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BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

IN THE MATTER OF THE APPLICATION OF SOUTHERN CALIFORNIA EDISON COMPANY AND ITS ASSIGNEES IN CONFORMANCE WITH THE REQUIREMENTS OF ARIZONA REVISED STATUTES SECTIONS 40-360.03 AND 40-360.06 FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AUTHORIZING CONSTRUCTION OF A 500kV ALTERNATING CURRENT TRANSMISSION LINE AND RELATED FACILITIES IN MARICOPA AND LA PAZ COUNTIES IN ARIZONA ORIGINATING AT THE HARQUAHALA GENERATING STATION SWITCHYARD IN WESTERN MARICOPA COUNTY AND TERMINATING AT THE DEVERS SUBSTATION IN RIVERSIDE COUNTY, CALIFORNIA

DOCKET No. L-00000A-06-0295-00130

Case No. 130

APPLICATION FOR ADMINISTRATIVE SUBPOENA AND SUBPOENA DUCES TECUM

Arizona Corporation Commission

DOCKETED

AUG 30 2006

DOCKETED BY

The Arizona Power Plant and Transmission Line Siting Committee requests the issuance of subpoenas and subpoenas duces tecum to Mr. Robert Kondziolka and Mr. Robert Smith in the forms attached hereto, pursuant to Arizona Administrative Code (A.A.C.) R14-3-210 in connection with the transmission line siting in the above-captioned proceeding.

DATED this 30th day of AUGUST, 2006.

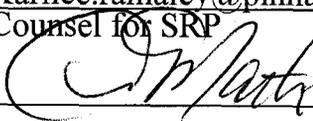
By:
Laurie A. Woodall
Assistant Attorney General
Chairman, Arizona Power Plant and
Transmission Line Siting Committee

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AZ CORP COMMISSION
DOCUMENT CONTROL

1 Copy, along with copies of the
2 Subpoenas and Subpoenas Duces
3 Tecum e-mailed to all parties on
4 the Docket, and

5 Laura Raffaeli, Esq.
6 Lfraffae@srpnet.com
7 Counsel for APS

8 Karilee Ramaley, Esq.
9 Karilee.ramaley@pinnaclewest.com
10 Counsel for SRP

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**BEFORE THE ARIZONA POWER PLANT AND
TRANSMISSION LINE SITING COMMITTEE**

IN THE MATTER OF THE APPLICATION,
OF SOUTHERN CALIFORNIA EDISON
COMPANY AND ITS ASSIGNEES IN
CONFORMANCE WITH THE
REQUIREMENTS OF ARIZONA REVISED
STATUTES SECTIONS 40-360.03 AND
40-360.06 FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATABILITY
AUTHORIZING CONSTRUCTION OF A
500kV ALTERNATING CURRENT
TRANSMISSION LINE AND RELATED
FACILITIES IN MARICOPA AND LA PAZ
COUNTIES IN ARIZONA ORIGINATING
AT THE HARQUAHALA GENERATING
STATION SWITCHYARD IN WESTERN
MARICOPA COUNTY AND
TERMINATING AT THE DEVERS
SUBSTATION IN RIVERSIDE COUNTY,
CALIFORNIA

) DOCKET No. L-00000A-06-0295-00130

) Case No. 130

) **SUBPOENA AND SUBPOENA
DUCES TECUM**

TO: Mr. Robert Kondziolka

Pursuant to Arizona Revised Statutes (A.R.S.) § 40-244, and Arizona
Administrative Code (A.A.C.) R14-3-210, you are hereby commanded to appear and give your
testimony at the time and place specified below:

BEFORE WHOM APPEARANCE TO BE MADE: Arizona Power Plant and Transmission
Line Siting Committee

DATE AND TIME OF APPEARANCE: The hearings are currently scheduled for resumption
September 11 and 12, 2006. Additional hearing
days are expected. The date and time of your
appearance is to be determined at a later date and
you will be notified upon that determination.

