

ORIGINAL



0000067873

BEFORE THE ARIZONA CORPORATION COMMISSION

47

COMMISSIONERS

MIKE GLEASON - Chairman
WILLIAM A. MUNDELL
JEFF HATCH-MILLER
KRISTIN K. MAYES
GARY PIERCE

RECEIVED

2007 MAR -5 P 4: 13

AZ CORP COMMISSION
DOCUMENT CONTROL

| | |
|--|-------------------------------|
| IN THE MATTER OF THE COMMISSION'S) | DOCKET NO. E-00000D-05-0040 |
| FOURTH BIENNIAL TRANSMISSION) | |
| ASSESSMENT ("BTA"), PURSUANT TO THE) | COMMENTS OF TUCSON |
| ADEQUACY OF EXHISTING AND PLANNED) | ELECTRIC POWER COMPANY |
| TRANSMISSION FACILITIES TO MEET) | AND UNS ELECTRIC ON |
| ARIZONA'S ENERGY NEEDS IN A RELIABLE) | BIENNIAL TRANSMISSION |
| MANNER.) | ASSESSMENT |
|) | |
|) | |

Tucson Electric Power Company and UNS Electric, Inc. (collectively "UniSource"), through undersigned counsel, submit the following comments on Staff's Fourth Annual Biennial Transmission Assessment as set forth in the related Proposed Order from Commission Staff ("Proposed Order").

The Proposed Order contains a recommendation in Paragraph 7.2.e of the Findings of Fact regarding the filing of an updated RMR Studies in Santa Cruz and Mohave County by UNS Electric and Southwest Transmission Cooperative ("SWTC"). However, the RMR Studies to be updated were prepared by the Western Area Power Administration ("WAPA") and WAPA would prepare any update to the Studies. Therefore, UniSource requests that Finding of Fact 7.2.e be modified to read:

- e. Regarding potential RMR requirements in Santa Cruz County beginning 2010 and Mohave County beginning 2012, UNS Electric, Inc. and SWTC should be directed to encourage and support completion of an RMR study by Western Area Power Administration ("WAPA") for filing due January 2008 for the 5th BTA.

Arizona Corporation Commission

DOCKETED

MAR 05 2007

| | |
|-----------------------------------|--------------------|
| DOCKETED BY <i>[Signature]</i> | <i>[Signature]</i> |
|-----------------------------------|--------------------|

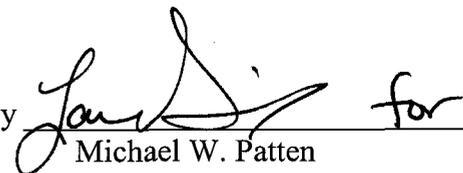
ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 This clarification would accurately reflect the existing circumstances and would not place an
2 unachievable compliance obligation on UNS Electric.

3 WHEREFORE UniSource requests that the Proposed Order regarding the Fourth Annual
4 Biennial Transmission Assessment be modified as set forth in these Comments.

5 RESPECTFULLY SUBMITTED this 5th day of March 2007.

6 ROSHKA DEWULF & PATTEN, PLC

7
8 By  for
9 Michael W. Patten
10 One Arizona Center
11 400 East Van Buren Street, Suite 800
12 Phoenix, Arizona 85004

13 And
14 Marcus G. Jerden
15 Tucson Electric Power Company
16 One South Church Avenue
17 Tucson, Arizona 85701

18 Attorneys for Tucson Electric Power Company and UNS
19 Electric, Inc.

20 Original and 13 copies of the foregoing
21 filed this 5th day of March 2007 with:

22 Docket Control
23 Arizona Corporation Commission
24 1200 West Washington Street
25 Phoenix, Arizona 85007

26 Copy of the foregoing hand-delivered/mailed
27 this 5th day of March 2007 to:

28 Mike Gleason Chairman
29 Arizona Corporation Commission
30 1200 West Washington Street
31 Phoenix, Arizona 85007

32 Commissioner William A. Mundell
33 Arizona Corporation Commission
34 1200 West Washington Street
35 Phoenix, Arizona 85007

ROSHKA DEWULF & PATTEN, PLC
ONE ARIZONA CENTER
400 EAST VAN BUREN STREET - SUITE 800
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 Commissioner Jeff Hatch-Miller
Arizona Corporation Commission
2 1200 West Washington Street
Phoenix, Arizona 85007

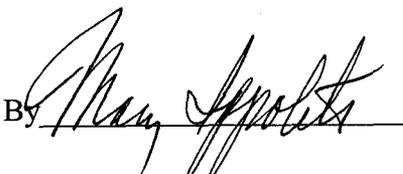
3
4 Commissioner Kristen K. Mayes
Arizona Corporation Commission
5 1200 West Washington Street
Phoenix, Arizona 85007

6 Commissioner Gary Pierce
Arizona Corporation Commission
7 1200 West Washington Street
Phoenix, Arizona 85007

8
9 Lyn Farmer, Esq.
Chief Administrative Law Judge
Hearing Division
10 Arizona Corporation Commission
1200 West Washington
11 Phoenix, Arizona 85007

12 Christopher C. Kempley
Chief Counsel, Legal Division
13 Arizona Corporation Commission
1200 West Washington
14 Phoenix, Arizona 85007

15 Ernest G. Johnson, Esq.
Director, Utilities Division
16 Arizona Corporation Commission
1200 West Washington
17 Phoenix, Arizona 85007

18
19
20 By 
21
22
23
24
25
26
27