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P.O. Box 711
Tucson, Arizona 85702-0711

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AZ CORP COMMISSION
DOCKET CONTROL

August 13, 2008

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Re: **Docket No. E-00000D-07-0376**

Docket Control:

UNS Electric, Inc. ("UNS Electric") hereby files, on behalf of Western Area Power ("Western"), comments from Western in response to comments in the July draft Biennial Transmission Assessment regarding the RMR study prepared by UNS Electric and filed in this docket.

If you have any questions regarding this filing, please call Ed Beck at (520) 745-3197.

Sincerely,

Jessica Bryne
Regulatory Services

Arizona Corporation Commission
DOCKETED

AUG 14 2008

DOCKETED BY	
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cc: Prem Bahl, ACC
Ed Beck, TEP

The summary below provides an explanation to the technical concerns cited by KRS with the Mohave County study portion of the 2008 BTA draft report. I would be able to meet at KRS to discuss any other BTA study concerns it deems appropriate.

Leonard York
TEL: 602-605-2797

1. SIL Generation Dispatch: In the SIL assessment, Western dispatched its hydro generation in accordance with the way SRP has dispatched its hydro generation in prior BTA/RMR studies. Ever since Western learned of the SRP method at the start of the second BTA, Western has been applying this method to dispatch its hydro generation in the SIL assessment.

2. Absence of NAEP from BTA: Because NAEP (Northern Arizona Energy Project) is a generation project that would consist of four gas turbines, its fossil units would not be in the SIL case. Therefore, its absence from the SIL case does not impact the SIL assessment. Because the MLSC study showed the post-transient stability margin to be restrictive across the Mohave County system, the presence of NAEP in the Griffith system would not mitigate the post-transient stability margin restrictions found in the vicinity of the Black Mesa and North Havasu stations.

3. NAEP System Impact Study Results: NAEP SIS results were developed from EOR rating cases, in which the EOR was at its non-simultaneous rating and, as such, the Liberty phase-shifter was holding its 450 MW rating. On the other hand, the BTA studies were developed from peak load cases that had started from an approximate economic dispatch of generation; and, as such, the Liberty phase-shifter was modeled in its normally bypassed condition. This, in large part, accounts for the differences in the single contingency steady-state power flow overload reported in the NAEP SIS but not in the BTA study.

4. Plant Out-Of-Step Protection for Primary Transmission Relay Failure: Black Mountain, Griffith, and NAEP generators require their plants to have out-of-step relaying protection. This protects both the generators and the rest of the system from consequences of the following type of disturbance: a fault close-in to a generator when it is operating at a high dispatch simultaneously with a failure of the transmission's primary protection system and reliance upon fault clearing by the transmission's local backup protection. Western has been working with Black Mountain, NAEP, and Griffith to affect this unit protection. In addition, Western has been working with each of these generators to implement appropriate automatic unit tripping to mitigate possible system violations that could be caused by particular unlikely or extreme system conditions.

5. Numerous Renewable Generation Projects: Western knows of only two renewable generation projects in the Mohave County study vicinity during this BTA study effort. One renewable generation project had started its Feasibility Study with Western, while the other had not even begun to create its Feasibility Study Agreement with Western.