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Wind & Solar Projects

October 2025

Lava Run Interconnection Project

CG Apache County Solar LLC and CG Apache County Wind LLC

Application for a Certificate of Environmental Compatibility, Case No. 250

Prepared for the Arizona Power Plant and Transmission Line Siting Committee

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October 2025

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Witness Introductions

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Witness Introductions

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Aubrey ("Trey") Patton III

Professional Experience

- Lead Project Manager for Repsol Renewables Development
- Responsible for managing development and stakeholder engagement
- 9 years experience of project development, M&A, construction across the United States servicing the energy industry
- 6 years industrial project management, fabrication servicing the mining industry

Education

- Dallas Community College – Welding Certification Program

Witness Introductions

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Trey Patton
CG Apache County Solar LLC
and
CG Apache County Wind LLC
Lead Project Manager, Development
Repsol Renewables North America

Witness Introductions

Lava Run
Wind & Solar Projects

Derek Rieman

Professional Experience

- Chief Development Officer for Repsol Renewables North America
- Executive, overseeing development of commercial-scale wind, solar, solar + battery storage, and other technologies
- 16 years of experience siting, developing, and constructing utility scale renewable energy projects

Education

- University of Oregon Juris Doctor with a specialization in Natural Resources and Environmental Law. Indiana University B.A. Political Science and Minors Business and Spanish.

Witness Introductions

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Derek Rieman
CG Apache County Solar LLC
and
CG Apache County Wind LLC
Chief Development Officer
Repsol Renewables North America

Witness Introductions

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Rebecca Turner

Professional Experience

- Vice President of Regulatory Affairs and Transmission Services for Repsol Renewables North America
- Responsible for managing the interconnection and transmission requirements for the Repsol Renewables North America portfolio.
- Over 35 years of experience in the energy business, with a concentration in the interconnection and transmission requirements for greenfield generation projects.

Education

- Georgia Institute of Technology, Master of Science Degree in Electrical Engineering
- University of South Florida, Bachelors of Science Degree in Electrical Engineering

Witness Introductions

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Rebecca Turner

CG Apache County Solar LLC

and

CG Apache County Wind LLC

Vice President of Regulatory Affairs and Transmission Services

Repsol Renewables North America

Witness Introductions

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Jeremy Casteel

Professional Experience

- Lead Environmental Planner for SWCA Environmental Consultants and Manager for the Interconnection Project CEC
- 21 years of environmental planning and permitting experience in Arizona
- Experienced in a variety of projects including renewable energy, transmission, transportation, and water infrastructure projects

Education

- Bowling Green State University, B.A. Environmental Policy and Analysis

Witness Introductions

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Jeremy Casteel
SWCA Environmental Consultants
Lead Environmental Planner

Witness Introductions

Lava Run
Wind & Solar Projects

Victoria Casteel

Professional Experience

- Natural Resources Director for Arizona at SWCA Environmental Consultants
- 19 years of environmental planning and permitting experience
- Experienced in transmission and infrastructure, renewable energy, transportation, commercial, and residential projects
- Provided testimony in Line Siting Case Nos. 209 and 240

Education

- University of Arizona, B.A. Environmental and Water Resource Economics

Witness Introductions

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Victoria Casteel
SWCA Environmental Consultants
Arizona Natural Resource Director

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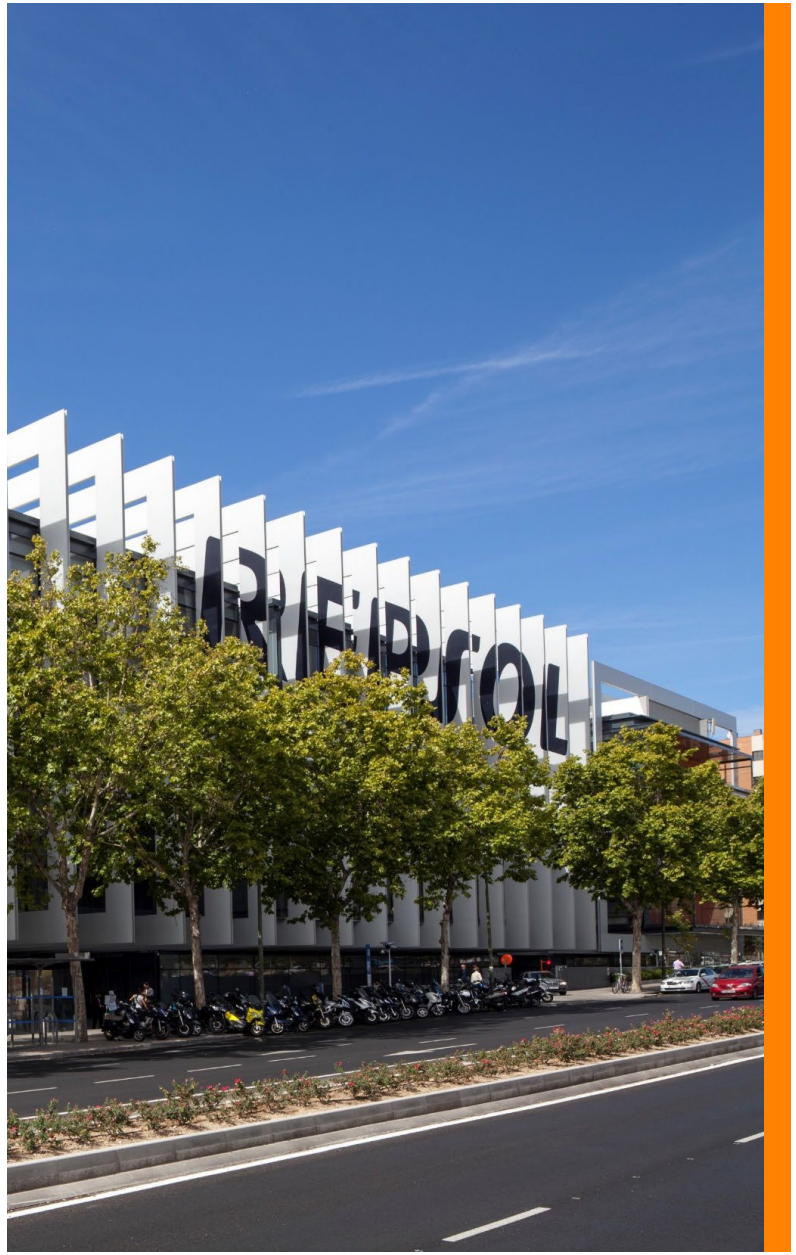

Applicants - Overview

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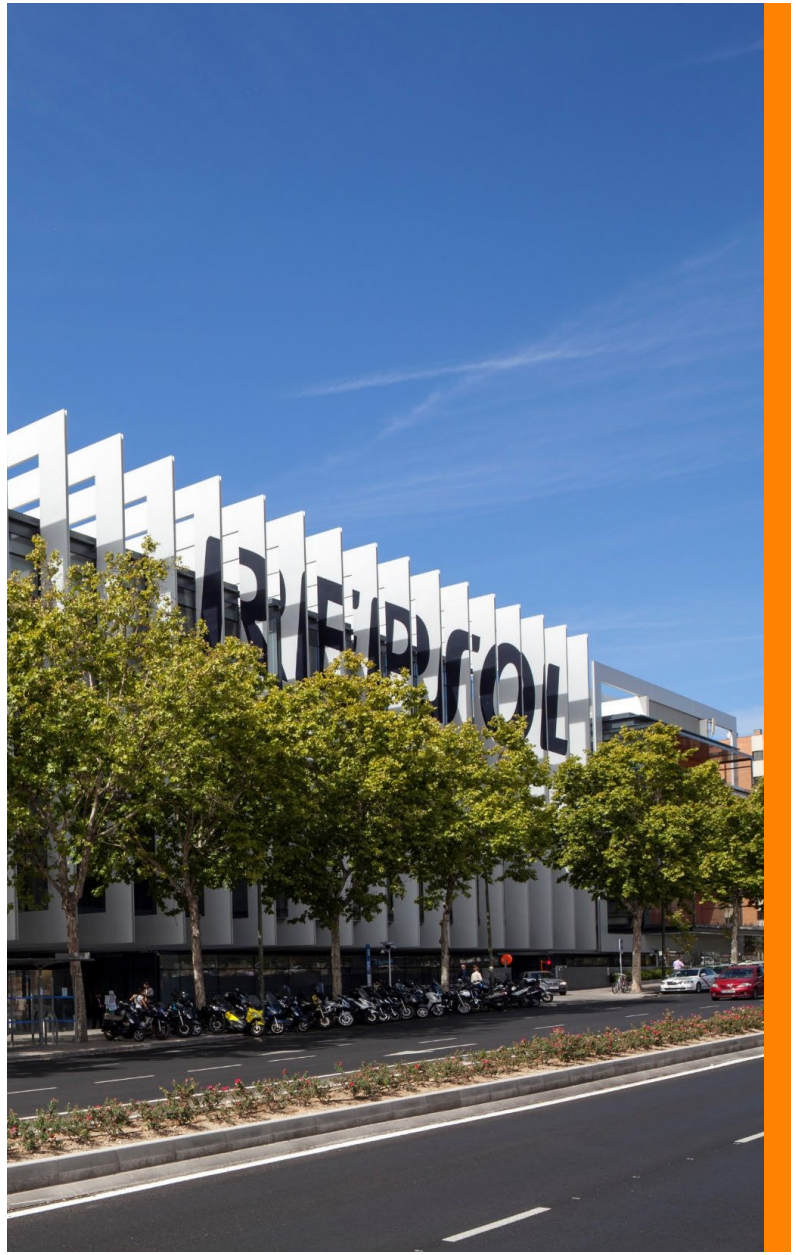
Wind & Solar Projects



Applicants - Overview

Applicants and Repsol Renewables North America

- Applicants: CG Apache County Solar LLC and CG Apache County Wind LLC, which are affiliates of Repsol Renewables North America.
- Repsol Renewables North America is an established renewables company, headquartered in Houston Texas.
- Repsol Renewables North America identifies, develops, builds, and operates renewable energy projects in the United States.
  - 1,400 MW operating, 1,200 MW under construction and a development pipeline of over 20,000 MW of wind, solar, and storage projects across the United States
- Repsol Renewables North America is part of a global energy company with a strong presence in the United States.
- In March 2024, Repsol Renewables North America acquired ConnectGen LLC and its entire portfolio of wind, solar, and energy storage projects including the Lava Run Wind & Solar Projects.

About Repsol Renewables North America

Lava Run
Wind & Solar Projects

Four Creeks Wind
Capacity: 200 MW
COD: 4Q 2028

Pike Creek Wind
Capacity: 200 MW
COD: 4Q 2026

Heritage Prairie Wind and Solar[1]
Capacity: 300 MW wind + 150 MWac solar
COD: 2Q 2028

Mill Point I + II
Capacity: 250 MWac + 100 MWac
COD: 4Q 2028

Rail Tie Wind
Capacity: 504 MW
COD: 4Q 2027

South Ripley
Capacity: 270 MWac
COD: 4Q 2027

Lava Run Wind & Solar
Capacity: 950 MW
COD: 4Q 2028

Ritter Station
Capacity: 270 MWac
COD: 4Q 2027

Jicarilla 1 Solar
Capacity: 50 MWac

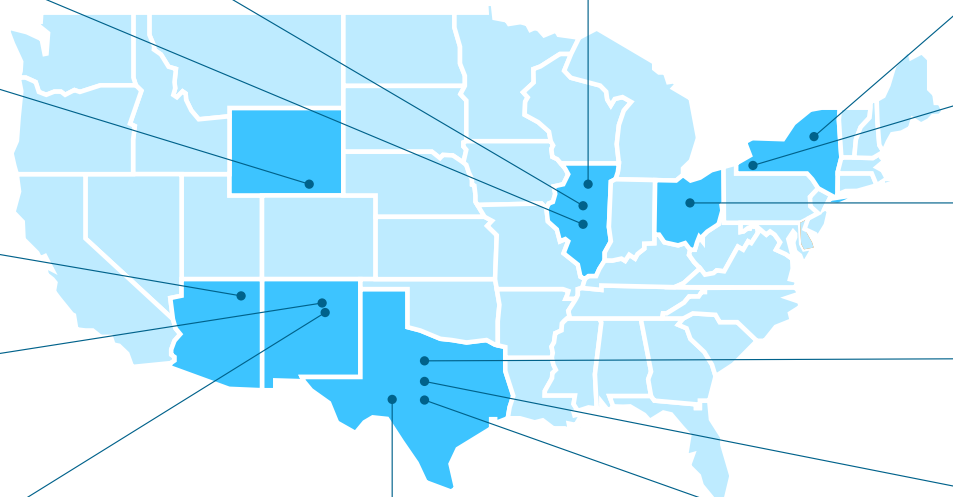
Pinnington Solar
Capacity: 650 MWac
COD: 2Q 2026

Jicarilla 2 Storage
Capacity: 20 MW storage
Storage COD: 2Q 2025

Outpost Solar
Capacity: 500 MWac

Frye Solar
Capacity: 500 MWac

Pecan Prairie Complex
Capacity: 450 MWac
COD: 3Q 2027



Operating
Under Development
Under Construction

- Selected sample of projects within the Repsol development pipeline
- COD dates are based on currently-known project schedules

1 Project is being developed in a 50/50 joint venture; Figure refers to RRNA's 50% stake in the project

Lava Run
Wind & Solar Projects

Wind and Solar Projects

Lava Run
Wind & Solar Projects

Wind and Solar Projects

Wind and Solar Projects - Overview

Lava Run
Wind & Solar Projects

Wind Facility

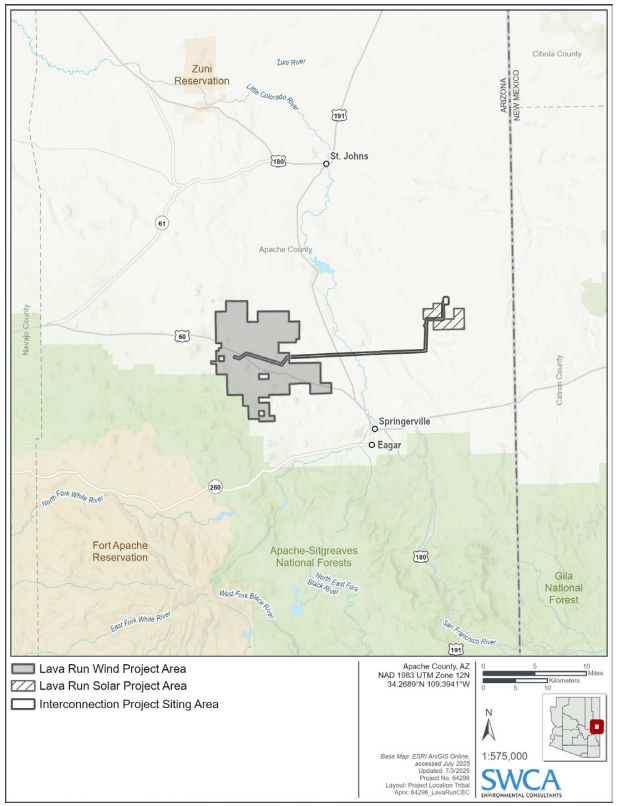
- Sited on approximately 44,550 acres of Arizona State Trust Lands, with approximately 500 acres being utilized for project infrastructure.
- Proposed up to 500 MW.

Solar Facility

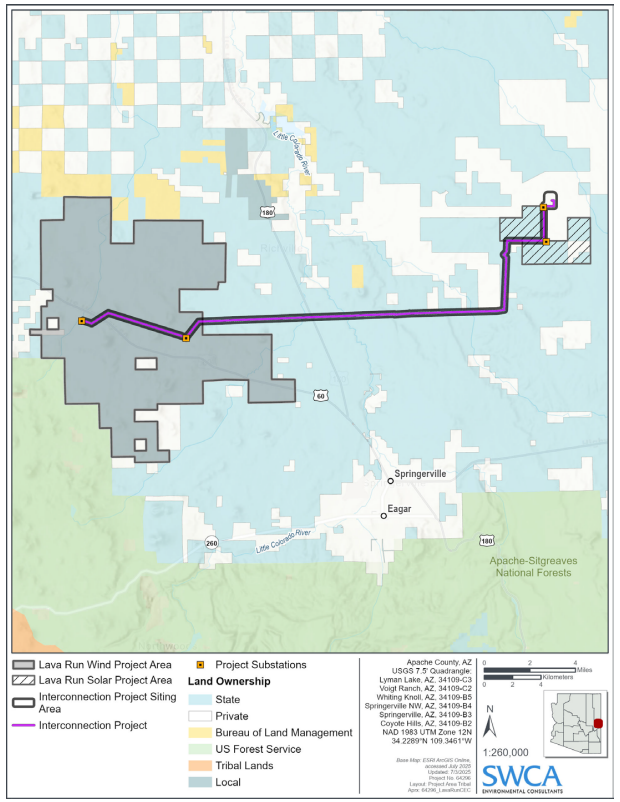
- A stand-alone facility on approximately 3,760 acres.
- Proposed up to 450-MW solar photovoltaic electrical generation facility paired with an up to 450-MW battery energy storage system

Wind and Solar Projects - Overview

Lava Run
Wind & Solar Projects



Regional Context



Project Vicinity and Land Ownership

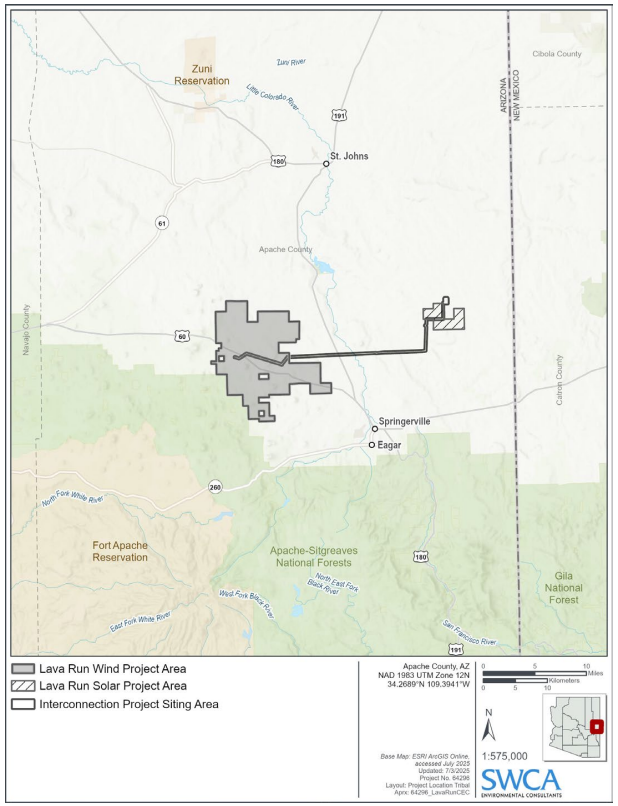
Wind and Solar Projects - Overview

Lava Run
Wind & Solar Projects

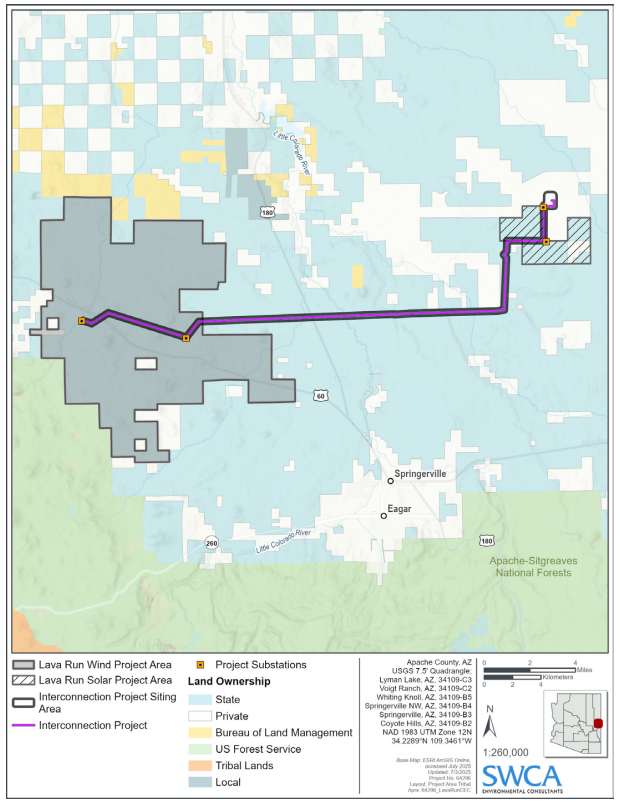
- Solar and Wind Project are primarily on Arizona State Trust Land in unincorporated Apache County
- Both projects are anticipated to be constructed in two phases
- Applicants are actively seeking long term power purchase agreements for both projects

Wind and Solar Projects - Overview

Lava Run
Wind & Solar Projects



Regional Context



Project Vicinity and Land Ownership

Lava Run
Wind & Solar Projects

Interconnection Project - Purpose and Need

Lava Run
Wind & Solar Projects

Interconnection Project - Purpose and Need

Interconnection Project – Purpose and Need

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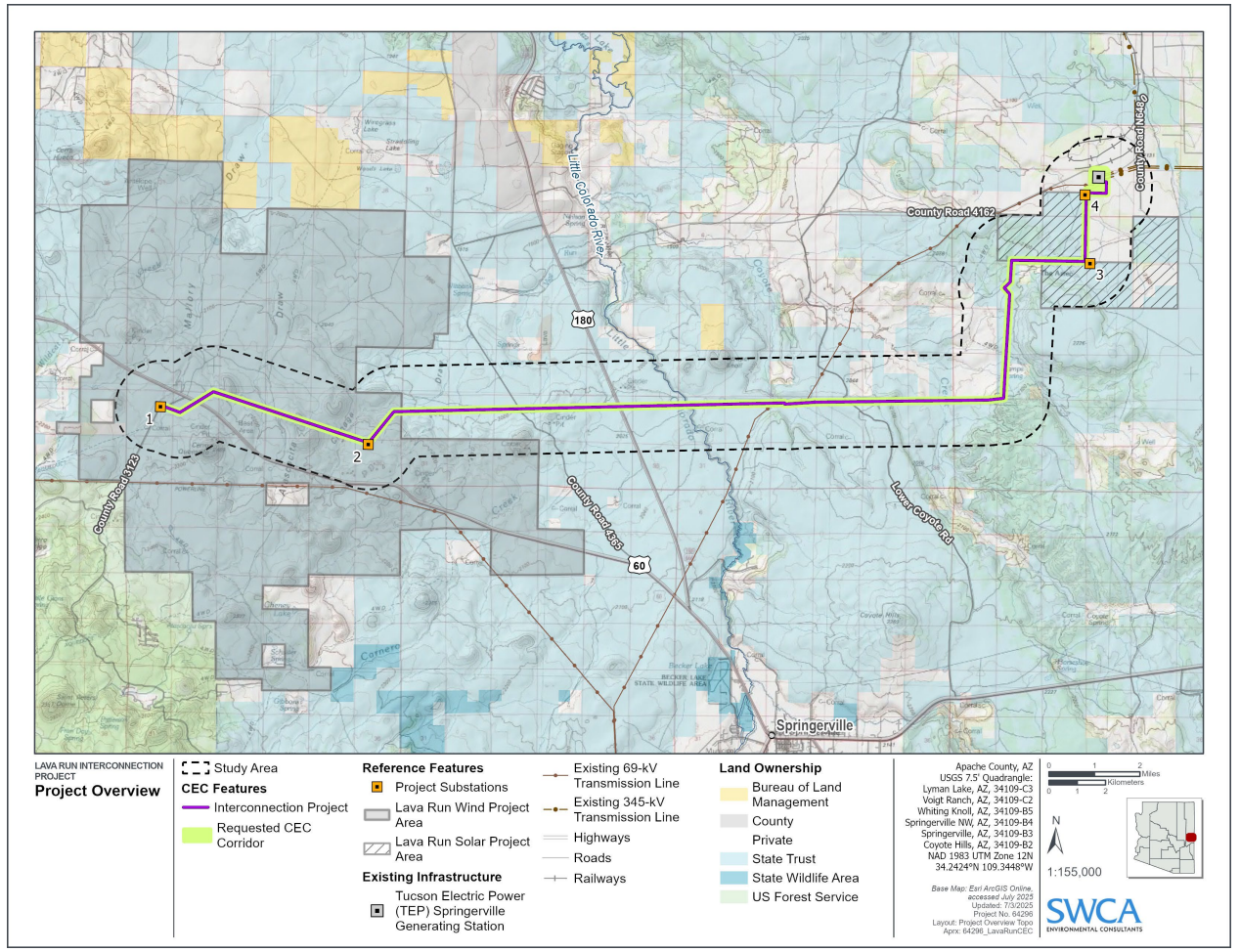
Wind & Solar Projects

- New Gen-Tie Line is needed to deliver energy from wind and solar facilities to the regional electrical grid.
- Closest point of interconnection to the regional electrical grid is TEP's 345 kV Springerville Substation.
- New Gen-Tie Line must extend from wind project substations miles to west of Springerville to solar project substations south of the Springerville Generating Station.
- Voltage of new Gen-Tie Line (345kV) is determined by voltage at Springerville Substation.

Interconnection Project – Purpose and Need

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Route Selection Process

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Wind & Solar Projects

Route Selection Process

Interconnection Project – Route Selection

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Wind & Solar Projects

- Initial route selection identified based on location of wind resources, early wind and solar project design, and topographic analysis.
- Applicants sought to minimize environmental impacts while also considering existing land use and infrastructure.

Interconnection Project – Route Selection

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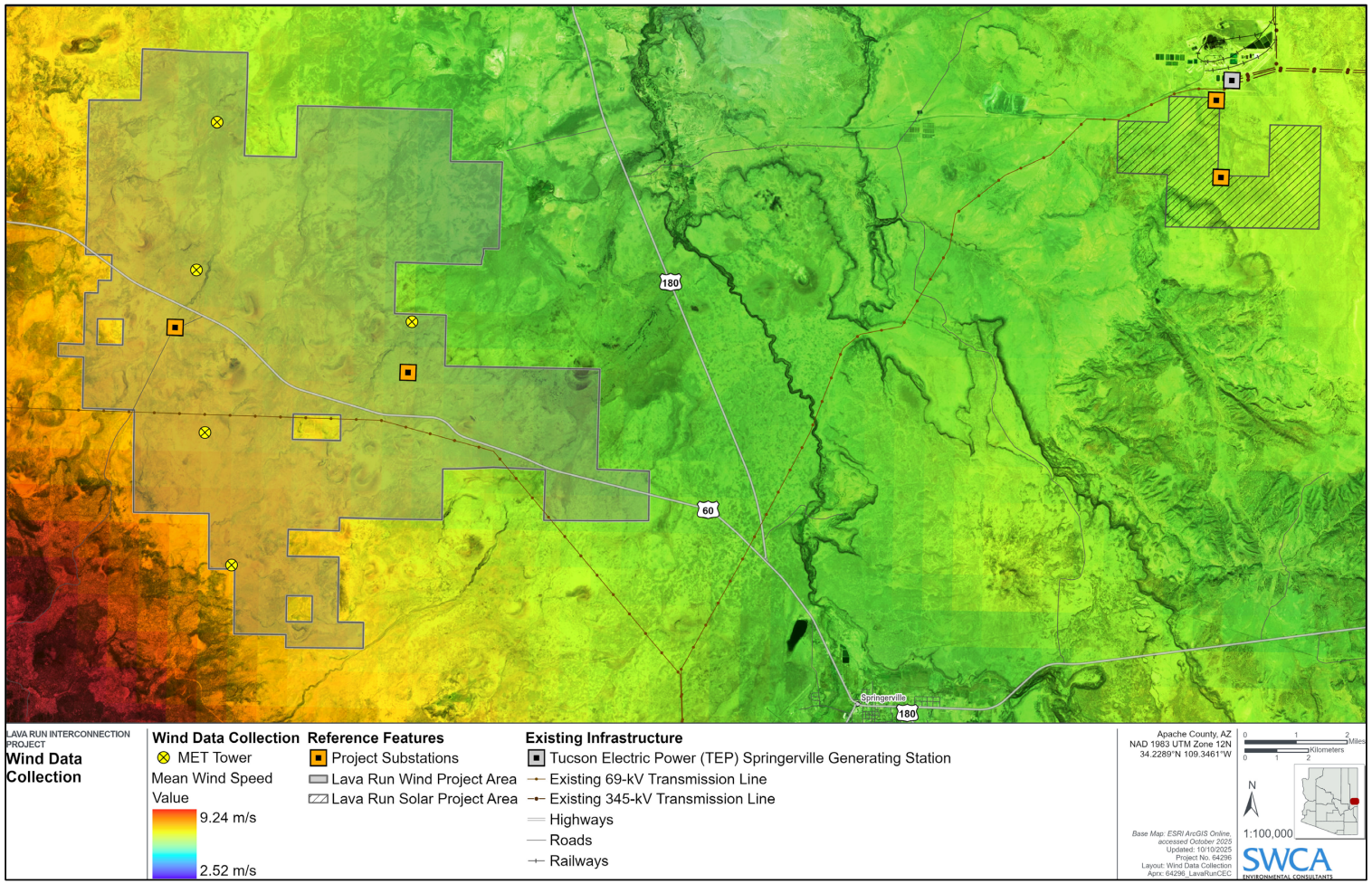
Wind & Solar Projects



Wind Data Collection Overview

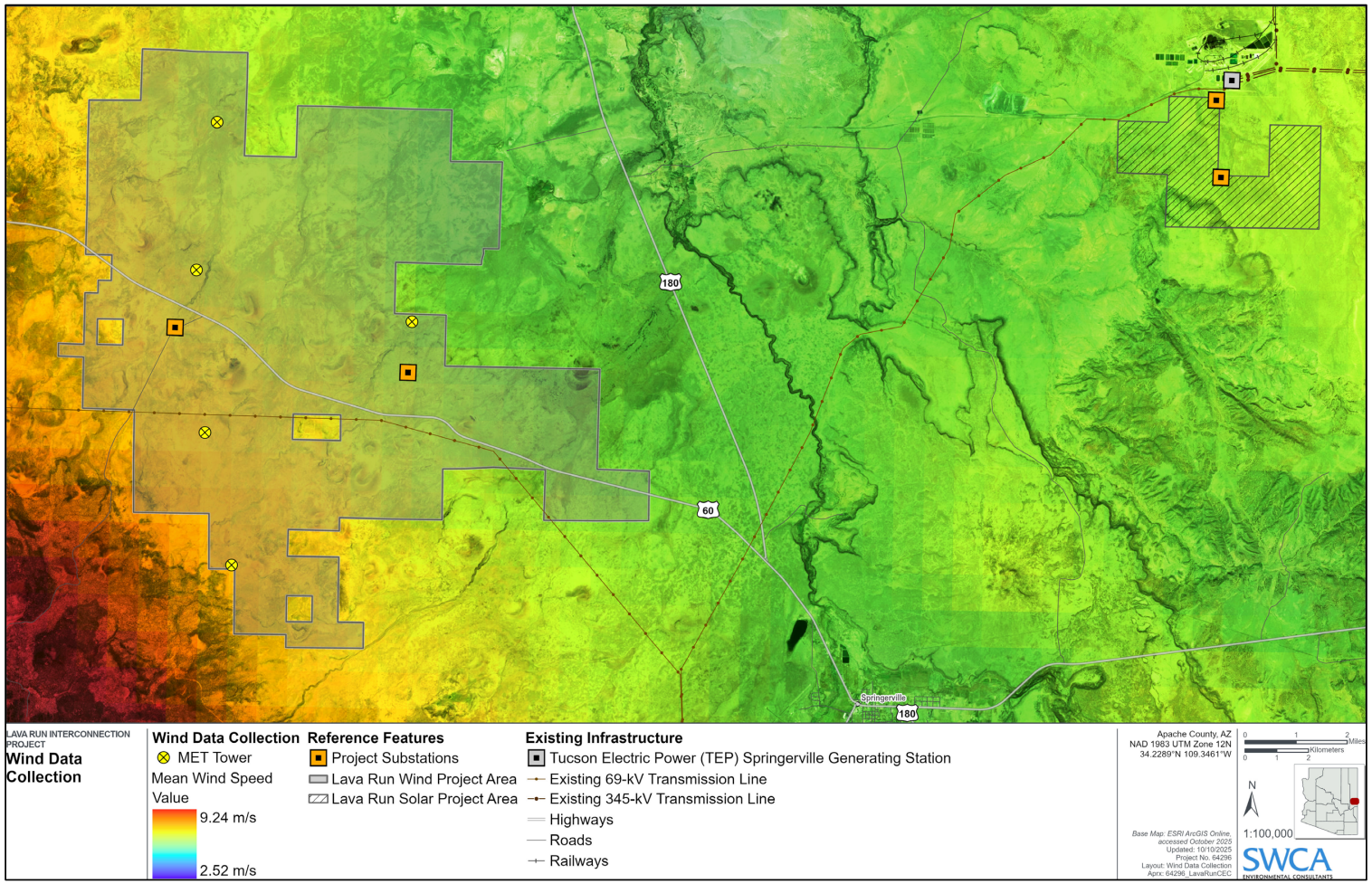
History of Wind and Solar Projects

Lava Run
Wind & Solar Projects

- 2018-2019 – Identification of commercially viable wind resource area in Apache County
- 2019 – Solar facility sited based on availability of land and proximity to Springerville Substation
- 2020 – Filing of initial Interconnection Requests with TEP
- 2021 – Meteorological tower installation for commencement of wind measurement campaign
- 2023 – The wind measurement campaign confirmed location and viability of wind resource
- 2023 – Initial project design commenced

Interconnection Project – Route Selection

Lava Run
Wind & Solar Projects



Wind Data Collection Overview

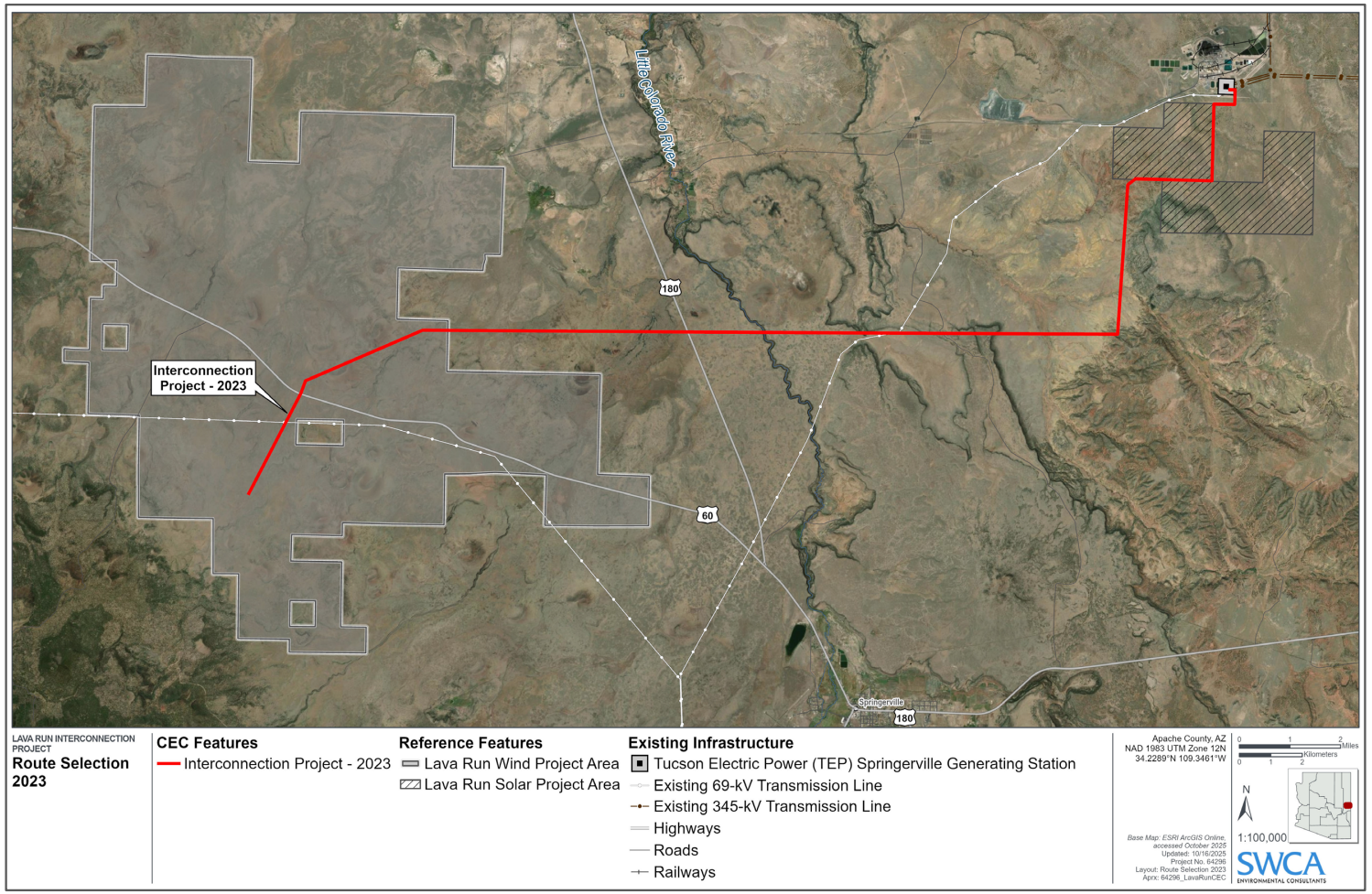
Interconnection Project – Route Selection

Lava Run
Wind & Solar Projects

- **Route selection was updated over time based on conversations with project stakeholders, including inholding landowners, grazing lessees, and TEP, as well as updated design iterations.**
  - **2023 Interconnection Project Route**
  - 2024 Interconnection Project Route
  - 2025 Interconnection Project Route (CEC Corridor)

Interconnection Project – Route Selection

Lava Run
Wind & Solar Projects



2023 Interconnection Project Route

Interconnection Project – Route Selection

Lava Run
Wind & Solar Projects

- **Route selection was updated over time based on conversations with project stakeholders, including inholding landowners, grazing lessees, and TEP, as well as updated design iterations.**
  - 2023 Interconnection Project Route
  - **2024 Interconnection Project Route**
  - 2025 Interconnection Project Route (CEC Corridor)

Interconnection Project – Route Selection

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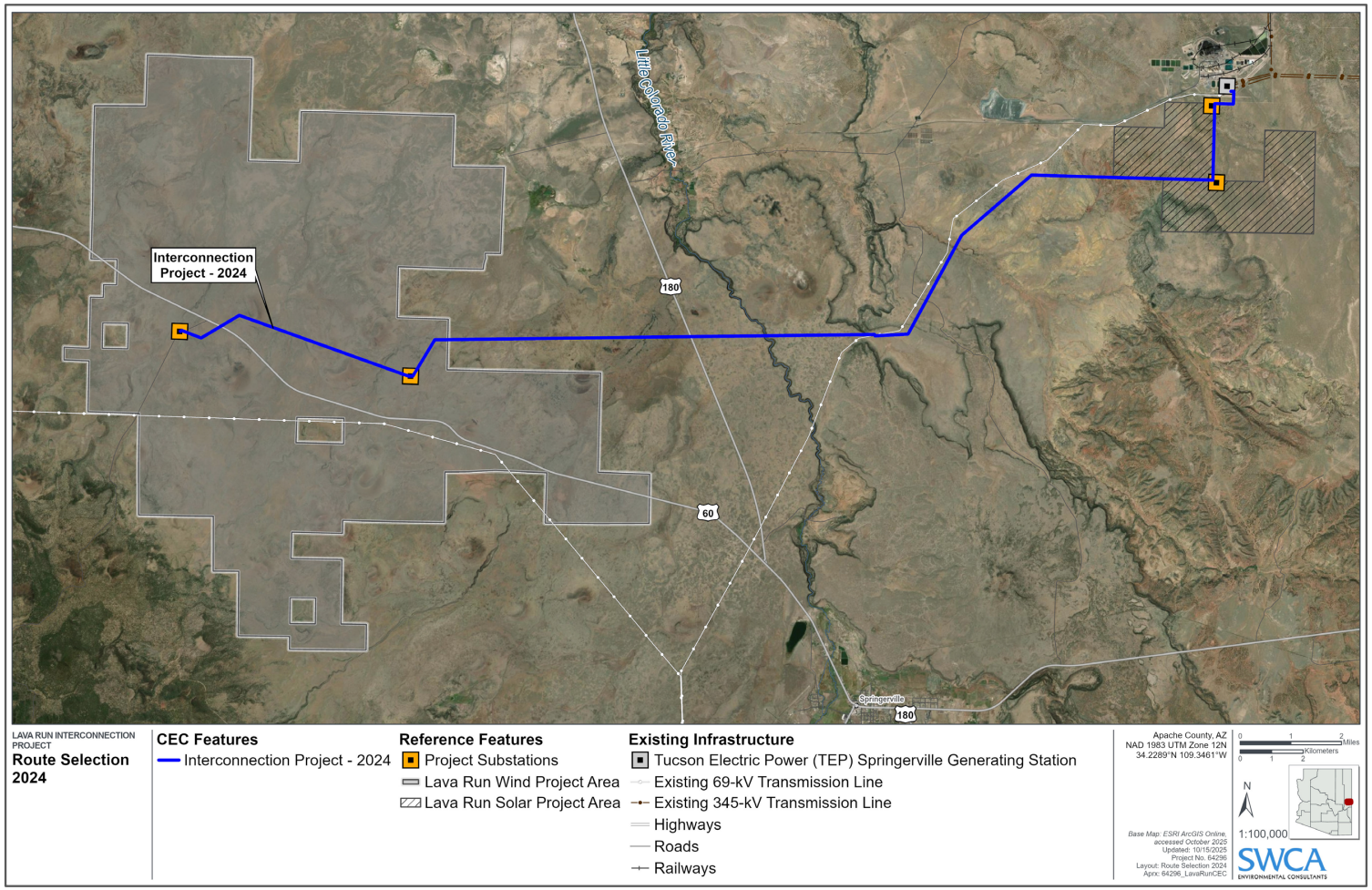


2024 Interconnection Project Route

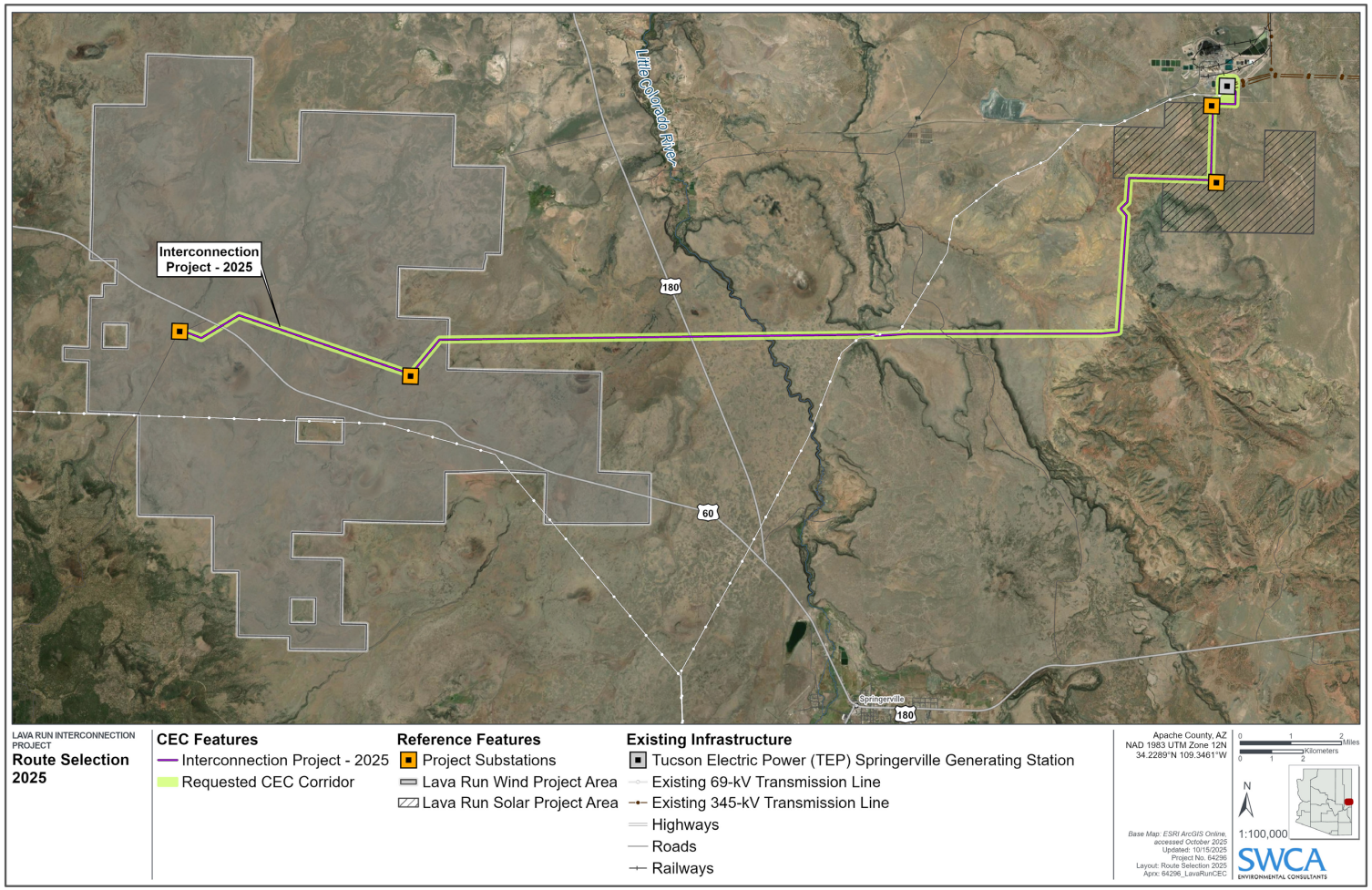
Interconnection Project – Route Selection

Lava Run
Wind & Solar Projects

- **Route selection was updated over time based on conversations with project stakeholders, including inholding landowners, grazing lessees, and TEP, as well as updated design iterations.**
  - 2023 Interconnection Project Route
  - 2024 Interconnection Project Route
  - **2025 Interconnection Project Route (CEC Corridor)**

Interconnection Project – Route Selection

Lava Run
Wind & Solar Projects



2025 Interconnection Project Route

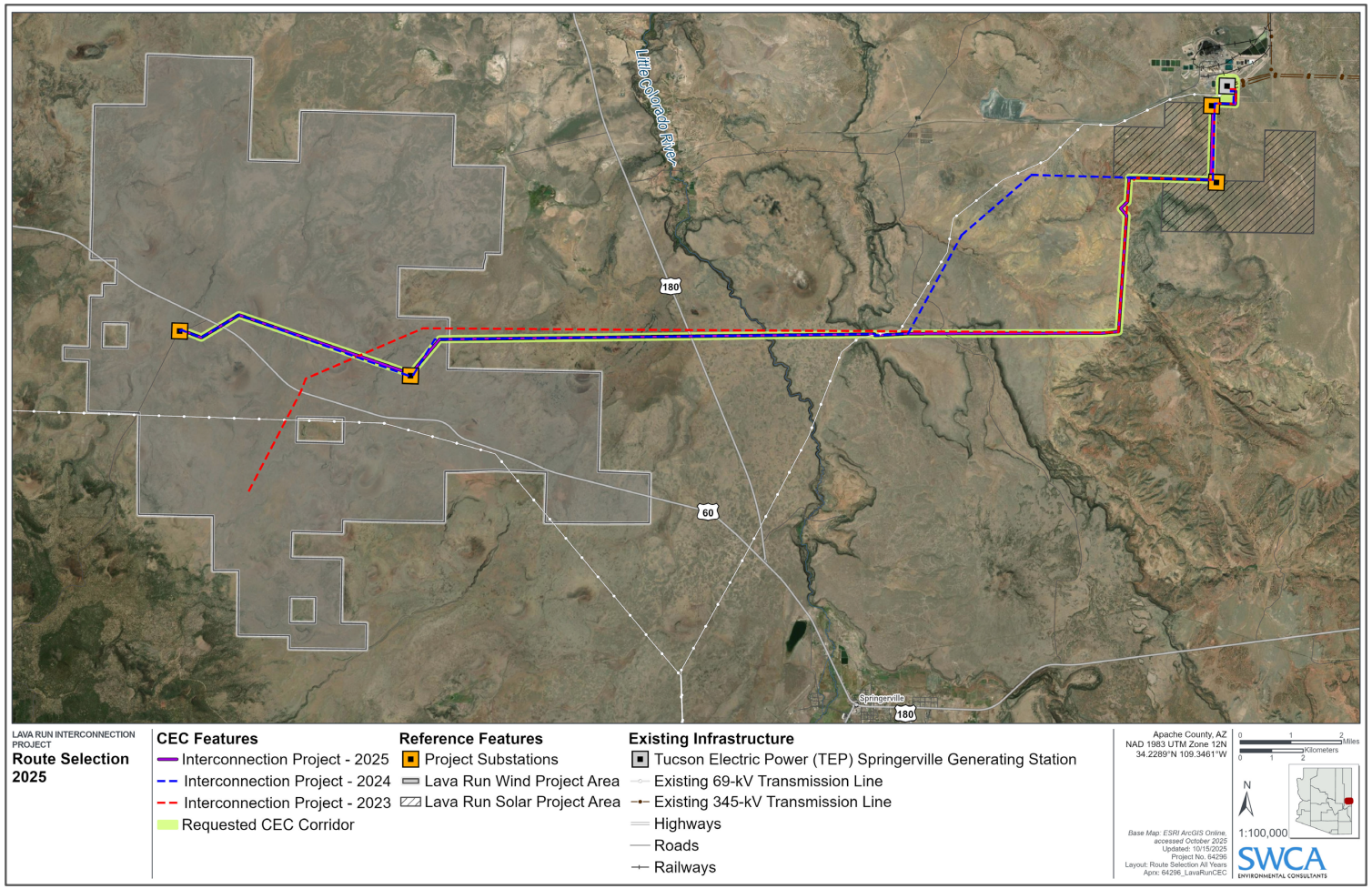
Interconnection Project – Route Selection

Lava Run
Wind & Solar Projects

- Route selection was updated over time based on conversations with project stakeholders, including inholding landowners, grazing lessees, and TEP, as well as updated design iterations.

