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January 25, 2013

Via Regular and E-mail
(SunValley-Morgan@blm.gov) this date to:

APS Transmission Line Project
Attention: Joe Incardine
National Project Manager
BLM Phoenix District Office
21605 North 7th Avenue
Phoenix, Arizona 85027

Re: IBEW Local 769 (APS Proposed Sun Valley to Morgan 500/230kV Transmission Line Project)
Our File No. 1451-049

Dear Mr. Incardine:

My client, Local Union 769, International Brotherhood of Electrical Workers, AFL-CIO, CLC ("IBEW Local 769"), wishes to express its strong support for the Arizona Corporation Commission's ("ACC") Decision Number 70850 in which it issued a Certificate of Environmental Compatibility associated with the above-referenced project. For a number of reasons, IBEW Local 769 supports the alignment proposed therein and it respectfully requests the Bureau of Land Management ("BLM") to adopt the same. Accordingly, we support the BLM's Preferred Alternative, as identified in the Draft Environmental Impact Statement for the proposed Sun Valley to Morgan Project.

IBEW Local 769 is a labor organization which represents non-managerial utility workers throughout the State of Arizona. For example, IBEW Local 769 is the duly elected and recognized exclusive bargaining agent for the employees of the Mohave County Electric Operations of UniSource, Mohave Co-Op, Frontier Communications and Griffith Power Plant. In addition, IBEW Local 769 is the exclusive bargaining agent for all IBEW outside line workers in the State of Arizona and its scope of work also includes tele-data, street light and trenching. For example, IBEW Local 769 has provided outside line construction work for the Arizona Public Service Company ("APS") through Wilson Construction, Klondyke, NPL, Henkels &

McCoy and Sturgeon Electric, among others. Currently, IBEW Local 769 is providing bargaining unit employees to Klondyke and NPL for the installation of sub-transmission lines for APS. At any given time, IBEW Local 769 will have anywhere from five (5) to two-hundred (200) of its bargaining unit employees working for subcontractors of APS.

In describing the public process addressed herein, the BLM stated that it needs “to make two separate decisions:

- Whether to amend its land use plan to create a utility corridor in the vicinity of SR 74;
- Whether to approve the APS application and any adjustments to the proposed transmission location or design.”¹

For the reasons set forth below, IBEW Local 769 respectfully submits that the response to first question is “yes” and the response to the second question is “yes” provided that no additional changes are made to what the ACC has already approved.

IBEW Local 769 believes that the BLM’s prompt adoption of the ACC’s proposed alignment will be a helpful step in addressing one of Arizona’s largest ongoing problems, *to wit*, creating good jobs. With Arizona’s unemployment rate hovering around 8%,² the proposed project will put Arizonans to work in fairly short order on a substantial infrastructure project that will both directly and indirectly create jobs here in Arizona.

As you know, the proposed route was thoroughly vetted in the ACC’s line siting process. Not only did the ACC bring its own legal authority and special expertise to the table but, equally important, that very public - and at times heated - process allowed for a great deal of public input. To that end, the local Vistancia community has consistently supported the ACC-approved route. By way of example, stakeholders, including the City of Peoria, City of Surprise, Town of Buckeye, Maricopa County, state agencies, federal elected officials, APS and large master-planned communities have supported the ACC-approved route as being most consistent with existing land use and infrastructure plans, such as Peoria’s General Plan, which are in place. In the estimation of IBEW Local 769, the ACC-approved route appropriately co-locates the proposed power line with an existing and approved Transportation Corridor, minimizing necessary environmental disturbance.

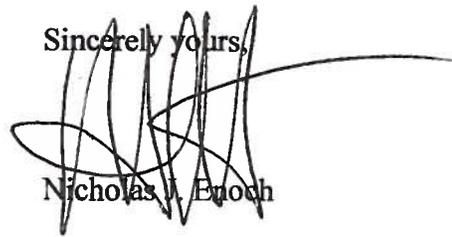
In short, IBEW Local 769 firmly believes that BLM approval of the ACC-approved rout will ensure that much needed economic benefits associated with the Project, from construction of the transmission line and potential for development of renewable generation, will not be unduly delayed by requiring additional state approvals. We thank the BLM in advance for its

¹ See *Draft Environmental Impact Statement*, <http://www.blm.gov/az/st/en/prog/energy/aps-sunvalley> (last visited Nov. 26, 2012).

² See *Bureau of Labor Statistics: Economy at a Glance*, <http://www.bls.gov/eag/eag.az.htm> (last visited Jan. 14, 2013).

consideration of our comments and should you have any questions related thereto, please do not hesitate to contact me.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Nicholas A. Enoch". The signature is highly stylized and somewhat illegible due to the cursive and overlapping lines.

Nicholas A. Enoch

NJE:tm

cc: Joel D. Bell
Thomas H. Campbell, Esq.
Giancarlo Estrada, Esq.
Linda J. Arnold, Esq.