P.O. Box 2193, Sacaton, Arizona 85147, via email: Larry.BenallieJr@gric.nsn.us (w/ enclosures)

Mr. Shane Anton, Tribal Historic Preservation Officer, Salt River Pima-Maricopa Indian Community, 10005 E. Osborn Road, Scottsdale, Arizona 85256, via email: Shane.Anton@srpmic-nsn.gov (w/ enclosures)



[redacted]

Figure 2 (confidential information redacted)

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September 16, 2022

Mr. Stewart Koyiyumptewa
Tribal Historic Preservation Officer
Hopi Tribe
P.O. Box 123
Kykotsmovi, Arizona 86039

Via email: SKoyiyumptewa@hopi.nsn.us

Subject: Eleven Mile Solar Center

Dear Mr. Koyiyumptewa:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Centerwill own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

To support the application for CECs that we will submit to the Arizona Power Plant and Transmission Line Siting Committee of the ACC, Eleven Mile Solar sponsored a cultural resource records review and intensive pedestrian survey of the CEC project area to identify any historic sites and structures or archaeological sites in the vicinity of the proposed facilities and to assess the effects the proposed facilities will have on them, as required by Exhibit E of the application for the CECs. The cultural resource studies also support ACC compliance with the State Historic Preservation Act by evaluating whether issuance of the CECs could result in substantial alteration or demolition of any properties listed in or eligible for the Arizona Register of Historic Places (ARHP). I have enclosed a report of the cultural resources studies for your review.

Gen-Tie Project Area and Description

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The gen-tie siting area ("Gen-Tie Project Area")includes part of Eleven Mile Solar where the project substation would be located and the area in which alternatives for the gen-tie were considered. The Gen-Tie Project Area encompasses 36.4 acres of privately owned land on the east and west sides of Eleven Mile Corner Road, south of Hackler Lane. The Gen-Tie Project Area east of Eleven Mile Corner Road (27.5 acres) was not surveyed because prior surveys had adequately covered that area. The Gen-Tie Project Area west of Eleven Mile Corner Road (8.9 acres) was surveyed, along with a buffer to the west and south covering an entire field that had been recently plowed (9.9 acres).

Study Results

The review identified four cultural resources in the eastern part of the Gen-Tie Project Area, including three historical in-use structures and an archaeological site. The historical in-use structures include Eleven Mile Corner Road and Sublateral SL 9 of the Casa Grande Canal, which were previously determined to be not eligible for the ARHP. The other historical in-use structure is the Coolidge-Saguaro 115kV transmission line, which has been recommended ineligible. Data recovery excavations were conducted at the Hohokam archaeological site, AZ AA:2:284(ASM), to mitigate the impacts of construction of the Pinal Central Substation, and 44 buried archaeological features were found and documented below the plow zone, including a cemetery with 11 cremation mortuary features and possibly one additional partial cremation. Less than 5 percent of that site overlaps the Gen-Tie Project Area and none of the archaeological features were found in that part of the site. The human remains and funerary objects were recovered and repatriated to the Gila River Indian Community. No further treatment of the site was recommended before the Pinal Central Substation was constructed.

The review identified 10 other historical resources recorded within 1 mile but outside the Gen-Tie Project Area. They include two SCIP canals and State Route 287 that have been determined eligible for the ARHP. Another is an archaeological site of a historic homestead that has been recommended eligible. One historic section line road and other Casa Grande Canal sublaterals have been determined to be not eligible, and another in-use canal maintenance road, an in-use transmission line, abandoned corral, and scatter of historic trash have been recommended not eligible.

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The gen-tie and project substation would not substantially alter the setting of the ARHP-eligible or recommended eligible historical in-use structures that have been recorded within 1 mile, but outside, the Gen-Tie Project Area. Nor would the gen-tie and project substation affect the potential of any of the archaeological sites recorded within 1 mile of the Gen-Tie Project Area. In summary, the results of the records review and field survey indicate that construction of the gen-tie and project substation would not substantially alter or demolish any properties listed in or eligible for the ARHP and no further consideration of cultural resources is recommended.

