

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Utah Board of Water Resources,)
Lake Powell Pipeline Project)

Project No. P-12966-004

**MOTION TO INTERVENE
OF THE CENTRAL ARIZONA WATER CONSERVATION DISTRICT**

Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, 18 C.F.R. §§ 385.212 and 385.214 (2004), the Central Arizona Water Conservation District (“CAWCD”) hereby respectfully submits this motion to intervene in the above-captioned proceeding. In support of this motion, CAWCD states the following:

I. CORRESPONDENCE AND COMMUNICATIONS

All correspondence and communications regarding this matter should be addressed to the following:

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II. DESCRIPTION OF THE CENTRAL ARIZONA WATER CONSERVATION DISTRICT

The Central Arizona Water Conservation District is a three-county special district formed under the laws of the State of Arizona to provide municipal, industrial, and agricultural water in central Arizona and which requires electric resources to accomplish that purpose. CAWCD is a

political subdivision of the State of Arizona and is governed by a 15-member elected board of directors. CAWCD operates the Central Arizona Project (“CAP”), a federal Reclamation project. The CAP delivers, on average, 1.5 million acre-feet of water through its canal and storage facilities to central Arizona from the Colorado River. CAWCD acquires the electric capacity and energy necessary to deliver the water through the CAP facilities, including capacity and energy from the Boulder Canyon Project and from the Navajo Generating Station adjacent to Lake Powell.

III. SUMMARY DESCRIPTION OF FILING

On May 2, 2016, the Utah Board of Water Resources filed the instant application.

On December 18, 2017, the Federal Regulatory Energy Commission (“Commission”) published a notice in the Federal Register, 82 Fed. Reg. 60010-1 (December 18, 2017), that the application had been accepted and was ready for environmental analysis. The notice provided that the deadline for motions to intervene would be 60 days from the issuance date of the notice, which was stated as December 11, 2017.

IV. INTEREST OF THE CENTRAL ARIZONA WATER CONSERVATION DISTRICT

CAWCD is the largest electric consumer in the State of Arizona with an average annual peak capacity requirement of approximately 400 megawatts. CAWCD purchases power from the Boulder Canyon Project (Hoover Dam) and from the Navajo Generating Station, as well as purchasing power from utilities to supplement those resources. The Navajo Generating Station is located adjacent to Lake Powell and derives its cooling water from the lake. Thus, CAWCD is potentially affected by any water uses from Lake Powell and by electric facilities that are constructed in the area including transmission and distribution facilities.

Additionally, CAWCD filed its motion to intervene in the original docket in this proceeding on January 11, 2008 and has participated thereafter in the proceedings to date.

CAWCD, therefore, continues to have a direct and substantial interest in the outcome of this licensing proceeding. That interest cannot be adequately represented by others and participation of CAWCD in this proceeding is in the public interest.

Accordingly, the Central Arizona Water Conservation District requests that it be permitted to intervene in the instant proceeding.

V. CONCLUSION AND REQUEST FOR RELIEF

For all of the above reasons, the Central Arizona Water Conservation District respectfully requests that the Commission:

- 1) Grant the Central Arizona Water Conservation District's motion to intervene in this proceeding; and
- 2) Grant such further and additional relief as the Commission deems just and reasonable.

Respectfully submitted,

/s/ Robert S. Lynch
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December 27, 2017
Phoenix, Arizona

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Phoenix, Arizona, this 27th day of December, 2017.

/s/ Robert S. Lynch _____

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