Interconnection Project – Route Selection

Lava Run
Wind & Solar Projects



Route Selection Overview

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Wind & Solar Projects

Interconnection Project – Project Overview

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Wind & Solar Projects

Interconnection Project – Project Overview

Interconnection Project Overview

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Approximately 27-mile-long, 345-kV, alternating current, generation-tie transmission line between the wind and solar projects and Springerville Substation.

- Will connect to 4 project substations
- Single-circuit until line reaches solar project and then double-circuit to carry output from solar and BESS project
- Route planned to cross existing roadways, transmission lines, and the Little Colorado River

Interconnection Project Overview

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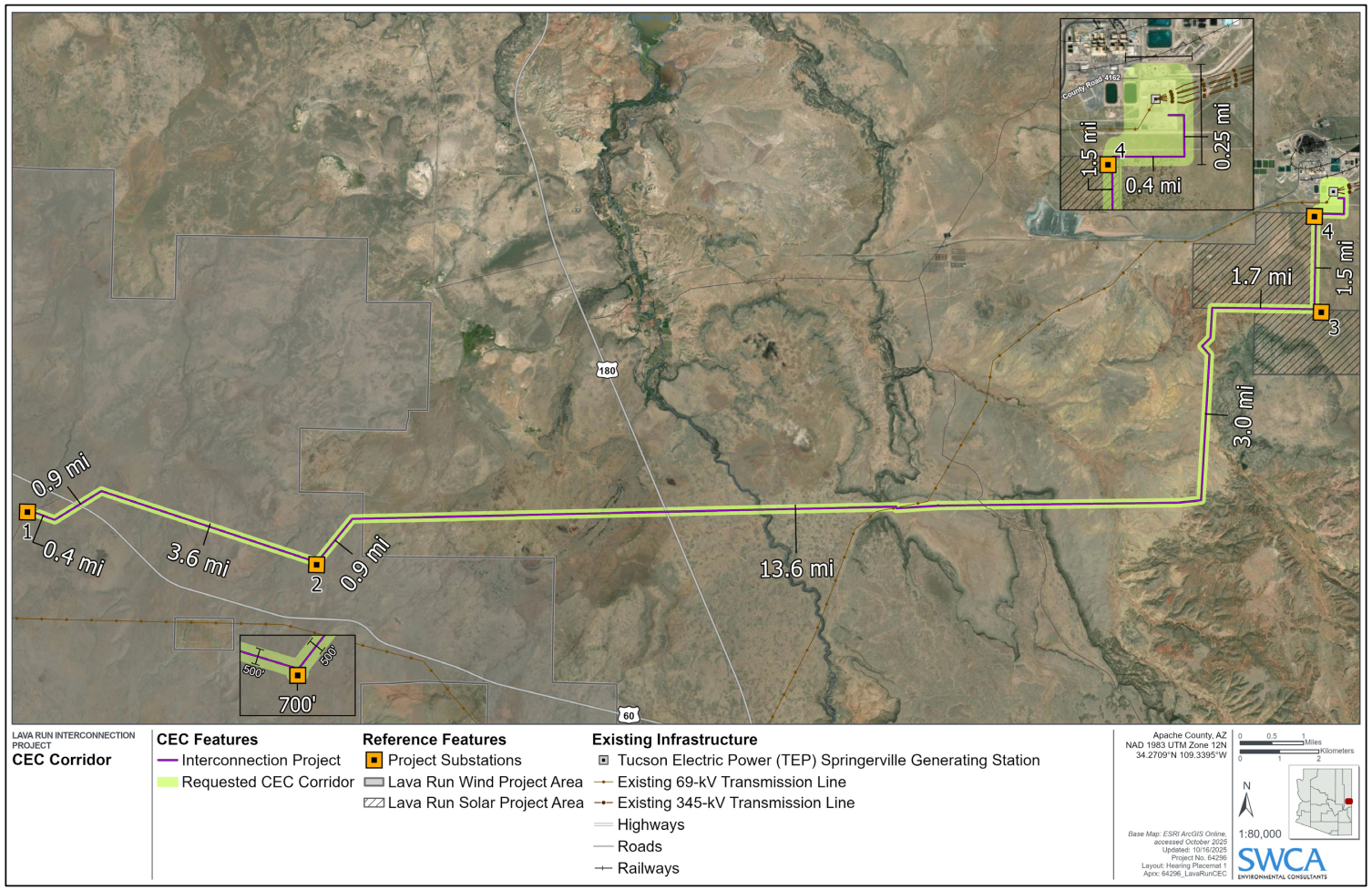

Interconnection Project CEC Corridor

Interconnection Project Overview

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Interconnection Project Route Overview:

- Starts at Project Substation 1 on ASLD-administered State Trust land
- Travels southeast for 0.4 mile, then northeast for 0.9 mile, crossing U.S. 60
- Continues southeast for 3.6 miles to Project Substation 2, then northeast for 0.9 mile
- Extends east for approximately 13.6 miles, crossing U.S. 180 before turning north and continuing for 3 miles
- Proceeds 1.7 miles east to Project Substation 3
- Continues 1.5 miles north to Project Substation 4
- Lastly, the route continues 0.4 mile east and then turns north for 0.25 mile to connect to the Springerville 345-kV Substation on private land

Interconnection Project Overview

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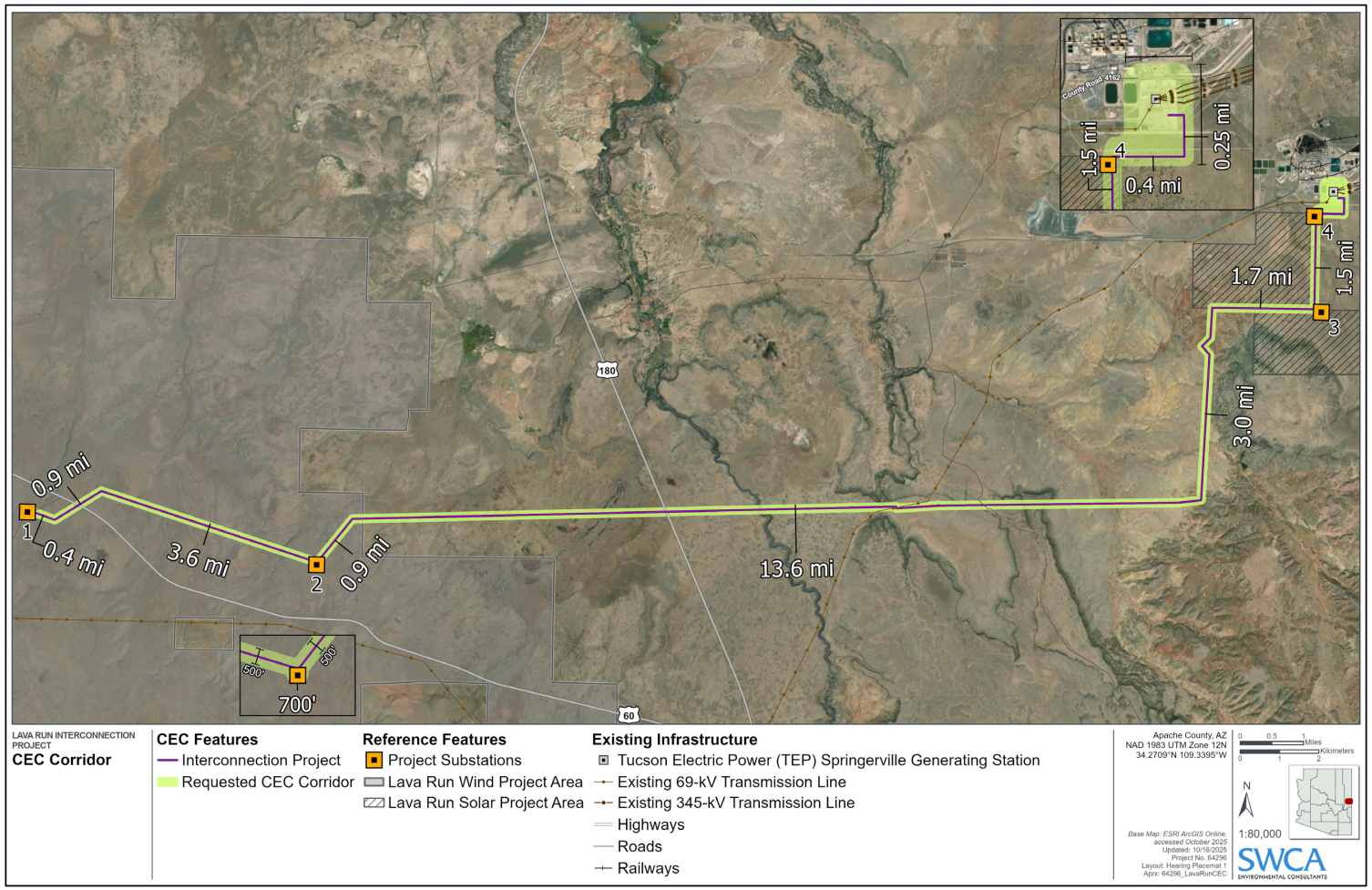

Interconnection Project CEC Corridor

Interconnection Project Overview

Lava Run
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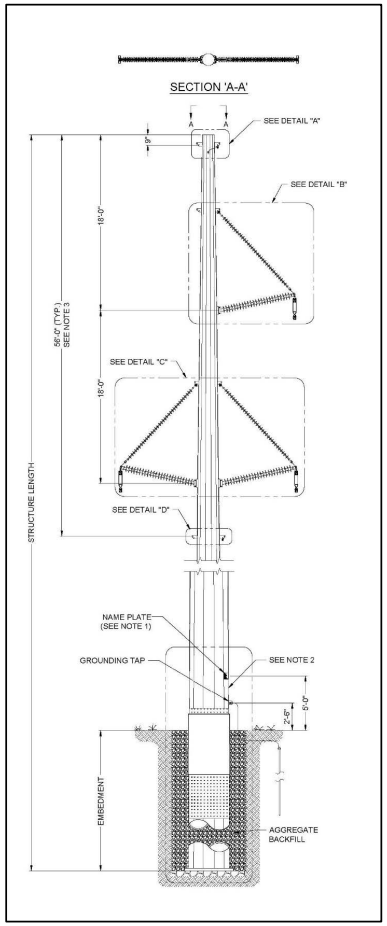
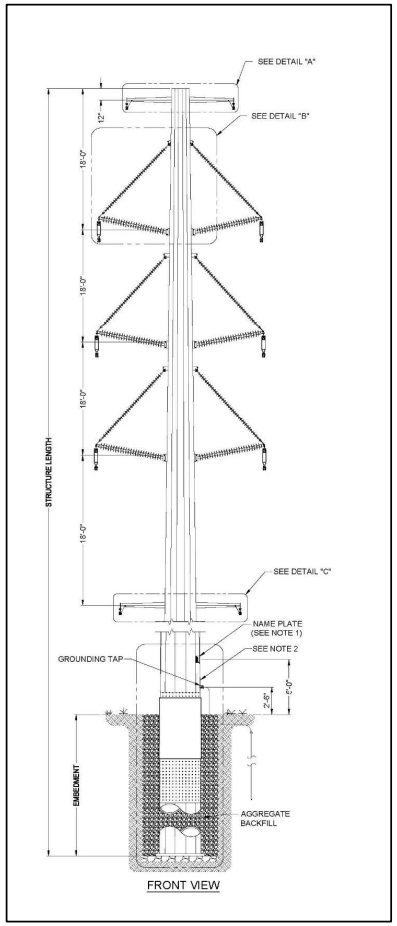
- **Structure Types:**
  - Tangent monopoles, angle monopoles, and dead-end monopoles.
  - Made of galvanized or weathering steel and will be self-supporting.
- **Key Project Specifications:**
  - Maximum Height: 180 feet
  - Maximum span length between structures: 1,200 feet
  - Range of typical span length: 675 to 770 feet
  - Minimum ground clearance: 25 feet
  - Anticipated number of structures: up to 200
- **Structure types at specific locations and size ranges are subject to change depending on final design.**

Interconnection Project Overview

Lava Run
Wind & Solar Projects



Typical 345-kV Delta BLP light-duty steel pole tangent framing



Typical 345-kV Vertical BLP light-duty steel tangent framing

Interconnection Project Overview

Lava Run
Wind & Solar Projects

- **Structure Types:**
  - Tangent monopoles, angle monopoles, and dead-end monopoles.
  - Made of galvanized or weathering steel and will be self-supporting.
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Interconnection Project Overview

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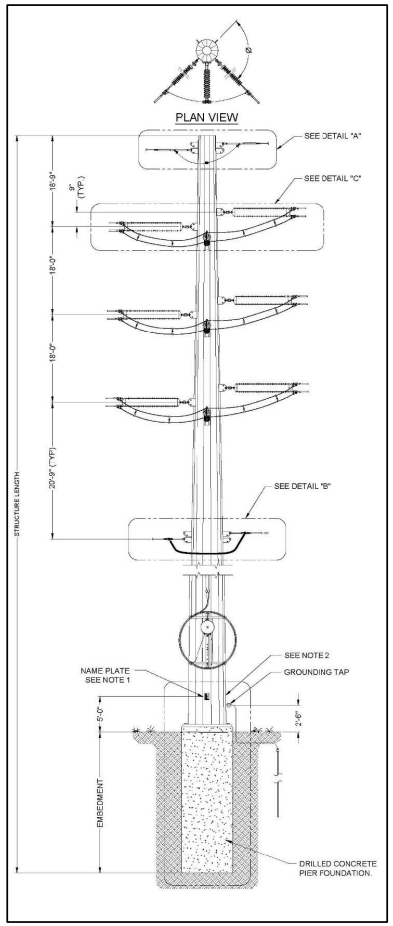
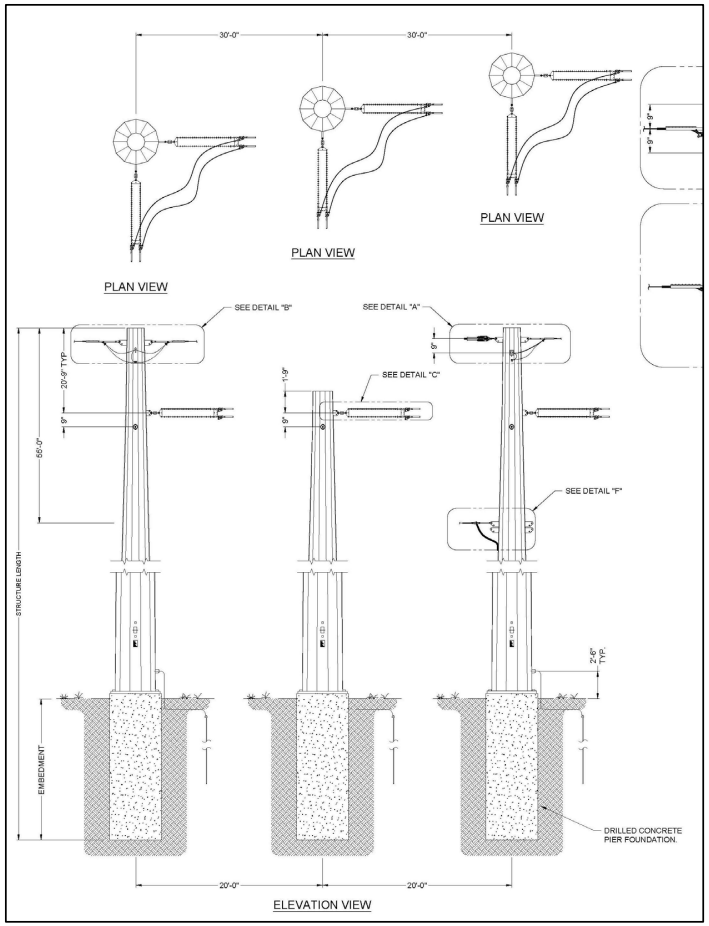
Wind & Solar Projects



Typical 345-kV vertical self-supporting steel dead-end framing



Typical 345-kV horizontal 3-pole self supporting steal angle dead-end

Interconnection Project Overview

Lava Run
Wind & Solar Projects

Requested CEC Corridor

- **Variable-width corridor along the Interconnection Project centerline**
  - 500 feet wide along most of the corridor
  - Up to 700 feet wide at connection with Substation 2
  - Up to 3,200 feet wide at the Springerville Substation to provide flexibility for final interconnection design

Right of Way (ROW)

- **200-foot ROW will be established within the requested CEC corridor based on final design**

Interconnection Project Overview

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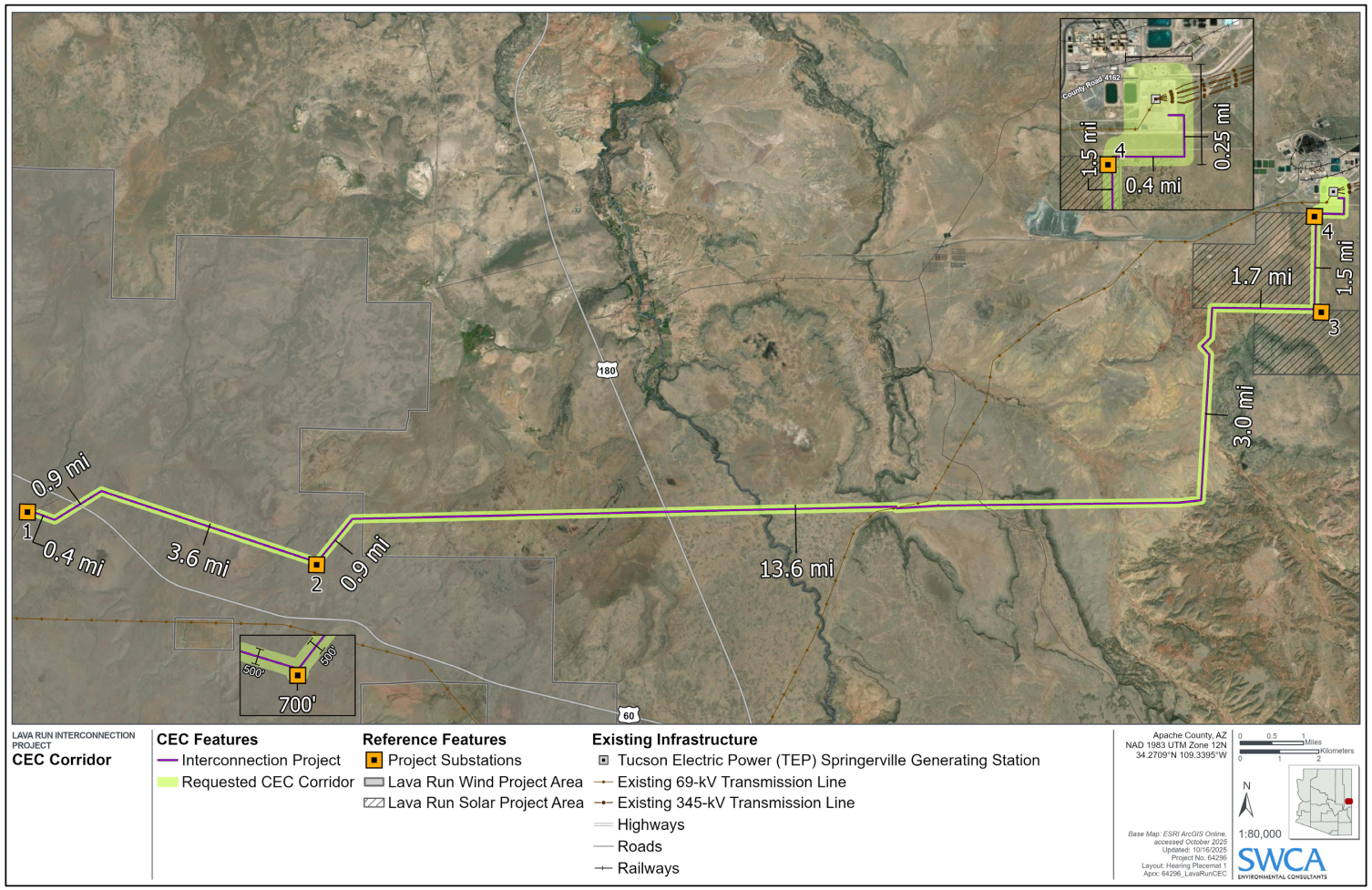


Interconnection Project CEC Corridor

Interconnection Project Overview

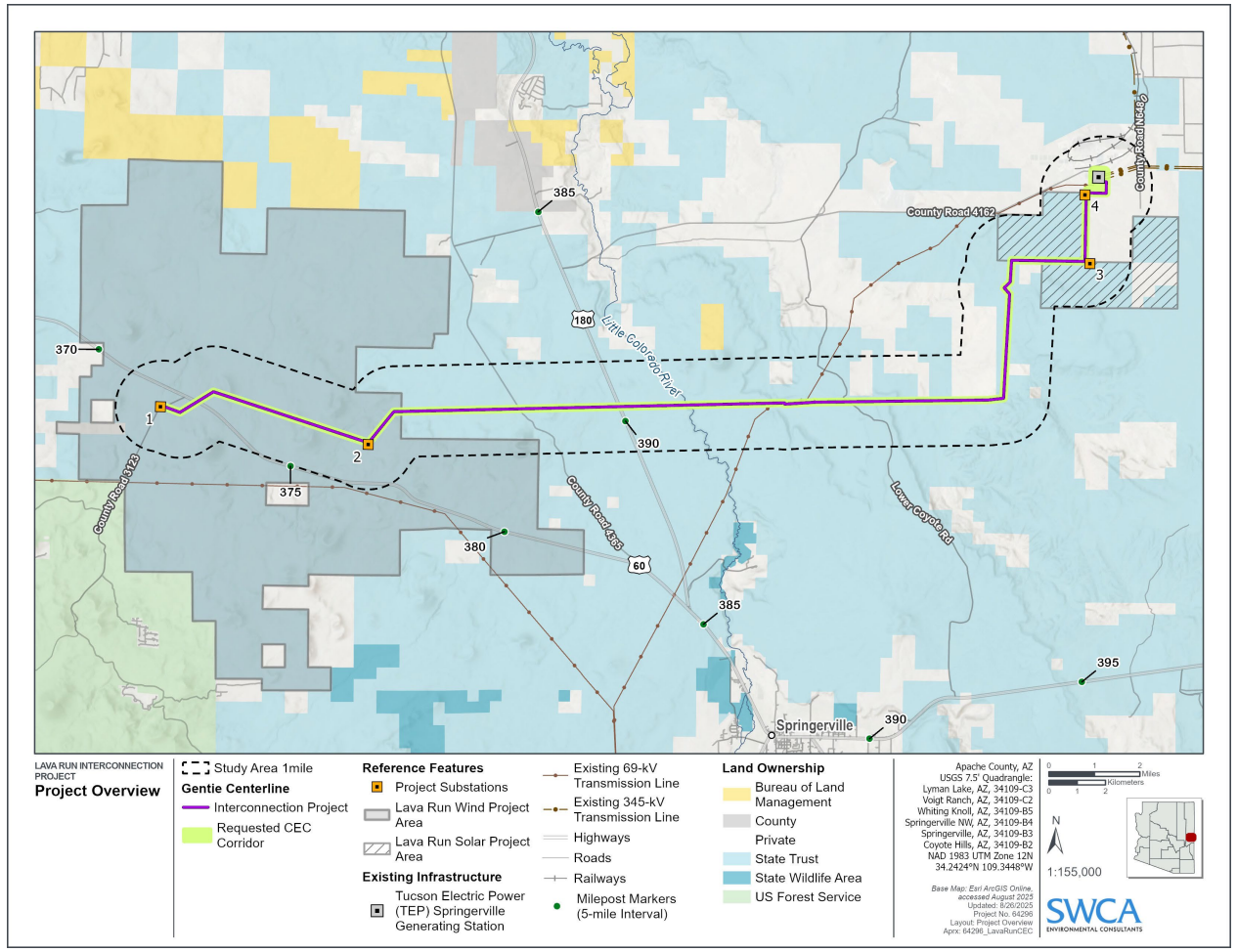
Lava Run
Wind & Solar Projects

Land Use Authorizations Needed:

- **ROW from the Arizona State Land Department (ASLD)**
  - ROW application has been submitted to ASLD
- **Encroachment Permits from the Arizona Department of Transportation (ADOT)**
  - Encroachment permits will be obtained prior to project construction within ADOT ROW (along U.S. 60 and U.S. 180)

Interconnection Project Overview

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Lava Run
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Ten-Year Plan and Transmission Studies

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Ten-Year Plan and Transmission Studies

Ten-Year Plan and Transmission Studies

Lava Run
Wind & Solar Projects

Ten-Year Plan

- Ten-Year Plan filed on August 8, 2023
- Ten-Year Plan updated on July 30 and 31, 2025, and amended on October 2, 2025

System Impact Studies

- Lava Run Solar I and Lava Run Wind I: January 13, 2021
- Lava Run Solar II: February 14, 2023

Facility Studies

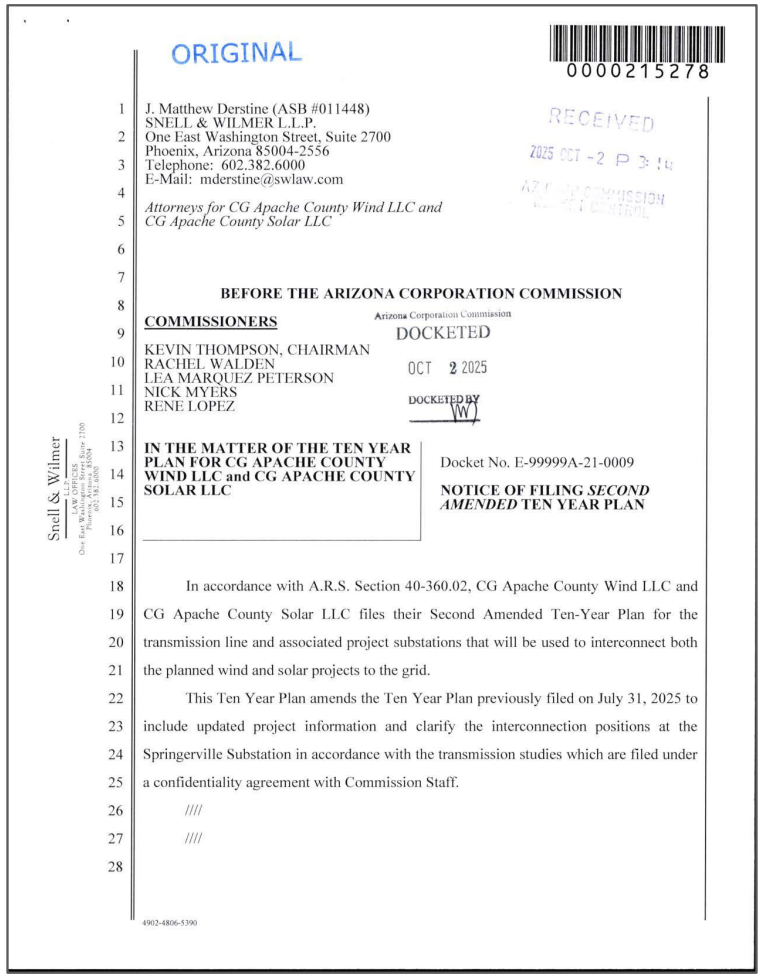
- Lava Run Solar I and Lava Run Wind I: October 5, 2021
- Lava Run Solar II: February 5, 2021

Interconnection Agreements

- Lava Run Solar I and Lava Run Wind I: September 9, 2025
- Lava Run Solar II: September 25, 2025

Ten-Year Plan and Transmission Studies

Lava Run
Wind & Solar Projects



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J. Matthew Derstine (ASB #011448)
SNELL & WILMER L.L.P.
One East Washington Street, Suite 2700
Phoenix, Arizona 85004-2556
Telephone: 602.382.6000
E-Mail: mderstine@swlaw.com

Attorneys for CG Apache County Wind LLC and CG Apache County Solar LLC

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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

KEVIN THOMPSON, CHAIRMAN
RACHEL WALDEN
LEA MARQUEZ PETERSON
NICK MYERS
RENE LOPEZ

Arizona Corporation Commission
DOCKETED
OCT 2 2025
DOCKETED BY

IN THE MATTER OF THE TEN YEAR PLAN FOR CG APACHE COUNTY WIND LLC and CG APACHE COUNTY SOLAR LLC

Docket No. E-99999A-21-0009

NOTICE OF FILING *SECOND AMENDED* TEN YEAR PLAN

Snell & Wilmer
LAW OFFICES
One East Washington Street, Suite 2700
Phoenix, Arizona 85004
(602) 382-6000

In accordance with A.R.S. Section 40-360.02, CG Apache County Wind LLC and CG Apache County Solar LLC files their Second Amended Ten-Year Plan for the transmission line and associated project substations that will be used to interconnect both the planned wind and solar projects to the grid.

This Ten Year Plan amends the Ten Year Plan previously filed on July 31, 2025 to include updated project information and clarify the interconnection positions at the Springerville Substation in accordance with the transmission studies which are filed under a confidentiality agreement with Commission Staff.

////

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4902-4806-5390

10-Year Filing Plan Update
October 2, 2025

Lava Run
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Corporation Commission Staff Letter

Lava Run
Wind & Solar Projects

Corporation Commission Staff Letter

Corporation Commission Staff Letter

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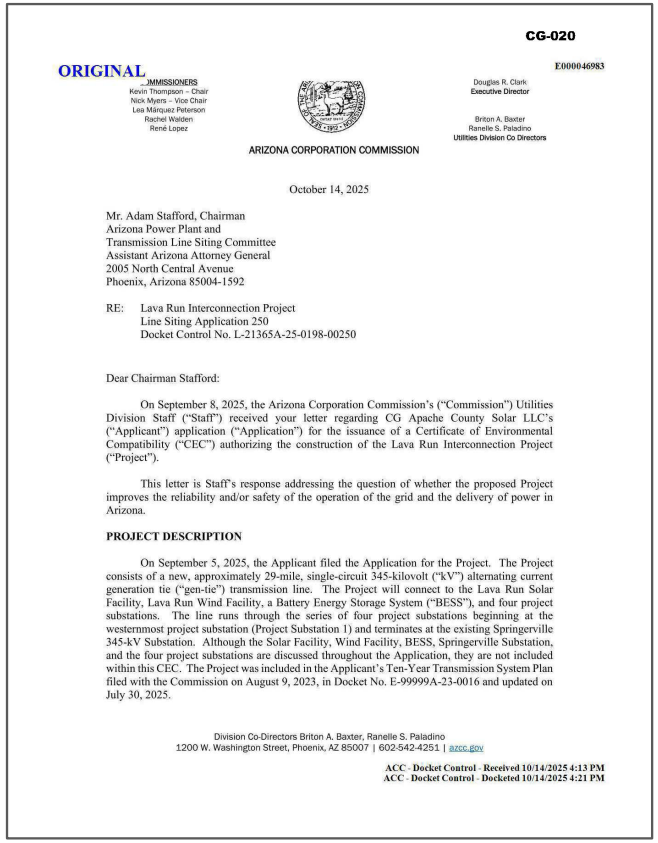
- Lava Run Wind Phase I and Lava Run Solar Phase I were evaluated and granted Network Resource Interconnection Service (NRIS).NRIS enables these projects to deliver energy to TEP's service territory, including its load pocket, without requiring any network upgrades.
- Lava Run Solar Phase II underwent studies for both NRIS and Energy Resource Interconnection Service (ERIS). ERIS enables Solar Phase II to interconnect with TEP's system; however, it does not provide transmission service rights.

Corporation Commission Staff Letter

Lava Run
Wind & Solar Projects



CG-020

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Nick Myers – Vice Chair
Lea Márquez Peterson
Rachel Walden
René Lopez

Douglas R. Clark
Executive Director

Briton A. Baxter
Ranelle S. Paladino
Utilities Division Co Directors

ARIZONA CORPORATION COMMISSION

October 14, 2025

Mr. Adam Stafford, Chairman
Arizona Power Plant and
Transmission Line Siting Committee
Assistant Arizona Attorney General
2005 North Central Avenue
Phoenix, Arizona 85004-1592

RE: Lava Run Interconnection Project
Line Siting Application 250
Docket Control No. L-21365A-25-0198-00250

Dear Chairman Stafford:

On September 8, 2025, the Arizona Corporation Commission's ("Commission") Utilities Division Staff ("Staff") received your letter regarding CG Apache County Solar LLC's ("Applicant") application ("Application") for the issuance of a Certificate of Environmental Compatibility ("CEC") authorizing the construction of the Lava Run Interconnection Project ("Project").

This letter is Staff's response addressing the question of whether the proposed Project improves the reliability and/or safety of the operation of the grid and the delivery of power in Arizona.

PROJECT DESCRIPTION

On September 5, 2025, the Applicant filed the Application for the Project. The Project consists of a new, approximately 29-mile, single-circuit 345-kilovolt ("kV") alternating current generation tie ("gen-tie") transmission line. The Project will connect to the Lava Run Solar Facility, Lava Run Wind Facility, a Battery Energy Storage System ("BESS"), and four project substations. The line runs through the series of four project substations beginning at the westernmost project substation (Project Substation 1) and terminates at the existing Springerville 345-kV Substation. Although the Solar Facility, Wind Facility, BESS, Springerville Substation, and the four project substations are discussed throughout the Application, they are not included within this CEC. The Project was included in the Applicant's Ten-Year Transmission System Plan filed with the Commission on August 9, 2023, in Docket No. E-99999A-23-0016 and updated on July 30, 2025.

Division Co-Directors Briton A. Baxter, Ranelle S. Paladino
1200 W. Washington Street, Phoenix, AZ 85007 | 602-542-4251 | azcc.gov

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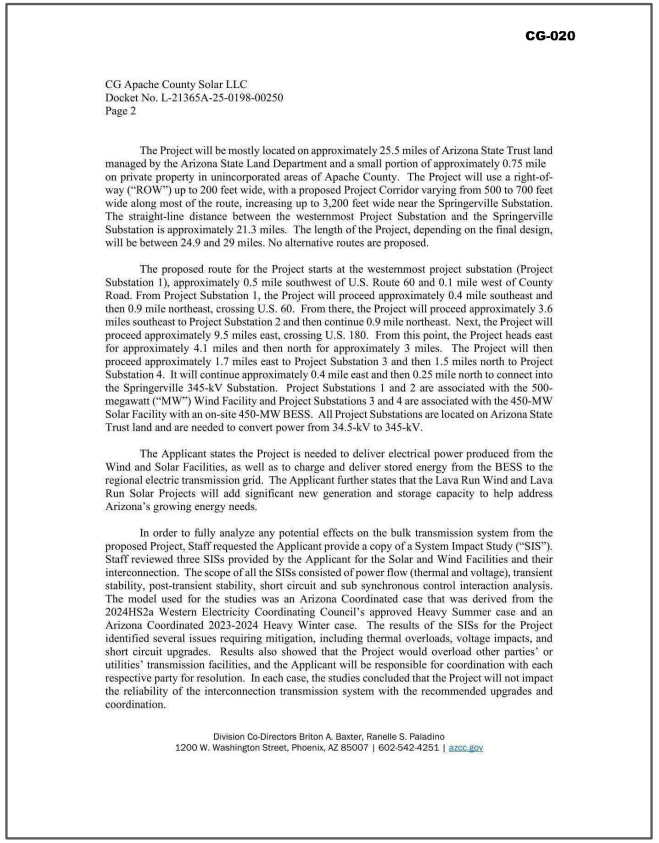

CG-020

CG Apache County Solar LLC
Docket No. L-21365A-25-0198-00250
Page 2

The Project will be mostly located on approximately 25.5 miles of Arizona State Trust land managed by the Arizona State Land Department and a small portion of approximately 0.75 mile on private property in unincorporated areas of Apache County. The Project will use a right-of-way ("ROW") up to 200 feet wide, with a proposed Project Corridor varying from 500 to 700 feet wide along most of the route, increasing up to 3,200 feet wide near the Springerville Substation. The straight-line distance between the westernmost Project Substation and the Springerville Substation is approximately 21.3 miles. The length of the Project, depending on the final design, will be between 24.9 and 29 miles. No alternative routes are proposed.

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The Applicant states the Project is needed to deliver electrical power produced from the Wind and Solar Facilities, as well as to charge and deliver stored energy from the BESS to the regional electric transmission grid. The Applicant further states that the Lava Run Wind and Lava Run Solar Projects will add significant new generation and storage capacity to help address Arizona's growing energy needs.

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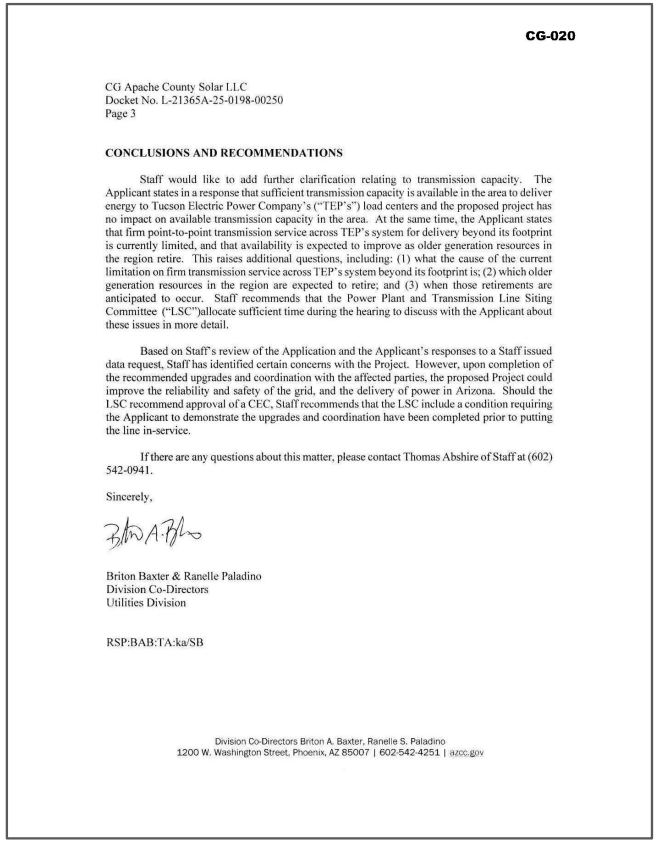

CG-020

CG Apache County Solar LLC
Docket No. L-21365A-25-0198-00250
Page 3

CONCLUSIONS AND RECOMMENDATIONS

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Based on Staff's review of the Application and the Applicant's responses to a Staff issued data request, Staff has identified certain concerns with the Project. However, upon completion of the recommended upgrades and coordination with the affected parties, the proposed Project could improve the reliability and safety of the grid, and the delivery of power in Arizona. Should the LSC recommend approval of a CEC, Staff recommends that the LSC include a condition requiring the Applicant to demonstrate the upgrades and coordination have been completed prior to putting the line in-service.

If there are any questions about this matter, please contact Thomas Abshire of Staff at (602) 542-0941.

Sincerely,

Briton Baxter & Ranelle Paladino
Division Co-Directors
Utilities Division

RSP:BAB:TA:ka/SB

Division Co-Directors Briton A. Baxter, Ranelle S. Paladino
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ACC Utilities Division Staff Letter
October 14, 2025

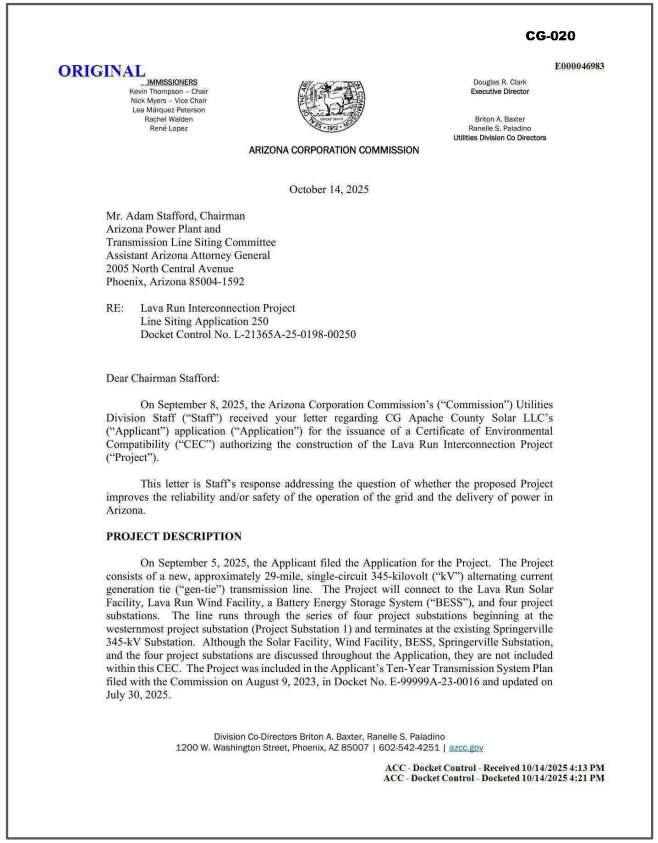
Corporation Commission Staff Letter

Lava Run
Wind & Solar Projects

- The NRIS study indicated that significant system upgrades would be required to deliver energy to TEP's service territory. In contrast, the ERIS study showed no need for network upgrades. Based on these results, the Applicants elected to proceed with the ERIS interconnection.
- The staff's proposed CEC conditions should not be applied because the Generator Interconnection Agreements (GIAs) for Phase I Wind and Phase I Solar provide NRIS without requiring any network upgrades. Likewise, the GIA for Phase II Solar provides interconnection under ERIS, also without any network upgrades.

Corporation Commission Staff Letter

Lava Run
Wind & Solar Projects



CG-020

ORIGINAL

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COMMISSIONERS
Kevin Thompson – Chair
Nick Myers – Vice Chair
Lea Márquez Peterson
Rachel Walden
René Lopez

ARIZONA CORPORATION COMMISSION

Douglas R. Clark
Executive Director

Briton A. Baxter
Ranelle S. Paladino
Utilities Division Co Directors

October 14, 2025

Mr. Adam Stafford, Chairman
Arizona Power Plant and
Transmission Line Siting Committee
Assistant Arizona Attorney General
2005 North Central Avenue
Phoenix, Arizona 85004-1592

RE: Lava Run Interconnection Project
Line Siting Application 250
Docket Control No. L-21365A-25-0198-00250

Dear Chairman Stafford:

On September 8, 2025, the Arizona Corporation Commission's ("Commission") Utilities Division Staff ("Staff") received your letter regarding CG Apache County Solar LLC's ("Applicant") application ("Application") for the issuance of a Certificate of Environmental Compatibility ("CEC") authorizing the construction of the Lava Run Interconnection Project ("Project").

This letter is Staff's response addressing the question of whether the proposed Project improves the reliability and/or safety of the operation of the grid and the delivery of power in Arizona.

PROJECT DESCRIPTION

On September 5, 2025, the Applicant filed the Application for the Project. The Project consists of a new, approximately 29-mile, single-circuit 345-kilovolt ("kV") alternating current generation tie ("gen-tie") transmission line. The Project will connect to the Lava Run Solar Facility, Lava Run Wind Facility, a Battery Energy Storage System ("BESS"), and four project substations. The line runs through the series of four project substations beginning at the westernmost project substation (Project Substation 1) and terminates at the existing Springerville 345-kV Substation. Although the Solar Facility, Wind Facility, BESS, Springerville Substation, and the four project substations are discussed throughout the Application, they are not included within this CEC. The Project was included in the Applicant's Ten-Year Transmission System Plan filed with the Commission on August 9, 2023, in Docket No. E-99999A-23-0016 and updated on July 30, 2025.

