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August 6, 2008

Arizona Corporation Commission  
Docket Control  
1200 W. Washington  
Phoenix, AZ 85007

Re: 2008 Biennial Electric Transmission Assessment for 2008-2017  
Docket No. E-00000D-07-0376

Dear Sir/Madam:

Attached are SRP's initial comments to the first draft of the Fifth Biennial Transmission Assessment Report.

Please feel free to contact me at (602) 236-5028 if you have any questions.

Sincerely,

Jana Brandt

Attachment

cc: Prem Bahl (mail and email)  
Laurie Woodall, K.R. Saline & Associates (mail and email)  
Jerry Smith, K.R. Saline & Associates (mail and email)  
Kelly Barr  
Rob Kondziolka  
Chuck Russell  
Jose Silva

Arizona Corporation Commission  
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**SRP's Comments on  
1<sup>st</sup> Draft of Fifth BTA Report**

**Submitted August 6, 2008**

**General Comments**

SRP appreciates the opportunity to review and comment on the first draft report. The draft report is of high quality and requires only minor editing. SRP has no significant disagreements with the content of the report.

SRP notes that there are no comments or mention of the DOE sponsored NREL/WestConnect Western Wind and Solar Integration Study (WW&SIS) in the draft BTA Report. This is a significant renewable energy operational integration study that made significant progress in 2007 and includes a focus on Arizona. SRP recommends the WW&SIS be addressed and included as part of the BTA Report.

**Specific Comments (additions are noted in *bold italics*; deletions in strike out)**

**Page 6, Section 1.3.1, Action Item 3**

Rob Kondziolka will provide this information for inclusion in the BTA under a separate submittal.

**Page 6, Section 1.3.2**

The third sentence should read "The draft report was placed on the Commission's website *and distributed via industry distribution lists* to expedite the review process."

**Page 8, Section 2, Table 1**

In Table 1, Southwest Power Group should be *Southwestern* Power Group.

**Page 8, Section 2, Last Paragraph**

The second sentence should read "These include; High Plains Express ~~Project~~ *Initiative (covering the states of Wyoming, Colorado, New Mexico, and Arizona) ...*"

**Page 9, Section 2.1, 2<sup>nd</sup> Paragraph**

In the second sentence, Table 20 should be changed to *Table 3*. Also, the last word of that sentence should be *Plans*.

**Page 9, Section 2.1, 2<sup>nd</sup> Paragraph**

In the last sentence of the paragraph, Table 3 should be changed to *Table 4*.

**Page 10, Section 2.1, 1<sup>st</sup> Paragraph**

The second sentence references three 500 kV projects that "account for 470 of the 805 miles displayed in the chart above." This sentence should identify the chart it is referring to, which we believe to be Table 4. In addition, Table 4 reflects a total mileage of 1324 for the 500 kV projects, not 805 miles as noted in the second sentence. This inconsistency needs to be resolved or further clarified.

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**Page 10, Section 2.1, 2<sup>nd</sup> Paragraph**

In the fifth sentence of the 2<sup>nd</sup> paragraph, “*was*” should be inserted between “what” and “identified”.

**Page 11, Table 5**

On the fourth line, the names (RS19 and Dinosaur) should be reversed from that shown.

**Page 11, Table 5**

The project currently known as Sugarloaf should be added to Table 5. This project was formerly known as Second Knoll.

**Page 11, Table 6**

On the third line of the table, Pinal Central-Southeast Valley/RS22 is shown as a 500 kV project. This project should be shown as a 230 kV line.

**Page 11, Table 6**

On the seventh line of the table, the Sugarloaf loop-in incorrectly reflects an in-service date of 2019 and is shown as a new project. This is not a new project as only the name has changed from Second Knoll since the previous BTA. In addition, the in-service date has remained as 2009, not 2019. Since this project reflects only a name change, the project should be removed from Table 6. SRP suggests that the name change be included in Table 5, as noted above.

**Page 11, Table 6**

On the eighth line of the table (Hassayampa-Pinal West #2), this is not a new project. The project was included as a TBD in the last BTA.

**Page 18, Section 2.4.6, 1<sup>st</sup> Paragraph**

In the fifth line of the first paragraph, preformed should be changed to *performed*.

**Page 18, Section 2.4.6, 1<sup>st</sup> Paragraph**

The last sentence of the first paragraph should be removed as it does not have any relevancy to the BTA Report. Additionally, a “cluster study” is a defined FERC term and neither SRP nor the Pinal West to Southeast Valley/Browning Project has received interconnection requests to consider for performance of a “cluster study.”

**Page 23, Table 8**

For the Pinal County CATS HV area, in the column titled “Nature of Constraint”, voltade should be changed to *voltage*.

**Page 29, Section 3.3.1, 1<sup>st</sup> Paragraph**

In the second sentence, UNES should be changed to *UNSE*.

