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1 Mark Nadeau (Az Bar # 011280)
2 mark.nadeau@dlapiper.com
3 Shane D. Gosdis (Az Bar # 022471)
4 shane.gosdis@dlapiper.com
5 DLA Piper LLP (US)
6 2415 E. Camelback Road, Suite 700
7 Phoenix, AZ 85016

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AZ CORP COMMISSION
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8 Attorneys for 10,000 West LLC

9 **BEFORE THE ARIZONA POWER PLANT**
10 **AND TRANSMISSION LINE SITING COMMITTEE**

11	IN THE MATTER OF THE APPLICATION)	
12	OF ARIZONA PUBLIC SERVICE)	
13	COMPANY, IN CONFORMANCE WITH)	Docket No. L-00000D-08-0330-00138
14	THE REQUIREMENTS OF ARIZONA)	
15	REVISED STATUTES §§ 40-360, <i>et seq.</i> ,)	Case No. 138
16	FOR A CERTIFICATE OF)	
17	ENVIRONMENTAL COMPATIBILITY)	10,000 WEST'S OPPOSITION TO
18	AUTHORIZING THE TS-5 TO TS-9 500/230)	ARIZONA CORPORATION
19	kV TRANSMISSION LINE PROJECT,)	COMMISSION'S NOTICE OF FILING
20	WHICH ORIGINATES AT THE FUTURE)	AND REQUEST FOR JUDICIAL NOTICE
21	TS-5 SUBSTATION, LOCATED IN THE)	
22	WEST HALF OF SECTION 29, TOWNSHIP)	
23	4 NORTH, RANGE 4 WEST AND)	
24	TERMINATES AT THE FUTURE TS-9)	
25	SUBSTATION, LOCATED IN SECTION 33,)	
26	TOWNSHIP 6 NORTH, RANGE 1 EAST, IN)	
27	MARICOPA COUNTY, ARIZONA.)	
28)	

Arizona Corporation Commission
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24 Intervenor 10,000 West, L.L.C. ("10,000 West") hereby files its Opposition to Arizona
25 Corporation Commission's Notice of Filing and Request for Judicial Notice, filed on November
26 20, 2008. The Corporation Commission's Notice of Filing and Request for Judicial Notice
27 ("Request for Judicial Notice") is intentionally vague and misleading and fails to establish that
28 the Committee has ever approved an extra high voltage transmission line that exceeds NERC or
WECC standards. In its Request for Judicial Notice, the ACC fails to cite to a single provision

1 of NERC or WECC, making it impossible to know which specific provisions were allegedly
2 exceeded. The ACC likewise fails to attach exhibits from any of the numerous transmission
3 line and power plant cases it cites. As a result, there is no way to determine if each of those
4 cases actually exceeded NERC and WECC standards and if they did, which specific standards
5 were exceeded and why they were exceeded. The ACC's conclusory claims do not suffice.

6 The one case that the ACC did discuss, Case #111, is wholly irrelevant to this action.
7 Case #111 involves a transmission line that was necessary to resolve widespread and
8 unresolved power outages. There are no such outages at issue in this case. Indeed, the parties'
9 uniformly agree that the TS-5 to TS-9 is not necessary to guard against the type of single
10 contingency (N-1) outages at issue in Case #111. The Committee should deny the ACC's
11 request for judicial notice.