PLACE OF APPEARANCE: The current place of hearings is The Embassy
Suites, 1515 North 44th Street, Phoenix Airport (@
McDowell Road) Phoenix, Arizona 85008. You
will be notified of the place of appearance upon
determination by the Committee.

1 YOU ARE COMMANDED to appear, provide testimony and presentation material concerning
the above-captioned matter:

2 As provided in Exhibit A, attached hereto.

3 YOU HAVE BEEN SUBPOENAED BY: The Arizona Power Plant and Transmission
4 Line Siting Committee

5 Disobedience of this subpoena constitutes contempt of the Arizona Corporation
6 Commission and is so punishable, pursuant to A.R.S. § 40-424.

7 Given under the hand and seal of the Arizona Corporation Commission this _____
day of _____, 2006.

8 By: _____
9 Executive Director

10 302860

1 EXHIBIT A

2 This subpoena is hereby served on Mr. Robert Kondziolka of Salt River Project ("SRP")
3 and Mr. Robert Smith of Arizona Public Service Company ("APS") for the purpose of
4 summoning their appearance as expert witnesses during Arizona's transmission line siting
5 hearings of the Palo Verde to Devers II 500 kV Project. You shall each appear before the
6 Arizona Power Plant and Transmission Line Siting Committee ("Siting Committee") on the
7 date(s) and time(s) established procedurally by the Siting Committee Chairman, Laurie A.
8 Woodall, in Docket No. L-00000A-06-0295-00130. You are to be called as a Siting Committee
9 witness in your respective areas of expertise: transmission planning. Your testimony will be
10 given in your individual capacity and not on behalf of the applicant, Southern California Edison
11 ("SCE"); any intervening party, including the Arizona Corporation Commission Staff ("Staff");
12 or your respective employers.

13 You are required to provide testimony in the form of a presentation addressing, at a
14 minimum, the issues outlined in the section below entitled 'Topics of Inquiry.' Your
15 presentation material and any associated exhibits are to be filed in accordance with the
16 procedures set forth for the subject proceeding by Chairman Woodall. You may supplement
17 your testimony with any other subject matter you feel would be helpful to the Siting Committee
18 and the Commission in their consideration of the Palo Verde to Devers II 500 kV Transmission
19 Project. You will be subject to cross examination by the intervening parties. You may also be
20 required to answer questions posed by members of the Siting Committee or the Commission.

21 FOUNDATION AS INDUSTRY EXPERT WITNESS

22 Mr. Kondziolka and Mr. Robert Smith have each assumed key leadership roles as the
23 electric industry has engaged in sub-regional and regional transmission studies of the Western
24 Interconnection. Mr. Kondziolka is Chairman of the Western Congestion Assessment Task
25 Force ("WCATF") and the Southwest Area Transmission ("SWAT") sub-regional planning
26 forum. He also is vice-chair of the Western Electricity Coordinating Council ("WECC")
Planning and Coordination Committee ("PCC"). Mr. Smith is co-chairman of the Southwest
Transmission Expansion Plan ("STEP") sub-regional planning forum.

Both Mr. Kondziolka and Mr. Smith have been participants in the Seam Steering Group –
Western Interconnection ("SSG-WI") Planning Working Group that has performed economic
transmission expansion planning studies for the West and the Western Governor's Association
("WGA"). They are also both members of the Transmission Expansion Planning Policy
("TEPP") Committee of the WECC Board of Trustees. They have also managed and
coordinated industry studies required to comply with Arizona Statutes (A.R.S.) §40-360, *et seq.*
regarding ten-year plan filings with the Arizona Corporation Commission ("Commission") and
the Commission's related Biennial Transmission Assessment. Those studies have included
Reliability Must Run studies of local transmission constrained areas, extreme contingency
studies, and Palo Verde Hub risk assessments. Their participation and leadership in these
industry forums serves as the foundation for calling upon them as industry experts regarding
transmission planning in the Western Interconnection, Desert Southwest and Arizona.

BOUNDS OF TESTIMONY

The technical studies performed in the aforementioned industry forums have considered
alternative transmission projects needed to maintain regional and national system reliability
standards established by WECC and North American Electric Reliability Council ("NERC").

