



March 28, 2024

Jose A. Macias  
El Mirage Senior Planner  
Development Services - Planning & Zoning  
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Re: Site Plan Application SPA24-02-01 PHX 82 Undergrounding Exemption Request

Dear Mr. Macias,

The Microsoft Corporation (Microsoft) respectfully requests relief from Zoning Code §152.030, which requires the undergrounding of all existing overhead utility lines, including but not limited to telephone, cable television, and electric power, *except electrical lines exceeding 13 kV capacity*, either within a proposed development or redevelopment project or within public rights-of-way or easements adjacent to the project, prior to issuance of a certificate of occupancy.

Microsoft requests relief from the undergrounding requirement based upon Zoning Code Chapter §152.030 (E), which provides relief from the undergrounding requirements, at the discretion of City Council under the following conditions:

*(3) Exemption may be considered when high-voltage powerlines, above 13 kV or similar, would remain on the poles after the undergrounding of the lower voltage lines.*

The PHX80 campus is currently fed by an existing overhead 69 kV Arizona Power Service (APS) transmission line along Olive Avenue, which enters the PHX80 APS Substation near the northeast corner of the PHX80 campus. The existing overhead 69 kV transmission line falls within the greater than 13 kV exemption to the Zoning Code §152.030 undergrounding requirement.

Accordingly, Microsoft requests that the exemption be granted for the PHX80 campus within the purpose, intent, and objective of the code. Public safety measures will be implemented by APS and Microsoft during the continued use of the existing lines.

Sincerely,  
Avery Africa  
Land Development – Sr Program Manager  
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