12 **I. THE ACC FAILS TO SPECIFY WHICH SPECIFIC NERC AND WECC**
13 **CONDITIONS HAVE BEEN EXCEEDED IN ITS CITED CASES.**

14 In its Request for Judicial Notice, the ACC claims that there "are two different types of
15 conditions that the Committee has required since 2000 that go beyond WECC and NERC
16 requirements." Request for Judicial Notice at 1:25-27. The first condition is one in which the
17 Committee has allegedly required utilities to comply with the single contingency (N-1) criteria
18 "without reliance on remedial schemes." *Id.* at 1:27-2:1. As an initial matter, the ACC fails to
19 cite to any specific WECC criteria that allow for a utility to comply with the N-1 standard by
20 using remedial schemes. *See id.* Indeed, NERC does not allow for compliance with the N-1
21 standard by using remedial schemes. *See* NERC Transmission System Standard – Normal
22 Contingency Conditions ("NERC Reliability Standards") attached hereto as Exhibit 1. In that
23 sense, in the cases cited by the ACC, the Committee apparently required compliance with
24 NERC criteria as opposed to the less stringent WECC criteria. The ACC fails to establish that
25 cited cases actually exceed the NERC and WECC criteria. Moreover, each of the cases cited by
26 the ACC (with the exception of the Palo Verde Hub case) involves a power plant, not the type
27 of extra high voltage transmission lines at issue in this case. *See* Request for Judicial Notice at
28

1 2:3-13. As such, the ACC's conclusory claim that the Committee has required more stringent
2 reliability criteria than WECC and NERC is unfounded.

3 The second condition that purportedly exceeds WECC and NERC criteria "is a condition
4 that either requires new transmission lines to be placed a minimum of 100 feet away from the
5 edge of existing major natural gas transmission pipeline rights of way, or the development of a
6 mitigation/protection plan in the case when the line is placed 100 feet or less from any such
7 pipeline right of way." *Id.* at 2:14-19. Again, the ACC fails to cite to any specific WECC or
8 NERC standard addressing the routing of extra high voltage transmission lines around "major
9 natural gas transmission pipeline[s]."¹ *See* generally Request for Judicial Notice. It is thus
10 impossible to understand which purported standards are at issue and how the cases cited by the
11 ACC in fact exceed those standards. Moreover, the cases cited by the ACC all involve routing
12 transmission lines to avoid natural gas lines, a condition that is no way relevant to this matter.
13 As a result, the Committee should disregard the ACC's unfounded and conclusory claims
14 regarding natural gas pipeline issues.

15 **II. CASE #111 IS IRRELEVANT TO THE RELIABILITY CONCERNS**
16 **ALLEGEDLY AT ISSUE IN THIS CASE.**

17 In its Request for Judicial Notice, the ACC cites to Case #111 as an example of a case in
18 which the "Committee and Commission had approved a transmission line premised on the need
19 to improve reliable delivery of electric power to ratepayers." *Id.* at 3:16-18. 10,000 West does
20 not dispute that in some circumstances it is appropriate to build a transmission line to improve
21 reliability. Indeed, NERC specifically states that it is proper to construct an additional
22 transmission line if a such a line is in fact necessary to meet the single contingency criteria (N-
23 1). *See* NERC Reliability Standards attached as Exhibit 1. Here, the parties uniformly agree
24 that there is no need to construct the TS-5 to TS-9 Project to meet the N-1 standard. *See*
25 Testimony of Dr. Hyde Merrill at 1579:1-12 ("Mr. Lucas confirmed quite specifically that
26 neither the 500 kV nor the 230 kV line is needed to meet the N-1 criteria, which again is the
27

28 ¹ Indeed, in the instant case, the Transwestern Pipeline project is notably laid within the Westwing corridor as should have been observed by the Committee members during their field visit.

1 governing criteria and the criteria which is basically used by every utility in the United States
2 with occasional minor tweaking, but those tweakings are quite minor”). There is certainly no
3 evidence in this case of the types of widespread and unresolved outages at issue in Case #111.
4 Thus the fact that it was necessary to construct a transmission line in Case #111 to meet the N-1
5 standard is irrelevant to this proceeding. Moreover, the ACC again fails to provide any support
6 for its conclusory allegation that Case #111 is an instance where the Committee approved “a
7 transmission line for reliability purposes surpassing the WECC and NERC reliability
8 requirements . . .” *Id.* at 4:2-4.

9 **III. CONCLUSION.**

10 Based on the foregoing, the Committee should deny the ACC’s request for judicial
11 notice. The ACC has failed to actually establish that any of the cited cases exceed specific
12 NERC and WECC standards and none of the cases cited by the ACC, including Case #111,
13 have anything to do with APS’s attempt in this case to protect against a hypothetical N-2-1
14 extreme contingency. The Request for Judicial Notice should be denied.

