

E-01575A. 08.0328



0000093637

ORIGINAL ARIZONA CORPORATION COMMISSION **RECEIVED**

UTILITY COMPLAINT FORM

2009 FEB 10 P 3:16

Investigator: Reg Lopez

Phone: [REDACTED]

Fax: [REDACTED]

Priority: Respond Within Five Days

AZ CORP COMMISSION
DOCKET CONTROL

Inquiry No. 2009 - 75546

Date: 2/9/2009

Complaint Description: 08Z Rate Case Items - Other
N/A Not Applicable

First:

Last:

Complaint By: Jeanne

Horsmann

Account Name: Jeanne Horsmann

Home: [REDACTED]

Street: [REDACTED]

Work:

City: 00000000000

CBR: [REDACTED]

State: AZ Zip: [REDACTED]

is: Cellular

Utility Company: Sulphur Springs Valley Electric Cooperative, Inc.

Division: Electric

Contact Name: [REDACTED]

Contact Phone: [REDACTED]

Nature of Complaint:

Received the following customer e-mail:

-----Original Message-----

From: Jeanne & Rob Horsmann [mailto:[REDACTED]]
Sent: Monday, February 09, 2009 2:12 PM
To: Reg Lopez
Subject: Response to SSVEC

Mr. Lopez,

I have responded to SSVEC's reply to my letter. I will be sending it to Deborah White by overnight mail. It is attached below. Instead of my emailing each of the commissioners, can you please make sure each of the commissioners receives a copy before the Public Hearing on Wednesday and that it is entered into the records for the hearing. Thank you for your time.

If you have any questions you can email or call me at home [REDACTED] or cel [REDACTED]

-Jeanne Horsmann

9 February 2009

Ms. Deborah White
Right of Way Services Manager
Sulphur Springs Valley Electric Company
PO Box 820

Arizona Corporation Commission

DOCKETED

FEB 10 2009

DOCKETED BY [Signature]

**ARIZONA CORPORATION COMMISSION
UTILITY COMPLAINT FORM**

Wilcox, AZ 85644

Dear Ms. White,

Thank you for your response. As you can see by the attached document, I have questions that have not been answered. I am not doing this to be obstructionist, I am very concerned about the quality and history of the environment in which I live and want to make sure that every effort is made to protect this rare resource for future generations.

I would appreciate your prompt attention to these questions.

Thank you,
Jeanne Hermann

[REDACTED]
Sonoita, AZ [REDACTED]
Cc: Reg Lopez, ACC Utilities Division

16 January 2009

Mr. Ron Orozco
Engineering Manager
Sulphur Springs Valley Electric Company
[REDACTED]
Sierra Vista, AZ 85635

Dear Mr. Orozco:

From the first meeting in July 2008, SSVEC has focused the community on the planned route through the Sonoita Hills neighborhood. There has been no discussion about the route from Huachuca City to Sonoita Hills (across the Babacomari Ranch) or from the Sonoita substation to Patagonia. As a member of SSVEC and a resident of Sonoita I request the following information in writing by 2 Feb 2009:

Sulphur Springs Valley Electric Cooperative, Inc. ("SSVEC or "Cooperative") received from the Arizona Corporation Commission ("ACC") a copy of your e-mail to the ACC Commissioners regarding SSVEC's Sonoita Reliability Project ("Project") which includes a proposed 69kV sub-transmission line ("Proposed Line"). The ACC's Utilities Division has requested that the Cooperative respond to your questions which are set forth below. Please note that the siting of the Proposed Line is not regulated by the ACC nor has SSVEC included the Project or Proposed Line as a component of its current rate case pending before the ACC. This notwithstanding, SSVEC makes every effort to be as responsive as possible to its members and the ACC. Accordingly, the Cooperative's responses to your questions are set forth below.

