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Sulphur Springs Valley Electric Cooperative, Inc.

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Arizona Corporation Commission

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JAN 25 2007

Tuesday, January 16, 2007

VIA EMAIL AND REGULAR MAIL

Prem Bahl
Electric Utilities, ACC

DOCKETED BY [Signature]

RE: SSVEC's COMMENTS ON THE 2006 BIENNIAL TRANSMISSION ASSESSMENT [ACC DOCKET #E-00000D-05-0040]

Dear Mr. Bahl:

Sulphur Springs Valley Electric Cooperative, which provides electric service to most of Cochise County and parts of Graham and Santa Cruz counties, offers the following comments to the Arizona Corporation Commission's *Fourth Biennial Transmission Assessment 2006-2015*:

COMMENT #1:

The latest draft report states that there are problems under N-1 contingencies in southeast Arizona. From page 72, Section 5.8:

Power flow and stability analysis conducted for 2006 and 2015 confirmed compliance with SWTC's n-0 and n-1 planning criteria, with the exception of the following two n-1 contingencies: loss of the Apache-Butterfield 230 kV line or the Butterfield-San Rafael 230 kV line. For these outages SWTC studies show that performance violations occur in the 2015 case as a result of an unanticipated increase in a customer load forecast. The violations cannot be resolved through remedial action schemes.

There are several corrections to be made:

- 1) In addition to the two 230KV lines mentioned, loss of the Pantano-Kartchner 115KV line could result in SSVEC having to drop load in the Sierra Vista area.
- 2) All three N-1 outages listed above could result in a loss of load if they occurred during Summer peak conditions.

Currently, the load serving entities, TEP [for Ft. Huachuca], SSVEC, and APS along with SSVEC's transmission provider, SWTC, are working together to establish a solution.

COMMENT #2

A significant comment has been removed and should be re-instated.

In the previous draft of this report (on page 4), there was a list of "findings" from the First BTA. One of findings from the first transmission assessment was:

Southeastern Arizona utilities relied upon restoration of service, rather than continuity of service, following transmission outage due to service via radial transmission lines.

This comment from the previous draft report has been removed in the proposed final draft. As the comment is still true, the comment should remain.

COMMENT #3

The report lists five transmission import constraint areas but leaves out southeastern Arizona.

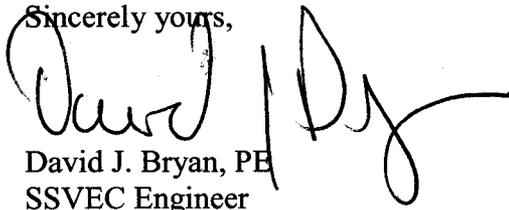
Southeastern Arizona's electric load, from Ft. Huachuca to Douglas, is currently 160MW. It is served by APS, SSVEC [through SWTC], and TEP via four radial transmission lines 115KV or above. The loss of any one of these lines during summer peak could result in the inability of one or more of the load serving entities in this area to serve their entire load without some period of service interruption.

Southeastern Arizona should be included in the load pocket areas.

CONCLUSION

There are several key items missing in the final draft of the BTA report. While the load serving entities are actively seeking solutions, the solutions have not been decided. SSVEC will continue to remain active in the various transmission groups to ensure a fair and equitable solution is found which resolves the existing transmission concerns.

Sincerely yours,



David J. Bryan, PE
SSVEC Engineer

CC:

Docket Control, ACC
Ken Bagley, Genessee Consulting Group
Jim Rein, SWTC
Don Hudgins, APS
William Stine, Fort Huachuca Military Base
Gary Trent, TEP