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REFER TO FILE NO. 1234
1234-7-19-1

April 4, 2007

Arizona Corporation Commission
DOCKETED
APR - 4 2007

Mr. Jan H. Bennett
Vice President Customer Service
Arizona Public Service Company
Post Office Box 53999
Mail Station 9086
Phoenix, Arizona 85072-3999

DOCKETED BY **NR**

Mr. Raymond Heyman
Unisource Energy Corporation
One South Church Street
Suite 1820
Tucson, Arizona 85701-0001

E-017504-05-0579

Re: Draft Community Catastrophic Emergency Response Plan in Mohave County

Dear Jan and Ray:

At the urging of the Governor and the instruction and direction (rather emphatic) of Commissioner Mayes, we have taken steps to initiate a draft Community Emergency Response Plan for catastrophic emergencies, including but not limited to, electrical outages in Mohave County outlining steps that might be taken by utilities and County emergency service departments.

We have contacted Alan Stephens of the Governor's office and have been directed by Mr. Stephens of the Governor's Office to touch base with the State and County Emergency Services Departments. We will be doing so by copy of this letter.

The reason for the Governor's inquiry and that of Commissioner Mayes was the catastrophic conditions encountered by the Havasupai in the bottom of the Grand Canyon in the summer of 2006 predominately precipitated by a structural failure of the BIA electric facilities and the lack of a BIA emergency preparedness plan to address health and other needs in the Supai

Mr. Jan Bennett
Mr. Raymond Heyman
4/4/07
Page 2

Village. It may interest you to know that on March 29, 2007 in an Appropriations Subcommittee hearing on the issue of the Bureau of Indian Affairs appropriations for health, safety and welfare of the BIA Indian charges, concerning the Havasupai and the Hualapai Congressman Ed Pastor challenged the BIA to respond to program and budget questions affecting both those Tribes submitted in October by the Congressional Delegation from Arizona and ignored by the BIA. Congressman Pastor drew an admission from the BIA representative testifying at the hearing that the BIA has a trust responsibility for providing electricity to the Havasupai. The BIA has consistently admitted that it owns and operates the retail electric distribution system serving the Indians in the bottom of the Grand Canyon. Congressman Pastor resubmitted to the BIA the questions previously asked and ignored by the BIA.

The enclosed plan is a *draft* of a Community response to a catastrophic emergency. Such a plan is supported already by reciprocal Mutual Aid Agreements to which all of the Rural Electric Cooperatives and the Aha Macav Indian Tribal Utility are signatories (and you have been asked to become signatories and a copy is provided) whereby in the event of an emergency, to the extent that materials, manpower and supplies are available, all of the signatories agree that upon assurance of compensation for assistance they will furnish, within their own system constraints, what they have in the way of resources to help others survive the emergency.

In meetings before then Commissioner Spitzer of the Arizona Corporation Commission (now a FERC Commissioner), Steve Wheeler on behalf of APS and Unisource and Counsel for Mohave Electric agreed that when called upon by the BIA for assistance to the BIA in restoring electricity service along the 70-mile line to the edge of the Canyon in the BIA utility area, that those utilities would respond, if compensated. In fact, historically they have been responding over the last two (2) years.

Most recently Mohave Electric Cooperative was asked by the BIA to solicit cost estimates and a contractor to do right-of-way line clearing along the 70-mile line from the Nelson Substation to the BIA transformer substation in the vicinity of Long Mesa. Mohave responded by securing a contractor which investigated and prepared a scope of work and a cost appraisal and bid the job to the BIA to begin implementing the line clearing requested by the BIA.

The Governor's Office and Commissioner Mayes have an interest in knowing what steps that utilities and emergency services authorities and agencies are prepared to take in the event of a catastrophe involving electrical outages in the bottom of the Grand Canyon for the Havasupai or another catastrophe in Mohave County that might not involve simply the loss of electricity, but involve a human health, safety and welfare issue in the bottom of the Canyon and elsewhere.

As a result, you will see that the draft plan being created takes into account such things as identification of generators, emergency service personnel, skilled medical personnel, available aircraft, and provision for modest amounts of such things as bottled water.

Mr. Jan Bennett
Mr. Raymond Heyman
4/4/07
Page 3

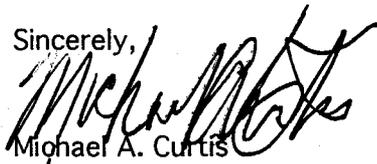
It is readily seen that this type of a Community Catastrophic Emergency Response Plan (a "Katrina" plan) can have an impact beyond the Havasupai and Hualapai and could apply to any service areas of the utilities in Mohave County (in the 1980's there was severe Colorado River flooding due to extraordinary releases from Hoover Dam along the Colorado River that required some emergency responses).