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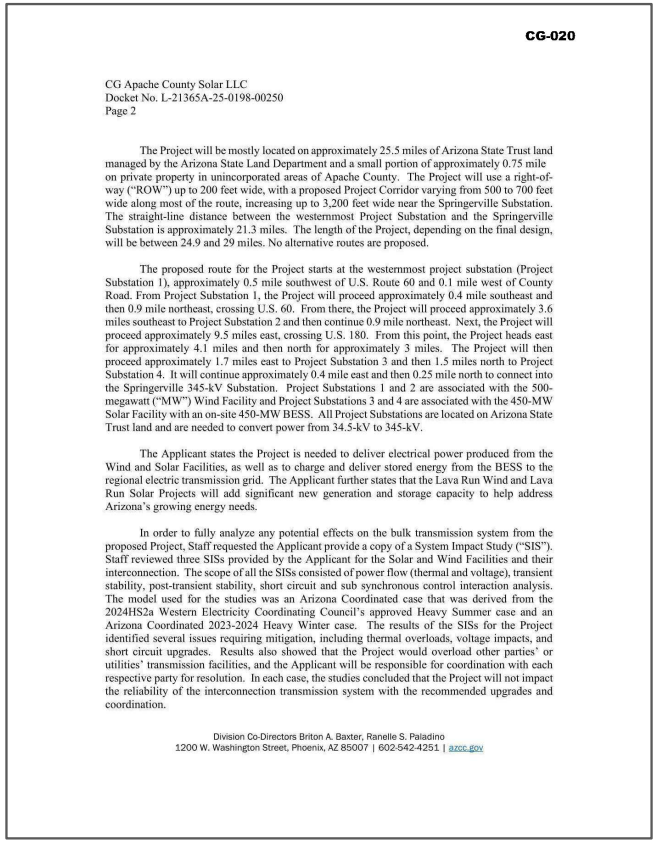

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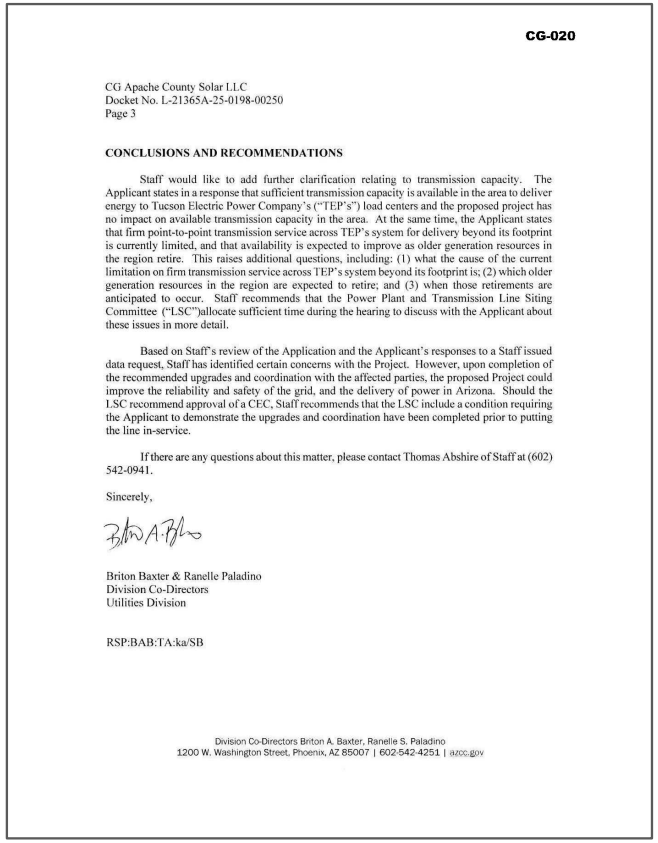

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ACC Utilities Division Staff Letter
October 14, 2025

Lava Run
Wind & Solar Projects

Virtual Tour

Lava Run
Wind & Solar Projects

Virtual Tour

Lava Run
Wind & Solar Projects

Environmental Compatibility

Lava Run
Wind & Solar Projects

Environmental Compatibility

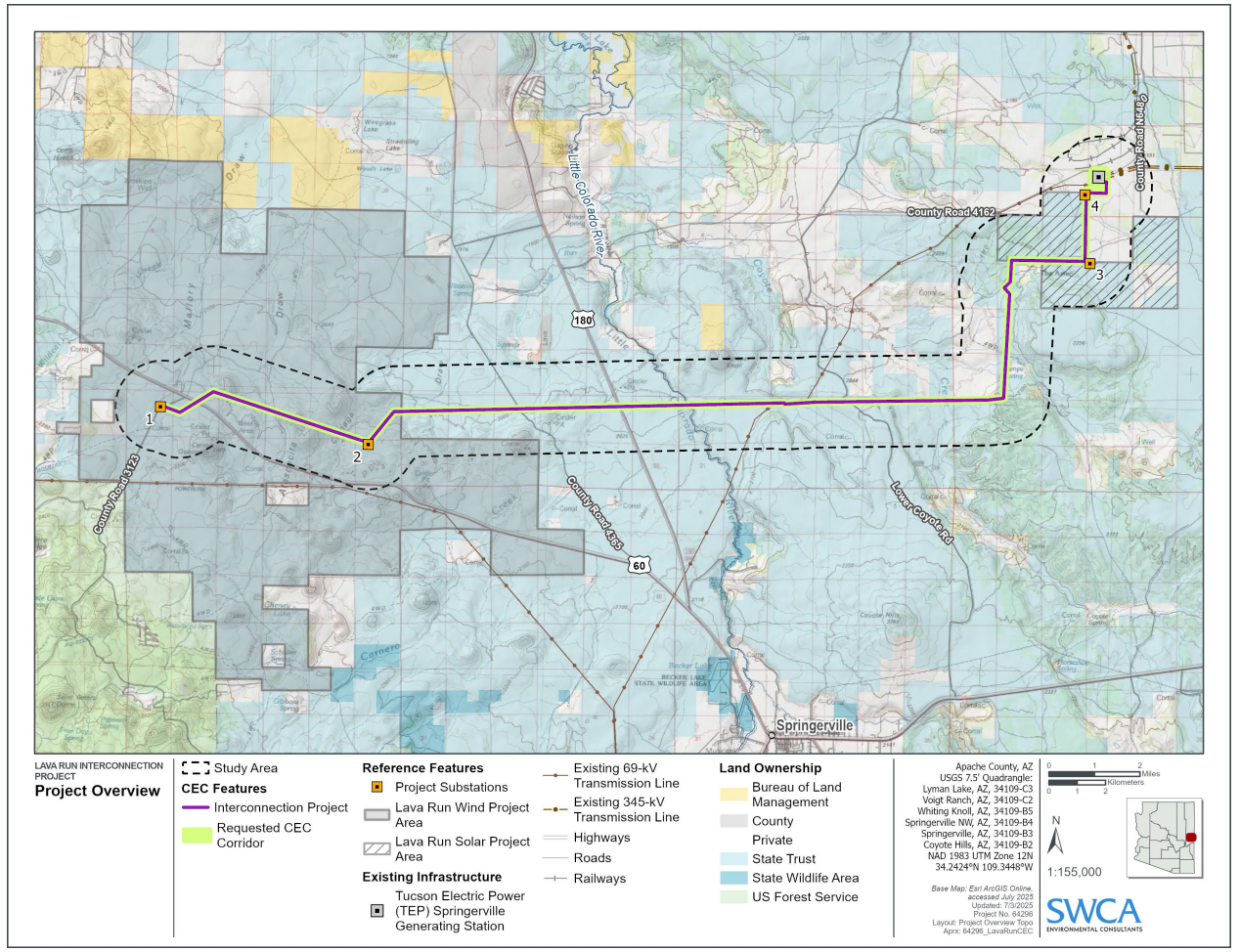
Overview of Environmental Studies

Lava Run
Wind & Solar Projects

- CEC Application Environmental Studies:
  - Land Use — *Exhibits A, B, and H*
  - Biological Resources — *Exhibits C and D*
  - Visual Resources — *Exhibits E and G*
  - Cultural Resources — *Exhibit E*
  - Recreation Resources — *Exhibit F*
  - Noise and Interference — *Exhibit I*
- Study Area comprised the CEC Corridor and a 1-mile buffer from the Proposed Route centerline

Overview of Environmental Studies

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Lava Run
Wind & Solar Projects

Environmental Compatibility – Land Use

Lava Run
Wind & Solar Projects

Environmental Compatibility – Land Use

Land Jurisdiction and Ownership

Lava Run
Wind & Solar Projects

Land Jurisdiction

- **Entirely within unincorporated Apache County**

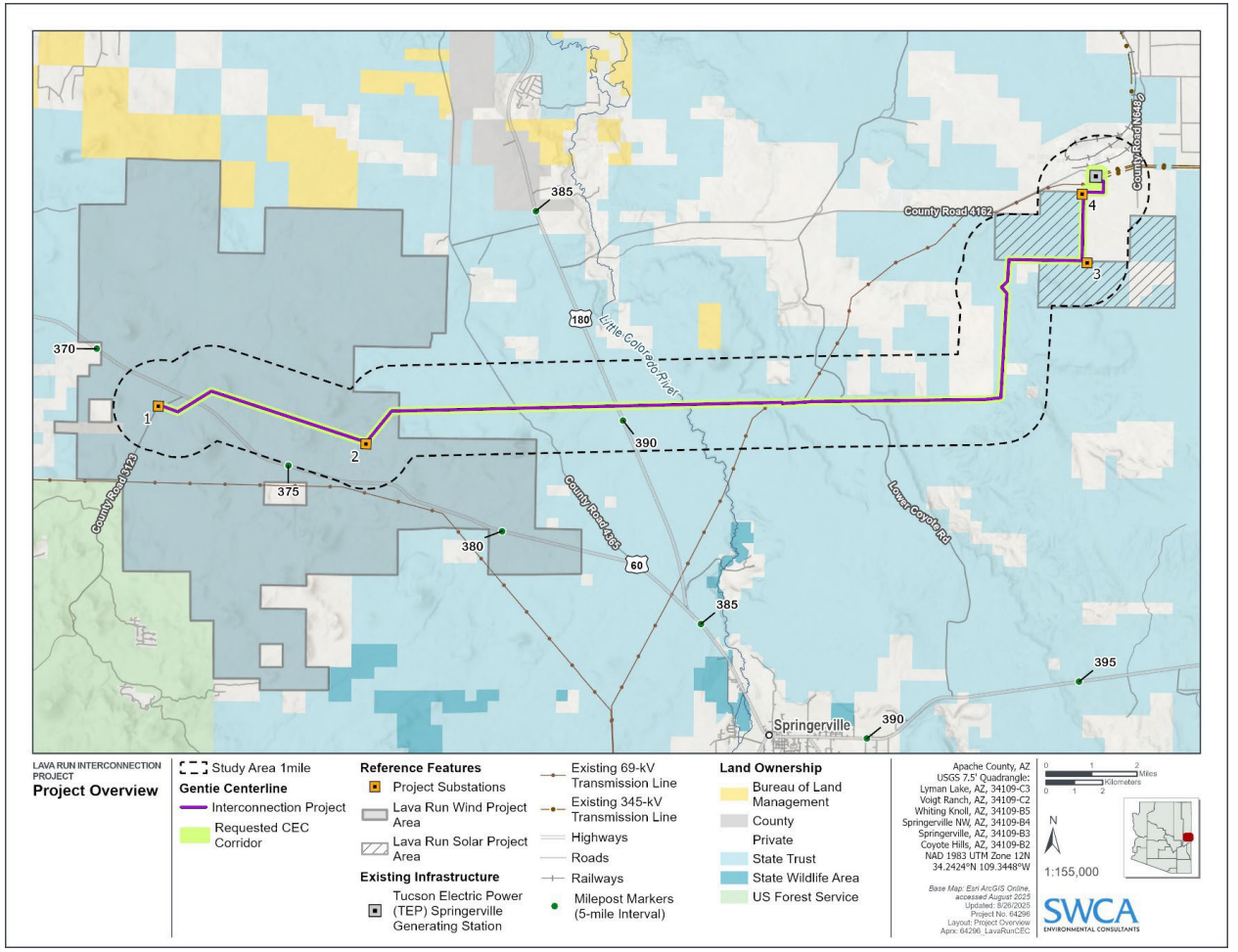
Land Ownership

- **Primarily on State Trust land administered by ASLD; remaining areas area privately owned**
  - Arizona State Trust Land access would be granted through a ROW agreement
  - Private property access would be granted through easements
- **Crosses Arizona Department of Transportation (ADOT) ROW**

Land Ownership	Acres in CEC Corridor	Miles of Proposed Route
Private	178 *(10%)*	0.75 *(3%)*
ASLD	1,533 *(90%)*	25.5 *(97%)*
Total	1,711	26.25

Land Jurisdiction and Ownership

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Existing Land Use

Lava Run
Wind & Solar Projects

Existing Land Use

- Study Area is rural in character, and is primarily undeveloped
- Existing land use is primarily vacant
  - Vacant land within the Study Area and along CEC Corridor is used for cattle grazing
- Other land uses include industrial, utilities, transportation, and Little Colorado River

Existing Utility Infrastructure

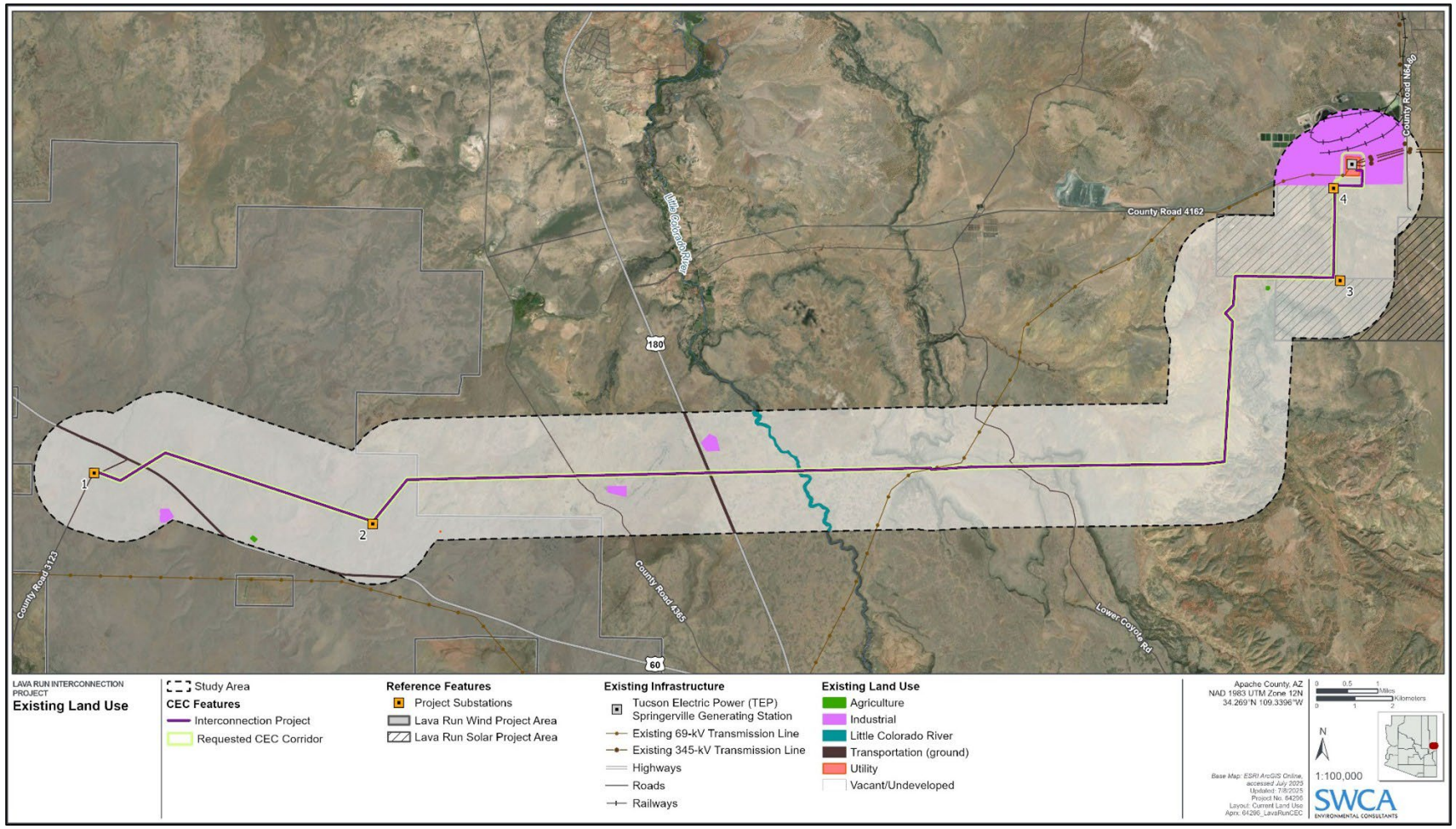
- 345 kV transmission line
- 69-kV distribution line
- Tucson Electric Power Company (TEP) Springerville Generating Station and substation

Apache County Zoning

- Agriculture (27%) and Unzoned (73%)
- No rezoning required

Existing Land Use

Lava Run
Wind & Solar Projects



Existing Land Use

Existing Land Use

Lava Run
Wind & Solar Projects

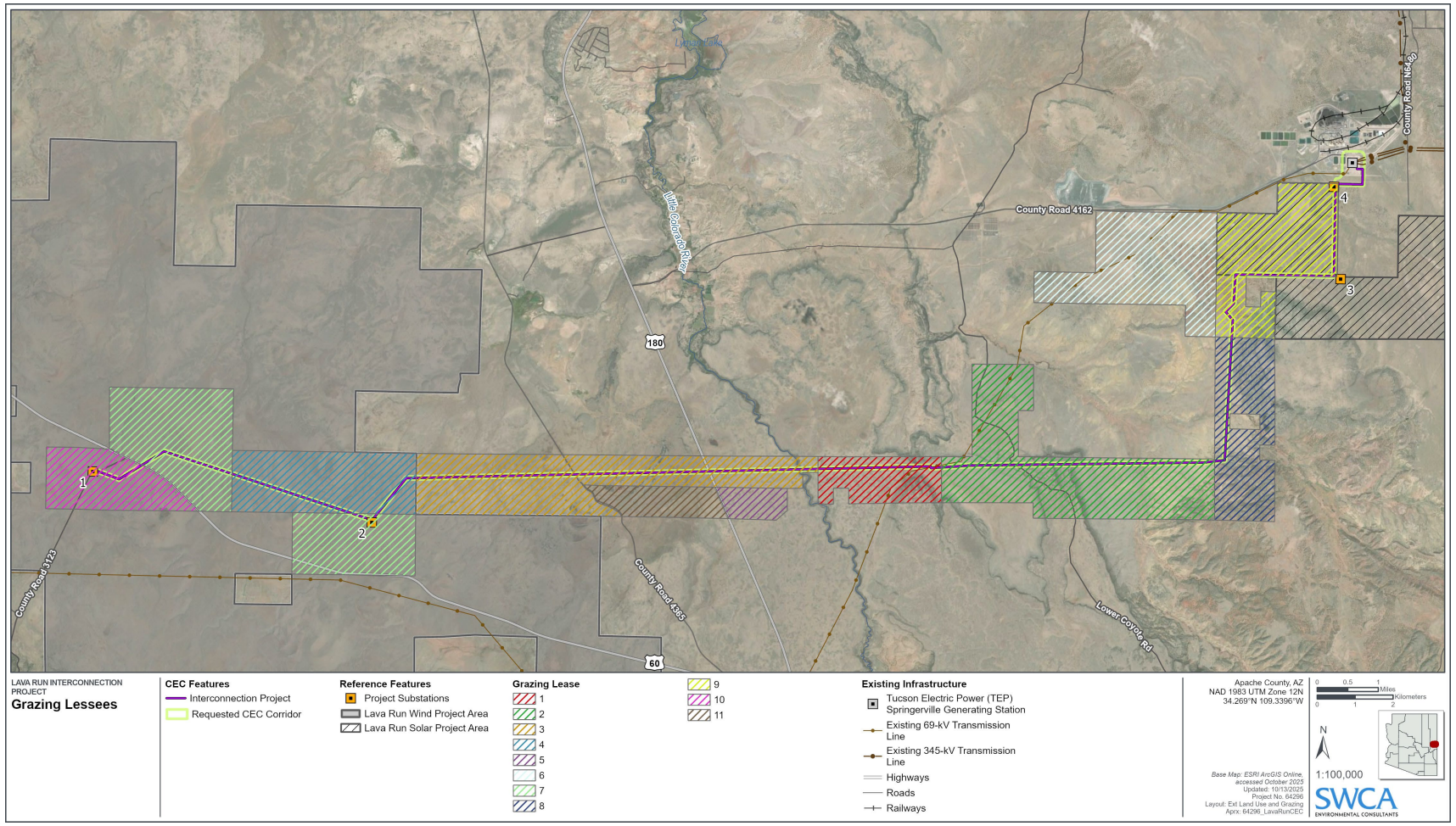
Grazing

- Within the CEC Corridor, 8 lessees hold 9 grazing leases with the ASLD
- Applicants are currently coordinating with the lessees and are in the process of executing construction impact agreements with each lessee
- Construction impact agreements will be used to ensure that impacts to access and grazing activities are avoided or minimized during construction

The Interconnection Project is environmentally compatible with existing land use.

Existing Land Use

Lava Run
Wind & Solar Projects



Grazing Lessees

Planned Land Use

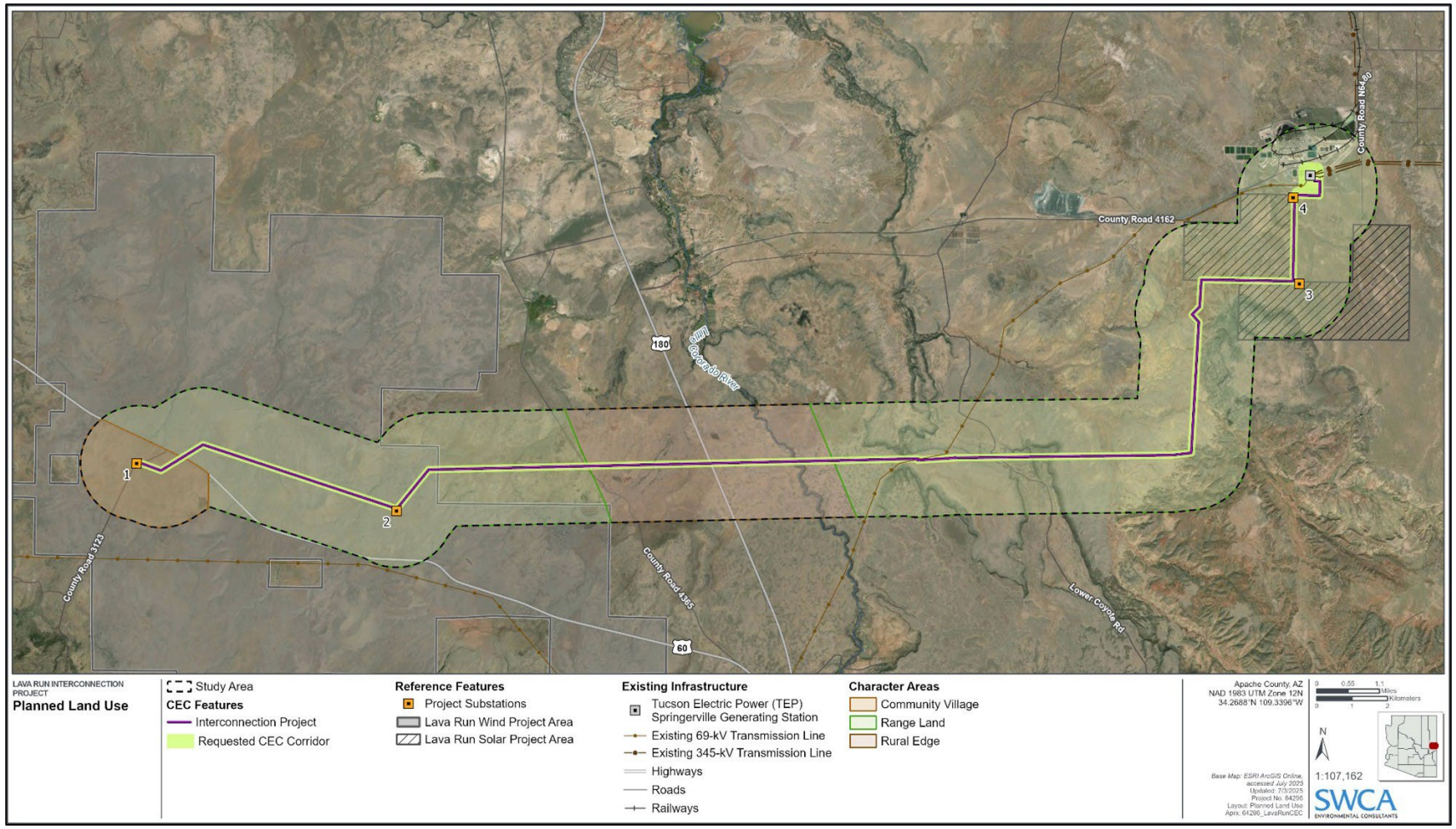
Lava Run
Wind & Solar Projects

Planned Land Use

- Planned land use within the Study Area can generally be characterized as continued grazing and cattle ranching, with provisions for lower density development and higher density development along highways and specified areas
- Study Area includes Range Land, Rural Edge, and Community Village character areas as defined by the Apache County Comprehensive Plan
  - **Range Land** purpose is to allow cattle ranching, farming, and other traditional agricultural uses
  - **Rural Edge** is to provide lower density residential development adjacent to Community Village
  - **Community Village** is to provide large areas with higher density residential development with a mix of related commercial, industrial, and institutional uses extending from highway corridors and highway intersections
- The Study Area also occurs within the Vernon Area Plan

Planned Land Use

Lava Run
Wind & Solar Projects



Planned Land Use

Planned Land Use

Lava Run
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Existing Plans for Development (Exhibit H)

- Letter sent to 24 different jurisdictions and stakeholders
- Requested information about planned developments within the Study Area
- No planned developments were identified

Planned Land Use

Lava Run
Wind & Solar Projects

SWCA
ENVIRONMENTAL CONSULTANTS
Sound Science. Creative Solutions.®

1750 South Woodlands Village Boulevard
Suite 200
Flagstaff, Arizona 86001
Tel 928.774.5500 Fax 928.779.2709
www.swca.com

May 5, 2025

First Name Last Name
Client Name
Address Line 1
Address Line 2
City, State XXXXX

Re: Lava Run Interconnection Project

Dear Name:

CG Apache County Wind LLC and CG Apache County Solar LLC (collectively "Applicants") plan to file an application for a Certificate of Environmental Compatibility ("CEC") for the Lava Run Interconnection Project ("Interconnection Project") with the Arizona Power Plant and Transmission Line Siting Committee ("Line Siting Committee") in September 2025. The Interconnection Project entails the construction, operation, and maintenance of an up to 29-mile-long, 345-kilovolt (kV) aboveground electrical generation-tie transmission line to connect the Lava Run Wind and the Lava Run Solar projects—respectively, a proposed 500-megawatt (MW) wind facility and a proposed 450-MW solar facility with an on-site battery energy storage system—to the regional electrical grid via Tucson Electric Power Company's ("TEP") existing Springerville 345 kV Substation at the Springerville Generating Station. The application seeks a CEC solely for the Interconnection Project, which will cross Arizona State Trust Lands and private property in unincorporated Apache County, Arizona. Further information about the project is available at: www.lavarunprojects.com

The Applicants are working with SWCA Environmental Consultants ("SWCA") to prepare environmental studies for the Interconnection Project's CEC application. A map of the proposed route for the Interconnection Project is attached (Figure 1). The Line Siting Committee will evaluate the CEC application at a public hearing in October 2025.

Arizona Administrative Code Rule R14-3-219 requires that CEC applications include an exhibit that identifies *"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 provides an opportunity for your organization to submit any information or comments regarding development plans for inclusion in the CEC application. Specifically, please advise us of any relevant existing or future development plans that you can identify at this time. We respectfully request your response in writing.

For the Applicants to include your information in the CEC application, please forward your written comments to SWCA by July 7, 2025, via email at Jeremy.Casteel@swca.com, or by physical mail: Attn: Jeremy Casteel, SWCA Environmental Consultants, 1750 S Woodlands Village Blvd., Ste 200, Flagstaff, AZ 86001. Thank you for your cooperation.

Respectfully,

Jeremy Casteel, Lead Environmental Planner
SWCA Environmental Consultants

Attachment: Figure 1

Information Request Letter

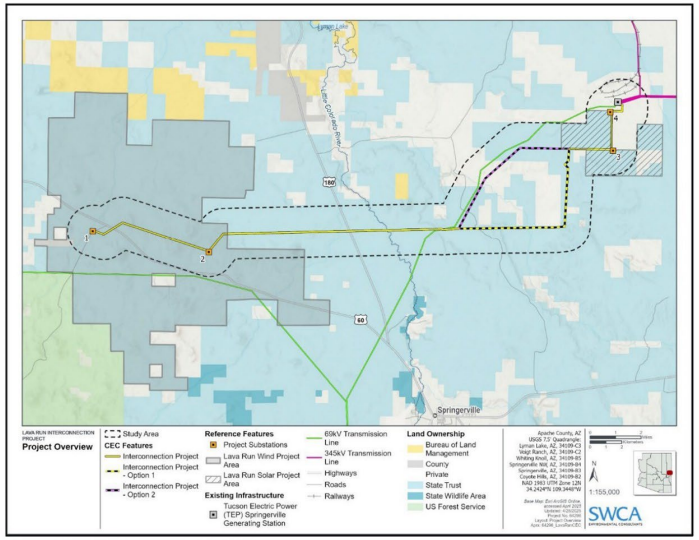


Figure 1. Lava Run Interconnection Project

Map Included with Letter

Land Use Summary

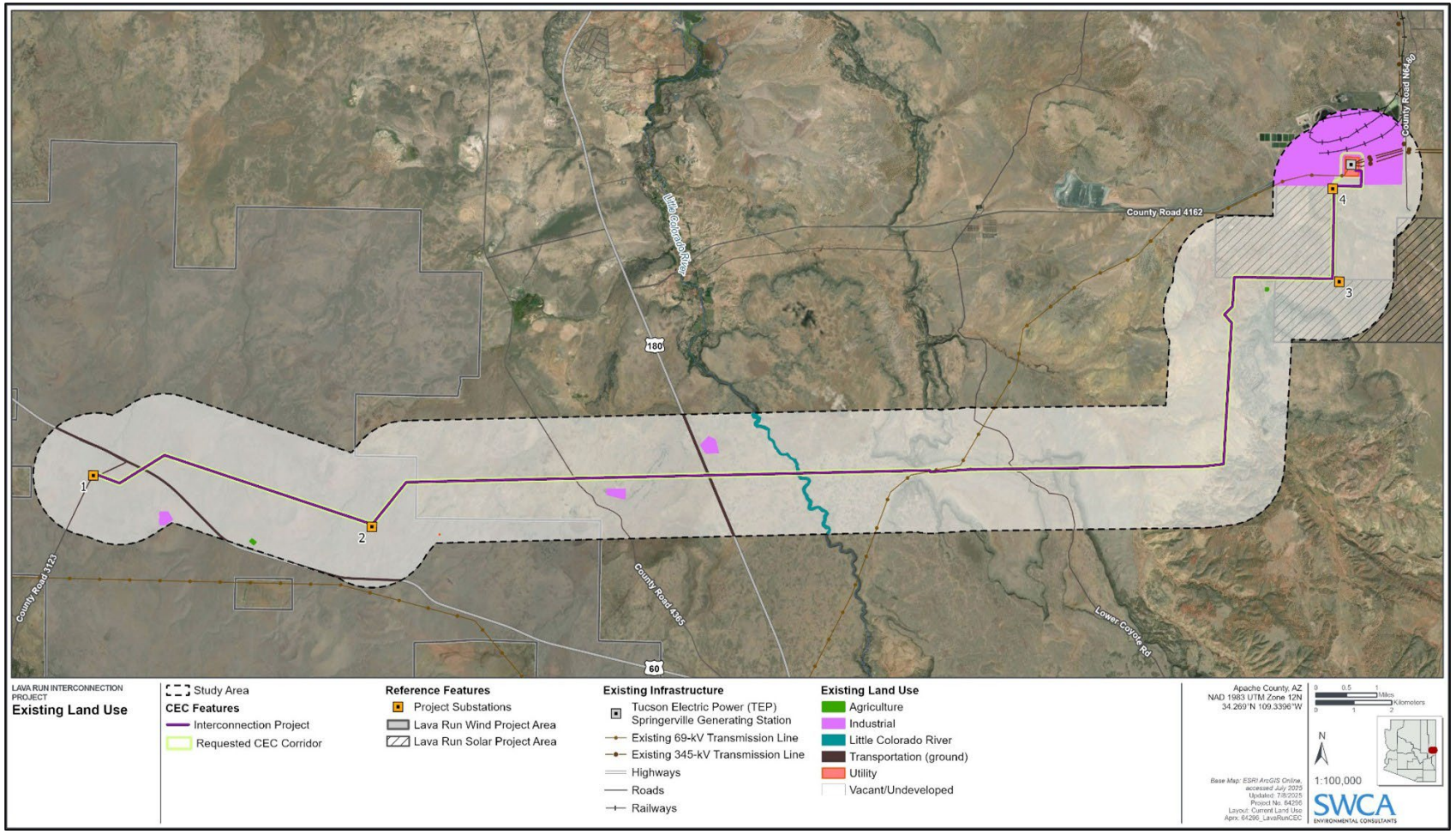
Lava Run
Wind & Solar Projects

- **Interconnection Project is consistent with existing and planned land uses**
  - Interconnection Project does not conflict with or preclude existing or future land uses (grazing/cattle ranching, transportation, industrial, utilities, transportation, and Little Colorado River)
  - Project does not conflict with Apache County Comprehensive Plan character areas in the Study Area
  - Agriculture zone allows for public and quasi-public uses, including utilities
  - Public and utility stakeholder outreach did not identify any planned development in the Study Area

The Interconnection Project is environmentally compatible with existing and planned land uses.

Land Use Summary

Lava Run
Wind & Solar Projects



Existing Land Use

Lava Run
Wind & Solar Projects

Environmental Compatibility – Biological Resources

Lava Run
Wind & Solar Projects

Environmental Compatibility – Biological Resources

Biological Resources Studies

Lava Run
Wind & Solar Projects

Review of existing publicly available data:

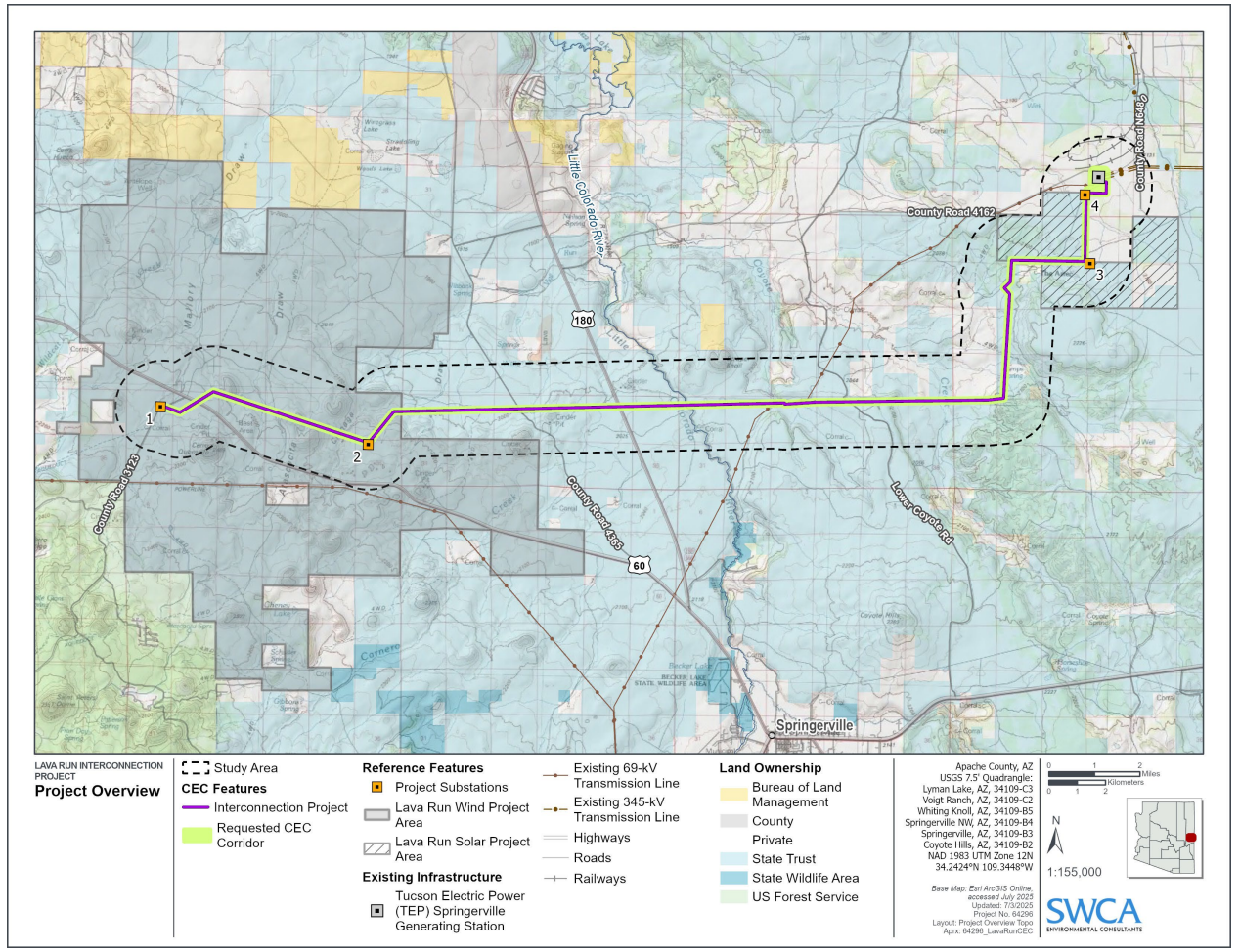
- To gather information on the biological setting and potential special-status species
- Sources include USFWS Information for Planning and Consultation (IPaC) system, AGFD Environmental Online Review Tool database, topographic data, aerial photos, land cover data, etc.
- Reviewed prior studies that overlapped all or portions of the Interconnection Project

Field survey of the Study Area:

- Biological surveys to support the CEC conducted in November 2024 and May 2025

Biological Resources Studies

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Biological Resources Agency Coordination

Lava Run
Wind & Solar Projects

- Outreach to USFWS and AGFD during all CEC stakeholder coordination efforts
- AGFD responses and coordination – ongoing since November 2022
  - AGFD agency coordination meeting November 30, 2022
  - Letters from AGFD to the Applicants February 3, 2023, and October 16, 2024
  - Letter from AGFD to ASLD August 11, 2023
  - Applicants' response to AGFD on March 17, 2025
- AGFD recommended:
  - Using construction best practices for wildlife conservation
  - Conducting pre-construction surveys
  - Following Avian Power Line Interaction Committee (APLIC) guidelines for transmission line design
  - Preparing conservation and pre-construction plans

Biological Resources Agency Coordination

Lava Run
Wind & Solar Projects

October 16, 2024

Tom Koronkiewicz
SWCA Environmental Consultants
1750 S Woodlands Village Blvd, Suite 200
Flagstaff, Arizona 86001

Electronically Submitted to: tkoronkiewicz@swca.com

RE: Lava Run Wind Project- Year 2 Bat Acoustic and Avian Use Survey Reports

Dear Mr. Koronkiewicz:

The Arizona Game and Fish Department (Department) appreciates the continued coordination on the proposed *Lava Run Wind Project* (*Project*) that will include a 500 MW wind facility and generation intertie (gen-tie) transmission line, and the opportunity to review the *Year 2 Bat Acoustic and Avian Use Survey Reports* (*Reports*); these surveys provide important data that will inform the design and siting of the project. The Department understands the *Reports* have been developed in accordance with recommendations in the *Guidelines for Reducing Impacts to Wildlife from Wind Energy Development in Arizona*[1] (*Guidelines*), recommendations in the U.S. Fish and Wildlife Service (USFWS) Wind Energy Guidance (WEG), the USFWS Eagle Conservation Plan Guidance (ECPG), and the Eagle Rule (USFWS 2016).

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission (Commission), has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations.

The Department recognizes the importance of planning efforts to develop renewable energy facilities that contribute to regional and state economic growth needs. As stated in previous correspondence, the Department would like to work closely with Repsol and SWCA during the

[1] https://s3.amazonaws.com/azgfd-portal-wordpress/PortalImages/files/wildlife/planningFor/wildlifeFriendlyGuidelines/RevisedAZWindGuidelinesOctober2012.pdf

ARIZONA
azgfd.gov | 602.942.3000
5000 W. CAREFREE HIGHWAY, PHOENIX AZ 85086
GOVERNOR: KATIE HOBBS COMMISSIONERS: CHAIRMAN CLAY HERNANDEZ, TUCSON | MARSHA PETRIE SUE, SCOTTSDALE | JEFF BUCHANAN, PATAGONIA
JAMES E. GOUCHNOUR, PAYSON | TODD G. GEILER, PRESCOTT DIRECTOR: TOM P. FINLEY DEPUTY DIRECTOR: JOSHUA W. HURST

planning and development of this facility. As noted in the Department's *Guidelines*, wind energy facilities can affect wildlife through a variety of means, including direct fatality, habitat loss and fragmentation, behavior modification, the introduction of invasive plant species, and more. The Department recognizes that appropriate placement, proper planning, and voluntary implementation of best management practices allow projects to be developed that avoid, minimize, or offset potential impacts to wildlife and recreation during the development and operation of the facilities.

The Department appreciates the use surveys and acoustic surveys that have been conducted for this potential facility. Based on the information in the *Reports*, the Department provides the following general recommendations on opportunities to avoid or minimize potential impacts to wildlife:

- The Department recommends a selection of turbines that include the capability for blade feathering at wind speeds below nameplate cut-in speeds to reduce bird and bat fatalities when energy is not being generated.
- The Department continues to recommend a minimum 2-mile buffer around documented golden eagle nests. Since golden eagles build multiple nests over time, nearby potential nesting substrates should also be considered when designing adequate buffers. In addition, turbine avoidance areas should be developed for regularly utilized foraging areas documented outside of nest buffers (i.e. prairie dog colonies).
- The Department cautions reliance on the newly created USFWS General Permit Eligibility Map to reliably inform eagle fatality risk throughout Arizona. The pre-construction avian use surveys identified eagle use rates indicative of anticipated golden eagle fatalities post-construction. Although the *Project* initially qualifies for a General Eagle Take Permit, there is potential that a Specific Eagle Take Permit will ultimately be needed based on eagle take at other locations in Arizona. Siting, design, and operation plans that avoid documented eagle nests, use areas, and prey concentration areas will help to reduce these eagle fatality risks and uncertainty in future Eagle Act General Permit eligibility.
- The Department recommends proactively painting one of the turbine blades black at the time of construction. A recent Before-After-Control-Impact study in Norway documented an over 70% reduction in avian fatalities across species (May et al. 2020)[2]. This approach to reducing avian fatalities is currently being evaluated for replicability in Wyoming. If replicated and effective, this approach should quickly become an industry standard reducing impacts to avian species without impacting energy production. Since painting of the blades would be resource-demanding at operational turbines, cost of implementation would be significantly reduced if implemented before construction.
- As described in the report, there are earthen stock tanks, springs, playas, etc. that collect water throughout the project area. The Department recommends incorporating setbacks, as appropriate, from sites that congregate avian and other wildlife species and is available to discuss and assist in identifying appropriate setbacks.
- The Department recommends establishing a minimum 0.5-mile buffer around ferruginous hawk nests.

[2] https://onlinelibrary.wiley.com/doi/10.1002/ece3.6592

- The report indicates that pinyon jay, which is a Species of Greatest Conservation Need (SGCN) and is currently under review for listing under the Endangered Species Act, was documented at several of the survey plots. Based on results from these analyses, the Department requests information on measures Repsol plans to implement to minimize potential risk to this species and is available to coordinate on options, to the extent feasible, including avoiding siting turbines near nesting and roosting habitats or areas where concentrations of pinyon jays were recorded.

The Department would like to work with Repsol and SWCA on opportunities to minimize potential risks to bats. Given the general reduction in bat fatalities that can be achieved by simply feathering blades, the Department would like to see this implemented as a proactive approach to reduce bat fatalities. The Department looks forward to working with Repsol and SWCA on the Bat and Bird Conservation Strategy (BBCS) to study fatalities post-construction. When developing the BBCS, for this project, the Department requests that additional consideration be given to hoary bats, big/pocketed free-tailed bats, and greater western mastiffs. As an example, specific research evaluating potential population-level impacts to hoary bats from wind facilities has indicated that implementation of proactive conservation measures such as curtailment can minimize potential long-term population impacts to this species (Friedenberg and Frick 2021[3]). Further, the Department recommends the identification of conservation measures that allow timely response to post-construction monitoring results that would reduce potential impacts to bat species that typically have smaller population densities, such as greater western mastiff and big/pocketed free-tailed bats.

Please reference the Department's response letters dated February 3, 2023 (M23-01060505; attached) and August 11, 2023 (M23-09172631; attached) for additional project-specific recommendations and the *Guidelines* and attached *Arizona Game and Fish Department Wind Energy Guidelines Supplement* for general recommendations to avoid or minimize the facility's potential impacts to wildlife.

Thank you for the opportunity to provide input on the *Year 2 Bat Acoustic and Avian Use Survey* for the *Lava Run Wind Project*. For further coordination, please contact Elizabeth Johnston at ejohnston@azgfd.gov or 928-532-3683.