All public information regarding the Project has been presented in several community meetings and in the Community Information Letter mailed September 22, 2008, to all SSEC members in the Sonoita/Elgin/Canelo/Patagonia service area. A copy of that Community Information Letter is available on SSVEC's website www.ssvec.org under "Sonoita Reliability Project". Our responses below may refer to the Community Information Letter, nonetheless much of the information regarding this Project (or any other SSVEC project) is not considered public and is so stated herein where applicable.

If SSVEC makes every effort to be as responsive as possible, why are you not responding to my request but responding because the ACC requested you to so?
1. When asked if there were any anthropological sites along the route, SSVEC stated that they were not required to but had done a survey, and there were none. We have found that the Babacomari River Village was situated directly along the site of the line. How will SSVEC avoid disrupting the Babacomari River Village that

ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM

the power line will directly cross?

SSVEC contracted an environmental survey on the project corridor in deference to the landowner - the findings of which is confidential information given its location on private property. However, SSVEC has publicly stated: "These studies concluded that no threatened or endangered species exist in the project area, and that the project may proceed with no further need of archeological or biological review." Nonetheless, SSVEC has researched the cultural site, Babocomari River Village as referenced, and found its location is at the confluence of the Babocomari River and the San Pedro River - which is over ten (10) miles from the Project.

According to "The Babocomari Village Site on the Babocomari River, Southeastern Arizona" by Charles Dipeso, published by The Amerind Foundation, the Babocomari Village lies in the southwest corner south ½ of Section 2, Township 21 south, Range 19 east, on the south side of the Babocomari River. "Approximately twelve miles west by southwest of the village of Fairbank, on the south bank of the Babocomari River, lies the village site ARIZONA:EE:7:1." I have verified this information with the State Historic Preservation Office. How will SSVEC prevent disruption to this site, which is eligible for the Federal Register.

2. When asked why not upgrade the current line along Hwy 82, SSVEC first responded that it was too dangerous and too expensive. Then next time they were asked why not, they responded that they would need to negotiate the easements. The last time they were asked this they answered that it would be too ugly to have the 54' poles along the highway. I would like to know

a. Why they could upgrade the poles along the Hwy 90 bypass in Sierra Vista if it is too dangerous?

b. How expensive it is to upgrade a current line vs. installing over 20 miles of new lines/poles?

c. As to the easements, how many of the current easements along Hwy 82 are 'grandfathered' in and how many new easements would be required as opposed the easements required on the chosen route?

d. If it is too ugly to put new poles (which SSVEC has assured us are visibly innocuous) along the highway were people are already used to seeing poles, how ugly is it to put over 20 miles of poles/lines through pristine grasslands view sheds?

SSVEC has consistently presented information regarding the constraints associated with each option analyzed - particularly the "Upgrade existing feeder line along Highway 82 and Elgin Road". Each project on SSVEC's system is unique in design and construction; the project along the Hwy 90 Bypass in Sierra Vista is not comparable to the Project.

You didn't answer my questions. The only options that SSVEC has presented information for are those that travel through residential Sonoita; not any options for the entire project line. What efforts for what constraints have been taken by SSVEC? For example: What steps have been taken to obtain ROW easements along SR 82? Have you asked the community leaders to assist in obtaining these easements? Have you tried to obtain an Exclusion from NEPA for this small segment in the NCA? What have you done to obtain grandfathering under the 1973-75 federal land management acts? No cost comparisons have been provided. Why doesn't SSVEC provide this information?

3. When asked if they will be putting in a road for these lines, SSVEC has replied no. This area, especially along the Babocomari River, is so rugged that a small 4-wheeled drive vehicle has trouble negotiating the terrain. There are multiple steep washes that drain directly into the Babocomari River that will be required to be crossed. These washes will be severely impacted by these vehicles. How does SSVEC plan to install 54' poles that require 4-6 large trucks/cranes through this type of terrain without impacting the washes?

SSVEC complies with all pertinent regulations during project design and construction as related to terrain considerations. SSVEC and the landowner of the Babocomari Ranch have a confidential agreement regarding access for construction and maintenance of the power line which is not a public document.

