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AZ CORP COMMISSION
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September 22, 2008

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

RE: Docket No. E-00000D-07-0376
Fifth Biennial Transmission Assessment First Draft

Dear Sir/Madam:

Enclosed are the SWTC comments to the Arizona Corporation Commission Fifth Biennial Transmission Assessment – 2008-2017 Second Draft Report.

If you or your staff has any questions regarding the comments please contact Bruce Evans at 520-586-5336.

Sincerely,

Jim Rein
Manager of Transmission Planning

Attachments

Cc. Docket Control (Original plus 13 copies)
Prem Bahl, ACC (Via e-mail)
Laurie A. Woodall, KRSA (Via e-mail)
Jerry D. Smith, KRSA (Via e-mail)

Arizona Corporation Commission
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**SOUTHWEST TRANSMISSION COOPERATIVE, INC.
COMMENTS TO STAFF'S FIFTH BIENNIAL TRANSMISSION
ASSESSMENT SECOND DRAFT**

DOCKET NO. E-00000D-07-0376

September 22, 2008

1) Executive Summary Recommendations, 3b (Page 5):

SWTC will work to resolve all “to be determined” (TBD) in-service dates listed for facilities envisioned to be constructed with the next ten years, and appreciates the clarification that plans which fall beyond the ten year horizon may be included in subsequent ten year plan filings, if they are identified as not occurring within the ten year plan horizon when a TDB date designation is used. As explained in our comments to the First Draft, we feel that the listing of all known future projects is valuable information for our Stakeholders.

2) Section 2.3 2008 Summer Preparedness (Page 17)

The last two sentences of the last paragraph offer up the suggestion of including AEPCO and SWTC to attend the annual summer preparedness meetings that have been typically attended by APS, SRP and TEP. These meetings, as understood by SWTC, are to ensure that reliability of service to the end-use customer is maintained during normal and extreme outage conditions. SWTC is willing to attend these meetings, but wishes to point out that it is not a load-serving entity, and therefore would not be able to certify that all possible “emergency plans (as it relates to maintaining service to customer load) are in place to respond to extreme outage events, system conditions and events of nature such as storms or fires.” The SWTC system was designed to deliver AEPCO resources to its transmission customers, including the Distribution Cooperatives, who in turn use their sub-transmission and distribution systems to serve their customer loads.

3) Section 3.2.1 Cochise County Import Assessment (Page 29)

SWTC offers a general comment to this section that it accepts Staff’s recommendations that “continuity of service” be developed for Cochise County and will work closely with the load-serving entities in the area, through SATS, to begin the transition to continuity of service.

4) Section 3.2.8 Tucson Area RMR Assessment (Page 37)

The third paragraph discusses the Tucson RMR Report for the year 2011 wherein the SIL limit is a thermal limit of the Bicknell 345/230 kV transformer for the corridor outage of the Springerville to Vail and Winchester to Vail 345 kV lines. As noted by TEP, there is an agreement between SWTC and TEP to trip this transformer when the loading reaches the trip point of 240 MW. SWTC has plans in 2012 to replace the existing Bicknell 345/230 kV transformer with a higher capacity MVA unit. The current Bicknell transformer has an upper rating of 193 MVA. The new transformer will have an upper rating of 420 MVA, to match the Winchester 345/230 kV transformer. In addition, the existing Bicknell transformer will be moved to Greenlee and be paralleled with a similarly rated MVA transformer, thus providing approximately 1200 MVA of capacity to the SWTC 230 kV system ties with TEP. This should eliminate the SIL limit that occurs as a result of the double 345 kV line outages and reduce the need to run local RMR generation.

5) Section 5 Conclusions (Page 66)

Sub-item 3b in this Section, discusses the emergency ties that TEP and APS have with SSVEC, stating that these emergency ties are placing an additional burden on the SSVEC 69 kV system “that is no longer able to operate as a network because of radial transmission line limitations.” SWTC is concerned that this language seems to suggest that emergency ties are not desirable. As the local load serving entities in the area work towards continuity of service, it seems reasonable that the emergency ties remain in place as a means of ensuring service reliability for all end-use customers in Southeast Arizona.

6) Section 6 Recommendations (Pages 73-74)

SWTC offers a general comment that it accepts the recommendations of this Section and as noted in 3) above will work closely with the load-serving entities in the area, through SATS, to begin the transition to continuity of service.

At the 2nd BTA Workshop, held on September 18th, language was added to 3) d. that states that SWTC is to participate in the studies as it is the sole transmission provider for SSVEC. It should be noted that SSVEC, under the terms and conditions of the three transmission contracts it has entered into with SWTC, has the ability to seek transmission services directly from any transmission provider.