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Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

cc: Mr. Jakob Maase, HCPO Staff Archaeologist II, 5205 E. Cortland Boulevard, Apt. 125, Flagstaff, Arizona 86004, via email: jmaase1@k-state.edu (w/ enclosure)

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Ørsted

September 16, 2022

Mr. Gabe Aguilar
President
Mescalero Apache Tribe
P.O. Box 227
Mescalero, New Mexico 88340

Via email: gaguilar@mescaleroapachetribe.com

Subject: Eleven Mile Solar Center

Dear President Aguilar:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Center will own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

To support the application for CECs that we will submit to the Arizona Power Plant and Transmission Line Siting Committee of the ACC, Eleven Mile Solar sponsored a cultural resource records review and intensive pedestrian survey of the CEC project area to identify any historic sites and structures or archaeological sites in the vicinity of the proposed facilities and to assess the effects the proposed facilities will have on them, as required by Exhibit E of the application for the CECs. The cultural resource studies also support ACC compliance with the State Historic Preservation Act by evaluating whether issuance of the CECs could result in substantial alteration or demolition of any properties listed in or eligible for the Arizona Register of Historic Places (ARHP). I have enclosed a report of the cultural resources studies for your review.

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The gen-tie siting area ("Gen-Tie Project Area")includes part of Eleven Mile Solar where the project substation would be located and the area in which alternatives for the gen-tie were considered. The Gen-Tie Project Area encompasses 36.4 acres of privately owned land on the east and west sides of Eleven Mile Corner Road, south of Hackler Lane. The Gen-Tie Project Area east of Eleven Mile Corner Road (27.5 acres) was not surveyed because prior surveys had adequately covered that area. The Gen-Tie Project Area west of Eleven Mile Corner Road (8.9 acres) was surveyed, along with a buffer to the west and south covering an entire field that had been recently plowed (9.9 acres).

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Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

cc: Ms. Holly Houghton, Tribal Historic Preservation Officer, P.O. Box 227, Mescalero, New Mexico 88340, via email: holly@mathpo.org (w/ enclosure)

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Ørsted

September 16, 2022

Mr. Peter Yucupicio
Chairman
Pascua Yaqui Tribe
7474 S. Camino de Oeste
Tucson, Arizona 85746

Via email: Peter.S.Yucupicio@pascuayaqui-nsn.gov

Subject: Eleven Mile Solar Center

Dear Chairman Yucupicio:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Centerwill own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

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Study Results

The review identified four cultural resources in the eastern part of the Gen-Tie Project Area, including three historical in-use structures and an archaeological site. The historical in-use structures include Eleven Mile Corner Road and Sublateral SL 9 of the Casa Grande Canal, which were previously determined to be not eligible for the ARHP. The other historical in-use structure is the Coolidge-Saguaro 115kV transmission line, which has been recommended ineligible. Data recovery excavations were conducted at the Hohokam archaeological site, AZ AA:2:284(ASM), to mitigate the impacts of construction of the Pinal Central Substation, and 44 buried archaeological features were found and documented below the plow zone, including a cemetery with 11 cremation mortuary features and possibly one additional partial cremation. Less than 5 percent of that site overlaps the Gen-Tie Project Area and none of the archaeological features were found in that part of the site. The human remains and funerary objects were recovered and repatriated to the Gila River Indian Community. No further treatment of the site was recommended before the Pinal Central Substation was constructed.

The review identified 10 other historical resources recorded within 1 mile but outside the Gen-Tie Project Area. They include two SCIP canals and State Route 287 that have been determined eligible for the ARHP. Another is an archaeological site of a historic homestead that has been recommended eligible. One historic section line road and other Casa Grande Canal sublaterals have been determined to be not eligible, and another in-use canal maintenance road, an in-use transmission line, abandoned corral, and scatter of historic trash have been recommended not eligible.