I asked how SSVEC will install these poles, not how you will access them. "Complying with all pertinent regulations" is a non-answer. Besides, a temporary and/or a maintenance access road must be in this "confidential" agreement, thus you have obtained an easement. Where is it recorded?

4. If there is a problem with this line, how will SSVEC access it for repairs since there will be no road?

See Item 3 above.

A double-circuit 23kV line on the existing route would be more reliable, have easy emergency access during an outage, and is more observable when inspecting or performing maintenance from SR-82 instead of the proposed inaccessible remote locations for the proposed 69kV line. What will be the maximum travel time to the Planned line vs. the existing line on SR-82?

5. At the Patagonia Town Council meeting Dec 2008, SSVEC mentioned the Point Paper that has been presented to them discussing alternatives to the current plan. SSVEC's stated that there were "technical

ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM

difficulties" with the outlined alternatives. What are those "technical difficulties"?

The Constructive Point Paper submitted by "Local concerned citizens, ratepayers, and customers" was stated by SSVEC, at the Patagonia Town Council Meeting December 23, 2008, to be "technically unsound". This determination considers the following statement from page 5 of 8:

"Assumptions for Alternatives: The process of creating various Alternatives, involved looking at the above maps, and seeing potential connections with existing systems as preferred to avoid new expenses and to avoid additional environmental impacts. Some assumptions are always necessary".

Unfortunately, the "assumptions" provided in this Constructive Point Paper demonstrate an unfamiliarity with electric power systems, land rights, service territory agreements, voltage conversions, and the costs associated with these issues. "Looking at maps and seeing potential connections" with other electric power systems is not sound analysis for the Alternatives suggested.

Furthermore several of the alternatives require contractual agreements and regulatory review/approvals power flow analysis, as well as significant financial investment by Southwest Transmission Cooperative, Tucson Electric Power, and/or Unisource Energy Services, none of which have utility service rights in this area.

The "Assumptions for Alternatives" was brief and written for non-technical review but is accurate. The "looking at the above maps and seeing potential connections" was an obvious observation a non-technical person can relate. The technical assumptions are all solvable issues with any power system, as land rights have solutions, agreements between companies, including SSVEC's others are common routine part in this business. A substation connecting to a transmission line can be tapped without going to the Arizona Power Plant and Transmission Line Siting Committee; however, keeping the ACC Staff and others informed is also a routine process. No Alternative should be decided without conducting a power flow analysis, that's a given. SWTC is SSVEC's transmission company and an assumed good working relationship exists which is part of the Alternative 3 rationale.

Discussions were held with TEP, that provides engineering support services for UNS Electric, and their reply was that all three of the interconnections could be up for discussion, and consideration of unique bonding for Alternative #4 an important concern. The Backup Alternatives have been implemented in Santa Cruz County with the TEP 46kV at Canoa to UNSE Amado substation backup line, used during an emergency. The Patagonia-UNSE backup helps both companies improve reliability on the worst circuit for each company with an emergency tie to help the other during an outage. Has SSVEC investigated any of these Alternatives with SWTC, TEP and/or UNSE?

According to the "Draft Southeast Arizona Transmission Study Report", there are numerous references to joint projects and potential interconnections between SSVEC, TEP, AEPSCO and SWTC. These interconnections are stated to be beneficial to all entities. Loops created will add increased reliability to all systems.

6.If there is no loop, how will this new line improve reliability over just upgrading the current line?

As referenced in the Project documentation the solution to improve reliability to the Sonoita/Elgin/Patagonia area is a new substation which divides the existing long radial feeder into four shorter individual feeders. The sub-transmission line must be constructed to power the substation; just upgrading the current line" does not resolve the reliability issues associated with the extremely long feeder.