15 RESPECTFULLY SUBMITTED this 28th day of November, 2008.

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18 Mark A. Nadeau
19 Shane D. Gosdis
20 DLA PIPER LLP (US)
21 2415 EAST CAMELBACK, SUITE 700
22 Phoenix, Arizona 85016
23 Telephone: (480) 606-5100
24 Facsimile: (480) 606-5101
25 Attorneys for Defendant 10,000 West, L.L.C.

26 **ORIGINAL and 25 COPIES** of
27 the foregoing filed this 28th day
28 of November, 2008, to:

The Arizona Corporation Commission
Docket Control – Utilities Division
1200 W. Washington Street
Phoenix, AZ 85007

1 **COPY** of the foregoing hand-delivered
2 this 28th day of November, 2008, to:

3 John Foreman, Chairman
4 Arizona Power Plant and Transmission Line Siting Committee
5 Office of the Attorney General
6 PAD/CPA
7 1275 W. Washington Street
8 Phoenix, AZ 85007
9 john.foreman@azag.gov
10 susan.ellis@azag.gov

11 Charles H. Haines
12 Ayesha Vohra
13 Janet Wagner
14 Legal Division
15 The Arizona Corporation Commission
16 Office of the Attorney General
17 1275 W. Washington Street
18 Phoenix, AZ 85007
19 Counsel for Legal Division Staff

20 **COPY** of the foregoing mailed/e-mailed
21 this 28th day of November, 2008, to:

22 Thomas H. Campbell
23 Albert Acken
24 Lewis and Roca LLP
25 40 N. Central Avenue
26 Phoenix, AZ 85004-4429
27 Attorneys for Applicant Arizona Public Service Company
28 tcampbell@lrlaw.com
aacken@lrlaw.com

James T. Braselton
Gary L. Birnbaum
Mariscal Weeks McIntyre & Friedlander, PA
2901 N. Central Ave., Suite 200
Phoenix, AZ 85012-2705
Attorneys for Intervenors Surprise Grand Vista JV I, LLC
and Sunhaven Property Owners
james.braselton@mwmf.com
gary.birnbaum@mwmf.com

1 Lawrence V. Robertson Jr.
2 2247 E. Frontage Road
3 P.O. Box 1448
4 Tubac, AZ 85646
5 Attorney for Intervenor Diamond Ventures, Inc.
6 tubaclawyer@aol.com

7 Stephen J. Burg, Chief Assistant City Attorney
8 City of Peoria
9 Office of the City Attorney
10 8401 W. Monroe Street, Room 280
11 Peoria, AZ 85345
12 Attorney for City of Peoria
13 steve.burg@peoriaaz.gov

14 Court S. Rich
15 Ryan Hurley
16 Rose Law Group PC
17 6613 N. Scottsdale Rd., Suite 200
18 Scottsdale, AZ 85250
19 Attorneys for Intervenor Lake Pleasant 5000, LLC
20 crich@roselawgroup.com
21 rhurley@roselawgroup.com

22 Scott S. Wakefield
23 Ridenour, Hinton, Kelhoffer & Lewis, PLLC
24 201 N. Central Avenue, Suite 3300
25 Phoenix, AZ 85004-1052
26 Attorney for DLGC II, LLC and
27 Lake Pleasant Group, LLP
28 sswakefield@rhhklaw.com

29 Scott McCoy
30 Earl Curley Lagarde, PC
31 3101 N. Central Ave., Suite 1000
32 Phoenix, AZ 85012-2654
33 Attorney for Intervenor Elliott Homes, Inc.
34 smccoy@ecllaw.com

1 Andrew Moore
2 Earl Curley Lagarde, PC
3 3101 N. Central Ave., Suite 1000
4 Phoenix, AZ 85012-2654
5 Attorney for Intervenor Woodside Homes of Arizona, Inc.
6 ammore@ecllaw.com

7 Joseph A. Drazek
8 Michelle De Blasi
9 Roger K. Ferland
10 Quarles & Brady LLP
11 One Renaissance Square
12 Two North Central Ave.
13 Phoenix, AZ 85004-2391
14 Attorneys for Intervenor Vistancia, LLC
15 jdrazek@quarles.com
16 mdeblasi@quarles.com
17 rferland@quarles.com