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The cultural resource survey conducted west of Eleven Mile Corner Road identified one isolated piece of prehistoric flaked stone in the Gen-Tie Project Area and two isolated historical in-use features (an irrigation field ditch and a dirt road) south of the Gen-Tie Project Area, which are not the type of resources typically considered eligible for the ARHP. Because they have no known historic associations or characteristics worthy of preservation it is recommended that they be considered ineligible for the ARHP.

The gen-tie and project substation would not substantially alter the setting of the ARHP-eligible or recommended eligible historical in-use structures that have been recorded within 1 mile, but outside, the Gen-Tie Project Area. Nor would the gen-tie and project substation affect the potential of any of the archaeological sites recorded within 1 mile of the Gen-Tie Project Area. In summary, the results of the records review and field survey indicate that construction of the gen-tie and project substation would not substantially alter or demolish any properties listed in or eligible for the ARHP and no further consideration of cultural resources is recommended.

We are contacting you to provide information about Eleven Mile Solar Gen-Tie Project Area and provide an opportunity for you to express any concerns your community might have about the Gen-Tie Project. We would appreciate any comments you care to offer so we can include them in our CEC applications.

If you have questions, please contact me at amysh@orsted.com or (458) 600-2031.

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

cc: Dr. Karl A. Hoerig, Tribal Historic Preservation Officer, 7777 S. Camino Huivisim, Building C, Tucson, Arizona 85757, via email: Karl.Hoerig@pascuayaqui-nsn.gov (w/ enclosure)

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

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September 16, 2022

Mr. Martin Harvier
President
Salt River Pima-Maricopa Indian Community
Route 1, Box 216
Scottsdale, Arizona 85256

Via email: martin.harvier@srpmic-nsn.gov

Subject: Eleven Mile Solar Center

Dear President Harvier:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Center will own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

To support the application for CECs that we will submit to the Arizona Power Plant and Transmission Line Siting Committee of the ACC, Eleven Mile Solar sponsored a cultural resource records review and intensive pedestrian survey of the CEC project area to identify any historic sites and structures or archaeological sites in the vicinity of the proposed facilities and to assess the effects the proposed facilities will have on them, as required by Exhibit E of the application for the CECs. The cultural resource studies also support ACC compliance with the State Historic Preservation Act by evaluating whether issuance of the CECs could result in substantial alteration or demolition of any properties listed in or eligible for the Arizona Register of Historic Places (ARHP). I have enclosed a report of the cultural resources studies for your review.

Gen-Tie Project Area and Description

The project substation would occupy approximately 1.5 acres in Eleven Mile Solar and be used exclusively to step up the electrical energy from 34.5 kV to 230 kV. The design of the gen-tie has yet to be completed but would be approximately 0.3 mile long and is likely to require no more than three structures outside the substations. Part of the gen-tie line might be installed underground.

The gen-tie siting area ("Gen-Tie Project Area")includes part of Eleven Mile Solar where the project substation would be located and the area in which alternatives for the gen-tie were considered. The Gen-Tie Project Area encompasses 36.4 acres of privately owned land on the east and west sides of Eleven Mile Corner Road, south of Hackler Lane. The Gen-Tie Project Area east of Eleven Mile Corner Road (27.5 acres) was not surveyed because prior surveys had adequately covered that area. The Gen-Tie Project Area west of Eleven Mile Corner Road (8.9 acres) was surveyed, along with a buffer to the west and south covering an entire field that had been recently plowed (9.9 acres).

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If you have questions, please contact me at amysh@orsted.com or (458) 600-2031.