Sincerely,

Callie Cavalcant

Callie Cavalcant
Habitat, Evaluation and Lands Branch Chief

cc: Ginger Ritter - Project Evaluation Program Supervisor
Aaron Hartzell - Region I Regional Supervisor
Elizabeth Johnston - Region I Habitat, Evaluation, and Lands Program Supervisor

[3] https://www.sciencedirect.com/science/article/am/pii/S000632072100361X

Arizona Game and Fish Department (AGFD) Letter 10/16/2024

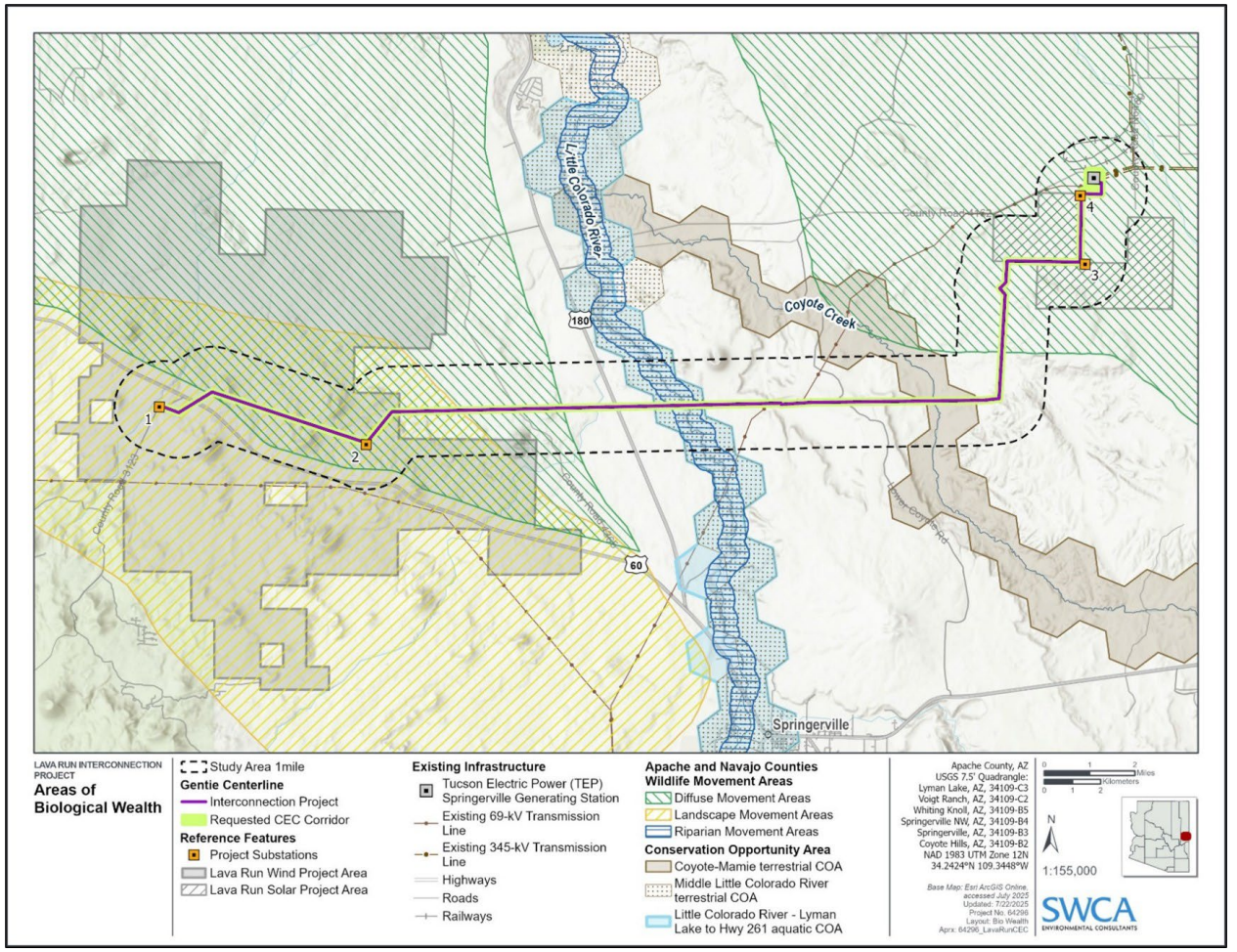
Areas of Biological Wealth

Lava Run
Wind & Solar Projects

- Defined as any habitat, feature, or location that might serve to provide important, unique, or concentrated resources for wildlife or plants in a landscape context
- 5 Areas of Biological Wealth in the Study Area:
  - Little Colorado River corridor
    - Includes two Conservation Opportunity Areas (COAs) and one riparian movement area
  - Coyote-Mamie terrestrial COA
  - 2 unnamed diffuse movement areas
  - Unnamed landscape movement area

Areas of Biological Wealth

Lava Run
Wind & Solar Projects



Areas of Biological Wealth

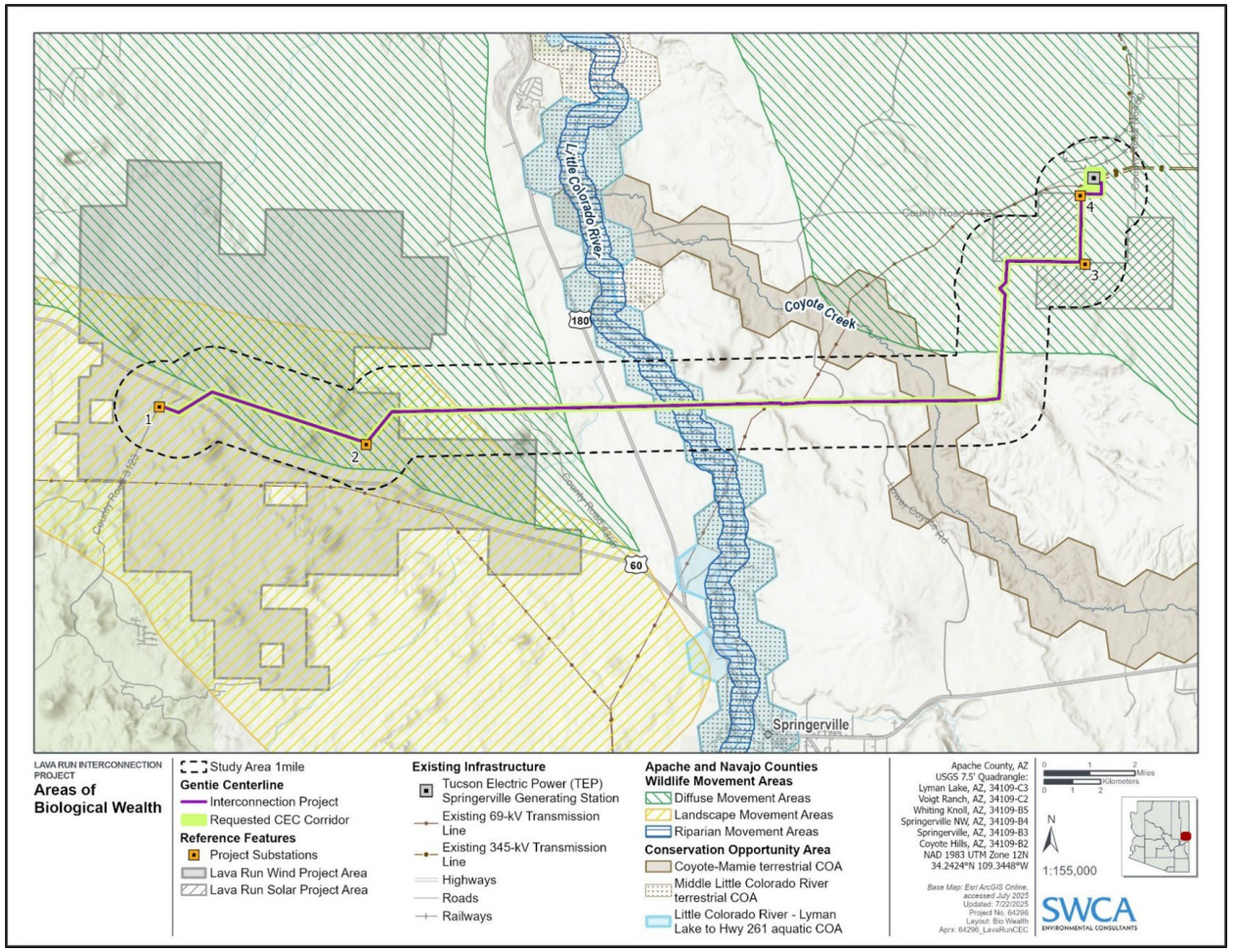
Areas of Biological Wealth

Lava Run
Wind & Solar Projects

- **Little Colorado River corridor:**
  - Little Colorado River Riparian Corridor riparian wildlife movement area
    - Goal: enable movement of both terrestrial and aquatic species
  - Middle Little Colorado River terrestrial COA
    - Goal: improve adjacent habitats, improve hydrological connections, and maintain travel corridors for a variety of wildlife species
  - Little Colorado River - Lyman Lake to Hwy 261 aquatic COA
    - Goal: provide habitat for aquatic- and riparian-dependent species, as well as migratory birds, and provide connectivity between other COAs

Areas of Biological Wealth

Lava Run
Wind & Solar Projects



Areas of Biological Wealth

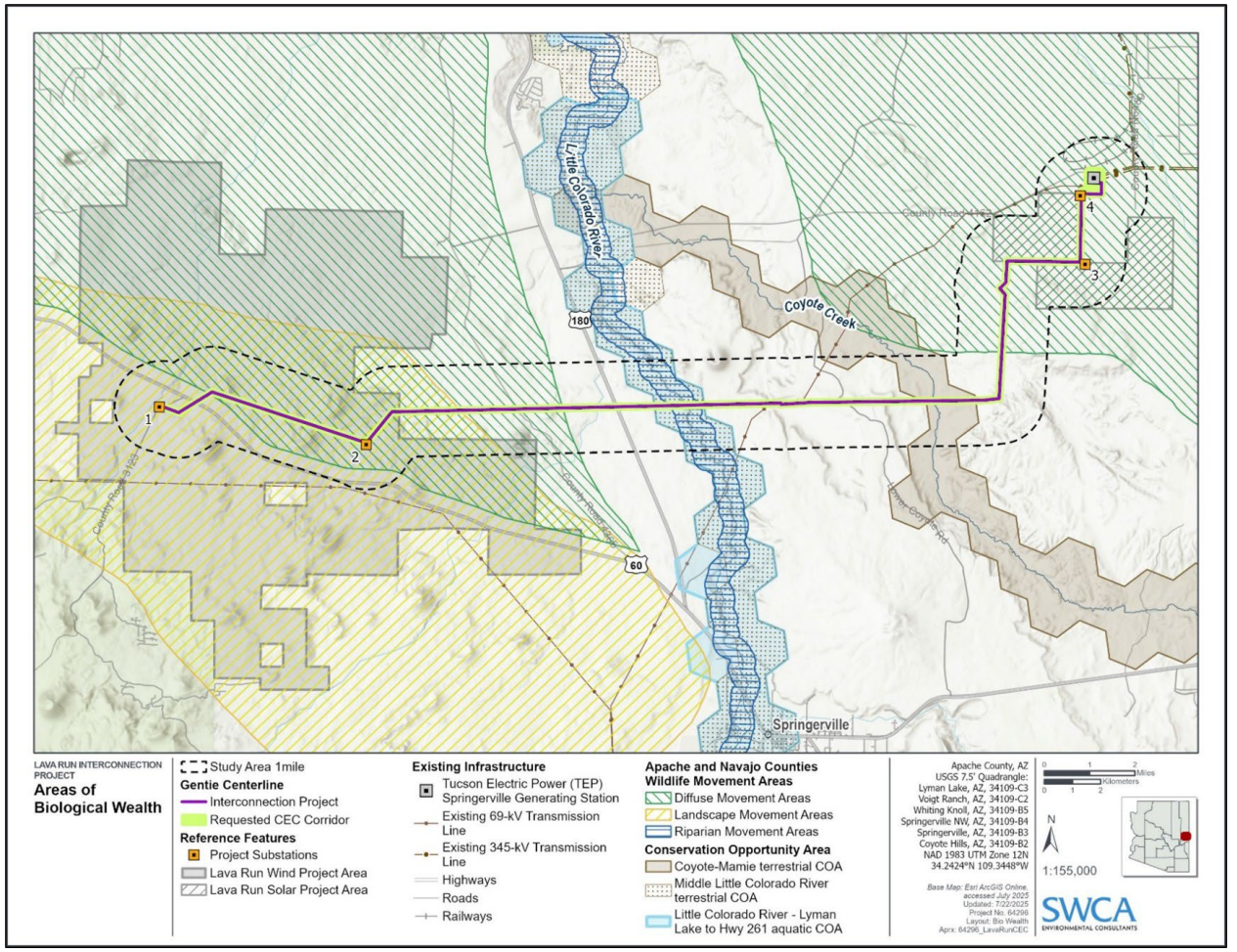
Areas of Biological Wealth

Lava Run
Wind & Solar Projects

- **Coyote-Mamie terrestrial COA**
  - Goal: improve adjacent habitats, improve hydrological connections, and maintain travel corridors for wildlife
- **Two diffuse wildlife movement areas**
  - Wildlife move within a habitat block (i.e., an approximate location of wildlife movements on the landscape)
  - Important for American pronghorn and mule deer
- **Landscape movement area**
  - Wildlife move between habitat blocks
  - Identified as important for several game species, including American pronghorn and mule deer

Areas of Biological Wealth

Lava Run
Wind & Solar Projects



Areas of Biological Wealth

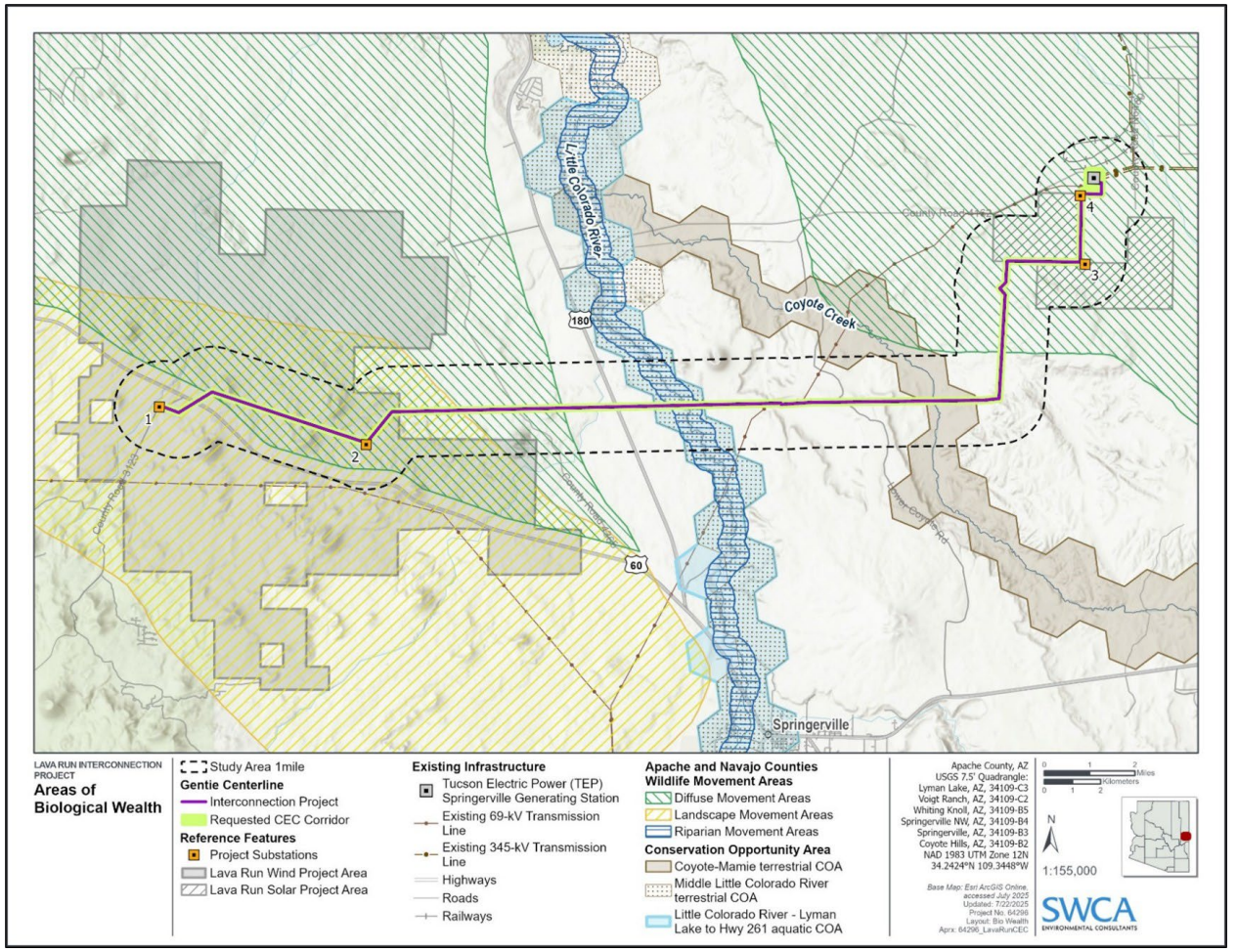
Areas of Biological Wealth

Lava Run
Wind & Solar Projects

- Construction activities may temporarily contribute to sedimentation in streams and may discourage wildlife movements due to human presence and noise-related disturbance.
- Once constructed, the project will be permeable and will not restrict wildlife movement.
- Minimization measures:
  - No disturbance will occur within the Little Colorado River or Coyote Creek
  - Erosion control measures will be implemented to minimize sedimentation.
  - Areas of temporary disturbance will be revegetated.
  - Interconnection Project will be designed and constructed following APLIC guidelines and standards as feasible.
  - Applicants will install bird diverters over the Little Colorado River and Coyote Creek crossings.
  - Fencing will be minimized and will follow the recommendations in the AZGFD's Wildlife Compatible Fencing Guidelines, as applicable and feasible.

Areas of Biological Wealth

Lava Run
Wind & Solar Projects



Areas of Biological Wealth

Special-Status Species

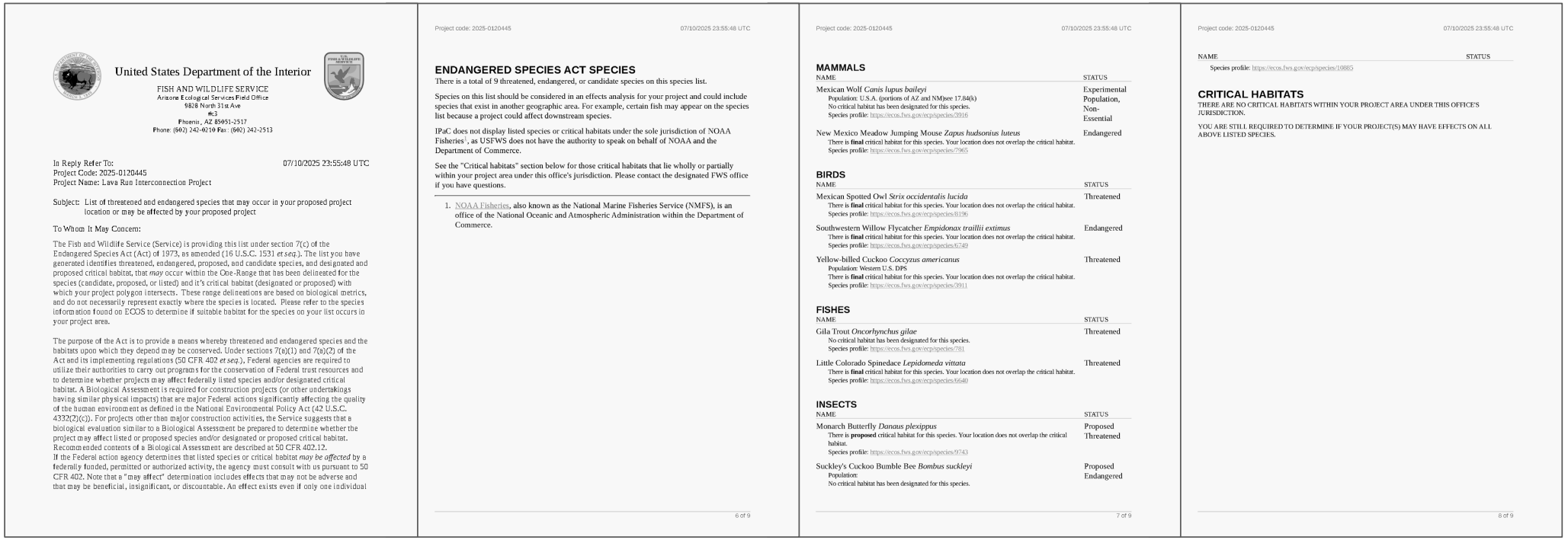
Lava Run
Wind & Solar Projects

Endangered Species Act (ESA)

- Study Area is within the geographic/elevational range and contains appropriate habitat conditions for 6 ESA-listed species:
  - Little Colorado spinedace (threatened)
  - Mexican wolf (nonessential experimental population)
  - Mexican Spotted Owl (threatened)
  - Monarch Butterfly (proposed threatened)
  - Southwestern willow flycatcher (endangered)
  - Yellow-billed cuckoo (threatened)
- No designated critical habitat

Special-Status Species

Lava Run
Wind & Solar Projects



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Arizona Ecological Services Field Office
9828 North 31st Ave
#c3
Phoenix, AZ 85051-2517
Phone: (602) 242-0210 Fax: (602) 242-2513

In Reply Refer To: 07/10/2025 23:55:48 UTC
Project Code: 2025-0120445
Project Name: Lava Run Interconnection Project

Subject: List of threatened and endangered species that may occur in your proposed project location or may be affected by your proposed project

To Whom It May Concern:

The Fish and Wildlife Service (Service) is providing this list under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*). The list you have generated identifies threatened, endangered, proposed, and candidate species, and designated and proposed critical habitat, that *may* occur within the One-Range that has been delineated for the species (candidate, proposed, or listed) and it's critical habitat (designated or proposed) with which your project polygon intersects. These range delineations are based on biological metrics, and do not necessarily represent exactly where the species is located. Please refer to the species information found on ECOS to determine if suitable habitat for the species on your list occurs in your project area.

The purpose of the Act is to provide a means whereby threatened and endangered species and the habitats upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of Federal trust resources and to determine whether projects may affect federally listed species and/or designated critical habitat. A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.
If the Federal action agency determines that listed species or critical habitat *may be affected* by a federally funded, permitted or authorized activity, the agency must consult with us pursuant to 50 CFR 402. Note that a "may affect" determination includes effects that may not be adverse and that may be beneficial, insignificant, or discountable. An effect exists even if only one individual

ENDANGERED SPECIES ACT SPECIES

There is a total of 9 threatened, endangered, or candidate species on this species list.

Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species.

IPaC does not display listed species or critical habitats under the sole jurisdiction of NOAA Fisheries[1], as USFWS does not have the authority to speak on behalf of NOAA and the Department of Commerce.

See the "Critical habitats" section below for those critical habitats that lie wholly or partially within your project area under this office's jurisdiction. Please contact the designated FWS office if you have questions.

1. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

MAMMALS

NAME	STATUS
Mexican Wolf *Canis lupus baileyi* Population: U.S.A. (portions of AZ and NM)see 17.84(k) No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/3916	Experimental Population, Non-Essential
New Mexico Meadow Jumping Mouse *Zapus hudsonius luteus* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/7965	Endangered

BIRDS

NAME	STATUS
Mexican Spotted Owl *Strix occidentalis lucida* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/8196	Threatened
Southwestern Willow Flycatcher *Empidonax traillii extimus* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6749	Endangered
Yellow-billed Cuckoo *Coccyzus americanus* Population: Western U.S. DPS There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/3911	Threatened

FISHES

NAME	STATUS
Gila Trout *Oncorhynchus gilae* No critical habitat has been designated for this species. Species profile: https://ecos.fws.gov/ecp/species/781	Threatened
Little Colorado Spinedace *Lepidomeda vittata* There is **final** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/6640	Threatened

INSECTS

NAME	STATUS
Monarch Butterfly *Danaus plexippus* There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. Species profile: https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Suckley's Cuckoo Bumble Bee *Bombus suckleyi* Population: No critical habitat has been designated for this species.	Proposed Endangered

NAME	STATUS
Species profile: https://ecos.fws.gov/ecp/species/10885	

CRITICAL HABITATS

THERE ARE NO CRITICAL HABITATS WITHIN YOUR PROJECT AREA UNDER THIS OFFICE'S JURISDICTION.

YOU ARE STILL REQUIRED TO DETERMINE IF YOUR PROJECT(S) MAY HAVE EFFECTS ON ALL ABOVE LISTED SPECIES.

Select pages from the
USFWS Information for Planning and Consultation (IPaC) system
7/10/2025

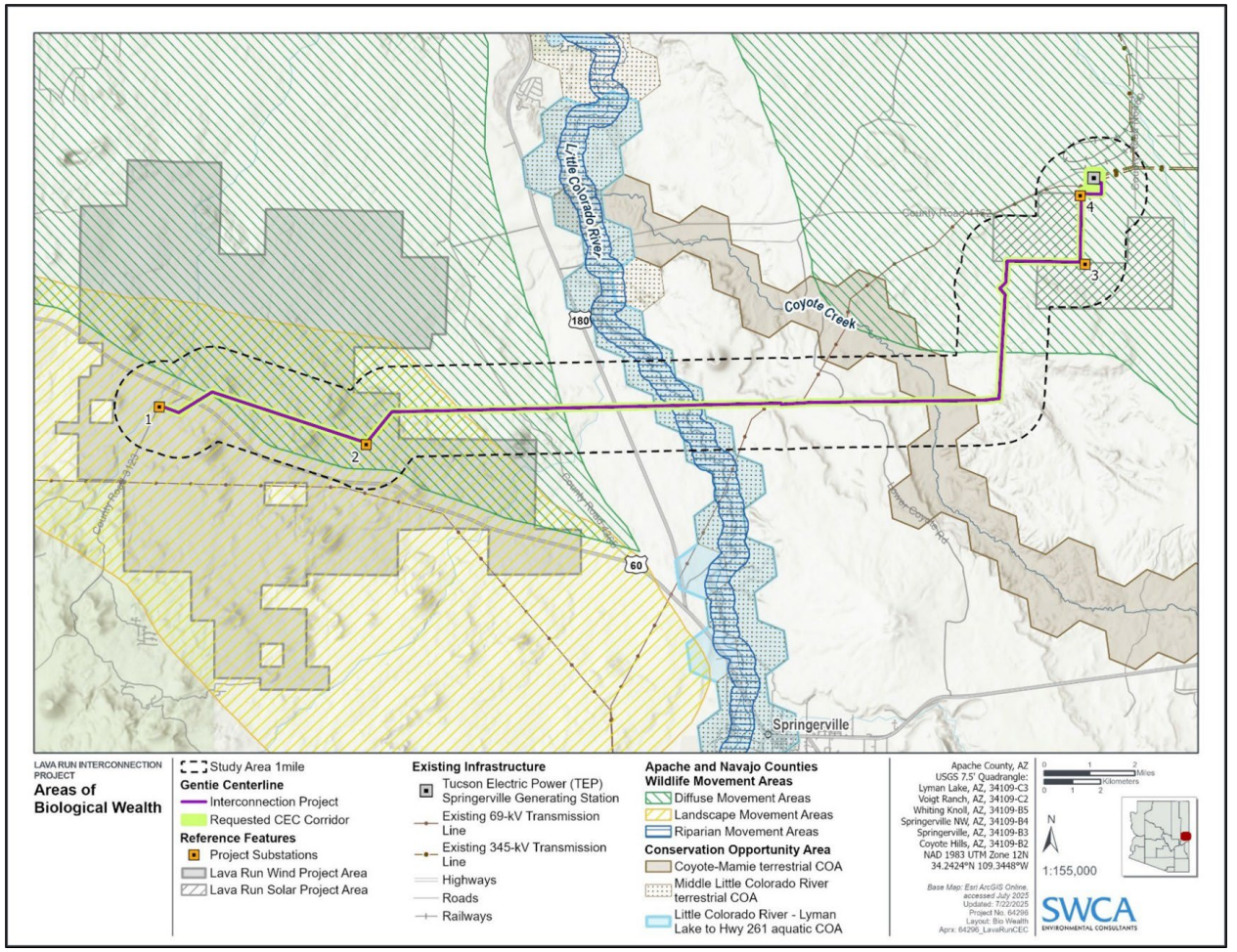
Special-Status Species

Lava Run
Wind & Solar Projects

- **Little Colorado spinedace**
  - Federally listed as threatened with designated critical habitat (approximately 7 miles south along Nutrioso Creek) and a Species of Greatest Conservation Need (SGCN) Tier 1 species
  - Species has been documented within 3 miles of the Study Area, both upstream (south) and downstream (north) of the Study Area
  - Minimization Measures:
    - No disturbance will occur within the Little Colorado River or its canyon.
    - Erosion control measures will be implemented to minimize sedimentation.

Areas of Biological Wealth

Lava Run
Wind & Solar Projects



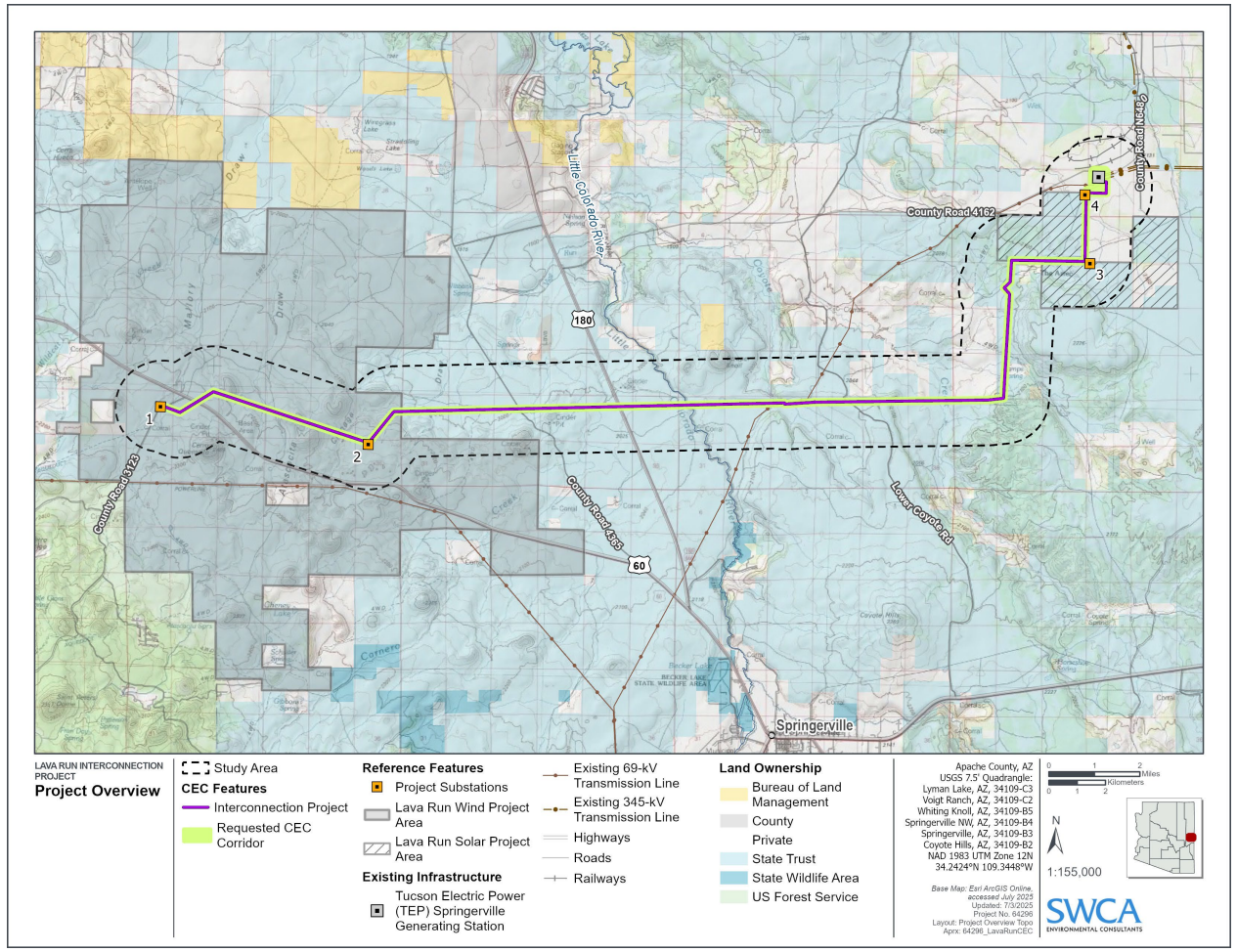
Areas of Biological Wealth

Special-Status Species

Lava Run
Wind & Solar Projects

- **Mexican Wolf**
  - Designated as nonessential experimental population (i.e., treated as proposed for listing) and an SGCN Tier 1 species.
  - Study Area is in Mexican Wolf Experimental Population Area (MWEPA) management area Zone 2, where the species is allowed to naturally disperse and may be translocated.
  - Study Area includes suitable pinyon-juniper woodlands habitat and is within the subspecies' occupied range.
  - Species has been documented within 3 miles of the Study Area.
  - Dispersing Mexican wolves may experience displacement or corridor impermeability during construction, but effects are anticipated to be minor and temporary.

Special-Status Species



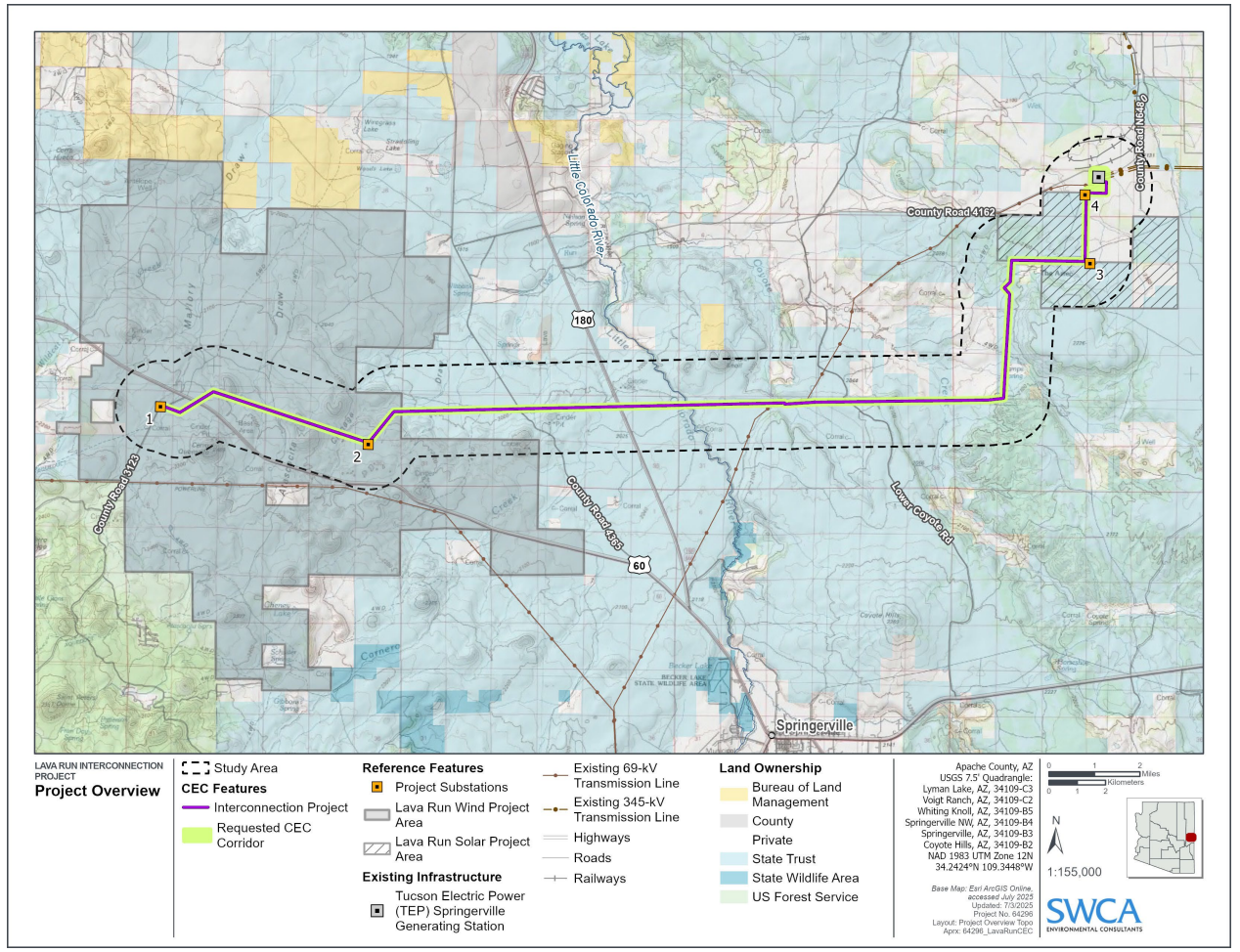
Interconnection Project Overview

Special-Status Species

- **Mexican Spotted Owl**
  - Federally listed as threatened with designated critical habitat (1 mile southwest of the Study Area) and is an SGCN Tier 1 species.
  - Study Area is within the subspecies' year-round range and may support dispersing or wintering individuals.
  - Construction may cause temporary displacement or impermeability.
  - Following construction, dispersing and wintering individuals may be at risk of collision during project operations, particularly along the Little Colorado River corridor.
  - Impacts would be minimal since any movements would likely occur at night (outside of construction timing) and Applicants will implement APLIC guidelines and standards as feasible, including installation of bird diverters.

Special-Status Species

Lava Run
Wind & Solar Projects



Interconnection Project Overview

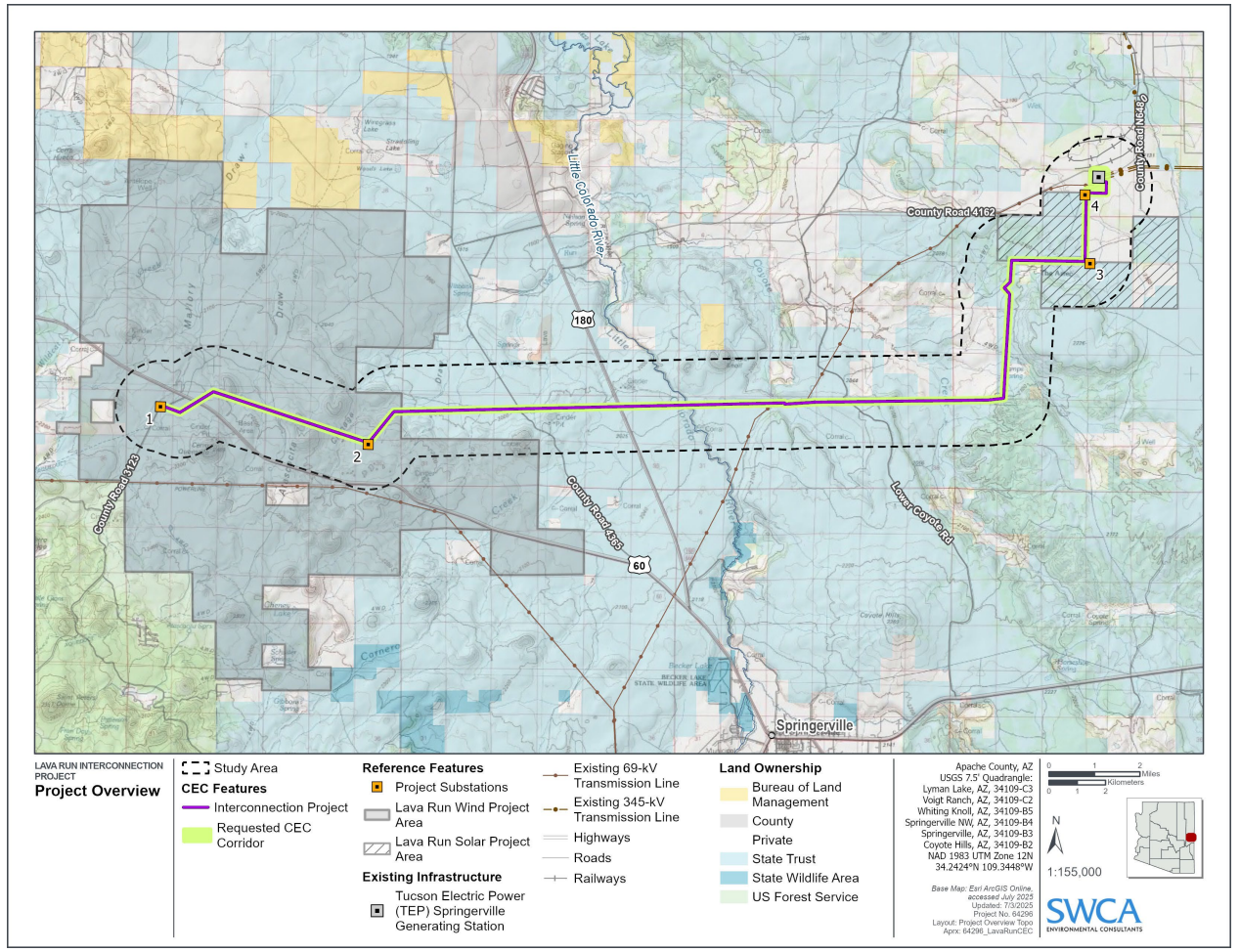
Special-Status Species

Lava Run
Wind & Solar Projects

- **Monarch Butterfly**
  - Proposed for listing under the ESA as a threatened species with a 4(d) rule for take exceptions
  - The Study Area is within the butterfly's spring, summer, and early fall migration range and contains suitable nectar-producing species for foraging.
  - Broadleaf milkweed has been documented in the adjacent Wind Facility project area, which could be used by breeding monarchs.
  - Impacts to individual monarchs would be limited to minor behavioral changes (to avoid construction equipment or in response to the removal of nectar sources).
  - If the species becomes listed, the Applicants will evaluate the need for additional effects analysis, survey, minimization measures, and permitting at that time.

Special-Status Species

Lava Run
Wind & Solar Projects



Interconnection Project Overview

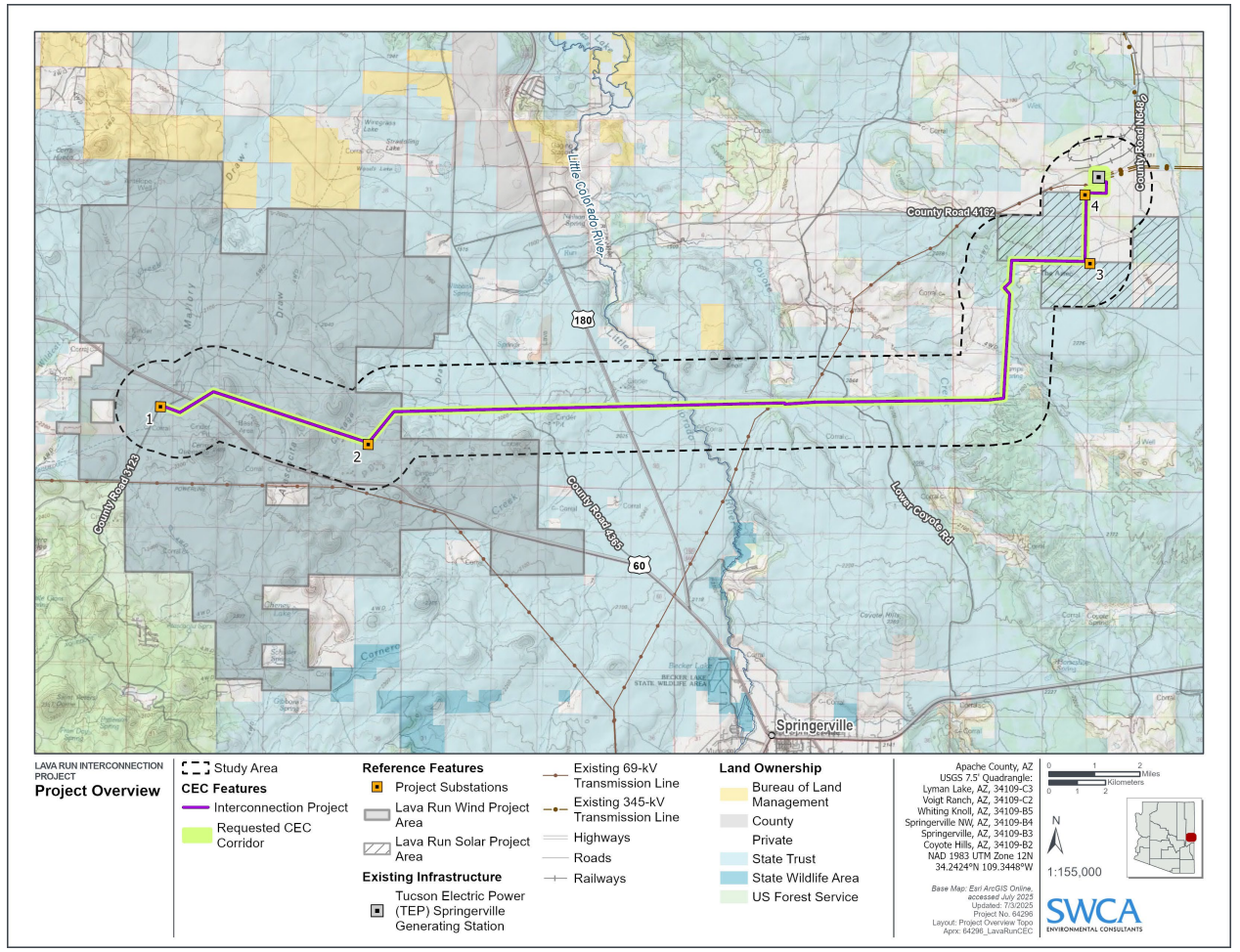
Special-Status Species

Lava Run
Wind & Solar Projects

- **Southwestern Willow Flycatcher**
  - Federally listed as endangered with designated critical habitat (approximately 9 miles south along the Little Colorado River) and is an SGCN Tier 1 species.
  - Study Area is within current and predicted ranges; habitats within the Study Area are not suitable for breeding but could support migrating individuals.
  - During construction, effects include disturbance due to noise and activity from the presence of humans and equipment.
  - Following construction, effects include risk of collisions with transmission lines.
  - Applicants will implement APLIC guidelines and standards as feasible, including installation of bird diverters.

Special-Status Species

Lava Run
Wind & Solar Projects



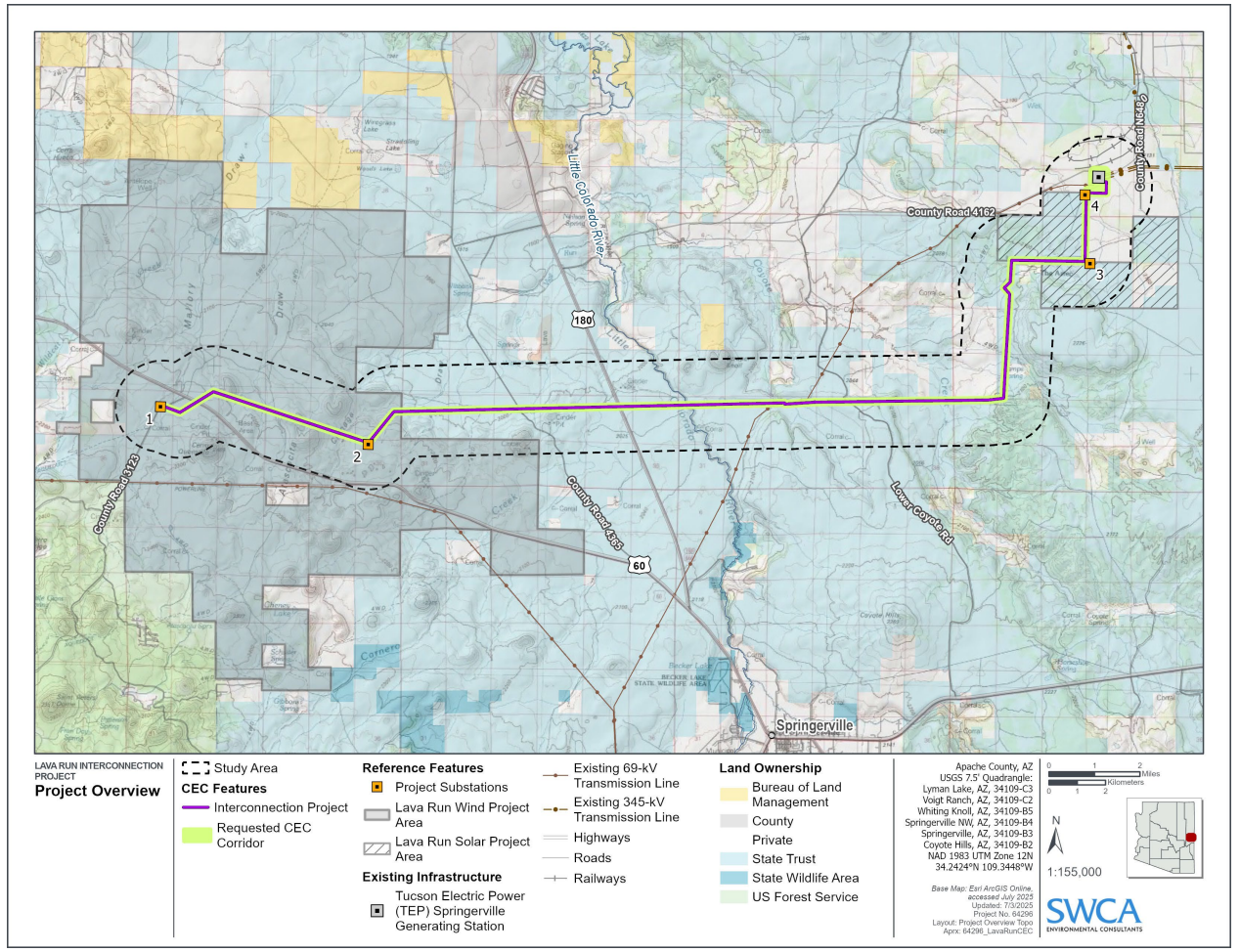
Interconnection Project Overview

Special-Status Species

Lava Run
Wind & Solar Projects

- **Yellow-billed Cuckoo**
  - Federally listed as threatened with designated critical habitat (approximately 60 miles south of the Study Area) and is an SGCN Tier 1 species.
  - Study Area is within the species' current and predicted ranges; habitats in the Study Area are not suitable for breeding but could support migrating individuals.
  - The species has been documented within 3 miles of the Study Area.
  - During construction, effects include disturbance due to noise and activity from the presence of humans and equipment.
  - Following construction, effects include risk of collisions with transmission lines.
  - Applicants will implement APLIC guidelines and standards as feasible, including installation of bird diverters.

Special-Status Species



Interconnection Project Overview

Special-Status Species

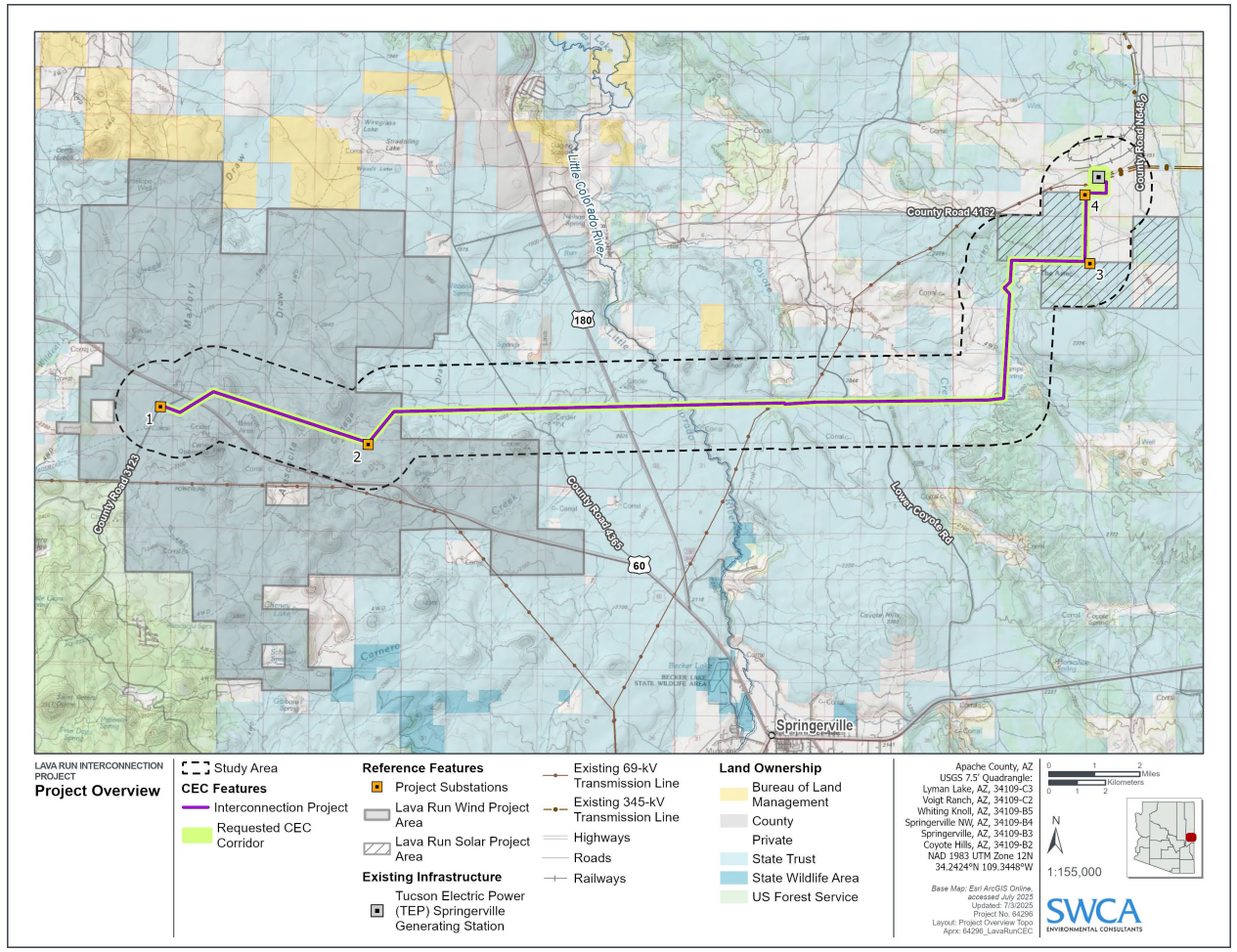
Lava Run
Wind & Solar Projects

Other Special-Status Species

- Bald and Golden Eagles
- Birds of Conservation Concern (BCC) and migratory birds
- Species of Greatest Conservation Need (SGCN)
- State-Protected Native Plant Species

Special-Status Species

Lava Run
Wind & Solar Projects



Interconnection Project Overview

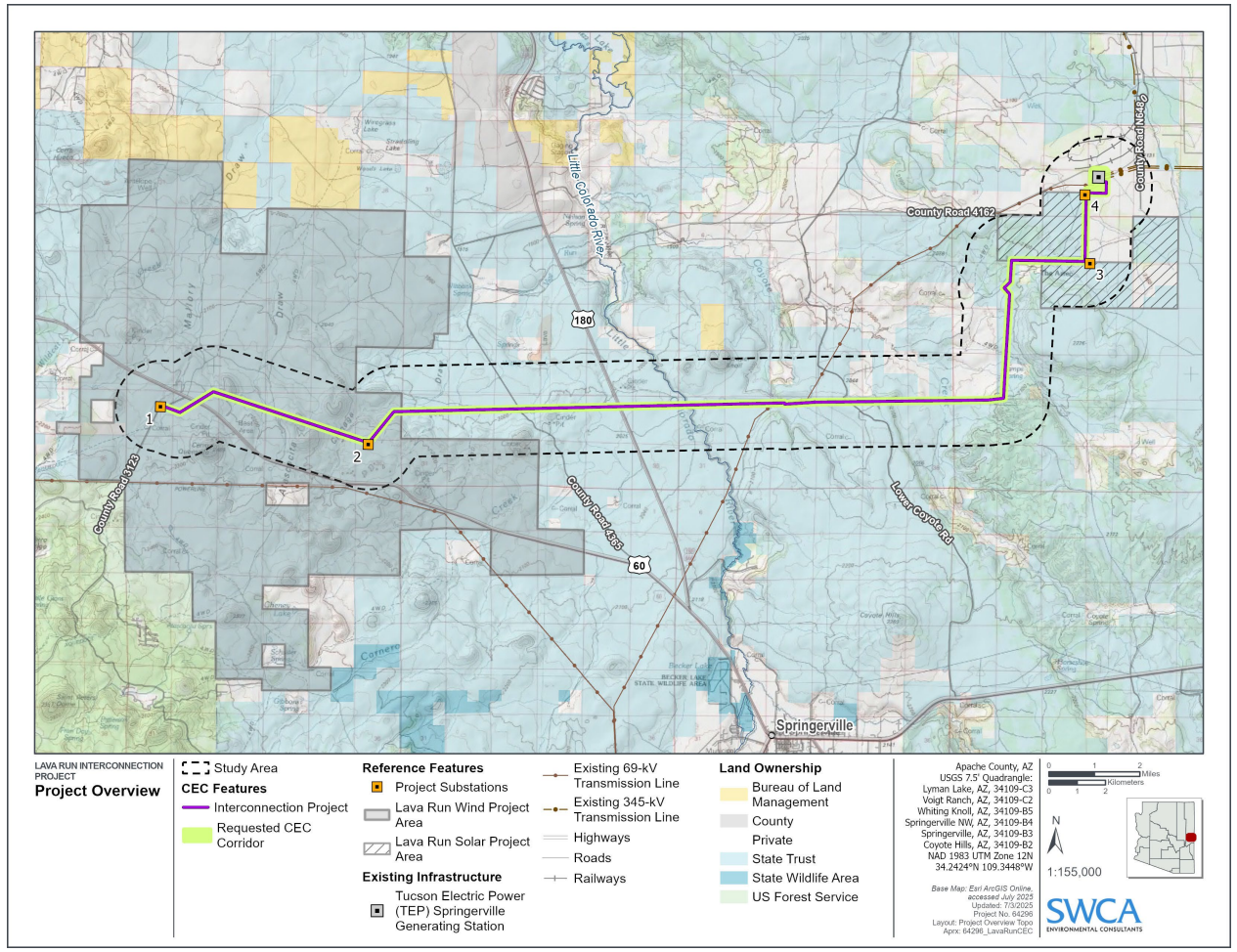
Special-Status Species

Lava Run
Wind & Solar Projects

- **Bald and Golden Eagles**
  - Protected by the Bald and Golden Eagle Protection Act (BGEPA)
  - Known to occur in the Study Area and vicinity but no nests were found within the Study Area during field surveys.
- **Birds of Conservation Concern (BCC)**
  - BCCs are bird species that represent the USFWS's highest conservation priorities.
  - 3 are known to occur and 14 may occur in the Study Area.
- **Migratory Birds**
  - Protected under the Migratory Bird Treaty Act (MBTA).
  - Present in the Study Area, especially along the Little Colorado River corridor, Coyote Creek, and the associated Conservation Opportunity Areas (COAs).

