



BEFORE THE ARIZONA POWER PLANT AND TRANSMISSION LINE SITING COMMITTEE

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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  
SEP 25 2006

DOCKETED BY *NR*

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 30<sup>th</sup> day of AUGUST, 2006.

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

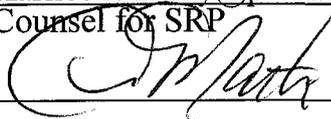
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Copy, along with copies of the  
Subpoenas and Subpoenas Duces  
Tecum e-mailed to all parties on  
the Docket, and

Laura Raffaelli, Esq.  
Lfraffae@srpnet.com  
Counsel for APS

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



1 **BEFORE THE ARIZONA POWER PLANT AND**  
2 **TRANSMISSION LINE SITING COMMITTEE**  
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5 IN THE MATTER OF THE APPLICATION,  
6 OF SOUTHERN CALIFORNIA EDISON  
7 COMPANY AND ITS ASSIGNEES IN  
8 CONFORMANCE WITH THE  
9 REQUIREMENTS OF ARIZONA REVISED  
10 STATUTES SECTIONS 40-360.03 AND  
11 40-360.06 FOR A CERTIFICATE OF  
12 ENVIRONMENTAL COMPATABILITY  
13 AUTHORIZING CONSTRUCTION OF A  
14 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**

15 TO: Mr. Robert Kondziolka  
16

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

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

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

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

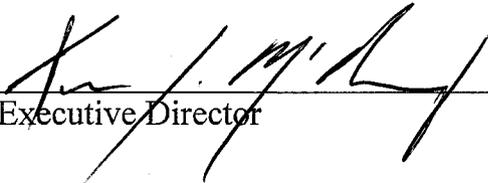
1 YOU ARE COMMANDED to appear, provide testimony and presentation material concerning  
the above-captioned matter:

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 30th  
day of August, 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")  
27 Planning and Coordination Committee ("PCC"). Mr. Smith is co-chairman of the Southwest  
28 Transmission Expansion Plan ("STEP") sub-regional planning forum.

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

41 BOUNDS OF TESTIMONY

42 The technical studies performed in the aforementioned industry forums have considered  
43 alternative transmission projects needed to maintain regional and national system reliability  
44 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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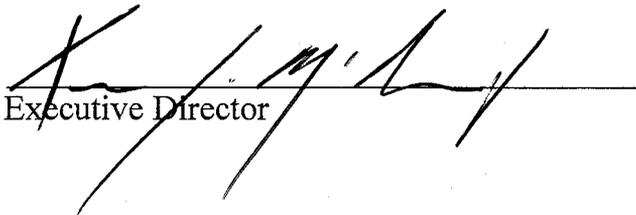
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