



CITY OF FLAGSTAFF

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June 7, 2024

Arizona Corporation Commission
1200 W Washington St.
Phoenix, AZ 85007

RE: City of Flagstaff comment letter on the UNS Electric, Inc. Arizona Power Plant and Transmission Line Siting Committee Application and Appeal to the Arizona Corporation Commission.

Dear Chairman O'Connor and Commissioners,

The City of Flagstaff submits this comment letter in response to UNS Electric, Inc Arizona Power Plant and Transmission Line Siting Committee application and appeal to the Arizona Corporation Commission as published in [Docket No. L-00000F-24-0056-00230](#). Thank you for the opportunity to share our input.

The City of Flagstaff asks that you reject UNS Electric's request to create a loophole to avoid environmental reviews and scrutiny regarding the impact of siting large gas power plants. These major facilities must be required to get a Certificate of Environmental Compatibility (CEC), and the Arizona Corporation Commission must allow the AZ Power Plant and Transmission Line Siting Committee to do its job to evaluate the impacts of the proposed plants versus the need for these specific facilities.

The Commission's decision on UNS Electric's request will affect all of Arizona's utilities and developers going forward. The result would be the unchecked development of natural gas power plants in Arizona's communities with no accountability to Arizona's citizens. For fifty years the Line Siting Committee and this Commission has held that the law requires a CEC for facilities which have units that are individually less than 100 MW but collectively over 100 MW. The Commission should not suddenly reject that interpretation of the law.

If UNSE is successful, this sets a concerning precedence. The AZ Power Plant and Line Siting Committee and the Commission would only have authority over transmission lines from now on and the Commission will lose regulatory oversight of gas projects.

The City of Flagstaff urges the Arizona Corporation Commission to affirm the Arizona Power Plant and Transmission Line Siting order and reject UNS Electric's effort to evade a Certificate of Environmental Compatibility for its Black Mountain Generating Station Expansion Project. The Commission should support local government and communities and ensure that utilities are held accountable. Thank you for considering our comments on this important issue.

Best regards,

Becky Daggett,
Mayor of Flagstaff, on behalf of the Flagstaff City Council