Special-Status Species

Lava Run
Wind & Solar Projects



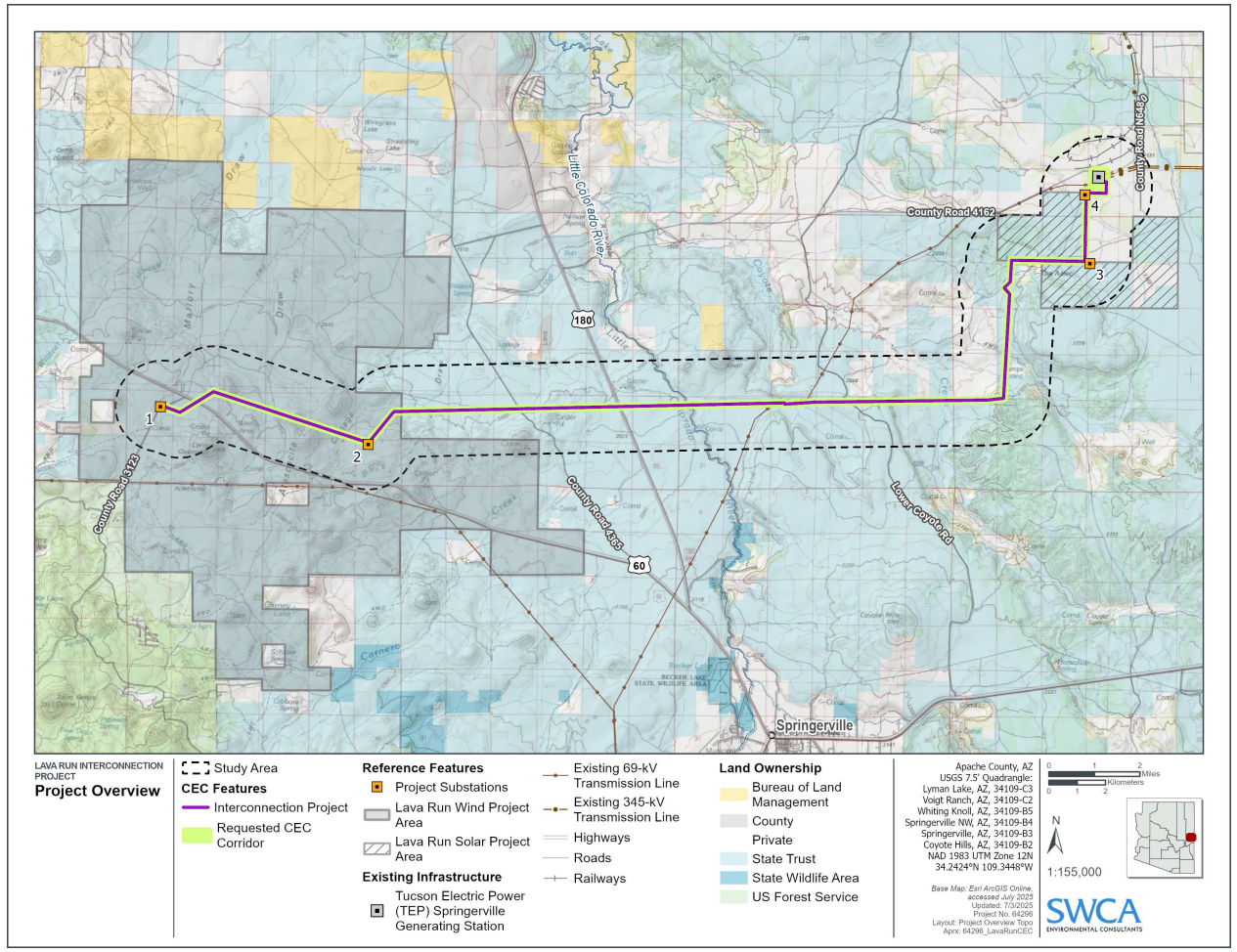
Interconnection Project Overview

Special-Status Species

Lava Run
Wind & Solar Projects

- **Impacts to Special-status Bird Species**
  - During the construction phase of the Interconnection Project, active nests, eggs, and nestlings may be damaged. Scavenging birds, particularly eagles, may be struck by construction vehicles.
  - Following construction, potential threats to birds, particularly eagles and other raptors, include risk of collisions with transmission lines and electrocution.
  - Minimization Measures:
    - Interconnection Project will be designed and constructed following APLIC guidelines and standards as feasible.
    - Applicants will install bird diverters over the Little Colorado River and Coyote Creek crossings.
    - If vegetation-disturbing activities are planned during the migratory bird nesting season, preconstruction surveys for migratory bird nests would be conducted.
    - Applicants will implement a temporal (and spatial) buffer around any new in-use eagle nests during the eagle nesting season or consider a disturbance permit.

Special-Status Species



Interconnection Project Overview

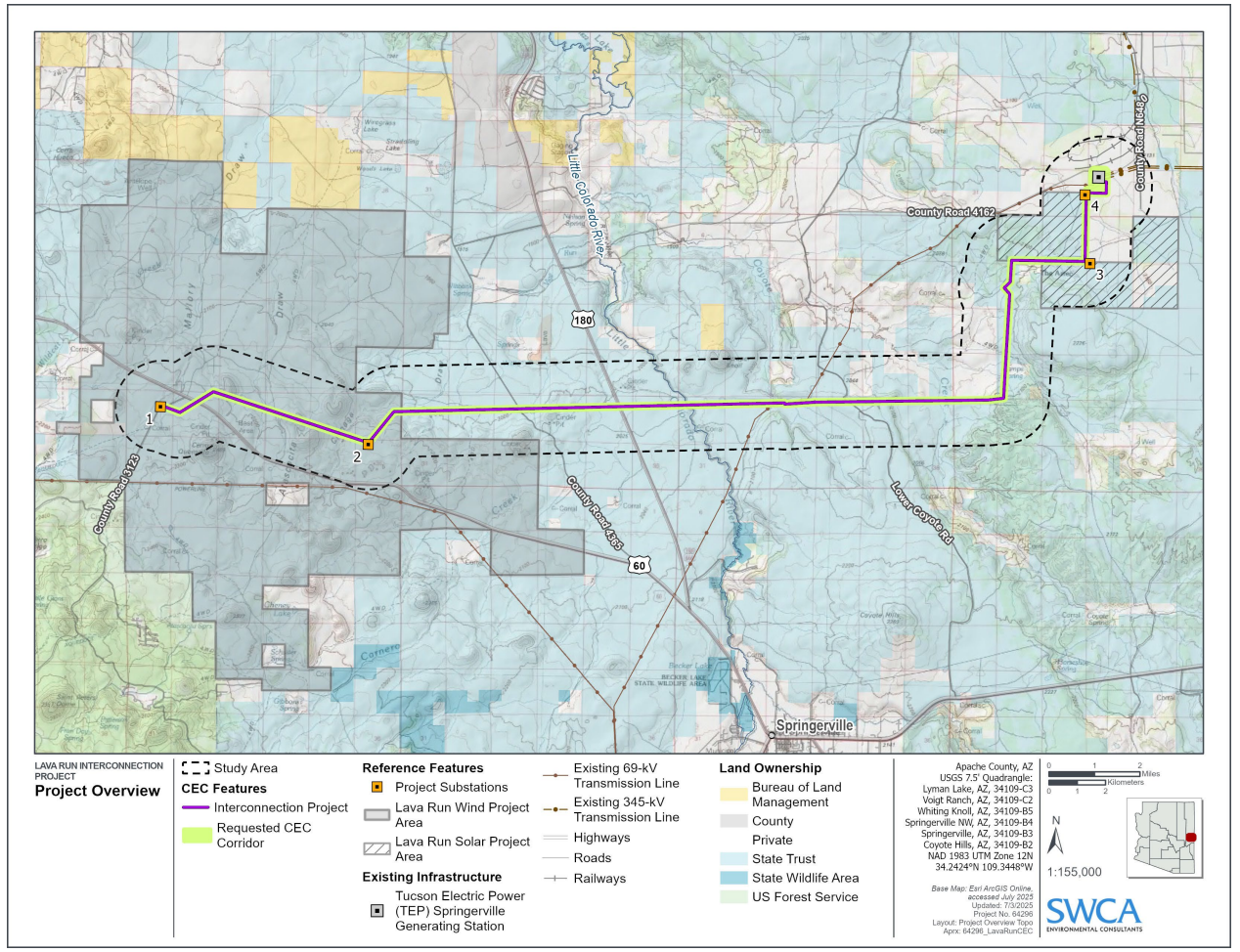
Special-Status Species

Lava Run
Wind & Solar Projects

- **Species of Greatest Conservation Need (SGCNs)**
  - SGCNs are wildlife species identified by AGFD that are most in need of conservation action and have conservation priority.
    - Tier 1 species are those categorized as “highest priority vulnerable”
    - Tier 2 represents the remainder of the species meeting vulnerability criteria
    - Tier 3 species have an “unknown” status and are priority species for additional research
  - 21 SGCN Tier 1 and 2 species, including the American pronghorn, are known to occur based on prior site surveys
  - 56 SGCN Tier 1 and 2 species may occur because the Study Area falls within the species’ predicted range and contains suitable habitat

Special-Status Species

Lava Run
Wind & Solar Projects



Interconnection Project Overview

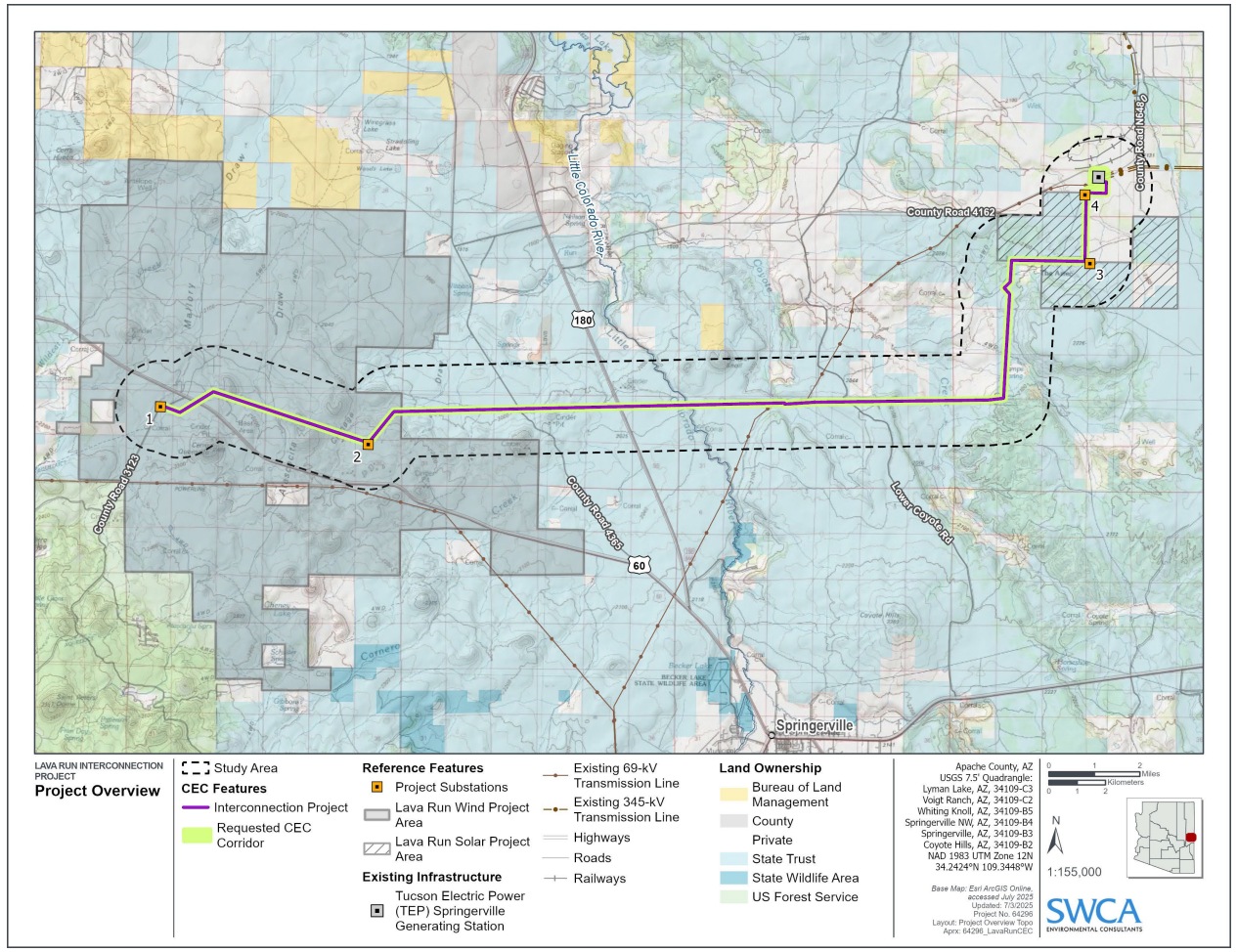
Special-Status Species

Lava Run
Wind & Solar Projects

- **Impacts to SGCNs**
  - Construction activities may discourage pronghorn movements, foraging, and fawning. These impacts would be short term and localized.
  - Following construction, the project will be permeable and will not restrict wildlife movement.
  - To minimize impacts to pronghorn during fawning season, construction schedule modifications will be implemented as feasible to reduce the amount of area disturbed at any given time.

Special-Status Species

Lava Run
Wind & Solar Projects



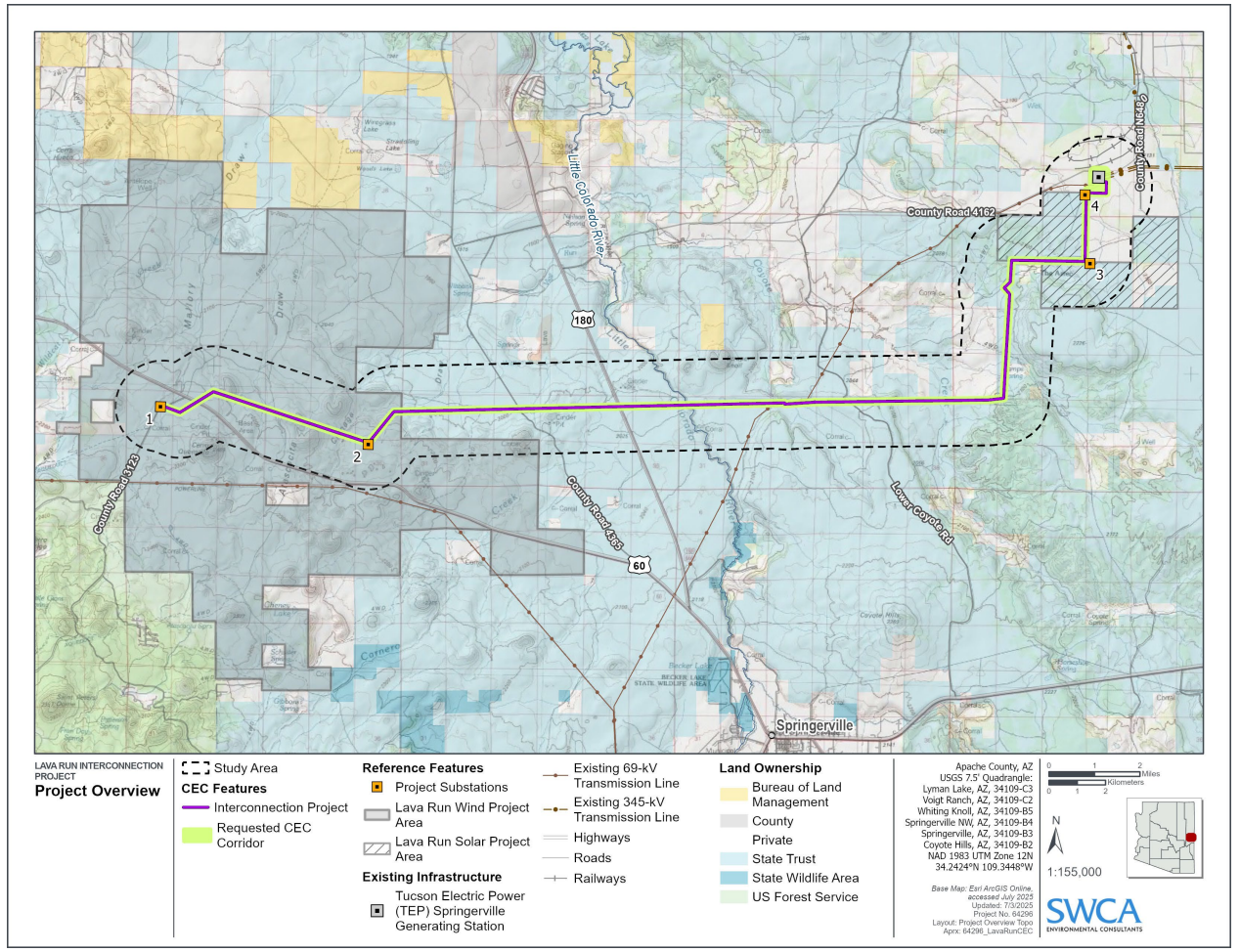
Interconnection Project Overview

Special-Status Species

Lava Run
Wind & Solar Projects

- **State-Protected Native Plant Species**
  - Arizona Native Plant Law (ANPL) identifies plant species that are susceptible to removal for collection, landscaping, sale, or other commercial uses.
  - These plants shall not be taken, transported, or possessed from any non-federal land without permission and a permit from the Arizona Department of Agriculture.
  - ANPL species are prioritized into four categories:
    - Highly Safeguarded
    - Salvage Restricted
    - Salvage Assessed
    - Harvest Restricted
  - During preconstruction site visits, 8 salvage restricted species were observed within the Study Area. No Harvest Restricted, Salvage Assessed, or highly safeguarded species were observed.

Special-Status Species



Interconnection Project Overview

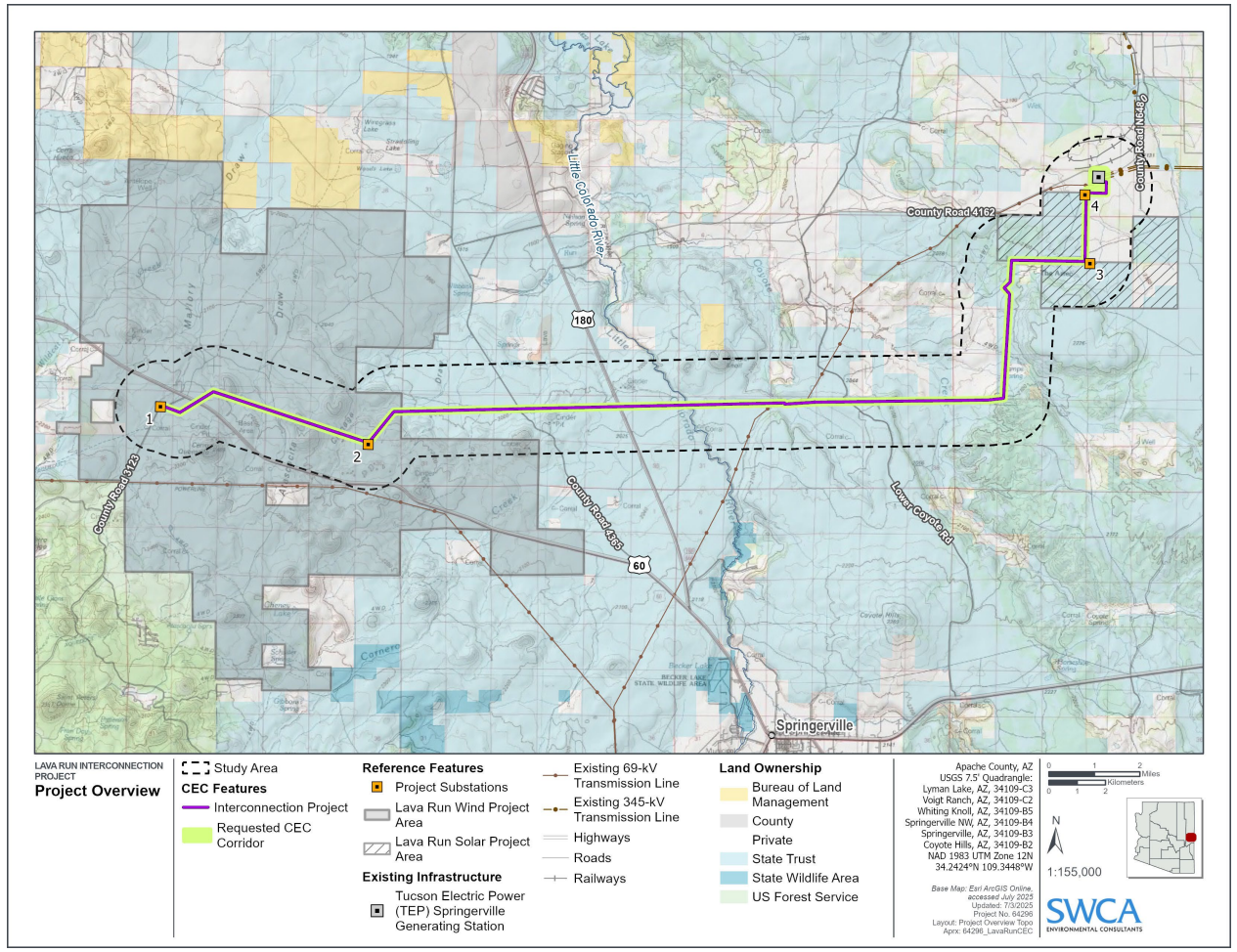
Special-Status Species

Lava Run
Wind & Solar Projects

- **Impacts to State-Protected Native Plant Species**
  - Potential effects include direct removal during vegetation clearing activities or crushing by heavy equipment and vehicles.
  - A Native Plant Inventory of ASLD-valued species was conducted on ASLD-administered lands for the Interconnection Project and the report will be submitted to ASLD for review.
  - In accordance with the ANPL requirements on state lands, the Arizona Department of Agriculture will be notified 60 days before plants are destroyed.

Special-Status Species

Lava Run
Wind & Solar Projects



Interconnection Project Overview

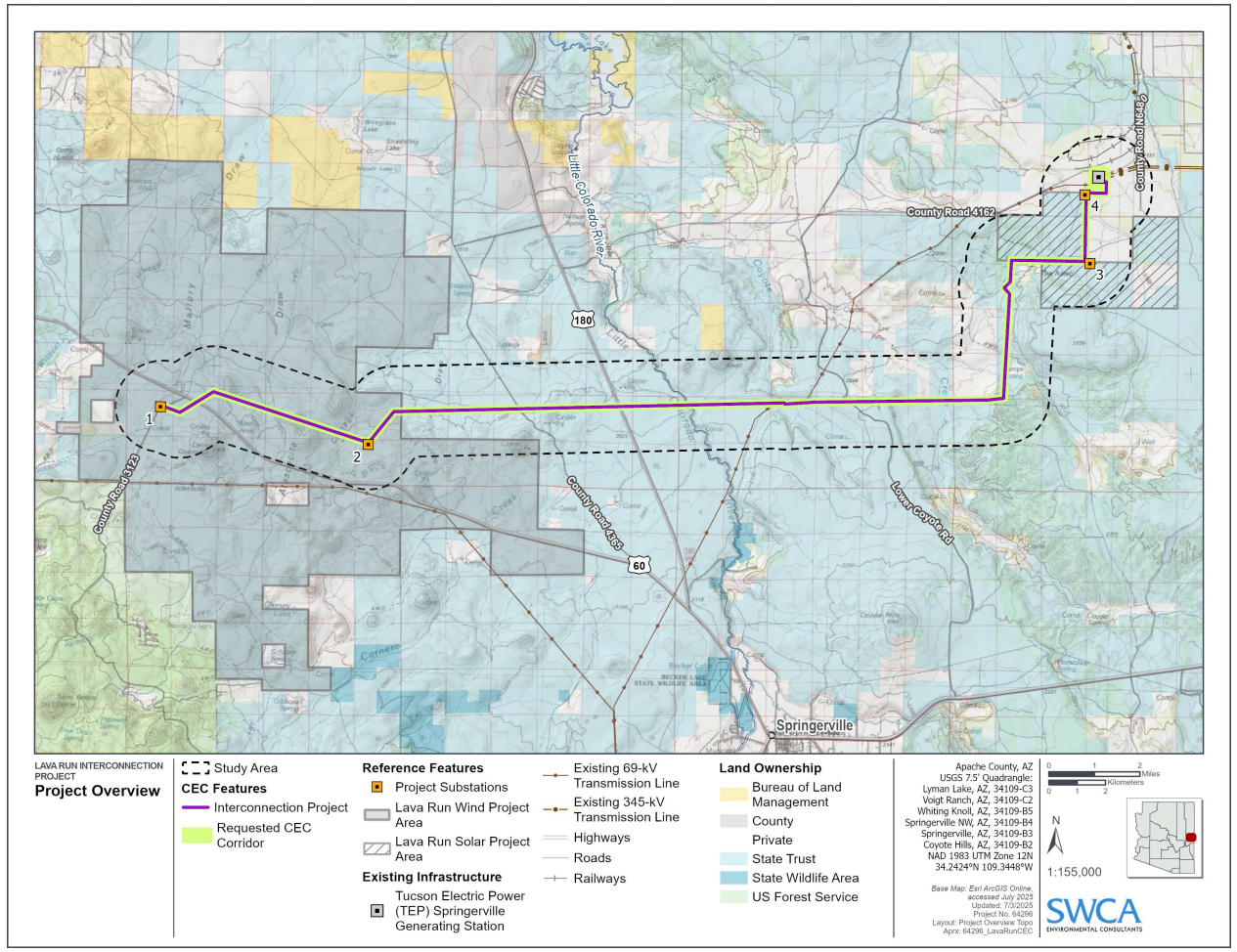
General Vegetation and Wildlife

Non-special-status Vegetation and Wildlife

- Vegetation will be disturbed in association with pole locations, access roads, and pulling locations.
- Areas of temporary disturbance will be revegetated.
- At a landscape level, the Interconnection Project will not significantly reduce the amount of vegetation available for wildlife use.
- The Interconnection Project may have a minor impact on individuals (both wildlife and plants) but is unlikely to result in impacts at the population level for any species.

General Vegetation and Wildlife

Lava Run
Wind & Solar Projects



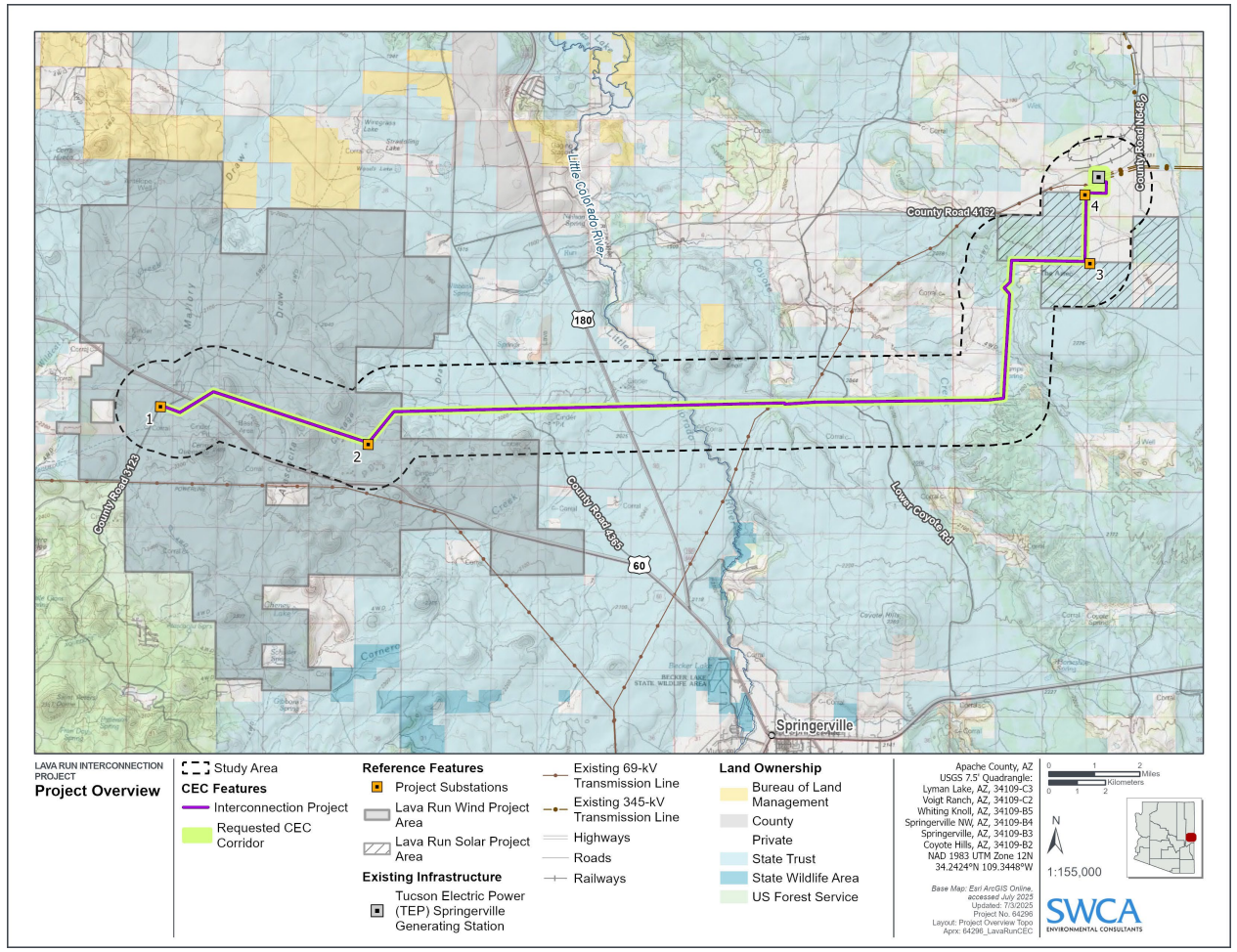
Interconnection Project Overview

Minimization Measures

- Minimization measures for non-special-status species:
  - If trenching is required and trenches cannot be backfilled immediately, escape ramps would be constructed, and any trenches left open overnight would be inspected to remove wildlife prior to backfilling.
  - Applicants will follow existing road alignments or existing two-track paths as the preferred option. New roads, as well as areas of temporary disturbance, will be revegetated in accordance with the vegetation/habitat restoration plan.
  - If injured or otherwise at-risk wildlife is encountered, wildlife specialists will be notified to assist in relocating wildlife as needed.
  - Applicants will consider the use of standard best management practices to minimize the introduction and spread of invasive species and noxious weeds, as well as the implementation of worker awareness trainings and low speed limits to reduce the potential of negative effects on species from collisions.

Minimization Measures

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Biological Resources

Lava Run
Wind & Solar Projects

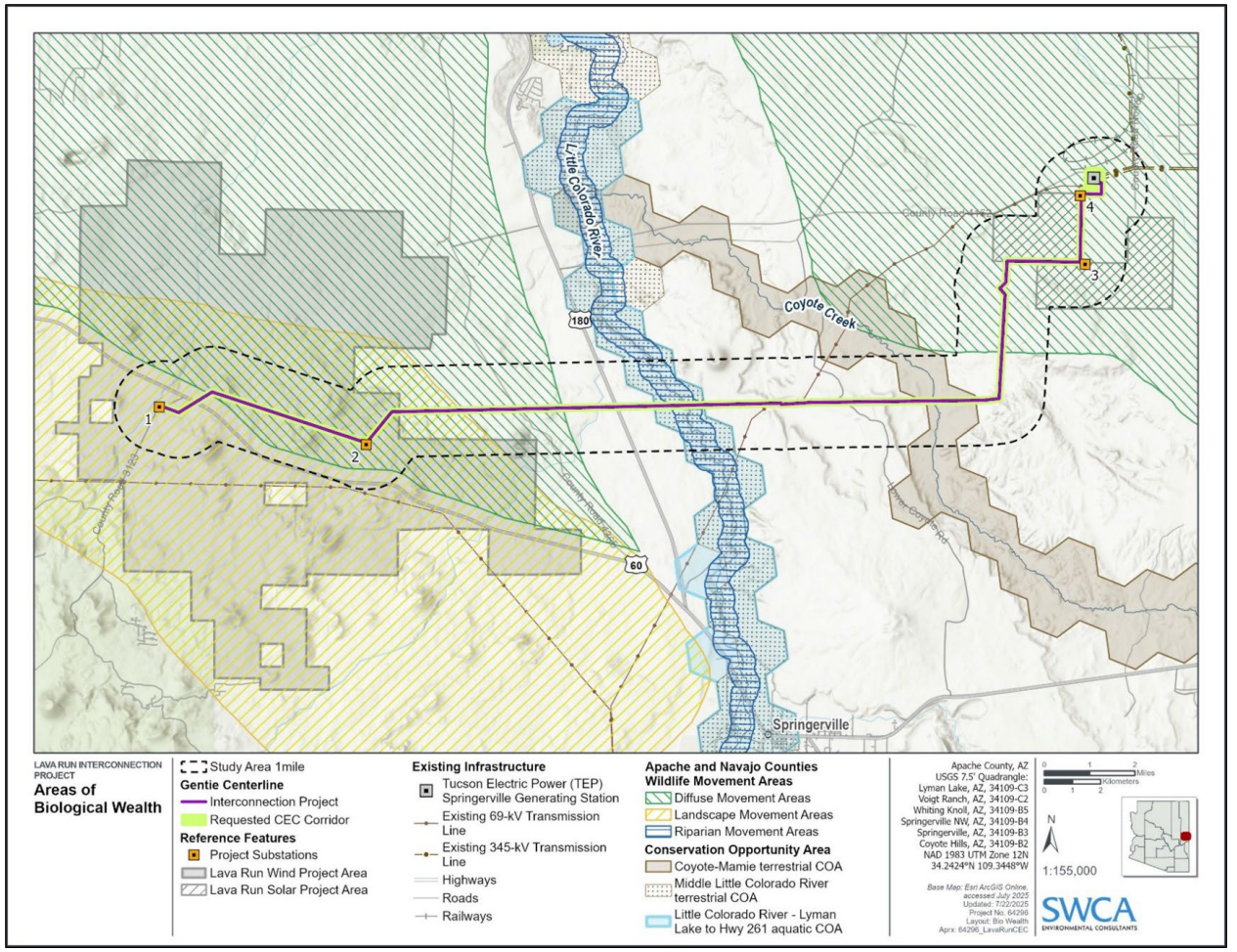
Conclusion

- Wildlife and vegetation, including special status species, may be impacted by the Interconnection Project.
- Construction activities may temporarily contribute to sedimentation in streams and may discourage wildlife movements due to human presence and noise-related disturbance.
- Once constructed, the project will be permeable and will not restrict wildlife movement.
- Proposed minimization measures will reduce impacts to wildlife and vegetation and
- Impacts to biological wealth, special-status species, and non-special-status species are anticipated to be minor.
- The Project will comply with all applicable laws and regulations: Endangered Species Act, Bald and Golden Eagle Protection Act, Migratory Bird Treaty Act, Arizona Native Plant Law, etc.

The Interconnection Project is environmentally compatible with biological resources.

Biological Resources

Lava Run
Wind & Solar Projects



Areas of Biological Wealth

Lava Run
Wind & Solar Projects

Environmental Compatibility – Visual Resources

Lava Run
Wind & Solar Projects

Environmental Compatibility – Visual Resources

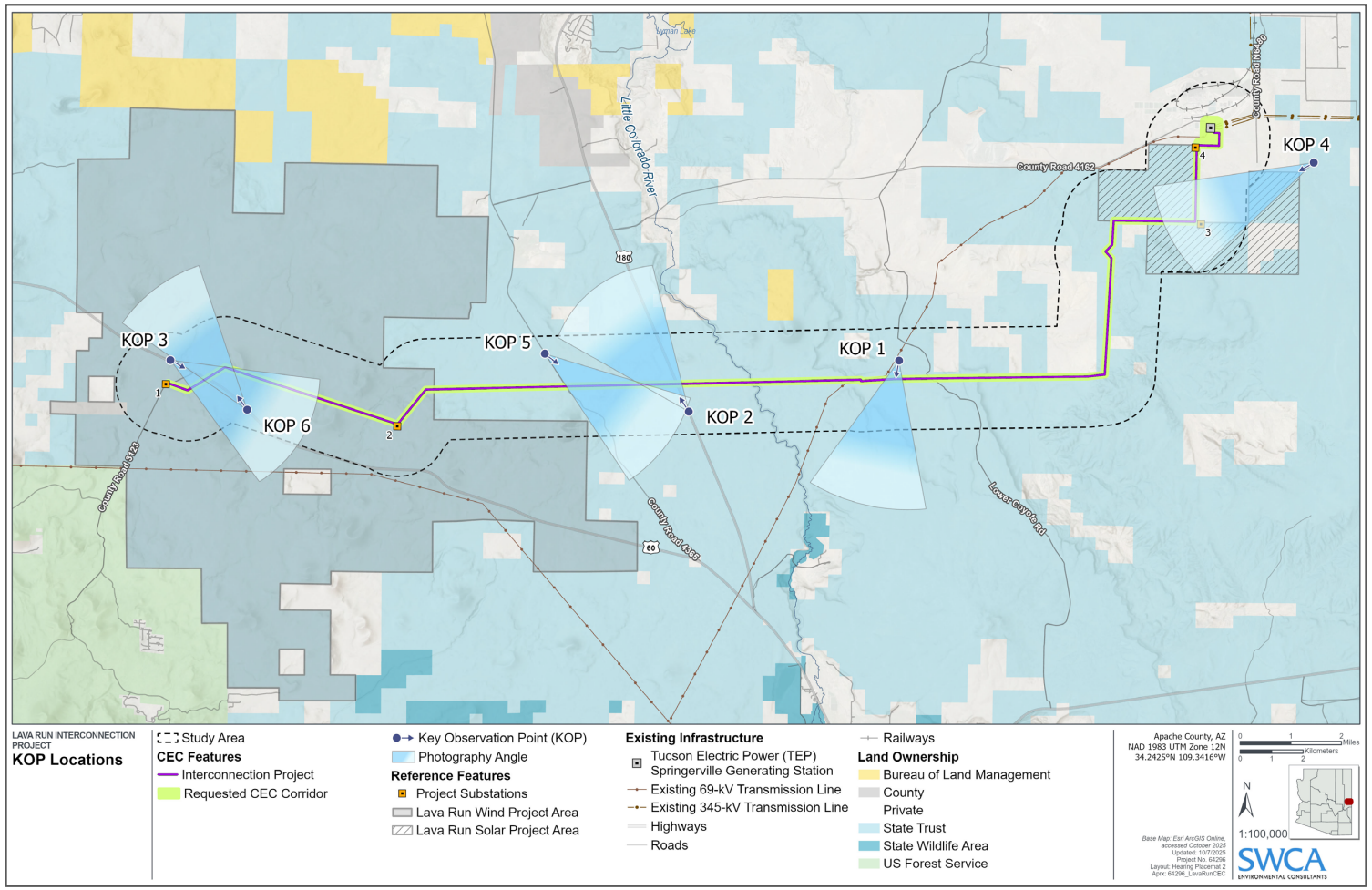
Visual Resources

Visual Resource Assessment

- SWCA conducted the assessment of the Study Area to:
  - Identify and characterize scenic quality (i.e., landscape character) and sensitive viewers
  - Evaluate the level of visual modification in the landscape that would result from the project
  - Assess conformance with applicable state, county, and local management plans
- During the field survey, key observation points (KOPs) were visited to collect site photographs and document existing conditions.
- No management plans that require conformance with visual resource management objectives or guidelines apply to the Study Area.
- The Study Area is not within any designated national or state scenic areas.

Visual Resources

Lava Run
Wind & Solar Projects



Interconnection Project – KOP Overview

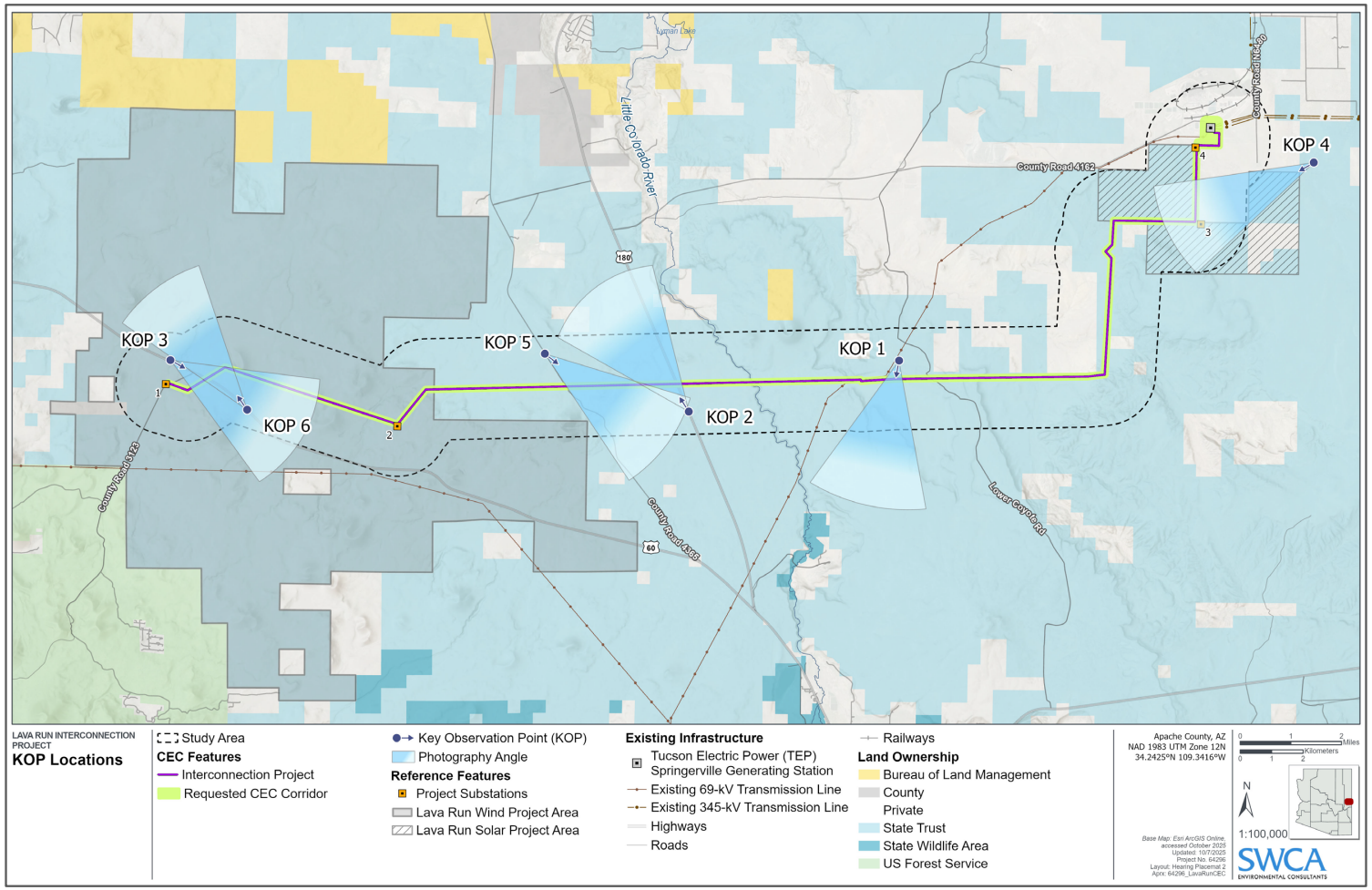
Visual Resources

Landscape character

- The overall visual and cultural impression of the landscape
- Existing scenery include views of adjacent mountains, open rolling rangeland and grasslands, occasional cinder cones and buttes, with existing built features in portions of the Study Area present.
- Development is limited and dispersed, and includes:
  - Utilities: TEP Springerville Generating Station and 345-kV Substation, 345 kV transmission lines, 69-kV distribution lines
  - Transportation: U.S. 60 and U.S. 180, various county roads and two-track roads
  - Grazing-related improvements: fencing, stock tanks
- **Low and Moderate scenic quality** within the Study Area based on the moderately visually interesting landforms and vegetation that is similar to landscape typical of the Colorado Plateau.