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**Page 31, Section 3.3.4, 1<sup>st</sup> Paragraph**

In the third and fourth sentences, UNS Electric and UNES should be changed to *UNSE*.

**Page 34, Section 3.4.1, 3<sup>rd</sup> Paragraph**

In the second to last sentence of the 3<sup>rd</sup> paragraph, there is an extra space that should be removed in CATS-EHV.

**Page 35, Section 3.4.2, 3<sup>rd</sup> Paragraph**

In the last sentence of the third paragraph, outs should be changed to *outages*.

**Page 37, Section 3.5, Item 2**

Change re-sources to *resources*.

**Page 37, Section 3.5, Item 2.a.**

Change pre-send to *present*.

**Page 44, Section 4.1, 1<sup>st</sup> Paragraph**

In the first sentence, change E pact 2005 to *EPAct 2005*.

**Page 44, Section 4.1, 2<sup>nd</sup> Paragraph**

The first and second sentence should be combined to read "*On March 16, 2007 FERC approved 83 reliability standards of the 107 which were originally proposed and directed the improvement of 56 of the approved reliability standards.*"

**Page 46, Section 4.2, 1<sup>st</sup> Paragraph**

In first sentence, add "*of*" between "section 216" and "the".

**Page 46, Section 4.2, 1<sup>st</sup> Paragraph**

In the last sentence, change "by Figure 36" to "*on Exhibit 38*".

**Page 49, Section 4.5.1, Item 2**

In the first sentence, add "*is*" between "(VCAWG)" and "to".

**Page 49, Section 4.5.1, Item 2**

In the 7<sup>th</sup> line, change group to *groups*.

**Page 50, Section 4.5.2, 1<sup>st</sup> and 2<sup>nd</sup> Paragraphs**

Remove all underlining.

**Page 51, Section 4.5.2, 1<sup>st</sup> Paragraph**

In the 7<sup>th</sup> line, strike the first "the".

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**Submitted August 6, 2008**

**Page 51, Section 4.5.2, 2<sup>nd</sup> Paragraph**

The last sentence references Appendices G and H. These appear to be incorrect references as Appendix G contains different information and there is no Appendix H.

**Page 52, Section 4.6.2, 1<sup>st</sup> Paragraph**

In the fourth line, CAT-HV should be changed to *CATS-HV*.

**Page 53, Section 4.6.2, 1<sup>st</sup> Full Paragraph**

There are several references to the CATS-HV study that need to be corrected for consistency as the acronym is misspelled or includes extra spaces.

**Page 53, Section 4.6.2, 1<sup>st</sup> Full Paragraph**

The second sentence of the first full paragraph references a value of 24,819MW in 2016 for the CATS-HV study area. This value refers to the entire load in the state of Arizona. The sentence should be reworded to clarify this. SRP suggests that the sentence be rewritten as follows: **“The CATS-HV study references a total load for the state of Arizona in 2016 as 24,819MW.”**

**Page 53, Section 4.6.3, 2<sup>nd</sup> Paragraph, 1<sup>st</sup> bullet**

Change Tenth to *Ten*.

**Page 53, Section 4.6.3, 2<sup>nd</sup> Paragraph, 1<sup>st</sup> bullet**

Change an to *and*.

**Page 54, Section 4.6.4, 1<sup>st</sup> Paragraph**

In the last sentence, change revision to *revised*.

**Page 56, Section 5, 1<sup>st</sup> Paragraph**

On lines 2 and 6, the hyphen should be removed from “ten-years”.

**Page 59, Section 5.1, Item 1.c.**

In the fourth sentence, add “*is*” between “This” and “underscored”.

**Page 60, Section 5.1, Item 2.e.**

In the first sentence, strike “in”.

**Page 62, Section 5.3, Item 2**

Rob Kondziolka will provide the requested information to KRS/ACC for this item under a separate submittal.

**Page 63, Section 5.4, Item 3**

In the second sentence, a space should be added in “islooking” to separate the two words.

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**Page 64, Section 6, Item 1.a.**

In the fourth line, change "with" to "*within*".

**Page 64, Section 6, Item 1.c.**

Add a space to "includethe" to separate the two words.

**Page 64, Section 6, Item 3.b.**

In the first sentence, remove the hyphen from "ten-years."

**Table of Exhibits**

Exhibits 36, 37 and 38 are incorrectly identified in the Table as Exhibit 35.

**Exhibit 2**

Two corrections are required to this exhibit. First, the transmission between Schrader and RS17 is already constructed (the two circuits are phase tied so it operates as one circuit). Second, the Browning to Dinosaur 230kV transmission section was constructed and energized in 2007.

**Exhibit 5**

Please make the same corrections as noted for Exhibit 2.

**Exhibit 6**

For 2011-46 (Pinal South to SEV/RS22), SRP is the only planned participant for this section of transmission line.

**Exhibit 8**

On the table of WECC Path Information, for Path 49, the Liberty-Peacock-Mead is a 345kV line, not a 500kV line, as shown.