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

cc: Mr. Shane Anton, Tribal Historic Preservation Officer, 10005 E. Osborn Road, Scottsdale, Arizona 85256, via email: Shane.Anton@srpmic-nsn.gov (w/ enclosure)

Ms. Angela Garcia-Lewis, Cultural Preservation Compliance Supervisor, 10005 E. Osborn Road, Scottsdale, Arizona 85256, via email: angela.garcia-lewis@srpmic-nsn.gov (w/ enclosure)

Ms. Martha Martinez, NAGPRA Coordinator, 10005 E. Osborn Road, Scottsdale, Arizona 85256, via email: Martha.martinez@srpmic-nsn.gov (w/ enclosure)

Ms. Sunday Eiselt, THPO Archaeologist, 10005 E. Osborn Road, Scottsdale, Arizona 85256, via email: Berniece.Eiselt@srpmic-nsn.gov (w/ enclosure)

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

RE: Eleven Mile Solar Center

ES

Eiselt, Sunday <Sunday.Eiselt@srpmic-nsn.gov>

To Johnson, Kirsten

Cc Anton, Shane; Garcia-Lewis, Angela; Martinez, Martha; Amy Shanahan; Donnie (DJ) Worth; Larry Benallie Jr; Barnaby Lewis; Reylynne Williams

Reply | Reply All | Forward | ...

Thu 9/22/2022 12:26 PM

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Report Suspicious

Eleven Mile Solar Center

Thank you for the information and update on the Eleven Mile Solar Center project. The proposed Center is located south of the Gila-Salt River baseline Meridian (Baseline Road, Phoenix, AZ) The SRPMIC-THPO wishes to continue receiving information and updates on this project, but defers to the Gila River Indian Community as lead in the consultation process.

Thank you for contacting the SRPMIC-THPO on this undertaking. Please do not hesitate to contact us if you should have any questions.

Respectfully,

Shane Anton, Tribal Historic Preservation Officer
Cultural Resources Department, SRPMIC
10,005 E. Osborn Rd.
Scottsdale, Arizona 85256
Email: Shane.Anton@SRPMIC-nsn.gov
Office Tele: (480) 362-6331

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September 16, 2022

Mr. Calvin Johnson
Chairman
Tonto Apache Tribe
Tonto Apache Reservation #30
Payson, Arizona 85541

Via email: cjohnson@tontoapache.org

Subject: Eleven Mile Solar Center

Dear Chairman Johnson:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Center will own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

To support the application for CECs that we will submit to the Arizona Power Plant and Transmission Line Siting Committee of the ACC, Eleven Mile Solar sponsored a cultural resource records review and intensive pedestrian survey of the CEC project area to identify any historic sites and structures or archaeological sites in the vicinity of the proposed facilities and to assess the effects the proposed facilities will have on them, as required by Exhibit E of the application for the CECs. The cultural resource studies also support ACC compliance with the State Historic Preservation Act by evaluating whether issuance of the CECs could result in substantial alteration or demolition of any properties listed in or eligible for the Arizona Register of Historic Places (ARHP). I have enclosed a report of the cultural resources studies for your review.

Gen-Tie Project Area and Description

The project substation would occupy approximately 1.5 acres in Eleven Mile Solar and be used exclusively to step up the electrical energy from 34.5 kV to 230 kV. The design of the gen-tie has yet to be completed but would be approximately 0.3 mile long and is likely to require no more than three structures outside the substations. Part of the gen-tie line might be installed underground.

The gen-tie siting area ("Gen-Tie Project Area")includes part of Eleven Mile Solar where the project substation would be located and the area in which alternatives for the gen-tie were considered. The Gen-Tie Project Area encompasses 36.4 acres of privately owned land on the east and west sides of Eleven Mile Corner Road, south of Hackler Lane. The Gen-Tie Project Area east of Eleven Mile Corner Road (27.5 acres) was not surveyed because prior surveys had adequately covered that area. The Gen-Tie Project Area west of Eleven Mile Corner Road (8.9 acres) was surveyed, along with a buffer to the west and south covering an entire field that had been recently plowed (9.9 acres).