Visual Resources

Lava Run
Wind & Solar Projects



Interconnection Project – KOP Overview

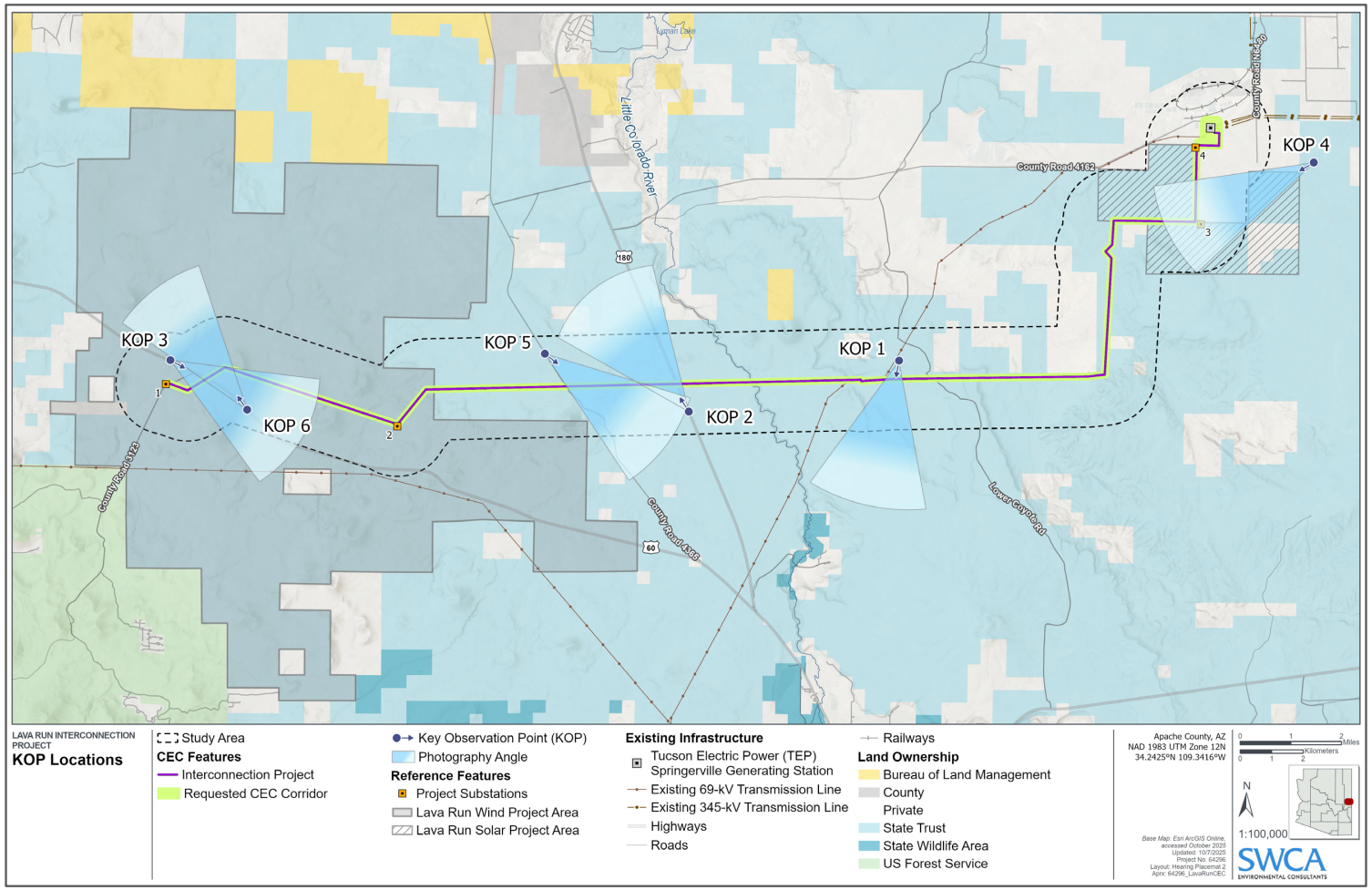
Visual Resources

Sensitive viewers

- Members of the public that may see the project and who may be sensitive to potential changes in the landscape character because of the project.
- Sensitive viewers include:
  - Vehicular travelers – primarily along U.S. 180 and U.S. 60
  - Recreational area visitors – activities in the Study Area consist of using local or county roads for hunting, operating off-road vehicles, horseback riding, nature viewing, birdwatching, and photography
- No residences within the Study Area; closest residence is approximately 1.83 miles south of the Proposed Route.
- The degree of visual contrast perceived by a change is dependent on several factors, including viewing distance, duration of view, viewing condition, and degree of visibility.
- **Low-moderate to moderate sensitivity** within the Study Area.

Visual Resources

Lava Run
Wind & Solar Projects



Interconnection Project – KOP Overview

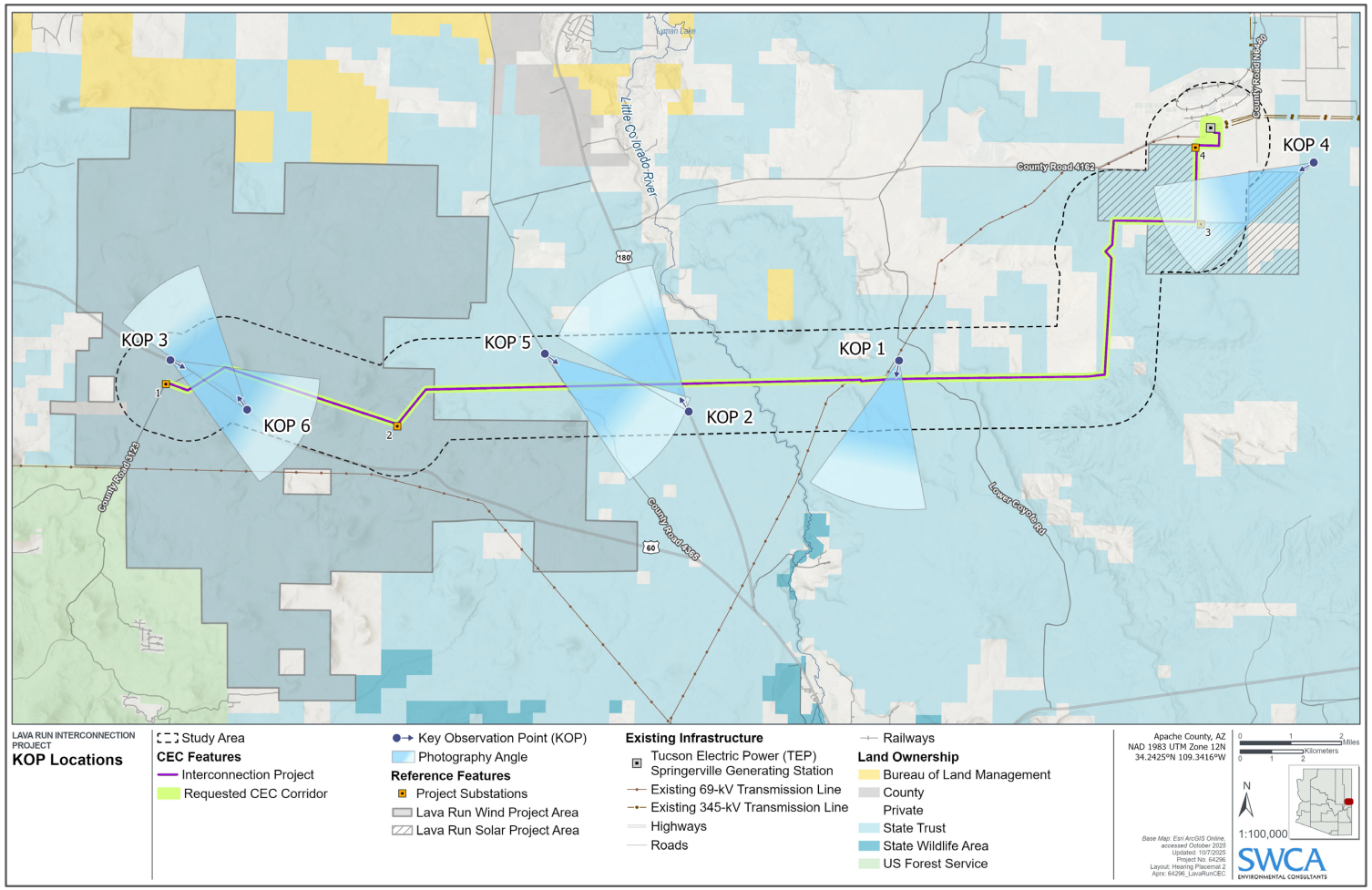
Visual Resources

KOPs and Visual Simulations

- Visual simulations were completed from six “Key Observation Points” (KOPs) to illustrate the Study Area’s landscape character and the potential impacts from the Interconnection Project.
- Existing conditions were photographed from each KOP for the purpose of creating photo-realistic visual simulations of the project.
- KOPs were chosen to represent sensitive viewers in a variety of contexts, including views from high use travel ways from different directions, pedestrian/hiking views in undeveloped areas, and a variety of distances and orientations.

Visual Resources

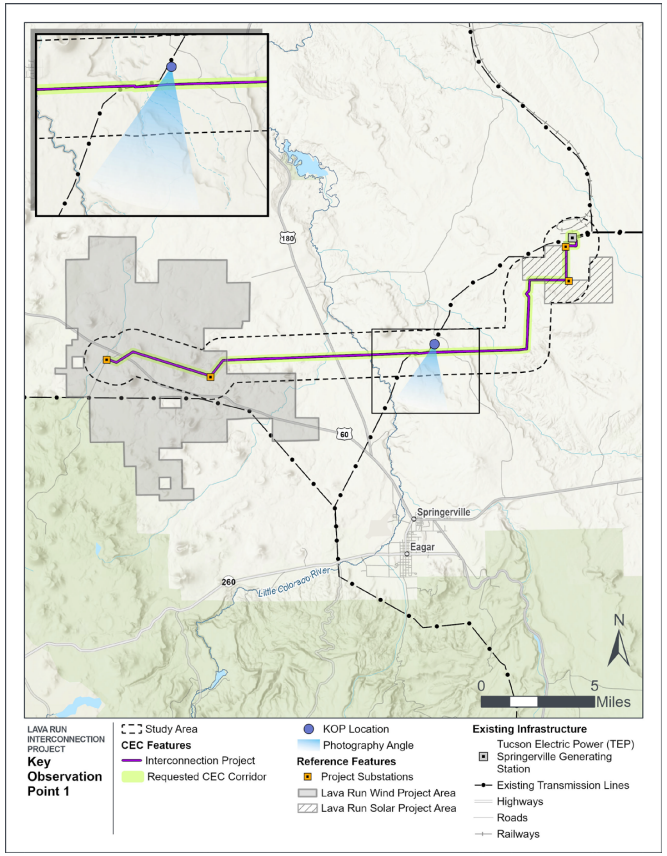
Lava Run
Wind & Solar Projects



Interconnection Project – KOP Overview

Visual Resources

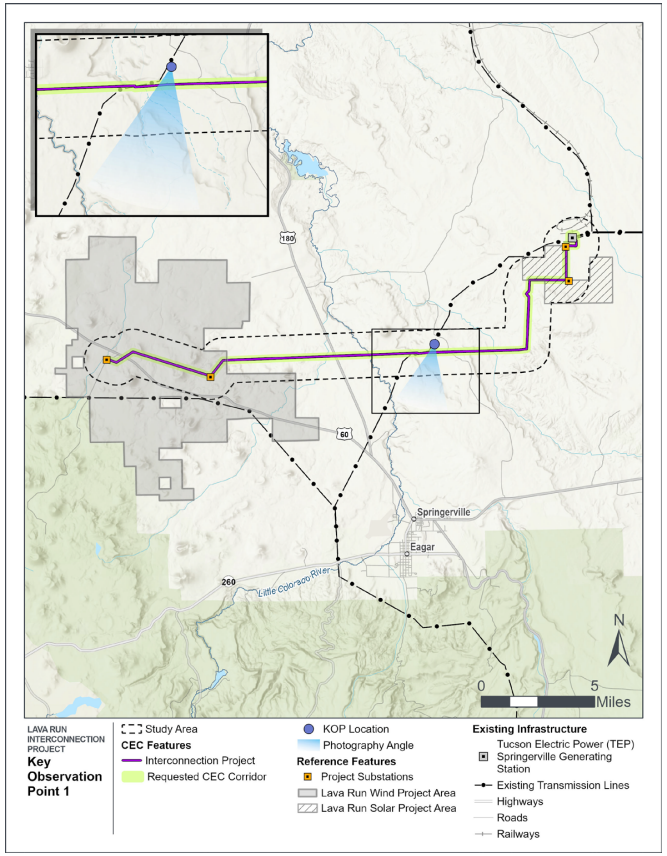
Lava Run
Wind & Solar Projects



KOP 1 – Existing Condition

Visual Resources

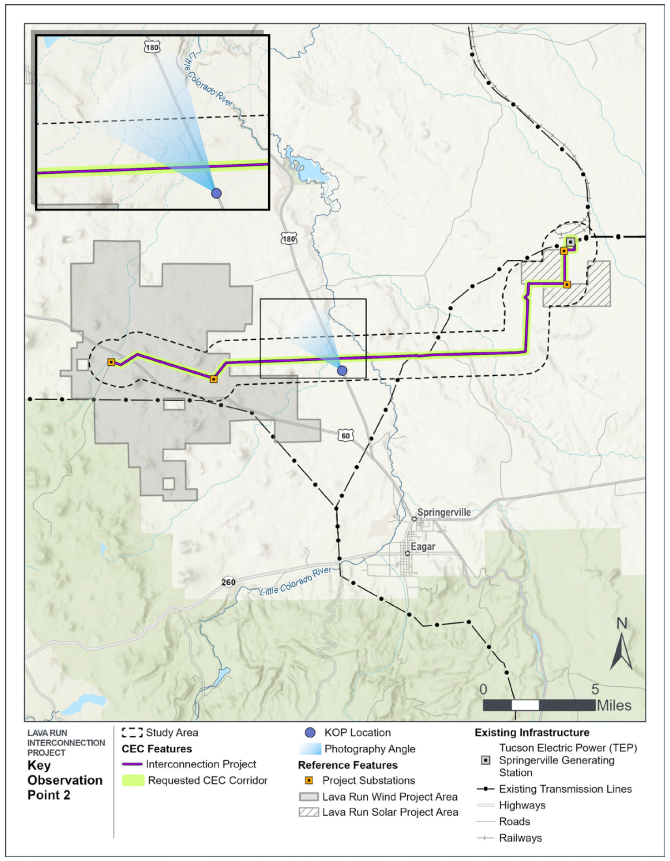
Lava Run
Wind & Solar Projects



KOP 1 – Simulated Condition

Visual Resources

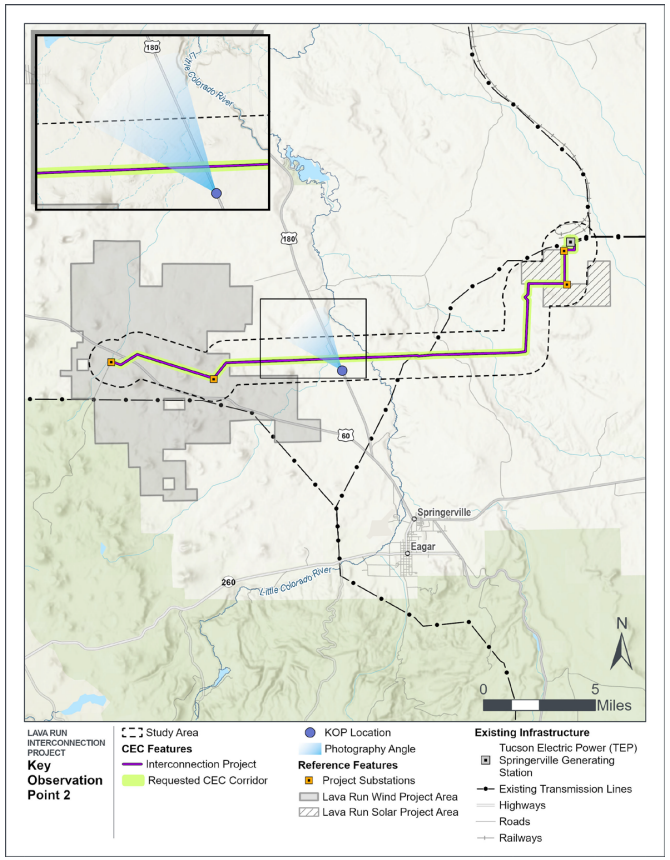
Lava Run
Wind & Solar Projects



KOP 2 – Existing Condition

Visual Resources

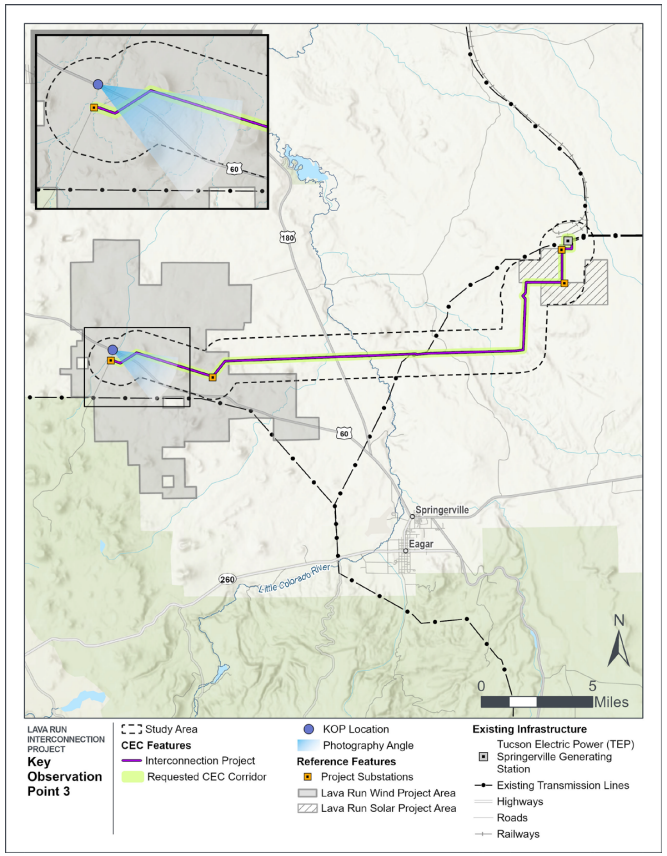
Lava Run
Wind & Solar Projects



KOP 2 – Simulated Condition

Visual Resources

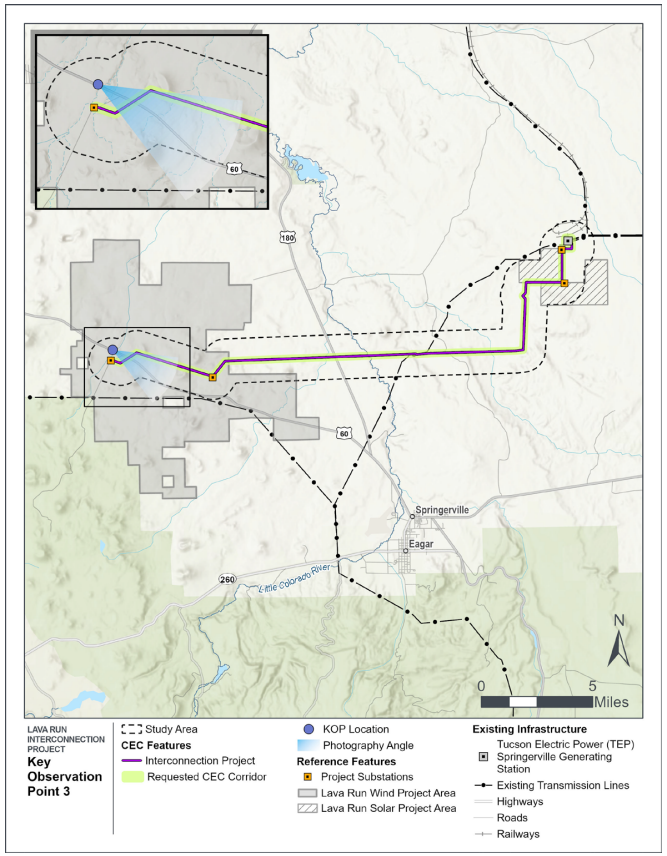
Lava Run
Wind & Solar Projects



KOP 3 – Existing Condition

Visual Resources

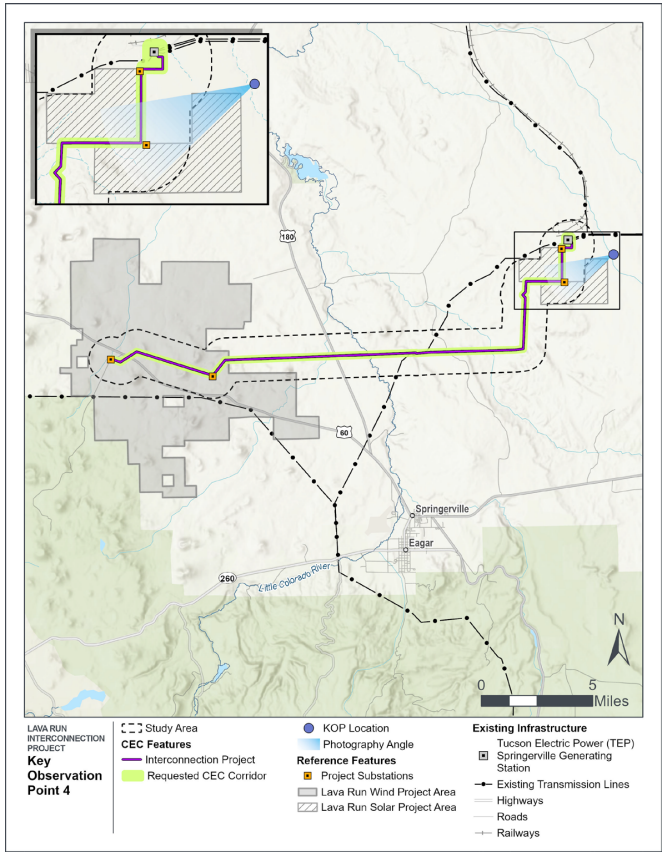
Lava Run
Wind & Solar Projects



KOP 3 – Simulated Condition

Visual Resources

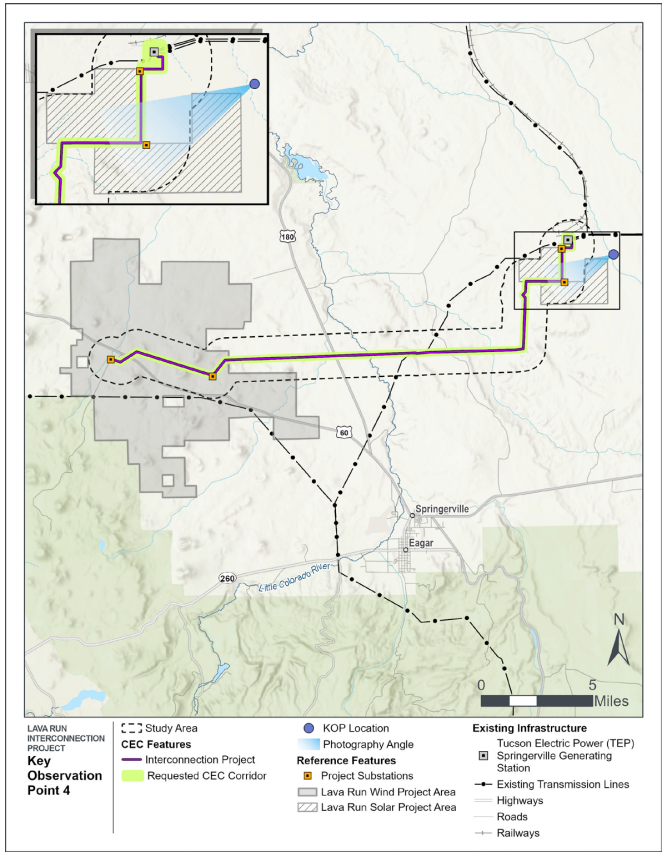
Lava Run
Wind & Solar Projects



KOP 4 – Existing Condition

Visual Resources

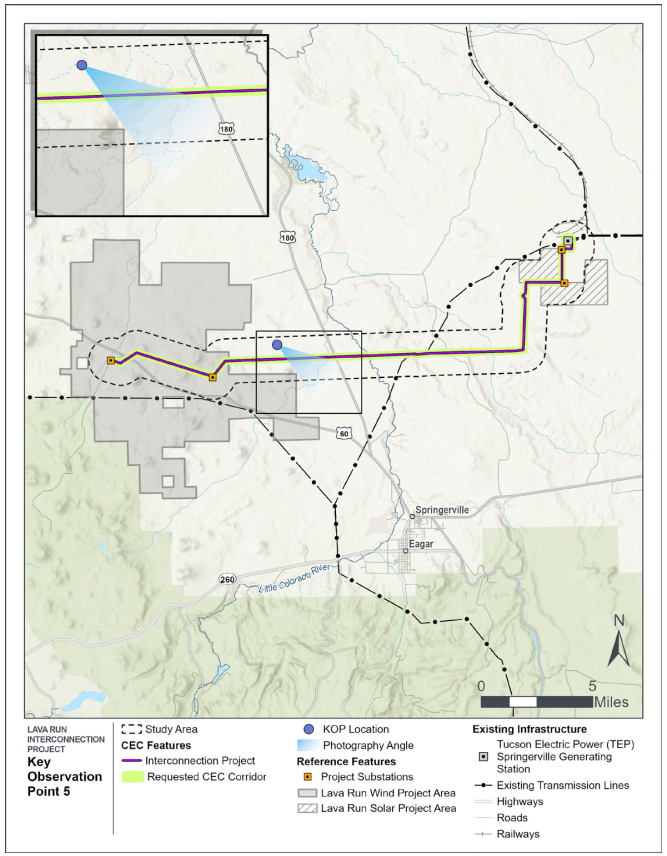
Lava Run
Wind & Solar Projects



KOP 4 – Simulated Condition

Visual Resources

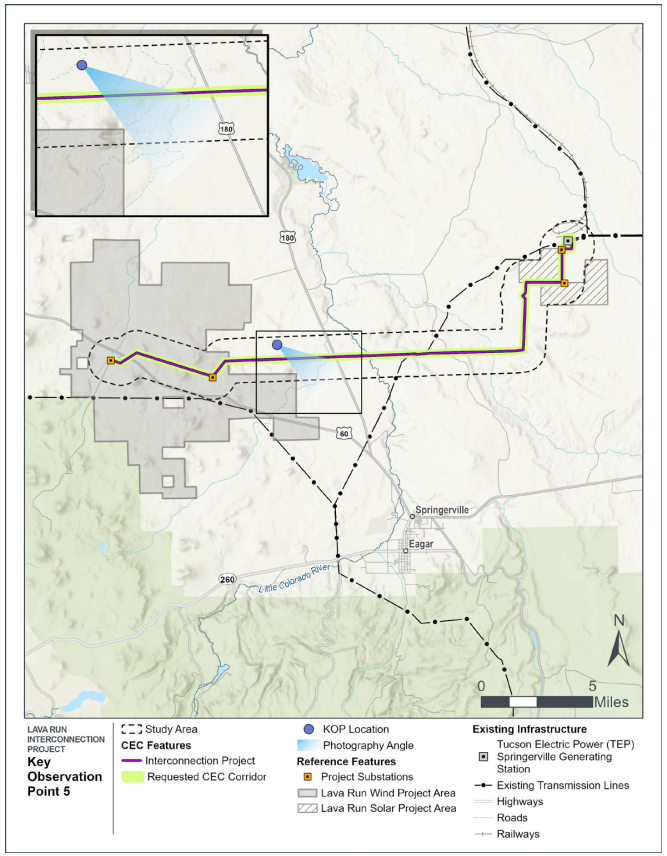
Lava Run
Wind & Solar Projects



KOP 5 – Existing Condition

Visual Resources

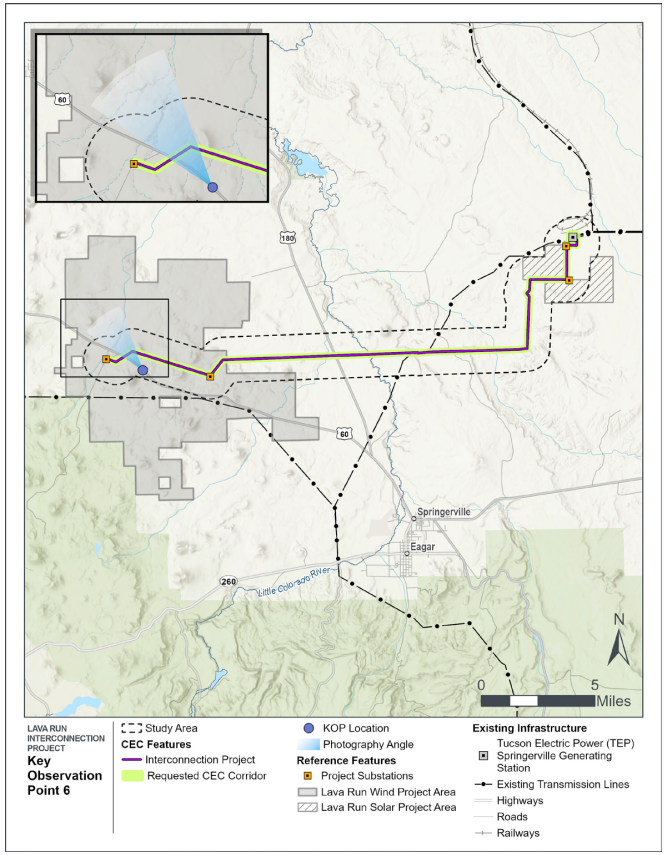
Lava Run
Wind & Solar Projects



KOP 5 – Simulated Condition

Visual Resources

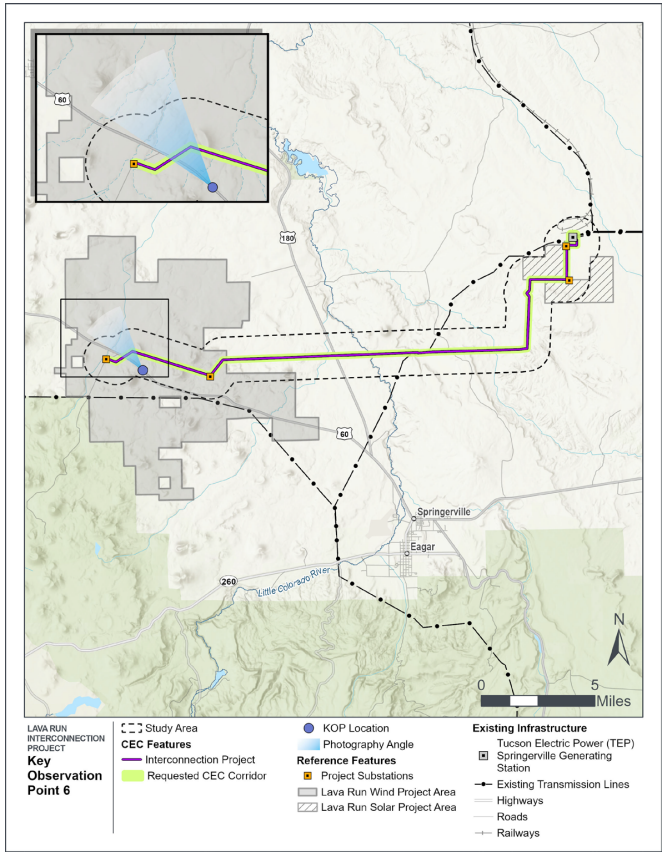
Lava Run
Wind & Solar Projects



KOP 6 – Existing Condition

Visual Resources

Lava Run
Wind & Solar Projects



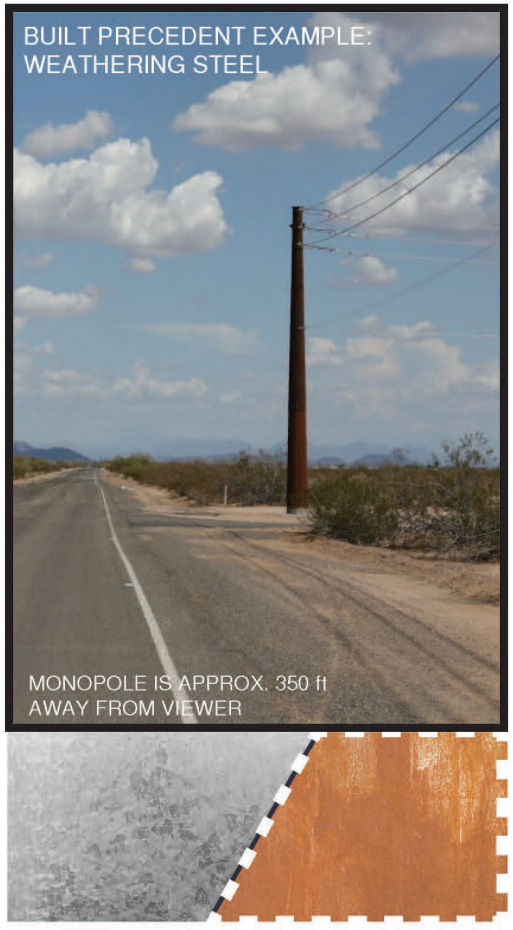
KOP 6 – Simulated Condition

Visual Resources

- **Structure Types:**
  - Tangent monopoles, angle monopoles, and dead-end monopoles.
  - Made of galvanized or weathering steel and will be self-supporting.

Visual Resources

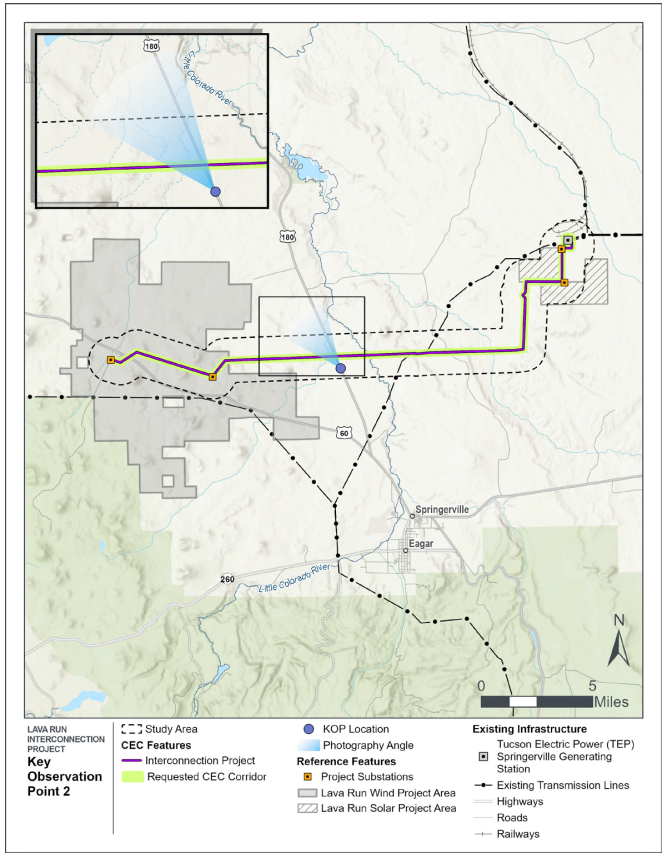
Lava Run
Wind & Solar Projects



Representative Monopole Building Material Comparison:
Galvanized Steel vs Weathering Steel Finish

Visual Resources

Lava Run
Wind & Solar Projects

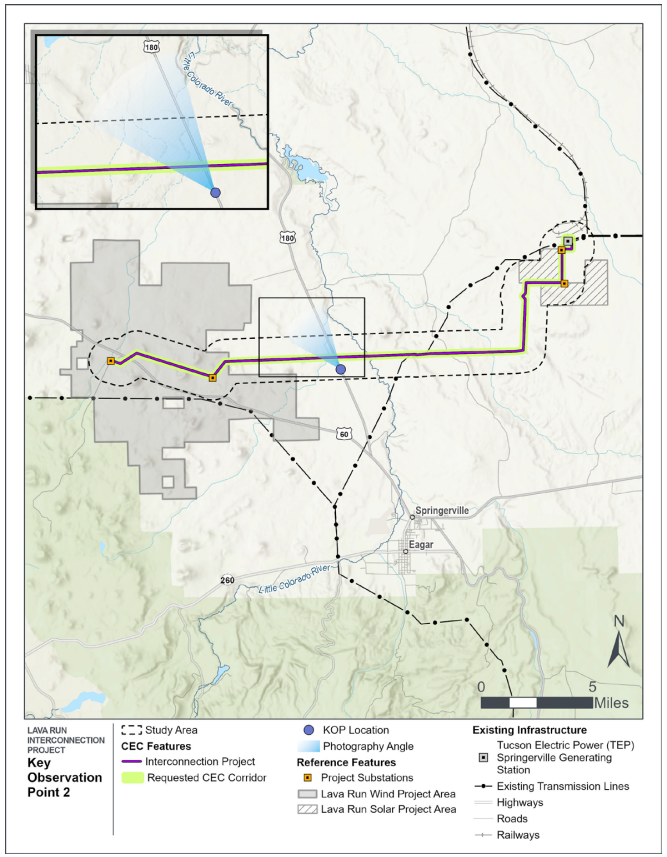


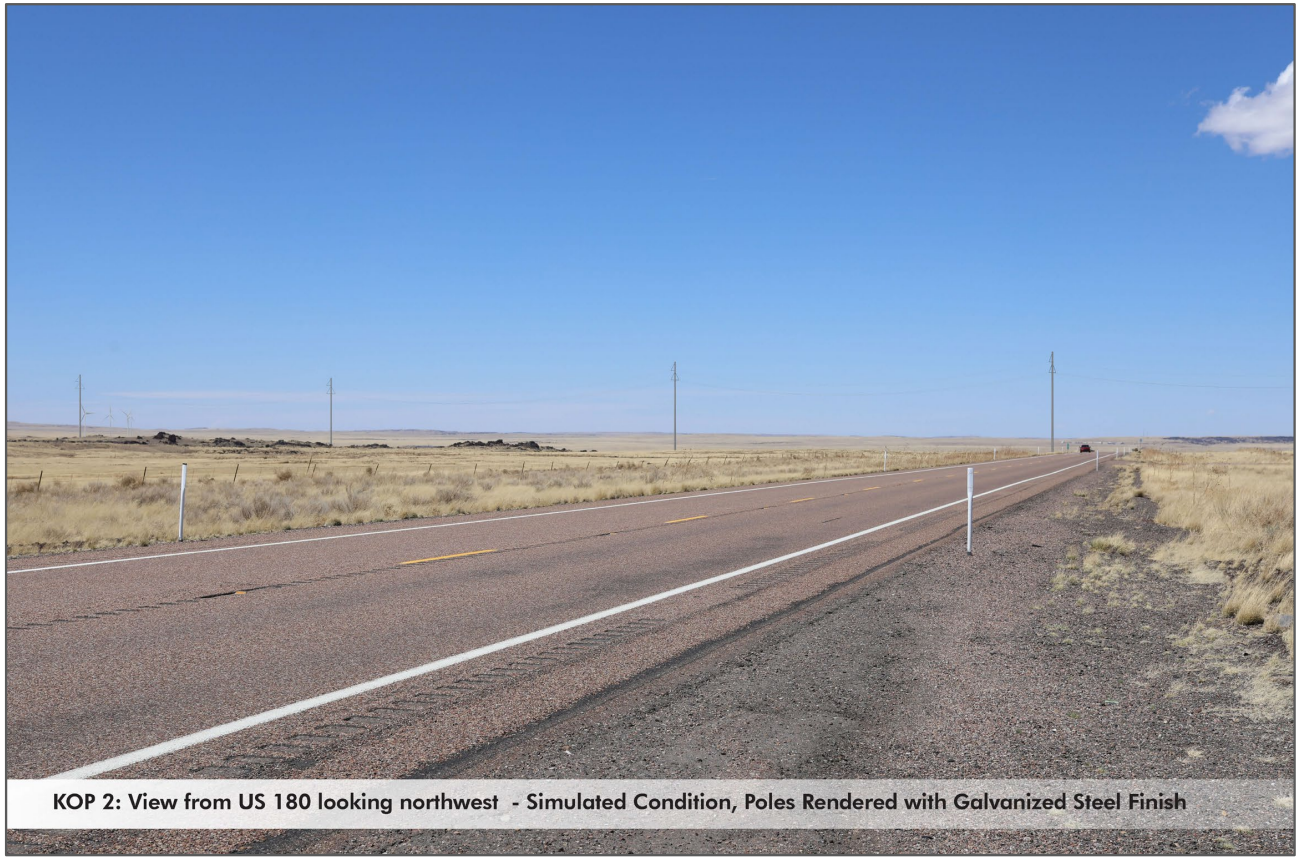
KOP 2 – WEATHERING STEEL Simulated Condition

(shown in previous slide)

Visual Resources

Lava Run
Wind & Solar Projects

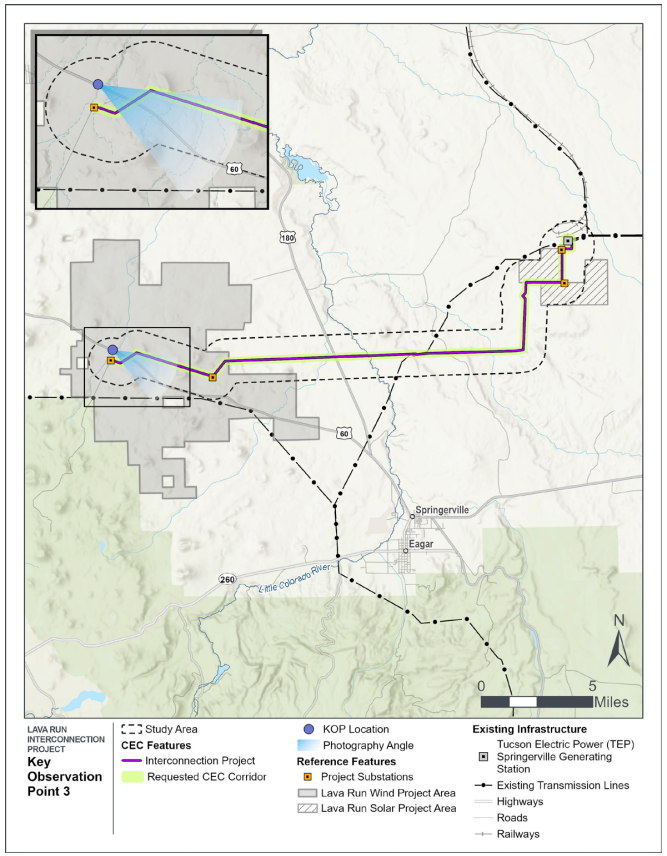




KOP 2 – GALVANIZED STEEL Simulated Condition

Visual Resources

Lava Run
Wind & Solar Projects

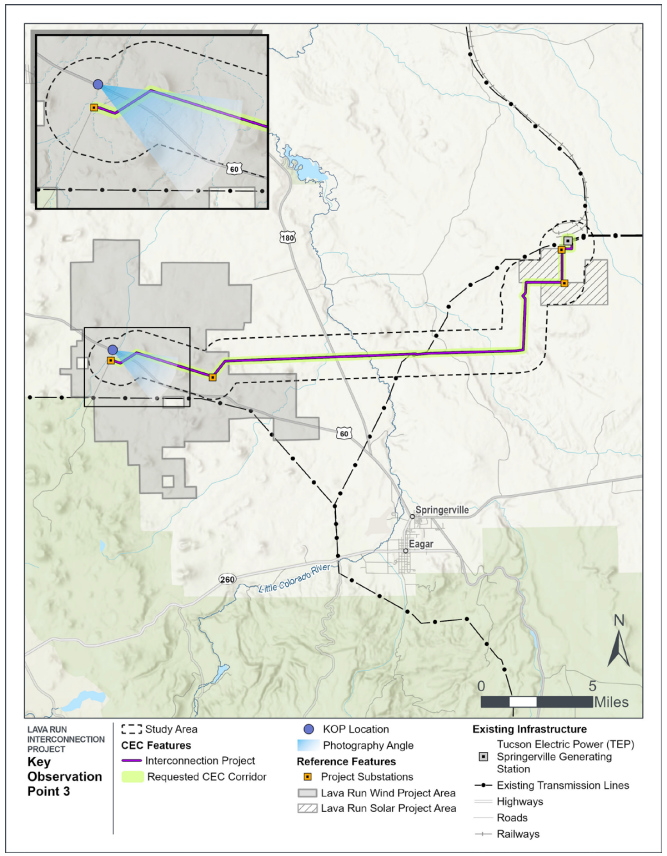


KOP 3 – WEATHERING STEEL Simulated Condition

(shown in previous slide)

Visual Resources

Lava Run
Wind & Solar Projects



KOP 3: View from US 60 Eastbound looking southeast - Simulated Condition, Poles Rendered with Galvanized Steel Finish

KOP 3 – GALVANIZED STEEL Simulated Condition

Visual Resources

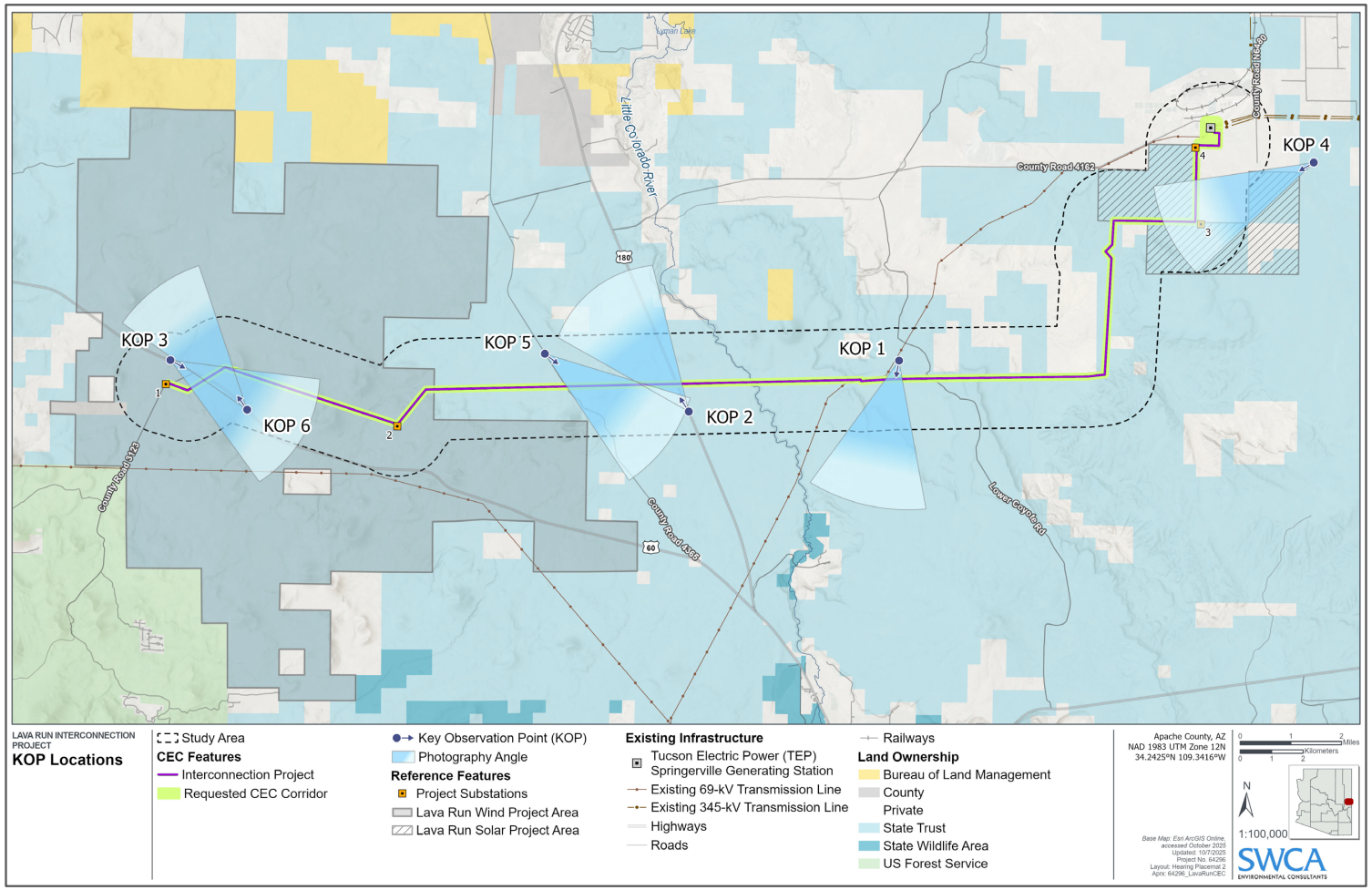
Conclusion

- Anticipated impacts on the landscape character and viewer sensitivity are assessed to determine an overall project visual impact for sensitive viewers.
- Project impacts are influenced by perceived contrast and/or similarities with existing natural and built features in the area, viewer distance and position, and the duration of view.
- Overall, the Interconnection Project will have **moderate to high visual impacts** on sensitive viewers.
- No management plans that require conformance with visual resource management objectives or guidelines apply to the Study Area.
- The Study Area is not within any designated scenic areas.

The Interconnection Project is compatible with visual resources.