We invite your analysis, comment and assistance in finalizing this draft Community Emergency Response Plan so that it can be finalized and submitted to the Governor and to Commissioner Mayes.

Please contact me with the specific individuals whom you have designated to be of assistance in this matter. Steve Wheeler has indicated I should be dealing with you, Jan Bennett; and Ray Heyman has not yet responded with the name of a person in the Unisource organization with whom we should be dealing.

By copy of this letter to the interested individuals in the Governor's Office, Commissioner Mayes, Coconino County Emergency Services, Yavapai Emergency Services and Mohave County Emergency Services, we are asking that we come to a type of agreement on the elements of a plan which all can support. You will note that we have also asked the Western Area Power Administration what type of resources, including expertise, it could offer in the three (3) County (Mohave, Yavapai and Coconino) area whether or not an event occurs on or off of the Reservation.

Sincerely,



Michael A. Curtis
General Counsel for Mohave Electric
Cooperative, Inc.

Enclosure: **Draft** Community Emergency Response Plan

cc: Alan Stephens, Operations Chief of Staff, Governor's Office
Lori Faeth, Policy Advisor Natural Resource, Governor's Office
Marnie Hodahdwen, Policy Advisor Tribal Affairs
Dan Roe, Arizona Emergency Response Commission
Kristin Mayes, Commissioner, ACC
Coconino County Emergency Services
Mohave County Emergency Services
Yavapai County Emergency Services
J. Tyler Carlson, Western Area Power Administration
Manager of Operations, Mohave Electric Cooperative
Comptroller, Mohave Electric Cooperative
Chief Executive Officer, Mohave Electric Cooperative

COMMUNITY CATASTROPIC EMERGENCY REACTION PLAN

DRAFT

Parties:

The United States Department of Interior Bureau of Indian Affairs ("BIA"); UniSource ("Unisource"); Arizona Public Service ("APS"); Mohave Electric Cooperative, Inc. ("Mohave"); the Western Area Power Administration Desert Southwest Region ("WAPA"); Coconino County Emergency Services; Mohave County Emergency Services; and Yavapai County Emergency Services.

Effective Date:

When executed.

Place:

Kingman, Mohave County, Arizona

Intent:

It is the intent of the Parties to join together and voluntarily create a proposed plan of operation to allow the Parties in Northwestern Arizona to join together in the instance of a widespread catastrophic emergency due to natural or other incidents or disasters including but not limited to loss of electric service to meet needs of the Parties and the public and to create protocols for lending of mutual aid and assistance to governmental and other entities which have responsibility for response, including among other things the rendering of mutual aid to sister utilities; and providing for compensation and reimbursement of costs. The intended form of agreement is the Mutual Aid Agreement currently adopted by the majority of Cooperative Electric Public Service Corporations in Arizona and certain non-jurisdictional entities, a copy of which is agreement is attached as an Exhibit.

Description of Requests for Aid and Assistance In the Event of an Emergency:

- A. Electrical-See the Mutual Aid Agreement.
- B. Humanitarian-To be developed.

Description of Parties:

BIA:

Service area

Mohave County
Yavapai County
Coconino County

Customers

Employees

Work locations

Miles of distribution lines

Miles of transmission or sub-transmission

Substations within area

Regulatory jurisdiction

Department of Interior
United States Congress

UniSource:

Service area
 Mohave County
 Yavapai County
 Coconino County
Customers
Employees
Work locations
Miles of distribution lines
Miles of transmission or sub-transmission
Substations within area
Regulatory jurisdiction
 Arizona Corporation Commission

APS:

Service area
 Mohave County
 Yavapai County
 Coconino County
Customers
Employees
Work locations
Miles of distribution lines
Miles of transmission or sub-transmission
Substations within area
Regulatory jurisdiction
 Arizona Corporation Commission

Mohave Electric:

Service area
 Mohave County
 Yavapai County
 Coconino County
Customers
Employees
Work locations
Miles of distribution lines
Miles of transmission or sub-transmission
Substations within area
Regulatory jurisdiction
 Arizona Corporation Commission
 Rural Utilities Service of Department of Agriculture

Western Area Power Administration:

- Service area
 - Mohave County
 - Yavapai County
 - Coconino County
- Customers
- Employees
- Work locations
- Miles of distribution lines
- Miles of transmission or sub-transmission
- Substations within area
- Regulatory jurisdiction
 - Department of Energy
 - United States Congress

Coconino County Emergency Services:

- Service area
 - Coconino County
- Population
- Employees
- Work locations
- Regulatory jurisdiction
 - Coconino County
 - State of Arizona

Mohave County Emergency Services:

- Service area
 - Mohave County
- Population
- Employees
- Work locations
- Regulatory jurisdiction
 - Mohave County
 - State of Arizona

Yavapai County Emergency Services:

- Service area
 - Yavapai County
- Population
- Employees
- Work locations
- Regulatory jurisdiction
 - Yavapai County
 - State of Arizona

Description of Party Capabilities-Electric:

BIA:

- Personnel available at Truxton and at Coolidge and Colorado River Tribes
- Equipment
- Generators-size and location
- Medical Supplies
- Food Stores
- Water Stores
- Access to Aircraft/Helicopter
- Local Funding sources-Rates and Appropriations and Contingency
- Other Funding sources
- Third Party Contractors-history of use
- Third Party Contractors-identification of new and existing sources

Coconino County Emergency Services:

- Communication System
- Generators-size and location
- Technical
- Funding
- Medical Supplies
- Food Stores
- Water Stores
- Access to Aircraft/Helicopter
- Other

Mohave County Emergency Services:

- Communication System
- Generators-size and location
- Technical
- Funding
- Medical Supplies
- Food Stores
- Water Stores
- Access to Aircraft/Helicopter
- Other

Yavapai County Emergency Services:

- Communication System
- Generators-size and location
- Technical
- Funding
- Medical Supplies
- Food Stores
- Water Stores
- Access to Aircraft/Helicopter
- Other

Arizona Department of Emergency Services

- Communication System
- Generators-size and location
- Technical
- Funding
- Medical Supplies
- Food Stores
- Water Stores
- Access to Aircraft/Helicopter
- Other

UniSource:

- Mohave, Coconino, Yavapai Office Locations-staffing
- Location of OMR units
- Nature of equipment and location
- Crew Size and Constraints
- Communication system to be used
- Dispatch criteria and constraints
- Generators-size and location
- Transportation criteria and constraints

Mohave Electric Cooperative:

- Mohave, Coconino, Yavapai Office Locations-staffing
- Location of OMR units
- Nature of equipment and location
- Crew Size and Constraints
- Communication system to be used
- Dispatch criteria and constraints
- Generators-size and location
- Transportation criteria and constraints

APS:

- Office Locations-staffing
- Location of OMR units
- Nature of equipment and location
- Crew Size and Constraints
- Communication system to be used
- Dispatch criteria and constraints
- Generators-size and location
- Transportation criteria and constraints

Western Area Power Administration:

- Office Locations-staffing
- Location of OMR units
- Nature of equipment and location
- Communication system to be used
- Dispatch criteria and constraints
- Generators-size and location
- Transportation criteria and constraints

Description of Party Capabilities-Humanitarian:

BIA:

- Contact Person:
- Personnel (Truxton and San Carlos Project and Colorado River)
- Generators (Describe Sizing and Number)
- Medical
- Medicine
- Transportation (Include Planes and Helicopter Availability)
- Water
- Food
- Indian Health Service
- FEMA
- Department of Interior
- Funding

Coconino County Emergency Services:

- Contact Person:
- Personnel
- Generators (Describe Sizing and Number)
- Medical
- Medicine
- Transportation (Include Planes and Helicopter Availability)
- Water
- Food
- FEMA
- State of Arizona
- Funding

Mohave County Emergency Services:

Contact Person:
Personnel
Generators (Describe Sizing and Number)
Medical
Medicine
Transportation (Include Planes and Helicopter Availability)
Water
Food
FEMA
State of Arizona
Funding

Yavapai County Emergency Services:

Contact Person:
Personnel
Generators (Describe Sizing and Number)
Medical
Medicine
Transportation (Include Planes and Helicopter Availability)
Water
Food
FEMA
State of Arizona
Funding

Arizona Department of Emergency Services:

Contact Person:
Personnel
Generators (Describe Sizing and Number)
Medical
Medicine
Transportation (Include Planes and Helicopter Availability)
Water
Food
FEMA
State of Arizona
Funding

UniSource:

Contact Person:
Personnel
Generators (Describe Sizing and Number)
Transportation (Include Planes and Helicopter Availability)
Water
Food
Funding

