



SAVE THE SCENIC SANTA RITAS ASSOCIATION

8987 E. Tanque Verde #309-157, Tucson, AZ 85749 info@scenicsantaritas.org www.scenicsantaritas.org (520) 246-3622

Staff

John Dougherty,
Executive Director

Board of Directors

Thomas Nelson, Ph.D.,
President
Ron Steffens, Vice-President
Carol Shinsky, Treasurer
Stan Hart, Ph.D., Secretary
Eric Betterton, Ph.D.
Steve Brown
Edward Buster
Sheila L. Dagucon, Esq.
Andrea Hoerr
Tai Kondo Koester
Erick Meza
Roger McManus
Alan Ruiz Berman
Gregory C. Shinsky

Emeriti

Gayle Hartmann
Morris Farr, Ph.D.
John Kozma
Tom Purdon M.D.

Advisory Board

Ann Audrey
George Binney
Phil Caputo
Fergus Graham
Russ McSpadden
Bob Sharp
Steve Strom, Ph.D.
Sarah Truebe, Ph.D.

July 3, 2026

RE: Santa Rita Connection Docket L-00000C-26-0125-00261

Honorable Commissioners:

Save the Scenic Santa Ritas ("SSSR") hereby submits comments concerning the Tucson Electric Power Company's application for a Certificate of Environmental Compatibility for the Santa Rita Connection. These comments include by reference comments filed on [May 26, 2026](#) and [May 28, 2026](#) and accepted under this docket.

The applicant's [CEC application](#) is *incomplete and should be denied*. The applicant failed to disclose the 138 kV Santa Rita Connection power line will terminate at the Toro Switchyard which is planned to be collocated with the Santa Rita Substation.

The Toro Switchyard was approved by the Commission in 2012 in the Rosemont 138 kV power line CEC. That line will extend from the switchyard to the proposed Copper World (formerly Rosemont) mine. ([Decision No. 73232](#))

The Toro Switchyard approved in the Rosemont CEC is in different location from where the applicant now intends to combine it with the Santa Rita Substation.

The Line Siting Committee's [approval of the Santa Rita Connection CEC](#) does not include any reference to the Toro Switchyard and focuses only on the proposed Santa Rita Substation, which is excluded from jurisdiction. The Committee, however, states that a switchyard would fall under the Committee's jurisdiction.

The Committee's Findings of Fact and Conclusions of Law No. 6 states: "The Project *substation is not jurisdictional* because the definition of a "transmission line" under [A.R.S. § 40-360 \(10\)](#) *only includes "new switchyards to be used therewith,"* not substations."

The applicant's failure to disclose that the Toro Switchyard is being collocated with the substation also prevented the Committee from



SAVE THE SCENIC SANTA RITAS ASSOCIATION

8987 E. Tanque Verde #309-157, Tucson, AZ 85749 info@scenicsantaritas.org www.scenicsantaritas.org (520) 246-3622

considering “*existing plans*” of “*private entities*” for developments at or “*in the vicinity of the proposed site*” under [A.R.S. 40-360.06 \(A\)\(1\)](#).

The fact that the Santa Rita Connection will terminate at the Toro Switchyard, which in turn, will provide power to the Copper World is a major omission. Copper World is planned to be one of the largest open pit copper mining operations in the United States and will require an additional [138 MW](#) of projected demand on TEP’s electric grid.

The applicant’s failure to disclose that the Toro Switchyard will be collocated with the Santa Rita Substation raises significant concern that residential and commercial ratepayers will unjustly subsidize the \$18 million Santa Rita Connection, whose single largest load by far will be Copper World.

The applicant’s failure to disclose that the Toro Switchyard would be collocated with the Santa Rita Substation shows that the evidence in the record is *not sufficient* to weigh the balancing of the public interest in favor of granting the CEC. Therefore, the CEC issued by the Siting Committee *should not be confirmed and approved* by the Commission.

I. TEP failed disclose the Toro Switchyard would be collocated with the Santa Rita Substation

The Toro Switchyard is required to be part of the CEC application under A.R.S. 40-360 (10). The definition of a “transmission line” includes “all new switchyards to be used therewith.”

The applicant’s CEC application did not disclose the Toro Switchyard would be collocated with the Santa Rita Substation. Nor does the application provide “safe harbor” language that references the Toro Switchyard being collocated with the Santa Rita Substation.

In a collocated switchyard/substation, a transmission line enters the switchyard first and then electricity passes through several primary pieces of equipment *before reaching* the substation transformers.

Including the switchyard in the CEC filing is necessary to legally establish the exact point where the Line Siting Committee’s jurisdiction stops. The failure to include the switchyard prevented the Committee from precisely determining which spans of the 138 kV Santa Rita Connection power line are being formally permitted under the requested certificate.

By failing to disclose the switchyard would be collocated with the substation, the CEC approved by the Committee was not based on information that is legally required to be disclosed.



SAVE THE SCENIC SANTA RITAS ASSOCIATION

8987 E. Tanque Verde #309-157, Tucson, AZ 85749 info@scenicsantaritas.org www.scenicsantaritas.org (520) 246-3622

II. TEP attempted to conceal the collocated switchyard from the public

SSSR did not discover that the switchyard would be collocated with the substation until May 27, 2026, one day after the applicant submitted [“late-filed exhibits”](#) to the docket. The filing was made just hours before a May 26, 2026 public hearing where SSSR presented testimony.

