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March 1, 2007

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Arizona Corporation Commission
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MAR -1 2007

Chairman Jeff Hatch-Miller
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Commissioner Mike Gleason
Commissioner Kristin K. Mayes
Commissioner Gary Pierce
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

DOCKETED BY	nr
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Re: *Southwest Transmission Cooperative, Inc. ("SWTC") Request for Amendment of Staff's Proposed Order Filed February 20, 2007 ("Proposed Order"); Fourth Biennial Transmission Assessment; Docket No. E-00000D-05-0040*

Dear Commissioners:

For the reasons stated, SWTC requests an amendment deleting the reference to it in paragraph 2(e) at page 6 of the Proposed Order. As drafted, the recommendation is that UNS and SWTC "should be directed to file updated RMR studies in their filings due January 2008" regarding potential RMR requirements in Santa Cruz and Mohave Counties.

Within the two counties, SWTC owns approximately 9 miles of 230 kV transmission lines in Mohave County and approximately 4 miles of 115 kV transmission lines crossing the northeast corner of Santa Cruz County. As to Mohave County, SWTC simply delivers to the Western Area Power Administration ("WAPA") Parker-Davis system the power and energy which Mohave Electric Cooperative ("MEC") has contracted for under its partial-requirements agreement with AEP. MEC is within the WAPA Control Area and WAPA, not SWTC, has RMR responsibility. As to Santa Cruz County, SWTC has no delivery points in Santa Cruz County. Accordingly, it has no RMR responsibility in that county, either.

As it has done in the past, SWTC is committed to support and work with the area utilities which are responsible for conducting the RMR studies.

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Therefore, SWTC would request that paragraph 2(e) at page 6 of the Proposed Order be amended to delete the reference to it as follows:

- e. Regarding potential RMR requirements in Santa Cruz County beginning 2010 and Mohave County beginning 2012, UniSource Energy Corp. ("UNS") should be directed to file updated RMR studies in its filing due January 2008 for the 5th BTA.

SWTC has discussed this amendment with Staff and believes it has no objection to this amendment to the Proposed Order.

Very truly yours,

GALLAGHER & KENNEDY, P.A.



By:

Michael M. Grant

MMG/plp
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Original and 13 copies filed with Docket
Control this 1st day of March, 2007.

cc: Prem Bahl, Utilities Division (delivered)
Steve Taylor, Utilities Division (delivered)
Jim Rein, SWTC (mailed)