18 Jay Moyes
19 Steve Wene
20 Moyes Sellers & Sims
21 1850 N. Central Avenue, Suite 1100
22 Phoenix, AZ 85004
23 Attorneys for Vistancia Associations
24 swene@lawms.com
25 jimoyes@lawms.com

26 Michael D. Bailey
27 City of Surprise Attorney's Office
28 12425 W. Bell Road
Surprise, AZ 85374
Attorney for Intervenor City of Surprise
michael.bailey@surpriseaz.com

Garry D. Hays
Law Offices of Garry D. Hays PC
1702 E. Highland Ave., Suite 316
Phoenix, AZ 85016
Attorney for Arizona State Land Department
ghays@lawgdh.com

1 Christopher S. Welker
2 Holm Wright Hyde & Hays PLC
3 10201 S. 51st Street, Suite 285
4 Phoenix, AZ 85044
5 Attorney for LP 107, LLC
6 cwelker@holmwright.com

7 Jeanine Guy, Town of Buckeye
8 Town Manager
9 Town of Buckeye
10 1101 E. Ash Avenue
11 Buckeye, AZ 85326
12 Intervenor on behalf of Town of Buckeye
13 jguy@buckeyeaz.gov

14 Dustin C. Jones
15 Jon Paladini
16 Tiffany & Bosco, P.A.
17 2525 E. Camelback Rd., 3rd Floor
18 Phoenix, AZ 85016
19 Attorneys for Intervenor Anderson Land and Development, Inc.
20 jmp@tblaw.com
21 dcj@tblaw.com

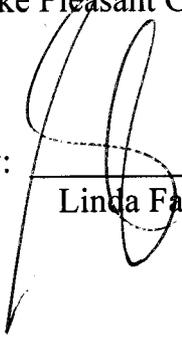
22 Frederick E. Davidson
23 Chad R. Kaffer
24 The Davidson Law Firm, P.C.
25 8701 E. Vista Bonita Dr., Suite 220
26 P.O. Box 27500
27 Scottsdale, AZ 85255
28 Attorneys for Quintero Association, Inc.
fed@davidsonlaw.net
crk@davidsonlaw.net

Edward W. Dietrich
Senior Project Manager
Real Estate Division Planning Section
Arizona State Land Department
1616 West Adam Street
Phoenix, AZ 85007
edietrich@land.az.gov

1 Robert N. Pizorno
2 Beus Gilbert, PLLC
3 4800 N. Scottsdale Rd., Suite 6000
4 Scottsdale, AZ 85251
5 rpizorno@beusgilbert.com

6 Meghan Grabel
7 Pinnacle West Capital Corporation
8 P.O. Box 53999, MS: 8602
9 Phoenix, AZ 85072
10 meghan.grabel@pinnaclewest.com

11 Charles & Sharie Civer (realtors)
12 42265 N. Old Mine Rd.
13 Cave Creek, AZ 85331
14 Intervenor on behalf of DLGC II and
15 Lake Pleasant Group

16 By:  _____
17 Linda Farrell

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19
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EXHIBIT 1