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Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

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September 16, 2022

Mr. Peter Steere, Tribal Historic Preservation Officer
Mr. Jefford Francisco, Cultural Resource Specialist
Cultural Affairs Office
Tohono O'odham Nation
P.O. Box 837
Sells, Arizona 85634

Via email: peter.steere@tonation-nsn.gov; jefford.fransicso@tonation-nsn.gov

Subject: Eleven Mile Solar Center

Dear Messrs. Steere and Francisco:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Center will own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

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Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 13:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

cc: Ms. Wavalene Saunders, Vice Chairwoman, P.O. Box 837, Sells, Arizona 85634, via email: wavalene.saunders@tonation-nsn.gov (w/ enclosure)

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

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September 16, 2022

Mr. Kasey Velasquez
Chair
White Mountain Apache Tribe
P.O. Box 700
Whiteriver, Arizona 85941

Via email: kasey.velasquez@wmat.us

Subject: Eleven Mile Solar Center

Dear Chairman Velasquez:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Center will own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

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Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

cc: Mr. Mark Altaha, Tribal Historic Preservation Officer, P.O. Box 1032, Fort Apache, Arizona 85926, via email: markaltaha@wmat.us (w/ enclosure)

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

White Mountain Apache Tribe

Office of Historic Preservation
PO Box 1032
Fort Apache, AZ 85926
Ph: (928) 338-3033 Fax: (928) 338-6055

To: Amy Shanahan, Senior Development Manager – Orsted North American Onshore

Date: September 19, 2022

Re: *Proposed Eleven Mile Solar Center construction of Solar Generation Facility*

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; September 16, 2022. 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 construction of a 300-magwatt solar generation facility in Pinal County.

Please be advised, we reviewed the consultation letter and the information provided, and we've determined the proposed project plans will have ***"No Adverse Effect"*** on the tribe's cultural heritage resources and/or historic properties. We concur with the project report and recommendations.

Thank you for your continued collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark T. Altaha

White Mountain Apache Tribe – THPO
Historic Preservation Office

Ørsted

September 16, 2022

Mr. Chris Coder
Tribal Archaeologist
Yavapai-Apache Nation
2400 W. Datsi Street
Camp Verde, AZ 86322

Via email: ccoder@yan-tribe.org; ccinkachinaland@gmail.com

Subject: Eleven Mile Solar Center

Dear Mr. Coder:

Eleven Mile Solar Center, LLC ("Eleven Mile Solar"), a wholly owned subsidiary of Ørsted North America Onshore, LLC. plans to construct a 300-megawatt solar generation facility in Pinal County. The project will include a 230-kilovolt (kV) transmission generation tie-in line (gen-tie) and an associated project substation to deliver electrical energy to the regional electric transmission grid by connecting to the Pinal Central Substation that is operated by the Salt River Project (SRP). The gen-tie will require two Certificates of Environmental Compatibility (CECs) from the Arizona Corporation Committee (ACC)—one for the project substation and western segment of the gen-tie that Eleven Mile Solar Center will own and one for the part of the gen-tie that SRP will own, east of the point where ownership of the electrical energy is transferred to SRP.

To support the application for CECs that we will submit to the Arizona Power Plant and Transmission Line Siting Committee of the ACC, Eleven Mile Solar sponsored a cultural resource records review and intensive pedestrian survey of the CEC project area to identify any historic sites and structures or archaeological sites in the vicinity of the proposed facilities and to assess the effects the proposed facilities will have on them, as required by Exhibit E of the application for the CECs. The cultural resource studies also support ACC compliance with the State Historic Preservation Act by evaluating whether issuance of the CECs could result in substantial alteration or demolition of any properties listed in or eligible for the Arizona Register of Historic Places (ARHP). I have enclosed a report of the cultural resources studies for your review.

Gen-Tie Project Area and Description

The project substation would occupy approximately 1.5 acres in Eleven Mile Solar and be used exclusively to step up the electrical energy from 34.5 kV to 230 kV. The design of the gen-tie has yet to be completed but would be approximately 0.3 mile long and is likely to require no more than three structures outside the substations. Part of the gen-tie line might be installed underground.