Visual Resources

Lava Run
Wind & Solar Projects



Interconnection Project – KOP Overview

Lava Run
Wind & Solar Projects

Environmental Compatibility – Cultural Resources

Lava Run
Wind & Solar Projects

Environmental Compatibility – Cultural Resources

Cultural Resources

Lava Run
Wind & Solar Projects

Class I Records Search

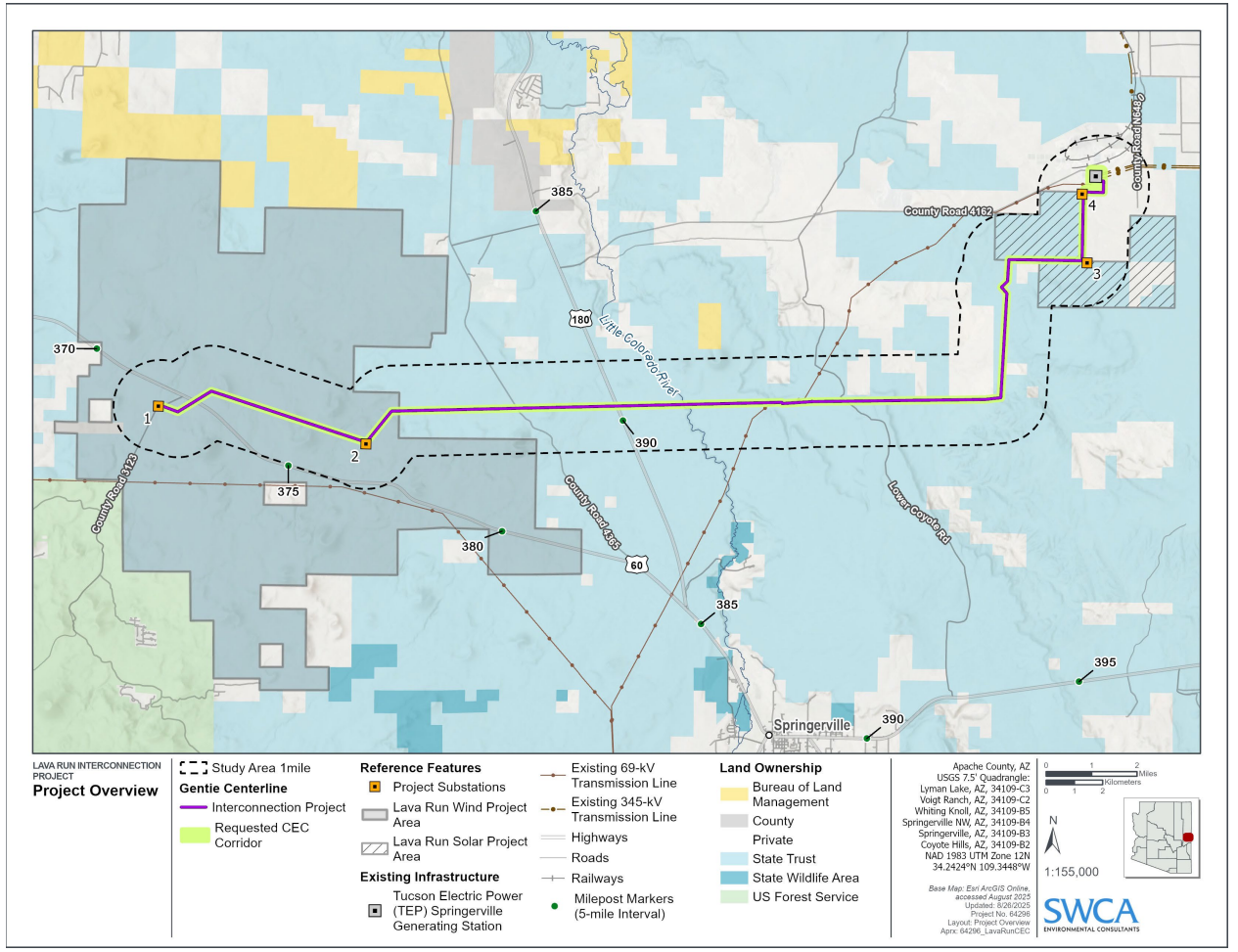
- Archival records review of previously identified historic sites, structures, or archaeological sites within the study area, plus 1-mile radius buffer.
- 50 prior cultural resource surveys (ranging from 1978 to 2024) within 1-mile of the CEC Corridor, 17 of which intersect.
- Prior surveys collectively cover 956.3 acres (60%) of the CEC Corridor.

Class III Survey

- Applicants will complete a Class III cultural resource survey for the remaining portions of the CEC Corridor prior to construction.

Cultural Resources

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Cultural Resources

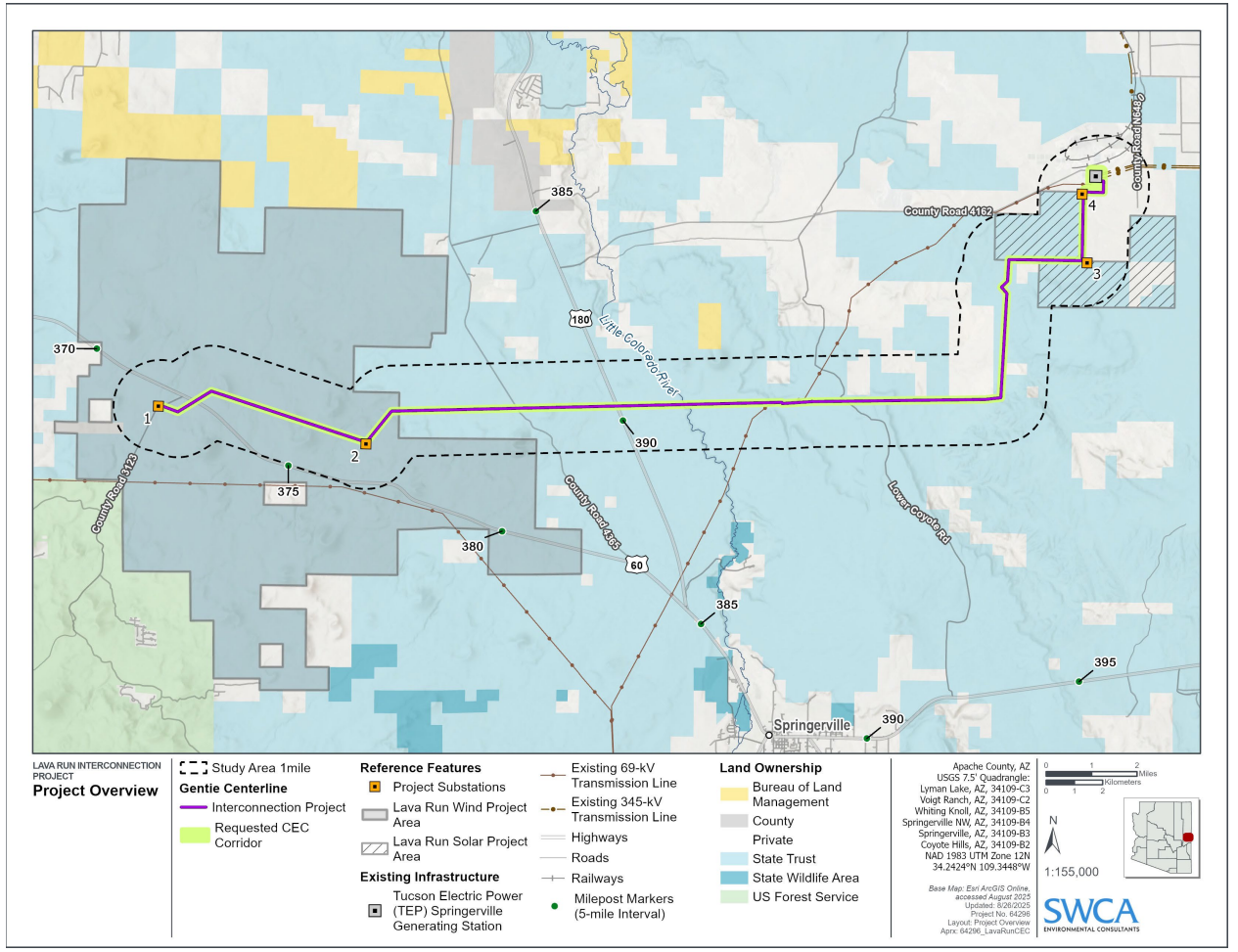
Lava Run
Wind & Solar Projects

Findings

- Study Area: two historic-era sites, two historic-era in-use structures (U.S. 60 and U.S. 180), and 21 archaeological sites.
- Two historic-era in-use structures (U.S. 60 and U.S. 180) and six archaeological sites within the CEC Corridor.
  - Three of the archaeological sites were recommended eligible for listing in the Arizona Register of Historic Places (AHRP) under Criterion D for their information potential.
- Historic-era in-use structures will not be directly impacted.
- The project would not introduce any incompatible elements that are not already present; therefore, no adverse indirect impacts to the setting or integrity of the historic properties.
- The proposed Interconnection Project will introduce weak visual contrast with low visual impacts that will not diminish the integrity of the archaeological sites.
- SHPO recommends that the remainder of the CEC Corridor be surveyed to current SHPO and ASM standards.

Cultural Resources

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Cultural Resources

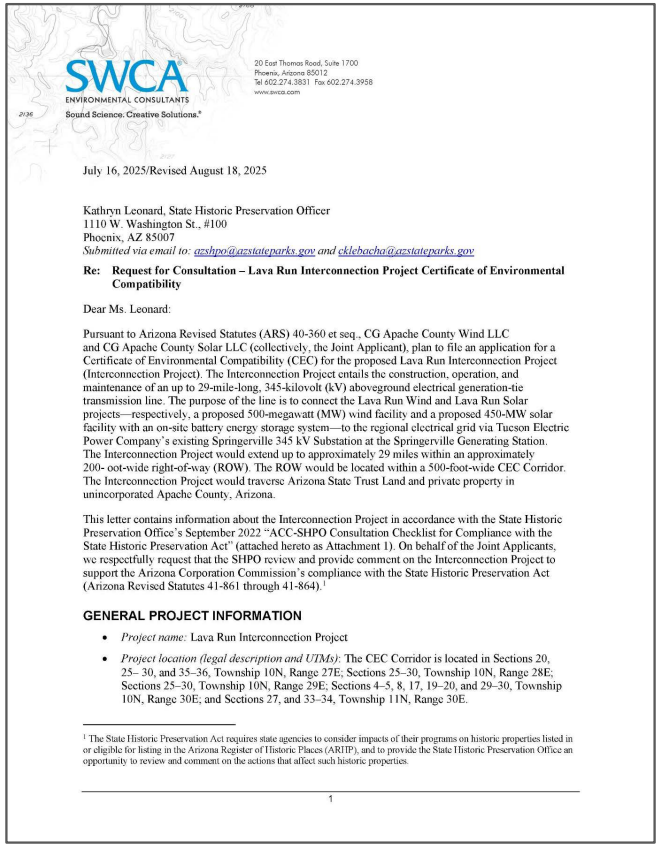
Lava Run
Wind & Solar Projects

SHPO Consultation

- Applicants followed the ACC-SHPO Consultation Checklist for Compliance with the State Historic Preservation Act.
- Consultation with SHPO regarding the Interconnection Project began July 16, 2025, and is ongoing.
- SHPO recommended that any unsurveyed portions of the CEC Corridor be surveyed to current SHPO and Arizona State Museum Standards.
- SHPO has deferred comments on site eligibility or project impacts until after the Class III Cultural Resources Survey for the project is submitted to SHPO for review.
- The Class III Cultural Resources Survey for the project is being updated and will be provided to ASLD and then to SHPO and the Tribes following their review.

Cultural Resources

Lava Run
Wind & Solar Projects



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Phoenix, Arizona 85012
Tel 602.274.3831 Fax 602.274.3958
www.swca.com

July 16, 2025/Revised August 18, 2025

Kathryn Leonard, State Historic Preservation Officer
1110 W. Washington St., #100
Phoenix, AZ 85007
Submitted via email to: azshpo@azstateparks.gov and cklebacha@azstateparks.gov

Re: Request for Consultation – Lava Run Interconnection Project Certificate of Environmental Compatibility

Dear Ms. Leonard:

Pursuant to Arizona Revised Statutes (ARS) 40-360 et seq., CG Apache County Wind LLC and CG Apache County Solar LLC (collectively, the Joint Applicant), plan to file an application for a Certificate of Environmental Compatibility (CEC) for the proposed Lava Run Interconnection Project (Interconnection Project). The Interconnection Project entails the construction, operation, and maintenance of an up to 29-mile-long, 345-kilovolt (kV) aboveground electrical generation-tie transmission line. The purpose of the line is to connect the Lava Run Wind and Lava Run Solar projects—respectively, a proposed 500-megawatt (MW) wind facility and a proposed 450-MW solar facility with an on-site battery energy storage system—to the regional electrical grid via Tucson Electric Power Company's existing Springerville 345 kV Substation at the Springerville Generating Station. The Interconnection Project would extend up to approximately 29 miles within an approximately 200- oot-wide right-of-way (ROW). The ROW would be located within a 500-foot-wide CEC Corridor. The Interconnection Project would traverse Arizona State Trust Land and private property in unincorporated Apache County, Arizona.

This letter contains information about the Interconnection Project in accordance with the State Historic Preservation Office's September 2022 "ACC-SHPO Consultation Checklist for Compliance with the State Historic Preservation Act" (attached hereto as Attachment 1). On behalf of the Joint Applicants, we respectfully request that the SHPO review and provide comment on the Interconnection Project to support the Arizona Corporation Commission's compliance with the State Historic Preservation Act (Arizona Revised Statutes 41-861 through 41-864).[1]

GENERAL PROJECT INFORMATION

- *Project name:* Lava Run Interconnection Project
- *Project location (legal description and UTMs):* The CEC Corridor is located in Sections 20, 25– 30, and 35–36, Township 10N, Range 27E; Sections 25–30, Township 10N, Range 28E; Sections 25–30, Township 10N, Range 29E; Sections 4–5, 8, 17, 19–20, and 29–30, Township 10N, Range 30E; and Sections 27, and 33–34, Township 11N, Range 30E.

[1] The State Historic Preservation Act requires state agencies to consider impacts of their programs on historic properties listed in or eligible for listing in the Arizona Register of Historic Places (ARHP), and to provide the State Historic Preservation Office an opportunity to review and comment on the actions that affect such historic properties.

1

SHPO Consultation Letter 7/16/2025, revised 8/18/2025

Katie Hobbs
Governor

ARIZONA
STATE PARKS & TRAILS

Bob Broscheid
Executive Director

August 12, 2025

David Barr
Cultural Resources Lead / Project Manager
SWCA Environmental Consultants
343 West Franklin Street
Tucson, Arizona 85701

RE: Apache County; Lava Run Interconnection Project Certificate of Environmental Compatibility; Initial State Act Consultation; Arizona Corporation Commission (ACC); SHPO-2025-0624(181983)

Dear Mr. Barr:

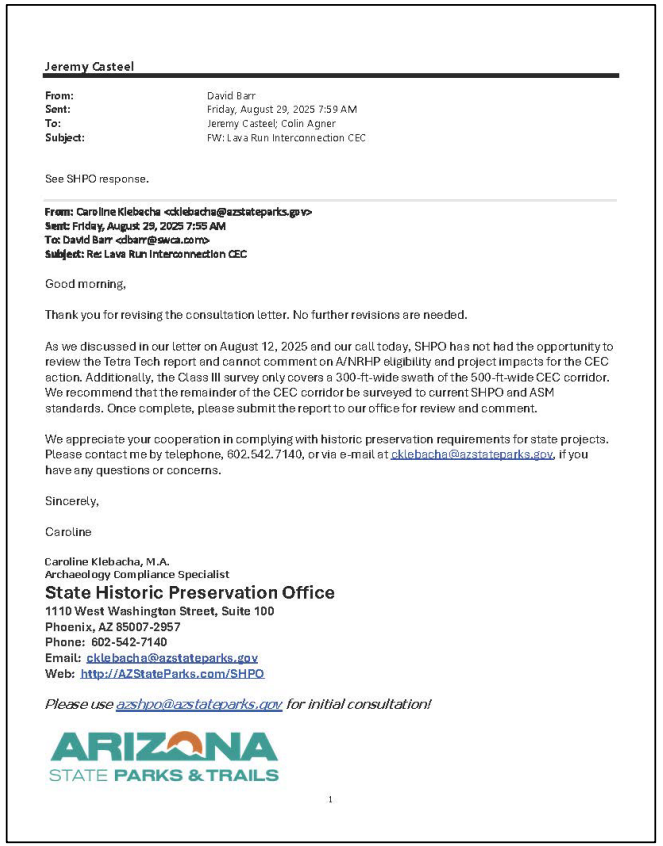
Thank you for consulting with our office regarding the above-referenced project, which requires the issuance of a Certificate of Environmental Compatibility (CEC) for the Lava Run Interconnection Project in Apache County, Arizona. The CEC will include a 29-mile-long by 200-ft-wide corridor for a 345-kilovolt (kV) overhead electrical generation-tie transmission line (project area) connecting the proposed Lava Run 500-megawatt (MW) Wind facility and the proposed Lava Run 450-MW Solar facility with an on-site battery energy storage system to the Tucson Electric Power Company's Springerville Generating Station. The transmission corridor encompasses a total of 1,711acres including 1,593 acres of State Trust land administered by the Arizona State Land Department and 178 acres of private land. Due to the issuance of the CEC by the ACC, the project is a state action subject to review pursuant to the State Historic Preservation Act (State Act), Arizona Revised Statutes (ARS) §41-861–864. The ACC is also required to consider the effects of the project on existing scenic areas, historic sites and structures, and archaeological sites at or in the vicinity of the proposed CEC corridor under ARS § 40-360.06(A)(5).

At your request, we have reviewed the consultation letter prepared by SWCA Environmental Consultants (SWCA). SWCA conducted a Class I inventory of the project area and identified 17 cultural resource surveys that have occurred within the project area, of which 15 meet current SHPO standards covering 956.3 acres (60%) of the project area. The Class I also identified 6 indigenous archaeological sites and 2 historic in-use structures, U.S. Route 60 and U.S. Route 180, within the project area. Of these, two sites are recommended eligible for inclusion in the Arizona and National Registers of Historic Places (A/NRHP), three sites are recommended ineligible, two structures are unevaluated, and one site recorded during two surveys was recommended alternately unevaluated and A/NRHP-eligible.

SWCA evaluated the project's impacts on the A/NRHP-eligible and unevaluated sites. None of the three sites have standing architecture and SWCA asserted visual impacts by the proposed transmission line will be low. SWCA recommended that the sites should be avoided by ground disturbance, but if avoidance is not possible, any ground disturbance located within a 50-ft buffer

State Historic Preservation Office, 1110 W. Washington Street, Suite 100, Phoenix, AZ 85007
602-542-4009 | AZStateParks.com/shpo

SHPO Response Letter 8/12



Jeremy Casteel

From: David Barr
Sent: Friday, August 29, 2025 7:59 AM
To: Jeremy Casteel; Colin Agner
Subject: FW: Lava Run Interconnection CEC

See SHPO response.

From: Caroline Klebacha <cklebacha@azstateparks.gov>
Sent: Friday, August 29, 2025 7:55 AM
To: David Barr <dbarr@swca.com>
Subject: Re: Lava Run Interconnection CEC

Good morning,

Thank you for revising the consultation letter. No further revisions are needed.

As we discussed in our letter on August 12, 2025 and our call today, SHPO has not had the opportunity to review the Tetra Tech report and cannot comment on A/NRHP eligibility and project impacts for the CEC action. Additionally, the Class III survey only covers a 300-ft-wide swath of the 500-ft-wide CEC corridor. We recommend that the remainder of the CEC corridor be surveyed to current SHPO and ASM standards. Once complete, please submit the report to our office for review and comment.

We appreciate your cooperation in complying with historic preservation requirements for state projects. Please contact me by telephone, 602.542.7140, or via e-mail at cklebacha@azstateparks.gov, if you have any questions or concerns.

Sincerely,

Caroline

Caroline Klebacha, M.A.
Archaeology Compliance Specialist
State Historic Preservation Office
1110 West Washington Street, Suite 100
Phoenix, AZ 85007-2957
Phone: 602-542-7140
Email: cklebacha@azstateparks.gov
Web: http://AZStateParks.com/SHPO

Please use azshpo@azstateparks.gov for initial consultation!

ARIZONA
STATE PARKS & TRAILS

1

SHPO Response Email 8/29/2025

Cultural Resources

Lava Run
Wind & Solar Projects

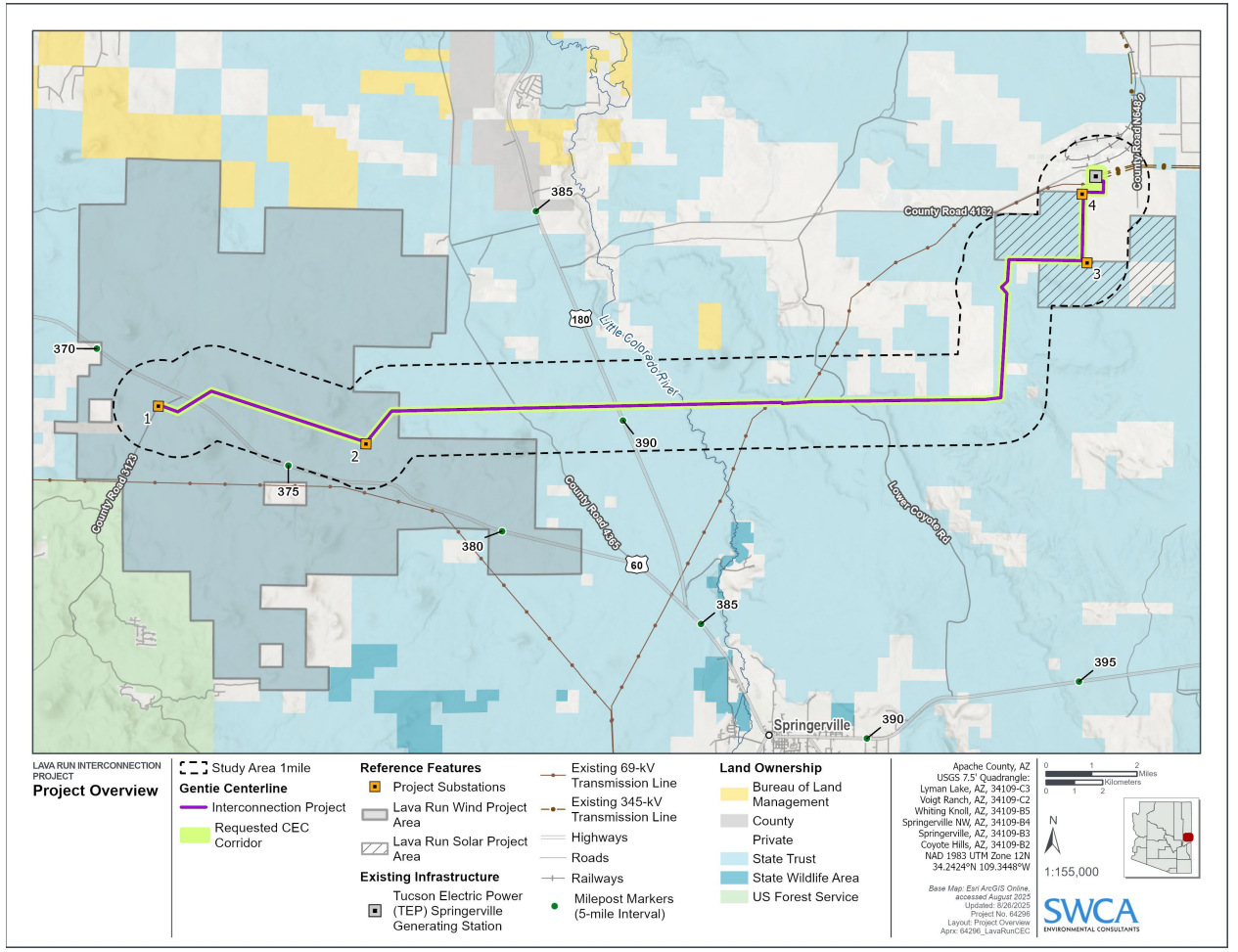
Conclusion

- The Applicants will continue to coordinate with the SHPO regarding necessary CEC conditions.
- The Applicants will avoid eligible sites whenever practicable.
- If the sites cannot be avoided, ground disturbance within 50 feet of the site boundary will be monitored by a qualified archaeologist. If ground disturbance within the site is necessary, additional data recovery will occur within the CEC Corridor prior to construction as needed.
- If previously undocumented buried cultural resources are found, all work within 100 feet will immediately cease until a qualified archaeologist has documented the discovery; work will not resume without ASM approval.
- If human remains found, all work within 100 feet will immediately cease. The ASM and appropriate Native American Tribes will be notified and work will not resume without ASM approval.

The Interconnection Project is compatible with cultural and historic resources.

Cultural Resources

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Lava Run
Wind & Solar Projects

Environmental Compatibility – Recreation Resources

Lava Run
Wind & Solar Projects

Environmental Compatibility – Recreation Resources

Recreation Resources

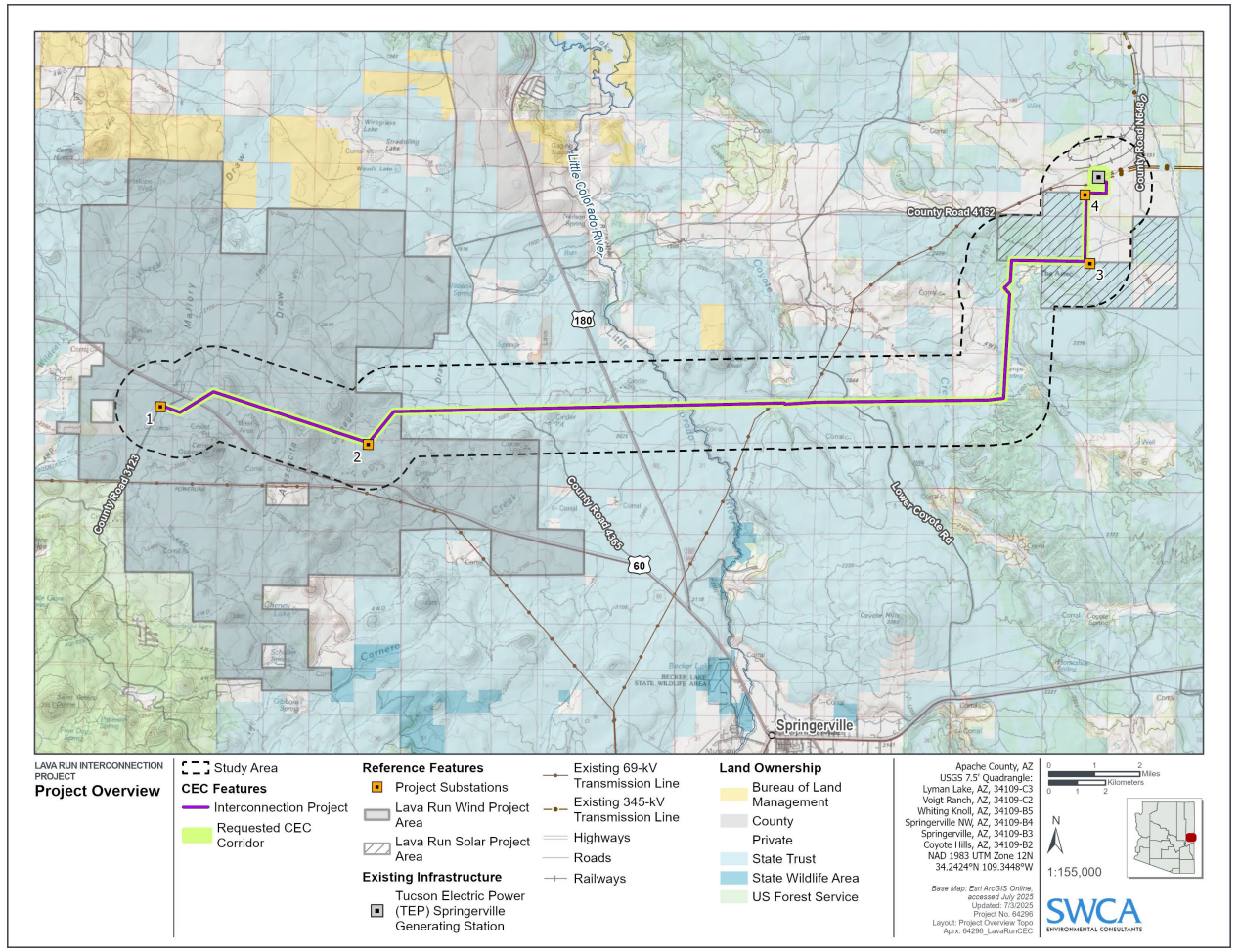
Lava Run
Wind & Solar Projects

- Privately owned land is not open for public recreation, but Arizona State Trust Land can be accessed by the public with a Special Use Permit for recreation
- No designated recreational facilities, parks, or open spaces existing or planned within the Study Area.
- Nearest designated public recreational opportunities are the South Fork Trailhead and Day Use Area in Apache-Sitgreaves National Forest (9 miles south) and Lyman Lake State Park (3.5 miles north).
- The Interconnection Project crosses game management units 1, 2B, 2C, and 3B that offer a variety of small- and big-game hunting opportunities.
- County Road 3123 at the westernmost end of the CEC Corridor provides access to Forest Service–administered hiking and biking trails but access would be maintained during construction.
- Once constructed, the Interconnection Project would not effect or inhibit access to existing or planned recreation opportunities.

The Interconnection Project is compatible with recreation resources.

Recreation Resources

Lava Run
Wind & Solar Projects



Interconnection Project Overview

Lava Run
Wind & Solar Projects

Environmental Compatibility – Noise and Signal Interference

Lava Run
Wind & Solar Projects

Environmental Compatibility – Noise and Signal Interference

Noise and Signal Interference

Lava Run
Wind & Solar Projects

Noise Levels

- Existing sound level estimated at 40 dBA during the day and 34 dBA at night
- Typical construction equipment producing noise levels in the range of approximately 70 to 90 dBA at 50 feet
- During operation, corona noise would range from 28.3 dBA to 58.3 dBA within the proposed 200-foot-wide ROW depending on weather conditions
- Construction noise will be temporary, will occur primarily during daylight hours, and will comply with noise-related ordinances of Apache County

Noise Sensitive Receptors

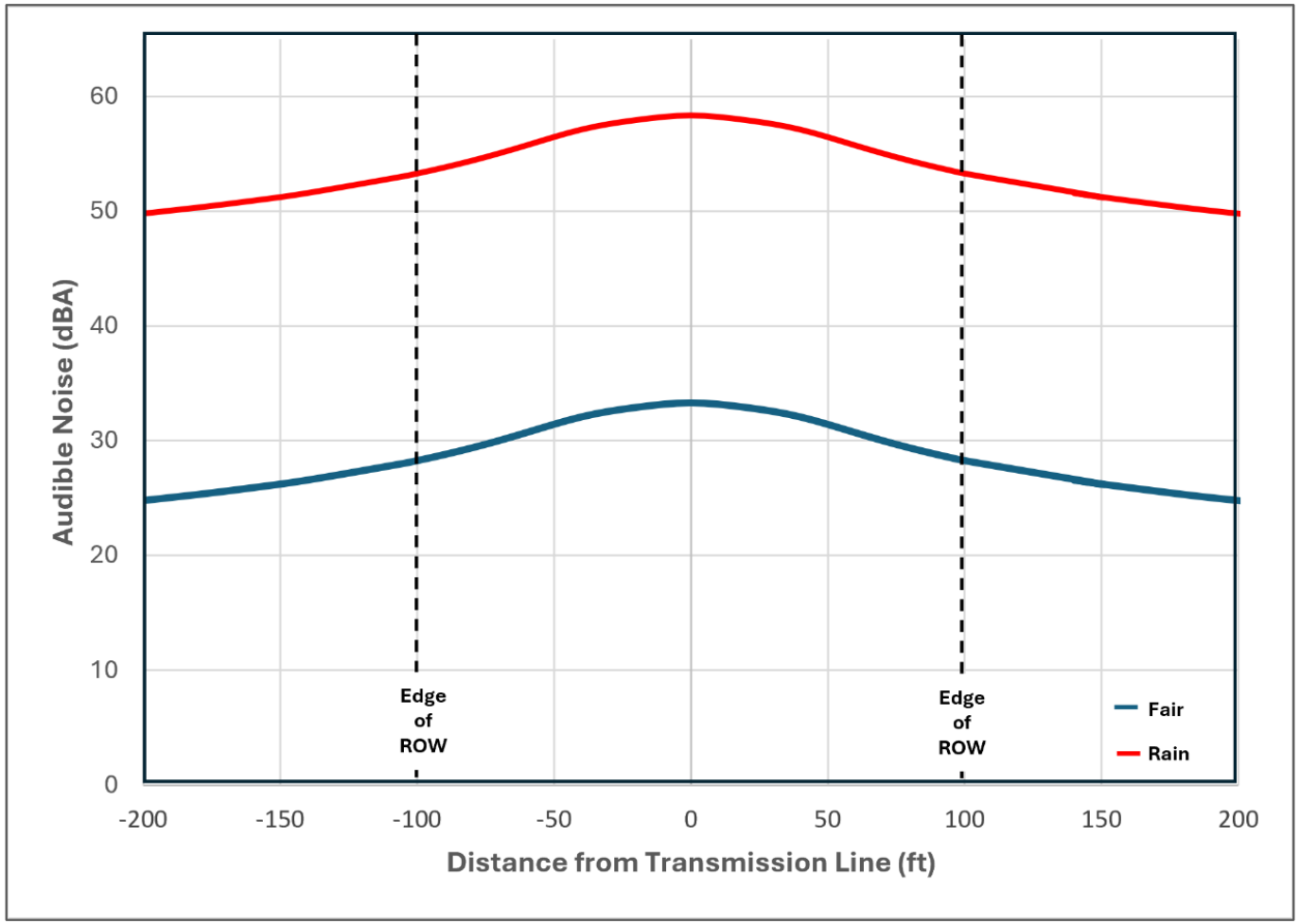
- The nearest noise sensitive receptor is 1.83 miles south of the request CEC corridor
  - Sufficient distance to effectively attenuate construction noise
  - Corona noise would be inaudible

Interference

- Signal interference is unlikely given the existing presence of other existing overhead transmission lines combined with the Interconnection Project's adherence to construction best practices

Noise and Signal Interference

Lava Run
Wind & Solar Projects



Corona Audible Noise Estimates for the Interconnection Project

Public Involvement

Lava Run
Wind & Solar Projects

Public Involvement

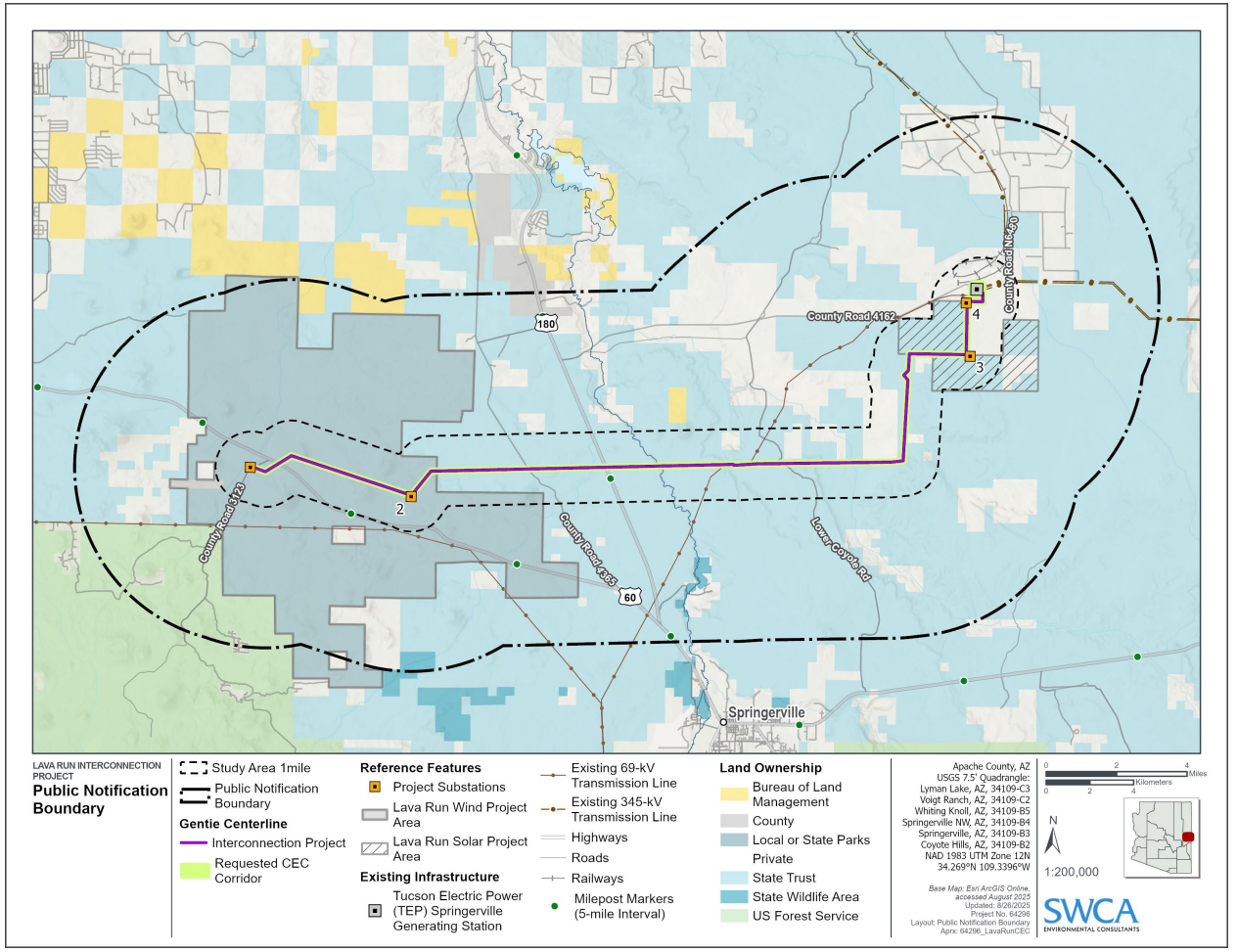
Public Involvement Summary

Lava Run
Wind & Solar Projects

- Methods of communication for outreach
- Project Website
- Informational Letter
- Newspaper Advertisements
- Social Media – Facebook Advertisements
- In-Person Open House
- Virtual Open House
- Public and Stakeholder Comment Summary
- Public Outreach Statistics
- Applicants Response to Comments
- Tribal Outreach

Public Involvement Summary

Lava Run
Wind & Solar Projects



Public Notification Boundary

Methods of Communication

Lava Run
Wind & Solar Projects

Methods of Communication for Outreach

- Dedicated project-specific email address
- Dedicated project-specific telephone line
- Arizona-based mailing address

Email address, telephone line, mailing address, and website included with public communications (e.g., letter, newspaper ads).

Methods of Communication

Lava Run
Wind & Solar Projects

Project Email Adress

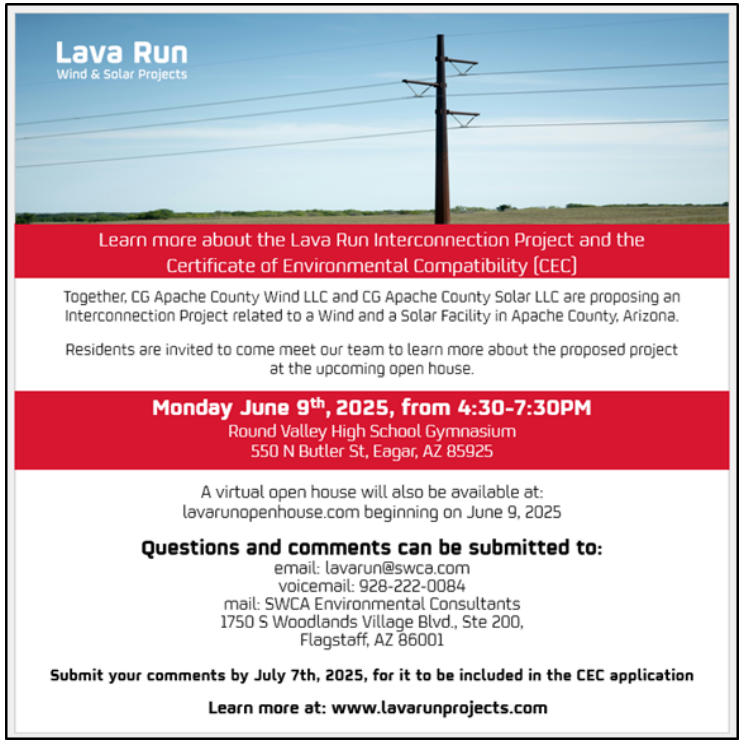
lavarun@swca.com

Project Telephone Line

(928) 222-0084

Project Mailing Address

Jeremy Casteel, Project Manager
CG Apache Count Wind LLC;
CG Apache County Solar LLC
c/o SWCA Environmental Consultants
1750 S. Woodlands Village Boulevard, Suite 200
Flagstaff, AZ 86001



Social media ad and newspaper advertisement

Project Website

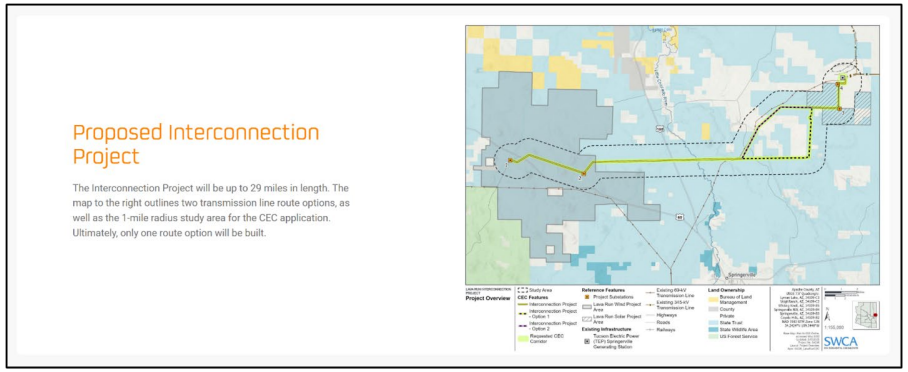
Lava Run
Wind & Solar Projects

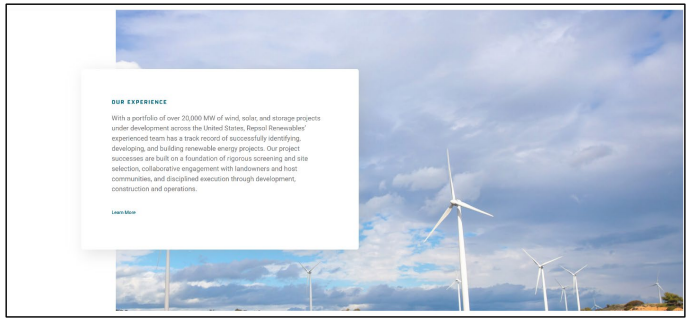
Project Website

- https://www.lavarunprojects.com
- Information on Solar, Wind, and Interconnection Project
- Updated as new information became available
- Project team contact information
- Public meetings and hearing information

Project Website

Lava Run
Wind & Solar Projects





Informational Letter

Lava Run
Wind & Solar Projects

1. Project Outreach and Open House Advertising

a. Mailing list for project Communications

354 property owners within **5 miles** of requested CEC corridor

45 stakeholder contacts (e.g., federal and state agencies, county officials and departments, city officials and departments)

16 Tribal Communities

12 Grazing leases

2 HOAs

88 Commenters on the Applicants' Apache County CUP application

168 individuals who signed into past Apache County CUP application open houses and meetings

685 total mailings

b. Letter direct mailing (May 5, 2025)

Interconnection project description and map

Open house event details

Project team contact information and website address

Virtual open house link

Request for comments and deadline to be included in CEC application

Informational Letter

Lava Run
Wind & Solar Projects

Lava Run
Wind & Solar Projects

May 5, 2025

Re: Invitation to learn about the proposed Lava Run Interconnection Project

Dear Interested Party,

This letter provides notice of the Lava Run Interconnection Project public open-house meeting **Monday, June 9, 2025, from 4:30 p.m. to 7:30 p.m. at the Round Valley High School Gymnasium, 550 N. Butler Street, Eagar, AZ 85925.**

CG Apache County Wind LLC and CG Apache County Solar LLC (collectively "Applicants") plan to file an application for a Certificate of Environmental Compatibility ("CEC") for the Lava Run Interconnection Project ("Interconnection Project") with the Arizona Power Plant and Transmission Line Siting Committee ("Line Siting Committee"). The Interconnection Project entails the construction, operation, and maintenance of an up to 29-mile-long, 345-kilovolt (kV) aboveground electrical generation-tie transmission line. The purpose of the line is to connect the Lava Run Wind and Lava Run Solar projects—respectively, a proposed 500-megawatt (MW) wind facility and a proposed 450-MW solar facility with an on-site battery energy storage system—to the regional electrical grid via Tucson Electric Power Company's existing Springerville 345 kV Substation at the Springerville Generating Station.

A map of the proposed route for the Interconnection Project is attached (Figure 1). It starts at the westernmost Project Substation 1. Project Substation 1 will be located on Arizona State Trust Land, approximately 0.5 mile southwest of U.S. Route 60 and approximately 0.1 mile west of County Road 3123, which is maintained by Apache County. From there, the Interconnection Project proceeds approximately 0.4 miles southeast and then 0.9 miles northeast, crossing U.S. Route 60. It then continues approximately 3.6 miles southeast and then 0.9 miles northeast. It then proceeds approximately 9.5 miles east, crossing U.S. Route 180. From this point, two route options ("Options 1 and 2") are proposed; only one of the two options will ultimately be constructed.

Option 1 heads approximately 4.1 miles east and then approximately 3 miles north. At this point, Option 1 connects with Option 2. Option 2 heads north to northeast for approximately 4 miles and then approximately 1.9 miles east. At this point, Option 2 connects with Option 1.

Once the two options connect, the Interconnection Project proceeds approximately 1.7 miles east and then 1.5 miles north. It then continues approximately 0.4 miles east and then approximately 0.25 miles north to connect into the Springerville 345 kV Substation. The Interconnection Project will be on Arizona State Trust Lands managed by the Arizona State Land Department and private property.

The Applicants plan to apply for a CEC in September 2025. **The application will be reviewed by the Line Siting Committee at a public hearing set to occur between October 20-24, 2025.** More details regarding the Line Siting Committee public hearing will be provided as the hearing date approaches.

The Applicants welcome feedback from the community and are soliciting public and stakeholder input on the Interconnection Project. Residents are invited to come meet our team to learn more about the proposed project at the upcoming open house.

Informational Letter

Lava Run Interconnection Project

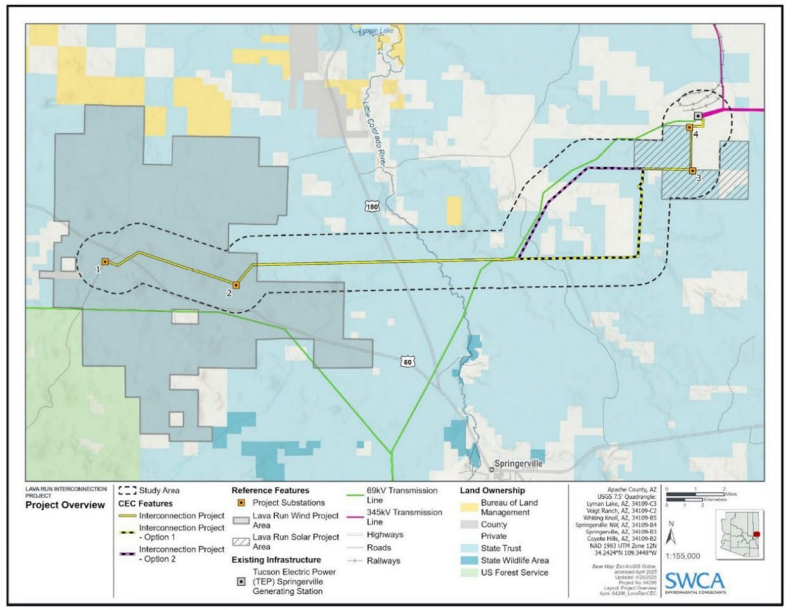


Figure 1. Lava Run Interconnection Project

2

Map Included with Letter

Newspaper and Social Media

Lava Run
Wind & Solar Projects

Newspaper advertisement

- White Mountain Independent advertisement – May 13, 20, and 27, 2025 and June 3, 2025
- Display advertisement
- Interconnection Project description and comment details
- Open House event details

Facebook advertisement

- Ad posted containing information about Interconnection project and Open House event
- Ad boosted May 12 through June 9, 2025
- Ad target zip codes 85924 (Concho), 85936 (Springerville), and 85938 (St. Johns)

Lava Run
Wind & Solar Projects

Newspaper and Social Media

Page 2 — *White Mountain Independent* — Tuesday, May 13, 2025

Water,

from Page 1

Hosted by the University of Arizona Cooperative Extension under Arizona Project WET and sponsored by a variety of local and state partners, the festival invited students to explore real-world concepts related to water conservation, the water cycle, groundwater and watershed protection. Through interactive stations, kids learned about the science behind water and experienced it firsthand.

