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Docket No. E-00000D-02-0065

IN THE MATTER OF THE VARIOUS ELECTRIC COMPANIES (ACC'S) BIENNIAL ELECTRIC TRANSMISSION ASSESSMENT FOR 10 YEAR PERIOD 2002-2011 FOR ELECTRIC TRANSMISSION LINES.

TUCSON ELECTRIC POWER COMPANY'S COMMENTS TO THE SECOND BIENNIAL TRANSMISSION ASSESSMENT 2002-2011

Tucson Electric Power Company ("TEP"), through undersigned counsel, hereby submits its comments to the Second Biennial Transmission Assessment 2002-2011 ("Second BTA"), as follows:

I. INTRODUCTION.

TEP commends the Commission Staff for its lead role in producing the Second BTA. TEP believes that the Second BTA presents a realistic representation of the state of the Arizona electric transmission system. TEP also acknowledges Commission Staff's efforts to seek information and input from affected parties in developing the Second BTA. TEP believes that by involving affected parties, Commission Staff has been able to present a more accurate analysis of the Arizona electric transmission system and its users.

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II. SPECIFIC COMMENTS TO SECOND BTA.

1. Section 3.1 "NERC/WECC Planning Standards": TEP believes that the discussion of NERC and WECC "categories" should be corrected by indicating that Category A applies to all lines in service, Category B applies to single contingencies and Categories C and D apply to multiple contingencies.

2. Section 3.7 "Evaluation of Planning Processes Active in Arizona": At page 23, it is stated that utilities plan their system under the (N-1) contingency criteria. TEP believes this language should be revised to state that utilities plan to NERC standards and internal reliability criteria (not N-1).

3. Table 4.1 "Summary of Existing Arizona Power Plants": TEP believes that Table 4.1 should be more descriptively titled, "Summary of Power Plants Owned by Arizona Utilities." It appears to TEP that the current title, "Summary of Existing Arizona Power Plants" indicates that the power plants are all located in the State of Arizona. In fact, the San Juan and Four Corners power plants are located in New Mexico. Also, although the table refers to the WECC Existing Generation Base as the source for the representation that North Loop has 73 MW of capacity, this information is incorrect. North Loop currently has approximately 95 MW of capacity.

1 4. Section 5.1 “2002-2011 Updates Filed January 2002”: At page 35, it is stated
2 that ten-year plans filed with the Commission shall provide, “the conductor size and
3 proposed route of any transmission lines proposed to be constructed.” However, A.R.S.
4 40-360.02 C.1. refers to, “the size and proposed route of any transmission lines.” When
5 TEP files its ten-year plans it references to the voltage of the transmission line rather than
6 the size of the conductor. Accordingly, TEP recommends that the word “conductor” be
7 removed from the language at page 35.
8

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10
11 5. Figure 5.1 “Arizona Planned EHV Transmission 2002-2011”: Figure 5.1
12 reflects that a second Springerville to Greenlee line exists. Although a second
13 Springerville to Greenlee line is planned, it does not yet exist. Figure 5.1 should be revised
14 to indicate that the second Springerville to Greenlee line is “planned.”
15

16
17 6. Table 5.1 “Transmission Projects Filed for the First Time”: Table 5.1
18 incorrectly lists a number of TEP transmission projects as having been filed for the first
19 time that actually were previously filed. TEP believes that the following transmission
20 projects should be listed on Table 5.2 “Transmission Projects with Change in Planned In-
21 service Date”:
22

- 23
24 a) Tortolita to South
25 b) Springerville to Greenlee #2
26 c) Westwing to South #2
27

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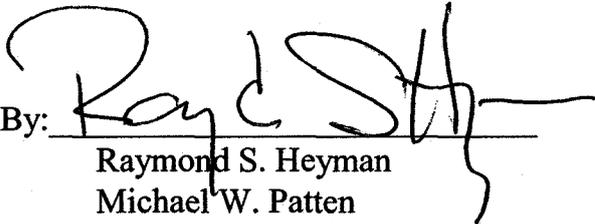
- d) Vail to East Loop #3
- e) East Loop to North East through Snyder

7. Page 73, first paragraph, last sentence: The word “serve” should be deleted and the word “serving” should be inserted.

8. Section 7.6 “Phoenix Area Import Assessment”: TEP believes that it would be helpful for illustrative purposes to provide separate maps of the various Western systems, such as the Parker – Davis system.

RESPECTFULLY SUBMITTED this 13th day of December, 2002.

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(See attached service list)



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