The gen-tie siting area ("Gen-Tie Project Area")includes part of Eleven Mile Solar where the project substation would be located and the area in which alternatives for the gen-tie were considered. The Gen-Tie Project Area encompasses 36.4 acres of privately owned land on the east and west sides of Eleven Mile Corner Road, south of Hackler Lane. The Gen-Tie Project Area east of Eleven Mile Corner Road (27.5 acres) was not surveyed because prior surveys had adequately covered that area. The Gen-Tie Project Area west of Eleven Mile Corner Road (8.9 acres) was surveyed, along with a buffer to the west and south covering an entire field that had been recently plowed (9.9 acres).

Study Results

The review identified four cultural resources in the eastern part of the Gen-Tie Project Area, including three historical in-use structures and an archaeological site. The historical in-use structures include Eleven Mile Corner Road and Sublateral SL 9 of the Casa Grande Canal, which were previously determined to be not eligible for the ARHP. The other historical in-use structure is the Coolidge-Saguaro 115kV transmission line, which has been recommended ineligible. Data recovery excavations were conducted at the Hohokam archaeological site, AZ AA:2:284(ASM), to mitigate the impacts of construction of the Pinal Central Substation, and 44 buried archaeological features were found and documented below the plow zone, including a cemetery with 11 cremation mortuary features and possibly one additional partial cremation. Less than 5 percent of that site overlaps the Gen-Tie Project Area and none of the archaeological features were found in that part of the site. The human remains and funerary objects were recovered and repatriated to the Gila River Indian Community. No further treatment of the site was recommended before the Pinal Central Substation was constructed.

The review identified 10 other historical resources recorded within 1 mile but outside the Gen-Tie Project Area. They include two SCIP canals and State Route 287 that have been determined eligible for the ARHP. Another is an archaeological site of a historic homestead that has been recommended eligible. One historic section line road and other Casa Grande Canal sublaterals have been determined to be not eligible, and another in-use canal maintenance road, an in-use transmission line, abandoned corral, and scatter of historic trash have been recommended not eligible.

The review also identified six Hohokam archaeological sites within 1 mile but outside the Gen-Tie Project Area. One was determined to be ARHP eligible and data recovery excavations conducted to mitigate the impacts of the construction of the Pinal Central Substation determined it was a farmstead with eight pit houses. Three other scatters of Hohokam artifacts have been recommended eligible for the ARHP and two other Hohokam artifact scatters have been recommended not eligible. The ARHP eligibility of one ambiguous undated archaeological site has not been evaluated.

The cultural resource survey conducted west of Eleven Mile Corner Road identified one isolated piece of prehistoric flaked stone in the Gen-Tie Project Area and two isolated historical in-use features (an irrigation field ditch and a dirt road) south of the Gen-Tie Project Area, which are not the type of resources typically considered eligible for the ARHP. Because they have no known historic associations or characteristics worthy of preservation it is recommended that they be considered ineligible for the ARHP.

The gen-tie and project substation would not substantially alter the setting of the ARHP-eligible or recommended eligible historical in-use structures that have been recorded within 1 mile, but outside, the Gen-Tie Project Area. Nor would the gen-tie and project substation affect the potential of any of the archaeological sites recorded within 1 mile of the Gen-Tie Project Area. In summary, the results of the records review and field survey indicate that construction of the gen-tie and project substation would not substantially alter or demolish any properties listed in or eligible for the ARHP and no further consideration of cultural resources is recommended.

We are contacting you to provide information about Eleven Mile Solar Gen-Tie Project Area and provide an opportunity for you to express any concerns your community might have about the Gen-Tie Project. We would appreciate any comments you care to offer so we can include them in our CEC applications.

If you have questions, please contact me at amysh@orsted.com or (458) 600-2031.