Table 1: NERC transmission system standards-normal and contingency conditions

Category	Contingencies		System Limits or Impacts				
	Initiating event(s) and contingency element(s)	Elements out of service	Thermal limits	Voltage limits	System stable	Loss of demand or curtailed firm transfers	Cascading outages ^c
A - No Contingencies	All facilities in service	None	Applicable Rating ^a (A/R)	Applicable Rating ^a (A/R)	Yes	No	No
B - Event resulting in the loss of a single element.	Single line ground (SLG) or 3-phase (3Ø) fault, with normal clearing: 1. Generator 2. Transmission circuit 3. Transformer Loss of an element without a Fault.	Single Single Single Single	A/R A/R A/R A/R	A/R A/R A/R A/R	Yes Yes Yes Yes	No ^b No ^b No ^b No ^b	No No No No
	Single pole block, normal clearing: 4. Single pole (dc) line	Single	A/R	A/R	Yes	No ^b	No
C - Event(s) resulting in the loss of two or more (multiple) elements.	SLG fault, with normal clearing: 1. Bus section 2. Breaker (failure or internal fault)	Multiple Multiple	A/R A/R	A/R A/R	Yes Yes	Planned/controlled ^d planned/controlled ^d	No No
	SLG or 3Ø fault, with normal clearing ^f , manual system adjustments, followed by another SLG or 3Ø fault, with normal clearing ^f : 3. Category B (B1, B2, B3, or B4) contingency, manual system adjustments, followed by another Category B (B1, B2, B3, or B4) contingency	Multiple	A/R	A/R	Yes	Planned/controlled ^d	No
	Bipolar block, with normal clearing: 4. Bipolar (dc) Line Fault (non 3Ø), with Normal Clearing ^f : 5. Any two circuits of a multiple circuit towerline ^g	Multiple Multiple	A/R A/R	A/R A/R	Yes Yes	Planned/controlled ^d Planned/controlled ^d	No No
	SLG Fault, with delayed clearing ^f (stuck breaker or protection system failure): 6. Generator 7. Transmission 8. Transformer 9. Bus Section circuit	Multiple Multiple	A/R A/R	A/R A/R	Yes Yes	Planned/controlled ^d Planned/controlled ^d	No No
	3Ø Fault, with delayed clearing ^f (stuck breaker or protection system failure): 1. Generator 2. Transmission 3. Transformer 4. Bus Section 5. Circuit 3Ø Fault, with normal clearing ^f : breaker (failure or internal fault) Other: 6. Loss of towerline with three or more circuits 7. All transmission lines on a common right-of way 8. Loss of a substation (one voltage level plus transformers) 9. Loss of a switching station (one voltage level plus transformers) 10. Loss of all generating units at a station 11. Loss of a large load or major load center 12. Failure of a fully redundant special protection system (or remedial action scheme) to operate when required Operation, partial operation, or misoperation of a fully redundant special protection system (or remedial action scheme) in response to an event or abnormal system condition for which it was not intended to operate 14. Impact of severe power swings or oscillations from disturbances in another Regional Council.						
D ^e - Extreme event resulting in two or more (multiple) elements removed or cascading out of service							

a) Applicable rating refers to the applicable normal and emergency facility thermal rating or system voltage limit as determined and consistently applied by the system or facility owner. Applicable ratings may include emergency ratings applicable for short durations as required to permit operating steps necessary to maintain system control. All ratings must be established consistent with applicable NERC Planning Standards addressing facility ratings.
b) Planned or controlled interruption of electric supply to radial customers or some local network customers, connected to or supplied by the faulted element or by the affected area, may occur in certain areas without impacting the overall security of the interconnected transmission systems. To prepare for the next contingency, system adjustments are permitted, including curtailments of contracted firm (non-recallable reserved) electric power transfers.
c) Cascading is the uncontrolled successive loss of system elements triggered by an incident at any location. Cascading results in widespread service interruption which cannot be restrained from sequentially spreading beyond an area predetermined by appropriate studies.
d) Depending on system design and expected system impacts, the controlled interruption of electric supply to customers (load shedding), the planned removal from service of certain generators, and/or the curtailment of contracted firm (non-recallable reserved) electric power transfers may be necessary to maintain the overall security of the interconnected transmission systems.
e) A number of extreme contingencies that are listed under Category D and judged to be critical by the transmission planning entity(ies) will be selected for evaluation. It is not expected that all possible facility outages under each listed contingency of Category D will be evaluated.
f) Normal clearing is when the protection system operates as designed and the fault is cleared in the time normally expected with proper functioning of the installed protection systems. Delayed clearing of a fault is due to failure of any protection system component such as a relay, circuit breaker, or current transformer (CT), and not because of an intentional design delay.
g) System assessments may exclude these events where multiple circuit towers are used over short distances (e.g., station entrance, river crossings) in accordance with Regional exemption criteria.
Source: NERC Planning Standards, June 15, 2001