The late exhibits include a [March 12 email exchange](#) between the Town of Sahuarita’s community development director and the applicant.

“Can you please refresh my memory—is the collocated substation proposed to be built on the parcel owned by Rosemont or the adjacent ASLD parcel?” Anna Casadei, Sahuarita community development director, asked.

Chris Orte y Pino, TEP’s Siting, Outreach and Engagement Manager, responded stating:

“The Santa Rita Substation will be on a leased parcel from ASLD that is directly adjacent to the Rosemont CopperWorld (sic) parcel. The Santa Rita Substation will now house the connection from CopperWorld.”

Ortez y Pino’s email is the only reference in the more than 1,000-page CEC application and exhibits that states the Santa Rita substation will be connected to Copper World. His email also states:

“This will be a cost benefit to TEP’s customers, as CopperWorld will be footing the bill for this larger substation that will benefit nearly 14k residents the South of Tucson/Sahuarita area.”

Once again, this email is the only reference that Hudbay, the owner of Copper World, will be paying for a portion of the “larger substation” that will be created by adding the Toro Switchyard to the facility.

The Copper World parcel identified in Orte y Pino’s email is the same property that received Commission approval in 2012 to construct the Toro Switchyard. Hudbay Minerals, Inc., the developer of Copper World, has also [identified this parcel](#) as the planned location for the Toro Switchyard.



SAVE THE SCENIC SANTA RITAS ASSOCIATION

8987 E. Tanque Verde #309-157, Tucson, AZ 85749 info@scenicsantaritas.org www.scenicsantaritas.org (520) 246-3622

SSSR subsequently published a series of news stories about the applicant's plan to combine the Toro Switchyard and the Santa Rita Substation that would connect to the Rosemont 138 kV line. (See: [SSSR asks state to review TEP's backdoor deal to provide Copper World power through the Santa Rita Connection and Sahuarita Town Manager refuses to disclose when staff learned about backdoor deal to power Copper World](#))

In response to SSSR's reports, the applicant submitted an opinion column to the *Green Valley News*, which was [published on June 16, 2026](#), under the headline: "There's no secret plan, just a needed grid upgrade". The column was written by Eric Bronner, TEP Vice President of Energy Management, Planning, and Development.

Bronner stated: "*The 138-kV Rosemont Transmission Line, originally approved in June 2012, would extend approximately 13 miles from the Sahuarita area to the mine site in the Santa Rita Mountains. Rather than originating at a **separate switchyard**, as envisioned at the time, the line would connect to the planned Santa Rita Substation in that same area.*"

On June 27, the *Arizona Daily Star*, [posted a story](#) on the Santa Rita Connection and its ties to Copper World. The story quoted multiple TEP spokesmen, and states:

"From the time the ACC approved what's now the Copper World power line (formerly named the Rosemont line) and until recently, Hudbay and its predecessor, Augusta Resource Corp., had planned to run the line to the mine from a new Toro Switchyard it would build in unincorporated Pima County just outside Sahuarita.

But to save money and to prevent duplication, TEP and Hudbay have agreed to move the operations of the switchyard to the new substation and that Hudbay will make use of the substation."

Elsewhere in the article, Steven Eddy, TEP's director of public affairs, said, "*Building the substation as it's now proposing simply gives TEP and Hudbay an opportunity to "co-locate" the needed infrastructure at one spot.*"

TEP did not provide an estimate of how much Hudbay will pay for the Toro Switchyard to be incorporated into the substation. A typical 138 kV substation of the size of the planned Santa Rita Substation will cost about \$26 million to build.

The mine developer will pay for any substation equipment required to provide service to the mine, said TEP spokesman Tom Barrios. How the two companies will split the substation's cost has yet to be determined, TEP told the Daily Star.



SAVE THE SCENIC SANTA RITAS ASSOCIATION

8987 E. Tanque Verde #309-157, Tucson, AZ 85749 info@scenicsantaritas.org www.scenicsantaritas.org (520) 246-3622

II. Conclusion

For the reasons stated above, the applicant's [CEC application](#) is *incomplete and should be denied*. The applicant failed to disclose that the Toro Switchyard will be collocated with the Santa Rita Substation. [A.R.S. § 40-360 \(10\)](#) requires a new switchyard to be included as part of the transmission line.

In addition, the failure to include the switchyard in the CEC application precluded the Committee from considering "*existing plans*" of "*private entities*" for developments at or "*in the vicinity of the proposed site*" under [A.R.S. 40-360.06 \(A\)\(1\)](#).

This prevented the Commission for knowing that the Santa Rita Connection will be providing power to the proposed Copper World mine. The CEC provided no analysis of how much of the power delivered through the Santa Rita Connection will be going to Copper World vs other users.

In addition to deny the application, the Commission should require the applicant to submit independent System Impact Studies in a CEC future application to fully analyze all potential effects on the bulk transmission system that includes the combined Toro Switchyard and Santa Rita Substation, including all impacts related to providing power to the Copper World project. This information is essential to determine how much of the cost of Santa Rita Connection should be paid directly by Toronto-based Hudbay Minerals.

Thank you for considering our comments in this matter.

Sincerely,

John Dougherty
SSSR Executive Director