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

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Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Ørsted

September 16, 2022

Mr. Val R. Panteah
Governor
Pueblo of Zuni
P.O. Box 339
Zuni, New Mexico 87327

Via email: val.panteah@ashiwi.org

Subject: Eleven Mile Solar Center

Dear Governor Panteah:

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If you have questions, please contact me at amysh@orsted.com or (458) 600-2031.

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Sincerely,

Amy Shanahan
Amy Shanahan (Sep 16, 2022 12:17 PDT)

Amy Shanahan
Senior Development Manager
(458) 600-2031
amysh@orsted.com

Enclosure: Report titled *Cultural Resource Assessment and Survey for the Eleven Mile Solar Center Generation Tie-Line and Substation, Pinal County, Arizona.*

cc: Mr. Kurt Dongoske, Tribal Historic Preservation Officer, P.O. Box 1149, Zuni, New Mexico 87327, via email: kdongoske@gmail.com (w/ enclosure)

Ørsted Onshore North America 812 San Antonio St, Ste 500 Austin, TX 78701 USA

Exhibit J-12. ACC CEC Hearing Sign and Sign Location Map

NOTICE OF PUBLIC HEARING

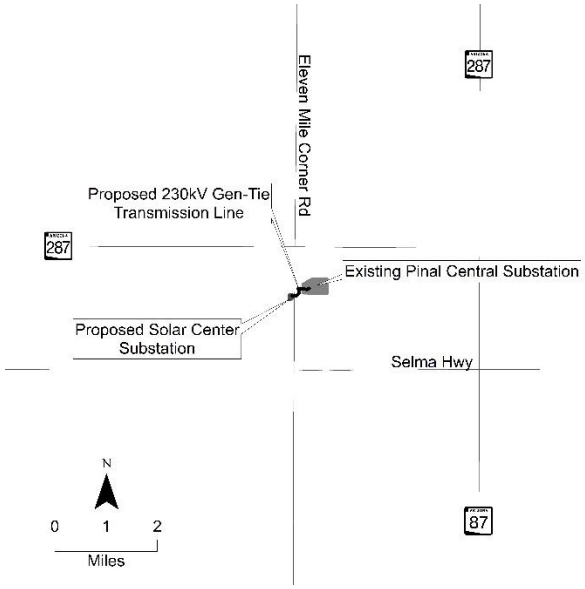
Eleven Mile Solar Gen-Tie Line Certificate of Environmental Compliance

ØRSTED INVITES THE PUBLIC TO AN UPCOMING HEARING BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

DATE	TIME	LOCATION
January 17, 2023	1 PM	Radisson Hotel Casa Grande
January 18-20, 2023	9 AM – 5 PM	777 N. Pinal Avenue, Casa Grande, Arizona 85122

PUBLIC COMMENTS WILL BE ACCEPTED DURING THE HEARING ON JULY 17, 2023, BEGINNING AT 5:30 PM. COMMENTS WILL BE TAKEN IN PERSON AND VIRTUALLY AND AT RADISSON HOTEL IN CASA GRADE, ARIZONA