"This is part of a national network, but Arizona is the only state doing extensive hands-on water education festivals like this," Michael Spaeth, outreach coordinator with the University of Arizona Cooperative Extension, said. "For over two decades, we've been expanding this effort across the state to get more regions involved and to help our youth understand the importance of water in their lives."

In one activity, students raced in a technology relay, where they spun like washing machines, carried cups of water while pretending to shower and mimicked dripping faucets, all to explore how technology both helps and hinders water conservation.

"The average Arizonan uses about 100 gallons of water a day," one facilitator noted. "So simple behaviors like turning off the faucet while brushing your teeth really add up."

Another station transformed students into water molecules, sending them through the unpredictable path of the water cycle: a process more like a web than a loop. From evaporation to condensation, precipitation to percolation, students learned how water moves through Earth's ecosystem and how only about one percent of it is fresh and accessible.

At the groundwater station, students discovered that 41% of Arizona's water comes from below the surface. They learned how groundwater is stored in aquifers, spaces between rocks and sand; and how over-pumping can lead to dangerous outcomes like sinkholes, subsidence and floods.

"Once groundwater is gone, those spaces collapse, and we can't get them back," a volunteer said.

In a session on watersheds and erosion, students got their hands on experiences with sponges and clay to understand how different surfaces affect water flow and pollution. From pet waste and fertilizer runoff to the effects of urban heat islands, the students explored how even small human actions can pollute water supplies.

"We all rely on water," Spaeth said, "and our behaviors directly affect the quality and availability of that water."

One station highlighted climate change's urban effects, explaining how more heat in big cities leads to increased evaporation and fewer rainstorms. Solutions like planting trees and creating green spaces were discussed as ways to cool neighborhoods and slow down water loss.

The event was made possible thanks to sponsorship by Arizona Water Company, American Ground Water Trust, the Town of Pinetop-Lakeside, Navajo County, Mogollon Water, Loft 54, Elizabeth Turner, State Farm Insurance (Carla Rubin), Roscoe Moss (Jeremy Kuhn) and the City of Show Low.

For more information on Project WET, go to projectwet.arizona.edu/.

Pinetop-Lakeside Public Library Director Betsy Peck cheers on the students as they run the technology relay race.

Lava Run
Wind & Solar Projects

Learn more about the Lava Run Interconnection Project and the Certificate of Environmental Compatibility (CEC)

Together, CG Apache County Wind LLC and CG Apache County Solar LLC are proposing an Interconnection Project related to a Wind and a Solar Facility in Apache County, Arizona.

Residents are invited to come meet our team to learn more about the proposed project at the upcoming open house.

Monday June 9th, 2025, from 4:30-7:30PM
Round Valley High School Gymnasium
550 N Butler St, Eagar, AZ 85925

A virtual open house will also be available at: lavarunopenhouse.com beginning on June 9, 2025

Questions and comments can be submitted to:
email: lavarun@swca.com
voicemail: 928-222-0084
mail: SWCA Environmental Consultants
1750 S Woodlands Village Blvd., Ste 200,
Flagstaff, AZ 86001

Submit your comments by July 7th, 2025, for it to be included in the CEC application

Learn more at: www.lavarunprojects.com

Art,

From Page 1

Animal Rescue added educational and charitable dimensions to the event.

FLAVORS THAT HIT THE SPOT

The food lineup didn't disappoint. Visitors could snack on Navajo tacos by Loretta Skeet, dig into sizzling plates from Smoke Show BBQ and Moondogs (complete with its unmistakable green alien mascot), or satisfy their cravings at Black Flame Grill and the Saucy Sicilian. Coffee lovers gravitated to Fairytale Coffee for a pick-me-up.

A PROMISING NEW TRADITION

Reflecting on the day's success, Springerville Mayor Shelly Reidhead said it was "a great event to kick off Spring and all the events that happen in Round Valley during the summer." She added, "We had a good turnout for our first art walk. Kristy Prather, our museum director, put a lot of work into this and it paid off. I am confident it will continue to grow."

Town Manager Tim Rasmussen also praised the event as a showcase of both local talent and municipal teamwork.

"This event brought hundreds of visitors into our downtown, introduced them to our artists and small businesses and spotlighted what makes Springerville special," Rasmussen said. "We're looking forward to making this an annual tradition."

TASTE OF THE WHITE MOUNTAINS

Step into a world of flavors and generosity at Taste of the White Mountains 2025, a fundraising event hosted by the Blue Ridge Scholarship Fund. Indulge in delectable dishes and try your luck at the raffle - all for a noble cause. Your presence and support will help us empower deserving students to reach new heights. Join us for an unforgettable afternoon of giving back and savoring the taste of making a difference.

Taste of the White Mountains

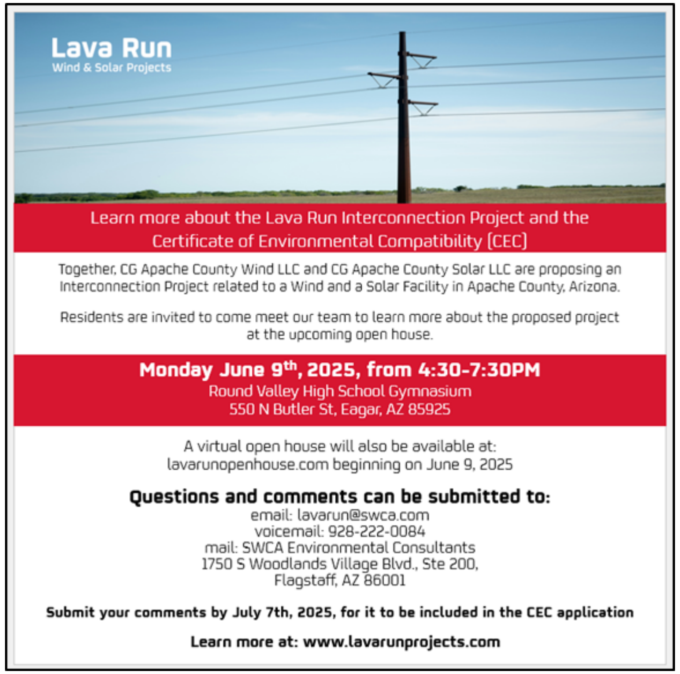
SCAN TO PURCHASE TICKETS

May 17th 11:30 CAMP GRACE
BUY TICKETS AT: BlueridgeScholarship.com

THANK YOU TO ALL OF OUR SPONSORS ~

Pinetop Brewing Co. · Red Barn Creamery · The House · Darbi's Cafe · Pitalian · The Pinetop Coffee House & Roasting Company · The Bistro at Annie's · Chalet

White Mountain Independent - Newspaper Advertisement



Social Media Advertisement

In-Person Open House

Lava Run
Wind & Solar Projects

In-person Open House Event

- June 9, 2025
- Local venue used - Round Valley High School multipurpose room

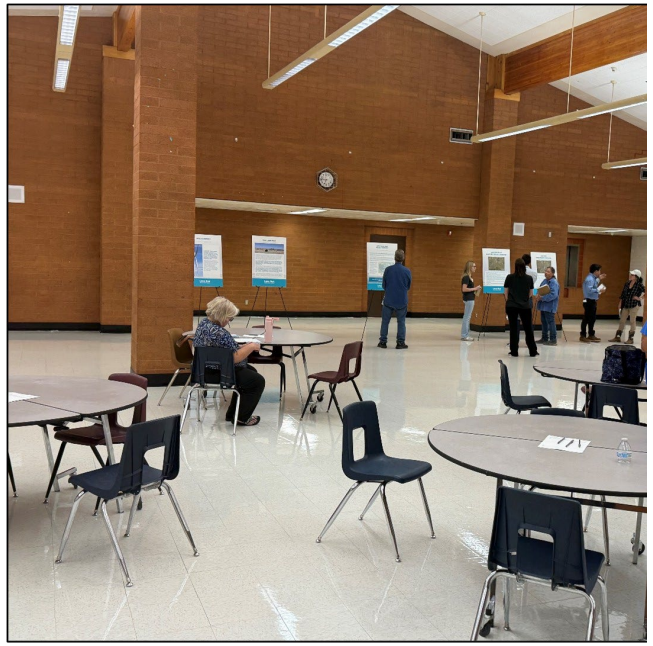
Attendees

- 19 individuals attended and signed in
- Two comments received

In-Person Open House

Lava Run
Wind & Solar Projects

In Person Open House Meeting Set Up



In Person Open House Meeting Set Up

Virtual Open House

Lava Run
Wind & Solar Projects

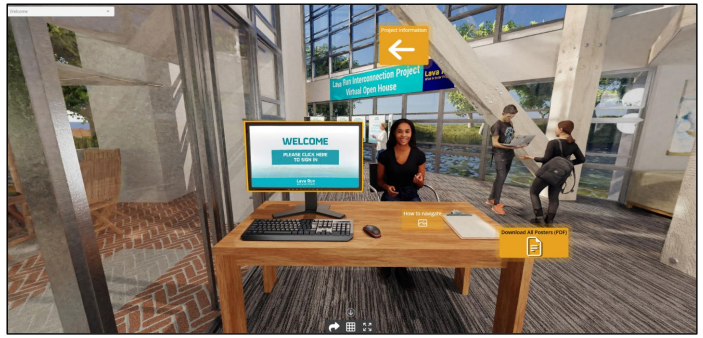
Virtual Open House

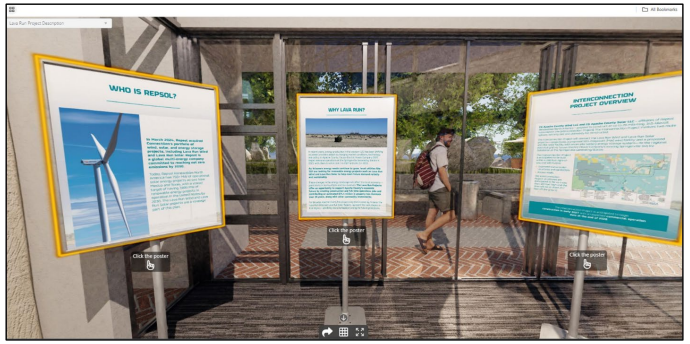
- http://lavarunopenhouse.com
- Provides
  - Applicants overview
  - Interconnection Project description and location
  - Land use maps
  - Visual simulations
  - Permitting requirements overview
  - Sign-in sheet and comment form

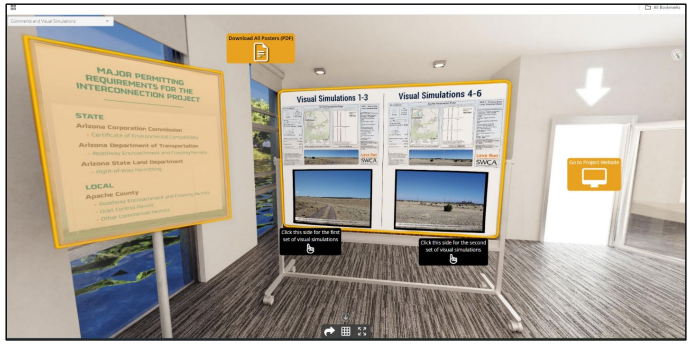
101 viewers to date and 2 sign-ins. No comments provided

Virtual Open House

Lava Run
Wind & Solar Projects







Public and Stakeholder Comment Summary

Lava Run
Wind & Solar Projects

Comments Received

- Twenty-two comments received
  - Four through telephone line
  - Six through Email address
  - Ten through the physical mailing address
  - Two at open house event
- One comment is from the White Mountain Apache Tribe
- One comment is from U.S. Army Corps of Engineers
- One comment is from Arizona Game and Fish Department
- One comment is from Arizona State Historic Preservation Office
- Thirteen comments expressed opposition, one in support, two that asked for more information, and one that expressed concern for hunting access.

Public Outreach Statistics

Lava Run
Wind & Solar Projects

Outreach	Results
Facebook Impressions	147,056
Facebook Accounts Reached	6,630
Virtual Open House Visits	116
Open House Invitations Mailed	685
Newspaper Display Advertisements	4
Open House Attendance	19
Comments Received through Telephone Line	4
Comments Received through Email	6
Comments Received through Physical Mail Address	10
Comments received through in-person Open House	2

Applicants Response to Comments

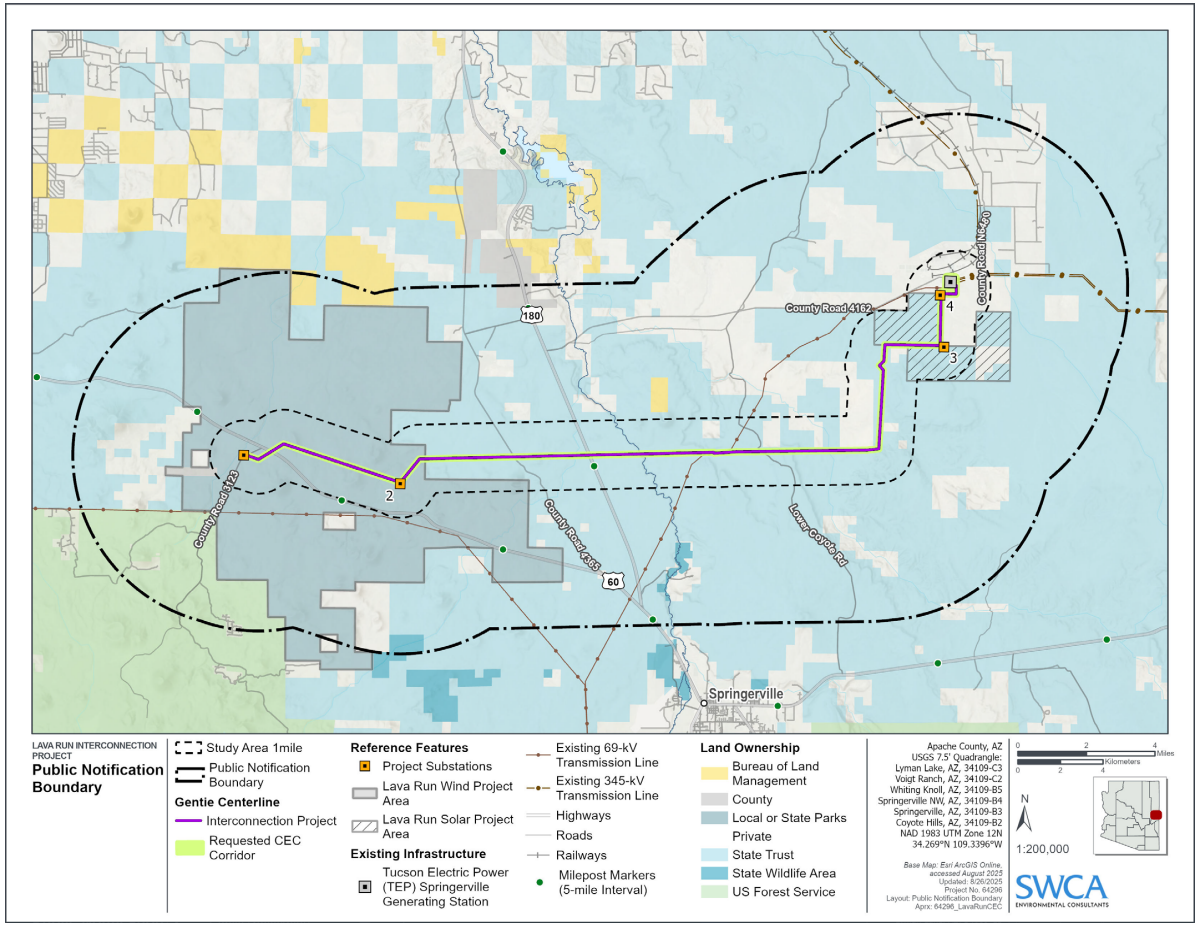
Lava Run
Wind & Solar Projects

Applicants Response to Comments

- The Applicants personally responded to comments received for the Interconnection Project
  - Two responses through email
  - One response through a returned phone call
  - One response via a letter, but the provided address could not be delivered to
  - One comment left via voicemail, but could not be reached for a response
- The contents of the responses can be found in Table J-1 in Exhibit J of the application

Applicants Response to Comments

Lava Run
Wind & Solar Projects



Public Notification Boundary

Tribal Outreach Summary

Lava Run
Wind & Solar Projects

Tribal Outreach

- Beginning in March 2021, the Applicants have conducted outreach to tribes affiliated with the lands associated with the proposed Wind Facility, Solar Facility, and Interconnection Project areas
- Tribes were identified by the Arizona Government-to-Government (G2G) Consultation Toolkit
  - Mescalero Apache Tribe
  - Pueblo of Zuni
  - San Carlos Apache Tribe
  - Tonto Apache Tribe
  - The Hopi Tribe
  - The Navajo Nation
  - White Mountain Apache Tribe

Tribal Outreach Summary

Lava Run
Wind & Solar Projects

Tribal Outreach

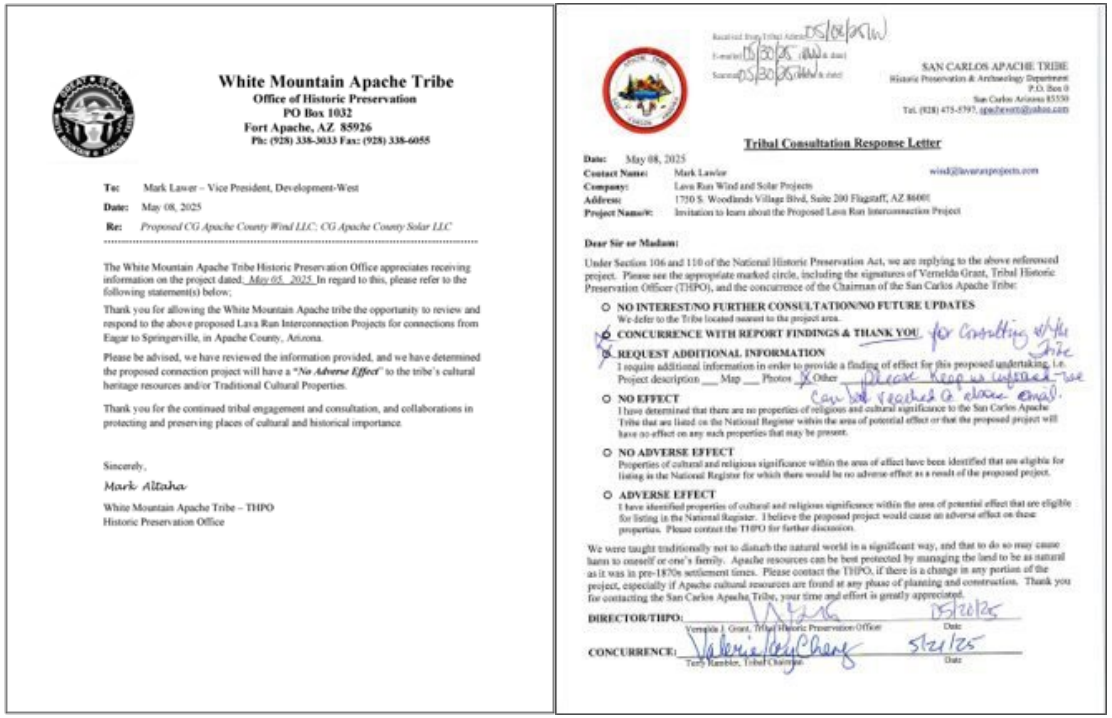
- Tribal outreach has been ongoing since March 2021
- Included initial outreach letters, records searches, survey reports, and Interconnection Project notification letters.
- Letters have been received from tribes that provided feedback on submitted reports, concurrences on findings, and requests to be involved in further coordination.
- A summary of tribal outreach conducted for the Interconnection Project is included in Exhibit CG-015 Public Involvement Summary.

Tribal Outreach Summary

Lava Run
Wind & Solar Projects

Tribal Outreach

- Tribes were contacted May 5, 2025 and provided an in-person open house invitation
- The San Carlos Apache Tribe and White Mountain Apache Tribe responded
- Each thanked the Applicants and requested to continue receiving information



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

To: Mark Lawler – Vice President, Development-West
Date: May 08, 2025
Re: *Proposed CG Apache County Wind LLC; CG Apache County Solar LLC*

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated: *May 05, 2025*. In regard 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 Lava Run Interconnection Projects for connections from Eagar to Springerville, in Apache County, Arizona.

Please be advised, we have reviewed the information provided, and we have determined the proposed connection project will have a "*No Adverse Effect*" to the tribe's cultural heritage resources and/or Traditional Cultural Properties.

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

Sincerely,
Mark Altaha
White Mountain Apache Tribe – THPO
Historic Preservation Office

SAN CARLOS APACHE TRIBE
Historic Preservation & Archaeology Department
P.O. Box 0
San Carlos Arizona 85550
Tel. (928) 475-2343, spacheart@yahoo.com

Tribal Consultation Response Letter

Date: May 08, 2025
Contact Name: Mark Lawler
Company: Lava Run Wind and Solar Projects
Address: 1750 S. Woodlands Village Blvd, Suite 200 Flagstaff, AZ 86001
Project Name/#: Invitation to learn about the Proposed Lava Run Interconnection Project

Dear Sir or Madam:

Under Section 106 and 110 of the National Historic Preservation Act, we are replying to the above referenced project. Please see the appropriate marked circle, including the signatures of Vernelda Grant, Tribal Historic Preservation Officer (THPO), and the concurrence of the Chairman of the San Carlos Apache Tribe:

- ○ **NO INTEREST/NO FURTHER CONSULTATION/NO FUTURE UPDATES**
  We defer to the Tribe located nearest to the project area.
- ○ **CONCURRENCE WITH REPORT FINDINGS & THANK YOU**
- ○ **REQUEST ADDITIONAL INFORMATION**
  I require additional information in order to provide a finding of effect for this proposed undertaking, i.e. Project description ___ Map ___ Photos _X_ Other ___
- ○ **NO EFFECT**
  I have determined that there are no properties of religious and cultural significance to the San Carlos Apache Tribe that are listed on the National Register within the area of potential effect or that the proposed project will have no effect on any such properties that may be present.
- ○ **NO ADVERSE EFFECT**
  Properties of cultural and religious significance within the area of effect have been identified that are eligible for listing in the National Register for which there would be no adverse effect as a result of the proposed project.
- ○ **ADVERSE EFFECT**
  I have identified properties of cultural and religious significance within the area of potential effect that are eligible for listing in the National Register. I believe the proposed project would cause an adverse effect on these properties. Please contact the THPO for further discussion.

We were taught traditionally not to disturb the natural world in a significant way, and that to do so may cause harm to oneself or one's family. Apache resources can be best protected by managing the land to be as natural as it was in pre-1870s settlement times. Please contact the THPO, if there is a change in any portion of the project, especially if Apache cultural resources are found at any phase of planning and construction. Thank you for contacting the San Carlos Apache Tribe, your time and effort is greatly appreciated.

DIRECTOR/THPO: Vernelda J. Grant, Tribal Historic Preservation Officer — Date
CONCURRENCE: Terry Rambler, Tribal Chairman — Date

Tribal Outreach Summary

Lava Run
Wind & Solar Projects

Tribal Outreach

- Tribes were contacted again on June 3, 2025 to notify tribes of the project and provide additional opportunity for comment
- The Class III cultural resources report was provided for review
- Tribes were included in the pre-hearing informational letter mailing on September 11, 2025
- One letter received from San Carlos Apache Tribe in response to the pre-hearing informational letter which thanked the Applicants for the tribal outreach

Lava Run
Wind & Solar Projects

May 30, 2025

Arden Kucate, Governor
Cordelia Hooee, Lt Gov
PUEBLO OF ZUNI
Zuni Tribal Council
P.O. Box 339
Zuni, NM 87327

Re: Proposed Lava Run Wind and Solar Projects, Apache County, Arizona

Dear Mr. Nuvangyaoma:

CG Apache County Solar LLC and CG Apache County Wind LLC (together "Applicants") are proposing a 500-megawatt ("MW") wind facility ("Lava Run Wind Project") and a 450-MW solar facility with an on-site battery energy storage system ("Lava Run Solar Project") in unincorporated Apache County, Arizona (Enclosure 1). The Projects would be sited within an approximately 72,000-acre area located on Arizona State Trust Lands, approximately 5 miles north of Springerville and 15 miles south of St. Johns. Lava Run Wind would be sited in the western portion of the project area, entirely west of US Route 180; Lava Run Solar would be sited in the northeastern portion, just south of the existing Springerville Generating Station (Enclosure 2). An up to 29-mile-long, 345-kilovolt, above-ground electrical generation-tie transmission line ("Interconnection Project") would connect both the Lava Run Wind and Lava Run Solar Projects to the regional electrical grid via Tucson Electric Power Company's existing Springerville 345 kV Substation at the Springerville Generating Station.

For administrative process planning context, Applicants anticipate there will be no federal involvement requiring tribal consultation under Section 106 of the National Historic Preservation Act. However, the Interconnection Project will require a Certificate of Environmental Compatibility ("CEC") from the Arizona Corporation Commission, at which time the Arizona Power and Transmission Line Siting Committee would consider your input on the Interconnection.

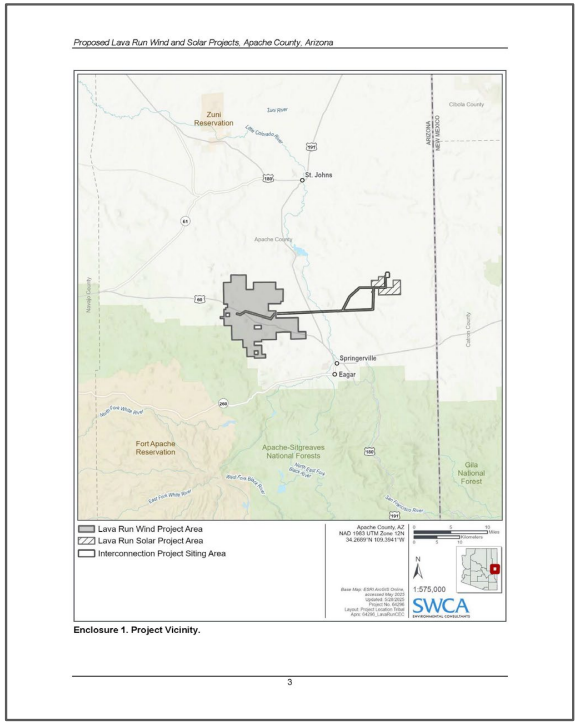
In any event, as part of its permitting efforts, the Applicants contracted SWCA Environmental Consultants and Tetra Tech to conduct field surveys of the Lava Run Wind Project, Lava Run Solar Project, and Interconnection Project areas to assess potential impacts on significant cultural resources. SWCA's reports (Enclosures 3 and 4) have been approved by ASLD and SHPO and Tetra Tech's reports (Enclosure 5) are still under agency review with ASLD and SHPO.

These reports are enclosed for your consideration and information. Applicant's respectfully request you submit any input you wish to provide Applicant by July 29, 2025, so that it may take it into consideration as the projects proceed. Please send any correspondence to the email or mailing address below.

Email
trinidad.kechkian@repsol.com

Mailing Address
Trinidad Kechkian
CG Apache County Solar LLC and CG Apache County Wind LLC
1221 McKinney St, Suite 1900
Houston, Texas 77010

Please let Applicants know if you want to receive future correspondence regarding these projects. Should you have any questions, please contact Project Manager Trinidad Kechkian at 832-808-1823.



Proposed Lava Run Wind and Solar Projects, Apache County, Arizona

Enclosure 1. Project Vicinity.

3

Lava Run
Wind & Solar Projects

Public Notice of CEC Hearing

Lava Run
Wind & Solar Projects

Public Notice of CEC Hearing

Public Notice for CEC Hearing

Lava Run
Wind & Solar Projects

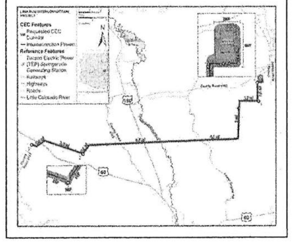
- CEC Application Filed September 5, 2025
- Publication of Notice of Hearing
  - White Mountain Independent (September 12, 2025)
  - The Arizona Republic/AZCentral.com (September 10, 2025)
- Public Viewing Locations
  - Public Libraries: Confirmed receipt on September 9 and October 8, 2025
    - St. John's Public Library at 35 South 3rd West, St. Johns, Arizona 85936
    - Round Valley Public Library at 179 South Main Street, Eagar, AZ 85925
- Project Website (electronic): https://www.lavarunprojects.com
- ACC Docket Control

Public Notice for CEC Hearing

Lava Run
Wind & Solar Projects

PUBLIC NOTICE

NOTICE OF HEARING



WHITE MOUNTAIN INDEPENDENT
PO. BOX 1570, SHOW LOW, AZ 85902

State of Arizona)
) ss.
County of Navajo)

Affidavit of Publication

[x] Navajo [x] Apache

I, KAITLYN WATSON, being first duly sworn, depose and say: I am the agent of the White Mountain Publishing LLC, publisher of the White Mountain Independent, a semi-weekly newspaper of general circulation published at Eagar, County of Apache, and Show Low, County of Navajo, Arizona and that the copy hereto attached is a true copy of the advertisement as published in the White Mountain Independent on the following date(s):

09/12/2025

White Mountain Independent

Sworn to me this 30th day of September 2025 A.D.

Notary Public

JENNA TROUT
NOTARY PUBLIC - ARIZONA
NAVAJO COUNTY
COMMISSION # 632220
MY COMMISSION EXPIRES
SEPTEMBER 07, 2026

LocaliQ
Arizona
GANNETT

PO Box 632099, Cincinnati, OH 45263-2099

AFFIDAVIT OF PUBLICATION

Colin Agner
Swca
343 W Franklin ST
Tucson AZ 85701-8294

STATE OF WISCONSIN, COUNTY OF BROWN

The Arizona Republic, a newspaper published in the city of Phoenix and general circulation in the counties of Maricopa, Coconino, Pima and Pinal, State of Arizona, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

PNI Arizona_Republic 09/10/2025
PNI azcentral.com 09/10/2025

and that the fees charged are legal.
Sworn to and subscribed before on 09/10/2025

Legal Clerk

Notary, State of WI, County of Brown

3-7-27

My commission expires

Publication Cost:	$5822.00		
Tax Amount:	$0.00		
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Please do not use this form for payment remittance.

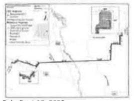
KAITLYN FELTY
Notary Public
State of Wisconsin

Page 1 of 3

Page 1 of 2

BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE
DOCKET NO.: L-21364A-25-0198-00250
Case No. 250
NOTICE OF HEARING

Page 2 of 2



Pub: Sept 10, 2025

(affidavits of publication)

Public Notice for CEC Hearing

Lava Run
Wind & Solar Projects

Notice of Certified Mail to “areas of affected jurisdiction”

- Apache County
- Town of Springerville
- Town of Eager
- Arizona State Land Department
- Arizona Department of Transportation

Public Notice of Hearing Letter – Mailed on September 11, 2025

- Same mailing list as the open house invitation mailing list
- Project description, docket and case no., hearing details, project website link, contact info, map

Public Notice for CEC Hearing

Lava Run
Wind & Solar Projects

Lava Run
Wind & Solar Projects

September X, 2025

Notice of Hearing for the Proposed Lava Run Interconnection Project (Docket No. L-XXXXXXXXX)

Dear Interested Party,

CG Apache County Wind LLC and CG Apache County Solar LLC (collectively "Applicants") are proposing to construct, operate, and maintain an up to 29-mile-long, 345-kilovolt ("kV") aboveground electrical generation-tie transmission line. The purpose of the line is to connect the Lava Run Wind and Lava Run Solar projects—respectively, a proposed 500-megawatt ("MW") wind facility and a proposed 450-MW solar facility with an on-site battery energy storage system—to the regional electrical grid via Tucson Electric Power Company's existing Springerville 345 kV Substation at the Springerville Generating Station. More information about the Interconnection Project is available at www.lavarunprojects.com. A map of the proposed route and requested CEC Corridor for the Interconnection Project is attached (Figure 1).

The Applicants filed an application for a Certificate of Environmental Compatibility ("CEC") for the Lava Run Interconnection Project ("Interconnection Project") with the Arizona Corporation Commission on construct and operate the Interconnection Project; the Project is docketed as L-XXXXXXXXXX. The Arizona Power Plant and Transmission Line Siting Committee ("Committee") will initially evaluate the CEC Application and, after holding public hearings, will make a recommendation to the Arizona Corporation Commission. This letter provides notice of the public hearing related to the CEC Application.

A copy of the CEC Application can be found on the Project website at www.lavarunprojects.com, at the Arizona Corporation Commission Docket Control, Phoenix Office, located at 1200 West Washington Street, Suite 108, Phoenix, AZ 85007, at the Round Valley Public Library located at 179 South Main Street, Eagar, Arizona, 85925 and at the St. Johns Public Library located at 35 South 3rd West, St. Johns, Arizona 85936.

A public hearing regarding the CEC Application has been scheduled before the Committee from October 20, 2025 through October 24, 2025 at the Hon-Dah Casino located at 777 AZ-260, Pinetop, Arizona, 85935. The hearing will commence at 1:00 p.m. on October 20 and at 9:00 a.m. on subsequent days, as necessary. Members of the public and other stakeholders are invited to attend this hearing in person or watch virtually through the following link: https://vimeo.com/event/5128411.

A public comment session regarding the CEC Application will be held starting at 5:30 p.m. on October 20, 2025 at the Hon-Dah Casino located at 777 AZ-260, Pinetop, Arizona, 85935. Members of the public and other stakeholders are invited to attend this comment session in person or virtually and provide comment. Please note the virtual public comment session options below carefully.

If you would like to provide public comment virtually via zoom:

https://us06web.zoom.us/j/87847914635

Meeting ID: 878 4791 4635

Passcode: None

If you would like to provide public comment virtually via telephone:

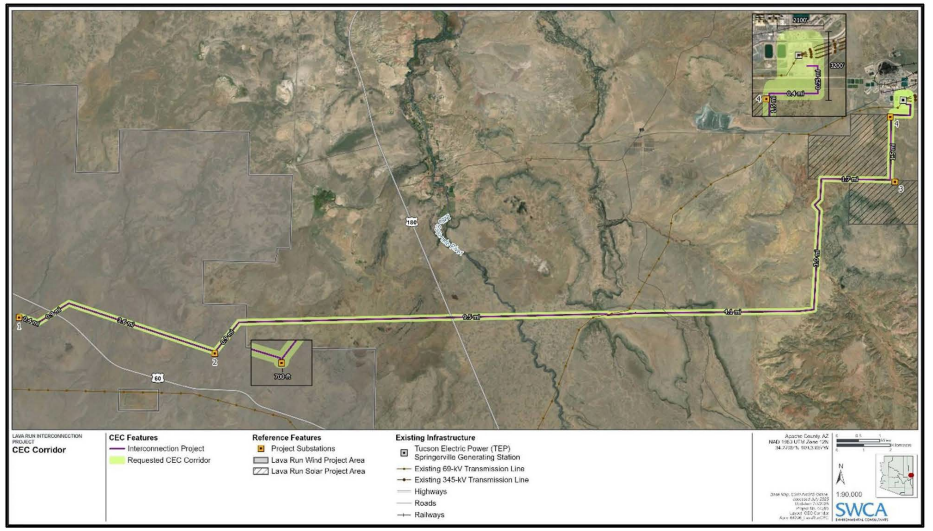


Figure 1. Lava Run Interconnection Project Requested CEC Corridor.

Notice Of Hearing Letter and Figure

Public Notice for CEC Hearing

Lava Run
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Public Notice Signs – Installed on September 12, 2025

- Locations for 5 signs provided during the pre-filing conference
- Project description, docket no., hearing details, project website link, map

Public Notice for CEC Hearing

Lava Run
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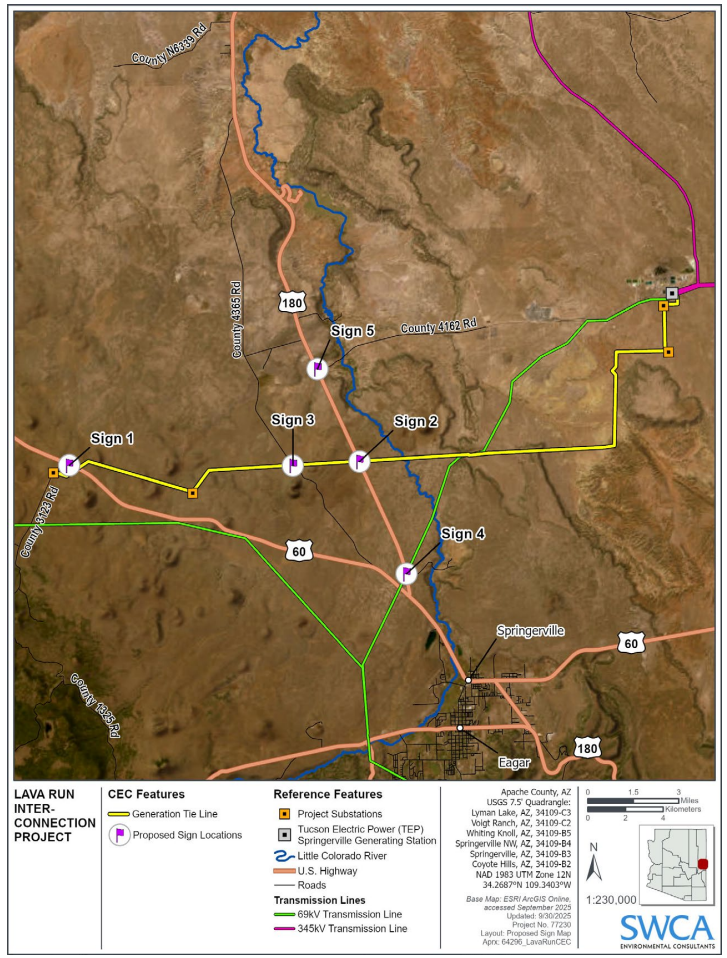


Sign Map

Sign 1

Sign 2

Sign 3

Sign 4

Sign 5

Photos of installed signs

Public Notice for CEC Hearing

Lava Run
Wind & Solar Projects

Social Media Advertisement

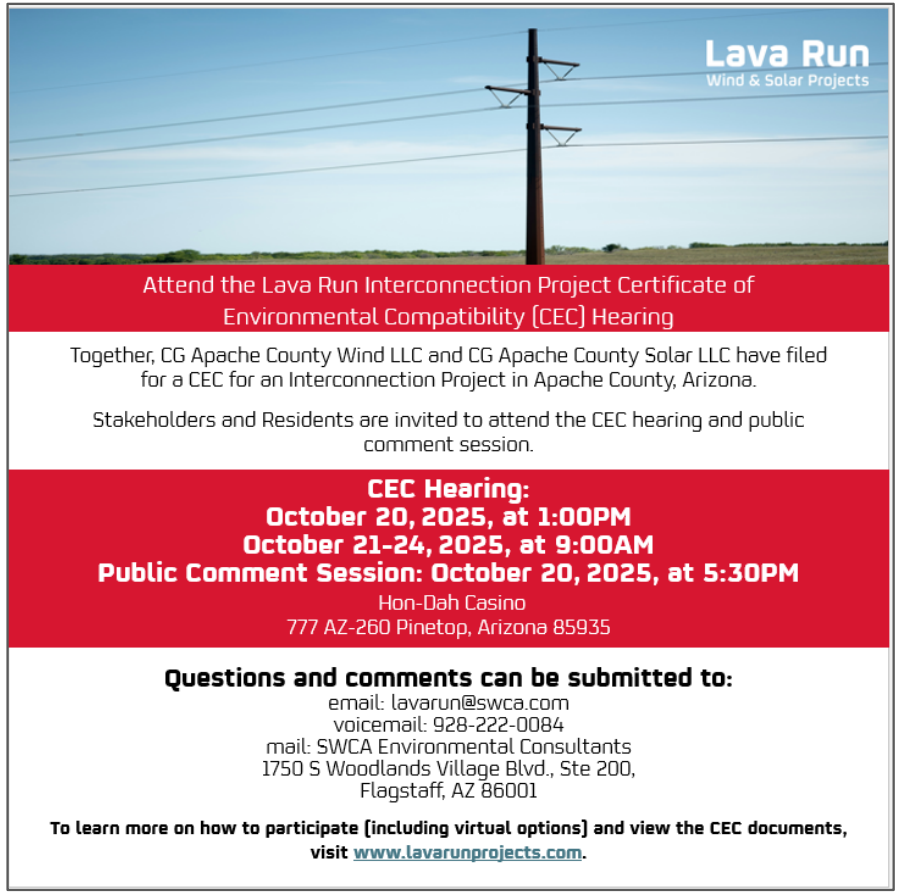
- Facebook page post
- CEC hearing post “boosted” to reach accounts in the vicinity of the interconnection project including zip codes 85924, 85936, and 85938
- Link to project website

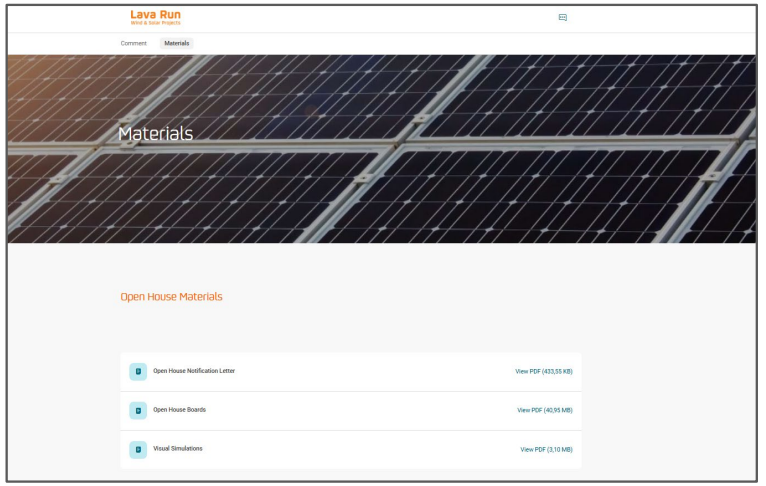
Project Website Updates

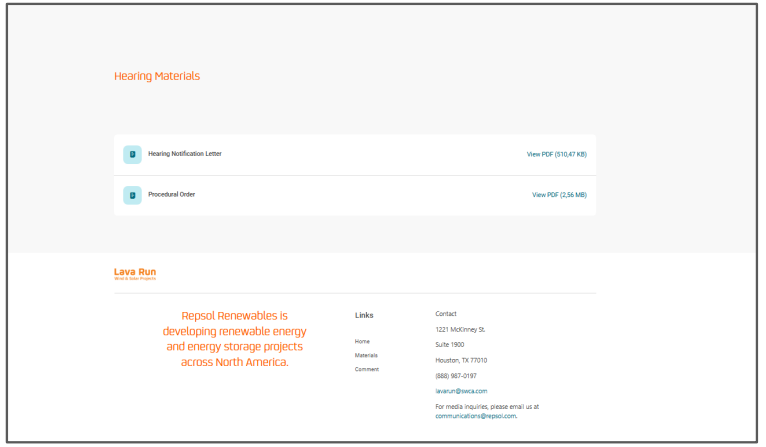
- Dedicated CEC page
- Provides CEC hearing event details and remote participation information (i.e., Zoom links, dial-in numbers)
- Key Documents
  - CEC Application
  - Pre-filing/hearing transcripts
  - Notice of Hearing
  - Route tour itinerary

Public Notice for CEC Hearing

Lava Run
Wind & Solar Projects







(social media post and website update)

Environmental Compatibility - Conclusion

Lava Run
Wind & Solar Projects

Environmental Compatibility - Conclusion

Environmental Compatibility – Conclusion

Lava Run
Wind & Solar Projects

The Interconnection Project:

- will be compatible with existing and planned land uses in the Study Area
- will avoid or mitigate impacts to areas of unique biological wealth, special-status species, and general vegetation and wildlife
- will have moderate to high visual impacts on sensitive viewers, but does not conflict with any management plans with visual resource management objectives or guidelines or designated scenic areas
- will avoid eligible sites whenever practicable; any ground disturbance activities would be monitored by a qualified archaeologist and subject to data recovery where appropriate
- will have minimal to no impact on recreation in the Study Area or surrounding region
- will have negligible impacts to noise beyond the project ROW during operation; construction noise would be effectively attenuated at the nearest noise receptor; will have minimal to no impacts related to signal interference

The Interconnection Project is environmentally compatible.

Environmental Compatibility – Conclusion

Lava Run
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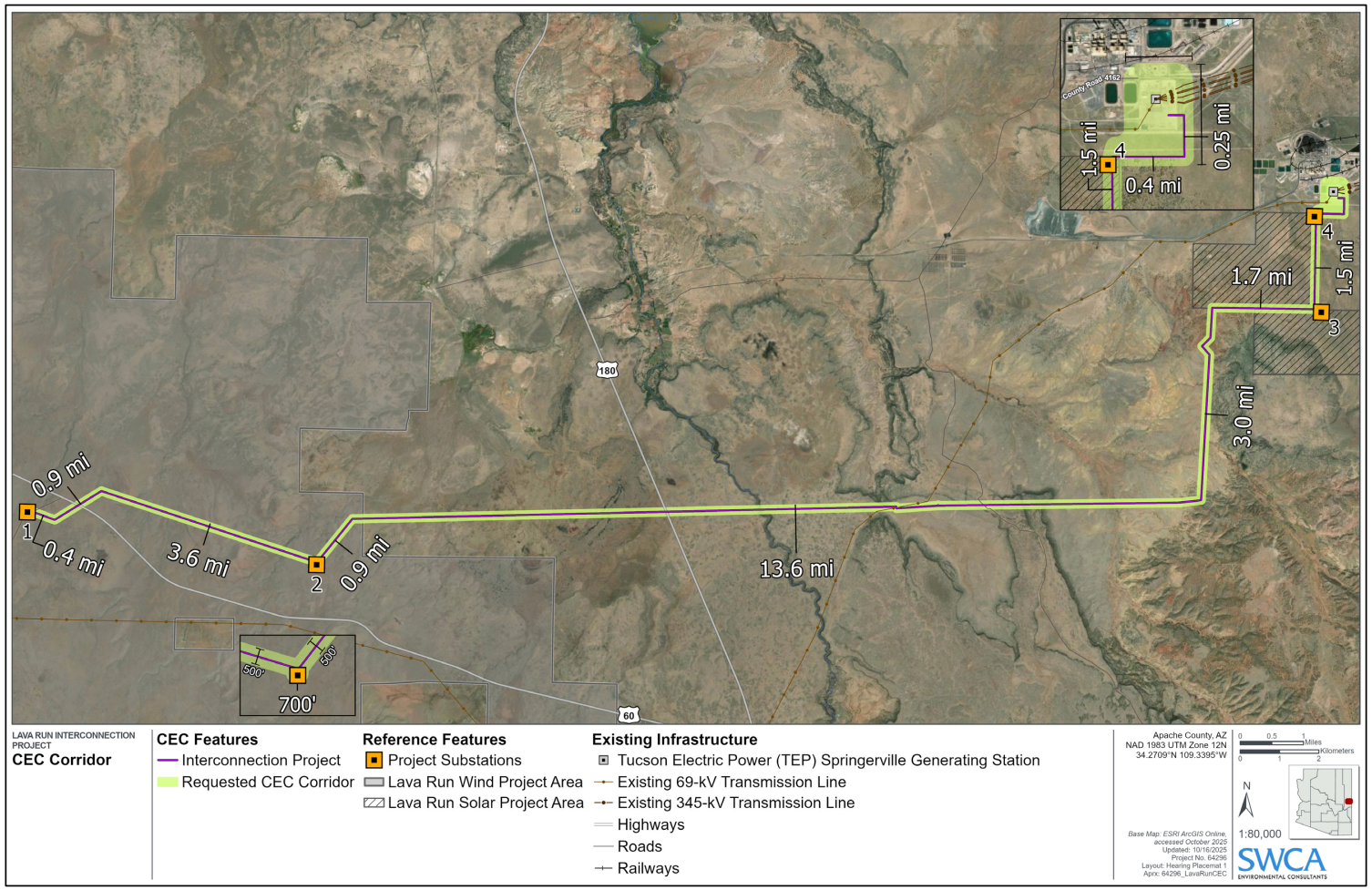

Interconnection Project CEC Corridor

Lava Run
Wind & Solar Projects

October 2025

Lava Run Interconnection Project

CG Apache County Solar LLC and CG Apache County Wind LLC

Application for a Certificate of Environmental Compatibility, Case No. 250

Prepared for the Arizona Power Plant and Transmission Line Siting Committee

Lava Run
Wind & Solar Projects

October 2025

Lava Run Interconnection Project

CG Apache County Solar LLC and CG Apache County Wind LLC

Application for a Certificate of Environmental Compatibility, Case No. 250

Prepared for the Arizona Power Plant and Transmission Line Siting Committee