Mohave Electric Cooperative:

Contact Person:
Personnel
Generators (Describe Sizing and Number)
Transportation (Include Planes and Helicopter Availability)
Water
Food
Funding

APS:

Contact Person:
Personnel
Generators (Describe Sizing and Number)
Transportation (Include Planes and Helicopter Availability)
Water
Food
Funding

Western Area Power Administration:

Contact Person:
Personnel
Generators (Describe Sizing and Number)
Transportation (Include Planes and Helicopter Availability)
Department of Energy
Funding

Electric Outage Protocol

FILED ELECTRIC LOAD CURTAILMENT PLANS OF EACH ACC REGULATED UTILITY

MUTUAL AID AGREEMENTS SIGNED BY ELECTRICAL PROVIDERS, JURISDICTIONAL AND NON

Outage Location:

In-service area-Defined by agreements
Outside service area-Defined by agreements
Within contract service area-Defined by agreements

Area of Origin Responsibility:

BIA-Map of Supai and Hualapai Reservations
UniSource-Exhibit on Certificated Area
Mohave-Exhibit on Certificated Area
APS-Exhibit on Certificated Area

Assessment:

Internal emergency-Within Certificated Area
External emergency-Outside Certificated Area
Within Contract service area emergency
Coincidence of Disaster inside and outside certificated area

First Responder Obligation:

- In-service area
- Outside service area
- Within contract service area
- Internal-cost calculation and assessment-See Mutual Aid Agreements.
- External-cost calculation and assessment- See Mutual Aid Agreements.

Request for additional Assistance:

- In-service area
- Outside service area
- Within contract service area
- Internal-cost calculation and assessment- See Mutual Aid Agreements.
- External-cost calculation and assessment- See Mutual Aid Agreements.
- Agreement to pay

Reporting Requirement:

- Regulatory Jurisdiction
- Other Jurisdiction
- County Emergency Jurisdiction
- State Emergency Jurisdiction

Community Outage Coordinating Committee Name, Phone Numbers, Addresses and Email Addresses:

BUREAU OF INDIAN AFFAIRS:

NAME _____
ADDRESS: _____

PHONE NUMBER: _____
EMAIL ADDRESS: _____

COCONINO COUNTY EMERGENCY SERVICES:

NAME _____
ADDRESS: _____

PHONE NUMBER: _____
EMAIL ADDRESS: _____

MOHAVE COUNTY EMERGENCY SERVICES:

NAME _____
ADDRESS: _____

PHONE NUMBER: _____
EMAIL ADDRESS: _____

YAVAPAI COUNTY EMERGENCY SERVICES:

NAME _____
ADDRESS: _____

PHONE NUMBER: _____
EMAIL ADDRESS: _____

ARIZONA DEPARTMENT OF EMERGENCY SERVICES:

NAME _____
ADDRESS: _____

PHONE NUMBER: _____
EMAIL ADDRESS: _____

UNISOURCE:

NAME _____
ADDRESS: _____

PHONE NUMBER: _____
EMAIL ADDRESS: _____

MOHAVE ELECTRIC COOPERATIVE, INC.:

NAME _____
ADDRESS: _____

PHONE NUMBER: _____
EMAIL ADDRESS: _____

ARIZONA PUBLIC SERVICE COMPANY:

NAME _____
ADDRESS: _____

PHONE NUMBER: _____
EMAIL ADDRESS: _____

WESTERN AREA POWER ADMINISTRATION:

NAME _____
ADDRESS: _____

PHONE NUMBER: _____
EMAIL ADDRESS: _____

Biannual Review Date and Filing with Arizona Corporation Commission by Jurisdictional Entities:

Participating Parties:

The Signatories may execute this Agreement in one or more counterparts with each counterpart being deemed an original Agreement, but with all counterparts being considered as one Agreement and as executed the same shall be filed with the Utilities Division of the Arizona Corporation Commission and whatever other location may be appropriate. Each party hereto has read, agreed to and executed this Agreement on the date indicated next to their signature.

Date:_____The United States Bureau of Indian Affairs (BIA) by

Date:_____UniSource (UniSource) by

Date:_____Arizona Public Service (APS) by

Date:_____Mohave Electric Cooperative, Inc. (Mohave) by

Date:_____The Western Area Power Administration Desert Southwest Region (WAPA) by

Date:_____Coconino County Emergency Services by

Date:_____Mohave County Emergency Services by

Date:_____Yavapai County Emergency Services by

Date:_____Arizona Department of Emergency Services by