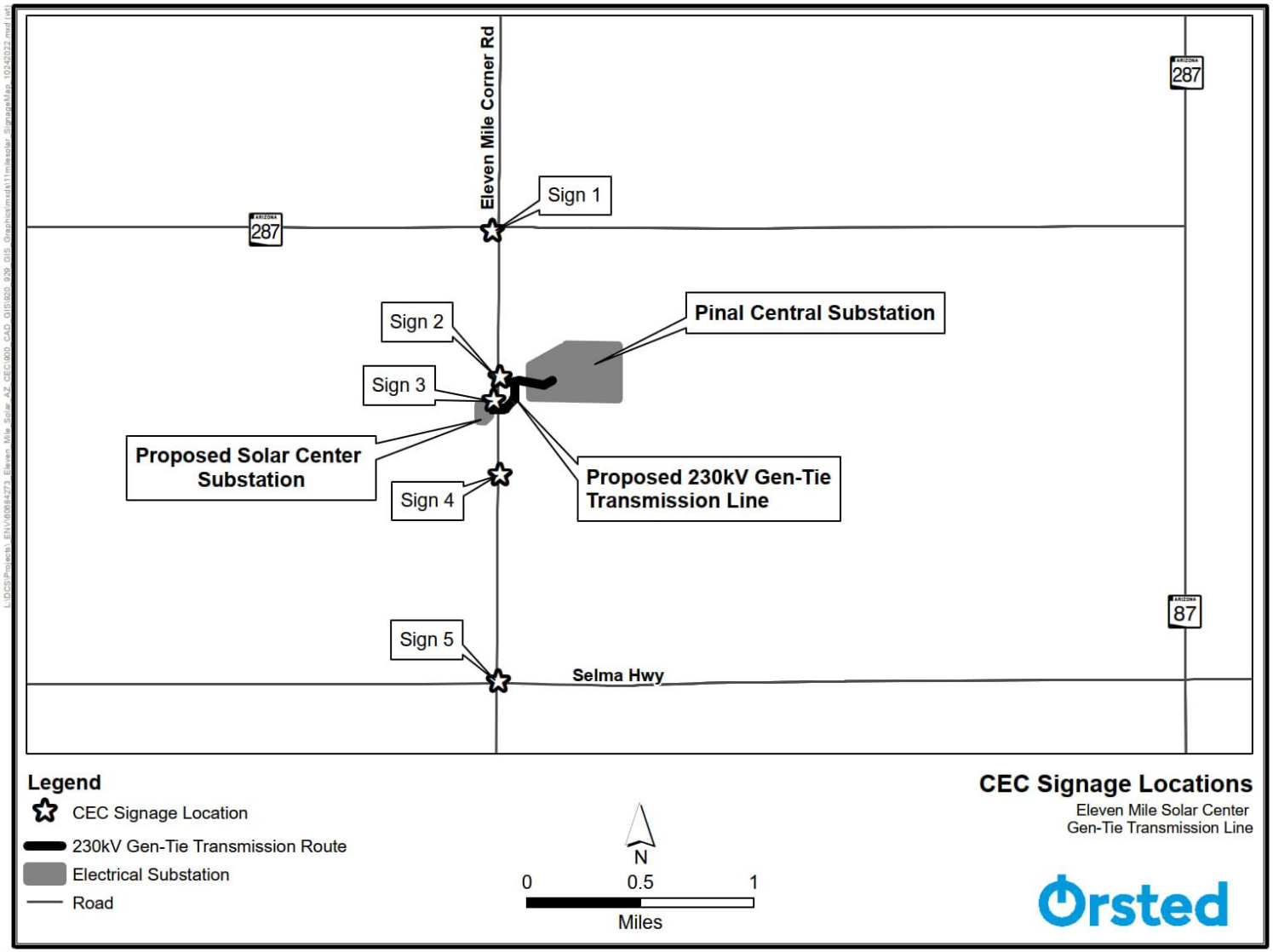
PLEASE VISIT WWW.TRANSMISSIONELEVENMILE.COM AND CLICK ON THE ZOOM LINK PROVIDED



FOR MORE INFORMATION OR TO PROVIDE A COMMENT PRIOR TO HEARING CALL 458.600.2031 OR VISIT: WWW.TRANSMISSIONELEVENMILE.COM

ARIZONA CORPORATION COMMISSION DOCKET NUMBERS

L-00000D-XX-XXXX


Eleven Mile Corner Rd
287
Sign 1
287
Sign 2
Pinal Central Substation
Sign 3
Proposed Solar Center Substation
Sign 4
Proposed 230kV Gen-Tie Transmission Line
87
Sign 5
Selma Hwy
Legend
CEC Signage Location
230kV Gen-Tie Transmission Route
Electrical Substation
Road
N
0
0.5
1
Miles
CEC Signage Locations
Eleven Mile Solar Center
Gen-Tie Transmission Line
Ørsted