1 Reliability serves as the justification of need for such projects. The same forums have
2 performed studies to simulate transmission congestion and investigate the effectiveness of
3 alternative proposed projects in mitigating such congestion. Economics serves as justification of
4 need for such transmission projects. In some instances a project is justified for both reliability
5 and economic reasons. Once need for a project has been established and moves forward for
6 development, the project goes through a WECC process to establish its rating. These three areas
7 of consideration frame the bounds of expert testimony being sought of Mr. Kondziolka and Mr.
8 Smith.

9 TOPICS OF INQUIRY

10 Mr. Kondziolka and Mr. Smith have first-hand knowledge of how the Palo Verde to
11 Devers II 500 kV Project has been studied on a comparative basis with other projects in each of
12 the following areas: reliability, economic benefit and path rating. Therefore, they are requested
13 to prepare testimony in the form of a presentation that addresses the following topics.

- 14 1. What is transmission congestion and what is the difference between physical
15 congestion and fiscal congestion? Define transmission congestion as presently
16 manifested in the Western Interconnection and in particular the Arizona/California
17 transmission interface? How is transmission congestion between Arizona and
18 California likely to change over time? In what way(s) are retail consumers affected
19 by transmission congestion?
- 20 2. What tools have been developed and used to model and study transmission congestion
21 in the West? How has the electric industry used these tools to study and analyze the
22 Western Interconnection? How well do such congestion studies correlate to
23 congestion actually experienced historically? Can these tools be used to forecast
24 future cost of electricity to consumers with any degree of accuracy?
- 25 3. What conclusions have been drawn from congestion studies assembled by the
26 WCATF for the U.S. Department of Energy ("DOE") congestion assessment of the
Western Interconnection? What is the status of DOE's efforts to determine the
appropriateness of establishing National Electric Transmission Congestion Corridors
("NIETC") for which the Federal Energy Regulatory Commission ("FERC") will
have backstop transmission siting authority? How do DOE's NIETC efforts align
with DOE's Programmatic Environmental Impact Statement for energy corridors over
federal lands in the West? What potential impact could either DOE process have on
the siting of transmission lines between Arizona and California and in particular the
Palo Verde to Devers II 500 kV Project?
4. What transmission and generation alternative solutions have been studied in the
various study forums to resolve the congestion between Arizona and California?
What project(s) or combination of projects has been determined to be effective in
mitigating this congestion? How has the industry determined what economic

1 transmission expansion projects would be developed? What measures or criteria have
2 been used in weighing the merits of alternative projects?

- 3 5. Are new transmission projects being considered in Arizona or for Arizona utilities
4 that may impact the merits of the Palo Verde to Devers II Project? If so, please
5 identify those projects and the ways (positive or negative) in which the Palo Verde to
6 Devers II 500 kV Project may be impacted.
- 7 6. Are new transmission projects being considered in Arizona or for Arizona utilities
8 that may be impacted by the scope or timing of the proposed Palo Verde to Devers II
9 500 kV Project? If so, please elaborate.
- 10 7. Provide general information regarding the frequency of transmission outages in
11 Arizona for high voltage and extra high voltage lines.
- 12 8. Discuss the reliability of the use of double circuit structures for EHV transmission
13 lines and, to the extent information is provided in the SCE application, the use of the
14 13 double circuit structures proposed by SCE through Copper Bottom Pass.
- 15 9. Provide your observations regarding slides 28 through 31 of Exhibit A-8, submitted
16 by SCE witness, Mr. Johannes P. Pfeifenberger, as they relate to reliability.

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1 **BEFORE THE ARIZONA POWER PLANT AND**
2 **TRANSMISSION LINE SITING COMMITTEE**
3

4 IN THE MATTER OF THE APPLICATION,
5 OF SOUTHERN CALIFORNIA EDISON
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9 STATUTES SECTIONS 40-360.03 AND
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) DOCKET No. L-00000A-06-0295-00130

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