I did not question the need for a new substation. How will the new 69kV line improve reliability over upgrading the current line to power the Sonoita substation? By increasing the capacity of the existing system, using two circuits on same pole, gives two 23 kV (vice one 69 kV) circuits that should interconnect with the new substation, the hub for the four feeders. As you have described, local distribution will not exist from the proposed 69kV line until reaching the substation. If two 23 kV circuits were run in parallel, then distribution connections between Mustang Corner and Sonoita could be run, without having to backtrack to all the customers passed on the way to downtown Sonoita. That capability will not exist; however, the new "to be designed" distribution system plan remains hidden from the public. There isn't any general opposition to the substation because so little is known.

7.In the Sonoita Reliability Presentation of 22 July 2008, SSVEC presented a chart titled "V-7 Feeder Outages per Year and Length in Miles as compared to all SSVEC feeders ". Please provide a map of the V-7 feeder with locations noted for all outages and an accompanying chart showing those outages, their duration, and cause. The chart that was already provided is a representation of engineering analysis. Your request for analysis data regarding specific customer reliability and outage information is not shared with the public for privacy reasons. I did not ask for specific customer reliability. Location, duration and cause of outages are important to know to understand where on this extremely long feeder the problems occur. For example, if the majority of outages

ARIZONA CORPORATION COMMISSION

UTILITY COMPLAINT FORM

occur between Sonoita and Patagonia then maybe a new line is not the most cost effective solution since pole maintenance between Sonoita and Patagonia will solve the majority of the problems.

If you cannot provide the requested information please provide the Customer Average Interruption Duration Index (CAIFI), System Average Interruption Duration Index (SAIDI), Customer Average Interruption Frequency Index (CAIFI), System Average Interruption Frequency Index (SAIFI) and Average Service Availability Index (ASAI). These are not private. What is the anticipated change from before and after the planned 69kV line is finished for these indices?

8. In the Sonoita Reliability Project report of 22 September 2008, SSVEC has stated "there will be 'distribution' loops between the new feeders out of the Sonoita substation." Please provide a map showing the routes of these distribution feeder loops and location of any new poles required to make these loops.

Distribution "loops" (or feeder ties) between the new feeders out of the substation will be designed for maximum efficiency and reliability. In the event new facilities are extended, the appropriate landowners will be contacted under SSVEC's policies and procedures. The maps requested contain private customer information and are not for use by the public.

Your response states: "feeders...will be designed" which implies more digging and cable work remains for this community. Why haven't the "distribution feeders" already been designed as a part of the system? The existing design must be SSVEC's phase I only and is obviously incomplete. How can the phase I being installed now be called a "reliability" program if new cables and new transformers will "be extended" to make these "loops."

Since all easements are required to be recorded at the County and shown on the county plats, what is private about the routes? Easements are not private information as other utilities, fire and safety issues, realtors, and the value of land all depend on public and timely disclosure.

9. Please provide copies of any and all reports from biologists, archeologists, hydrologists, etc. that there will be no impact on the Babacomari River, the Cienega Creek, and any cultural historic sites.

See Item 1 above.

What is confidential about an environmental survey? Why can't the sensitive information be redacted, as is routinely done in similar situations? Please provide a copy of the Environmental Survey (redacted version) including the qualifications of the organization that conducted the survey.

I have been doing some research. Attached is a printout from the Arizona Department of Game and Fish Heritage Data Management System that shows 29 Special Status Species Occurrences within 3 miles of the Project. I also have a statement from the Director of the Audubon Research Ranch that 15 of these Special Status Species have been documented on or adjacent to the Ranch. I have included this printout to ensure that your survey took into consideration this information.

10. Please provide copies of all requests to the appropriate agencies and their corresponding replies that permits are either granted or are not required.

Any permits required for the Project will be submitted under the rules and regulations of the appropriate jurisdictional authority.

Let me rephrase this. What permits has SSVEC gotten for the Project? Do you have the Santa Cruz County special use permit? Please provide copies of all Santa Cruz County permits and all Cochise County permits.

At the Patagonia Town Council meeting in Dec 2008, SSVEC was asked if the new 69 kV line to the Sonoita Substation and the current 23 kV line into Sonoita would form a "loop". SSVEC answered, yes that if the power went out on the 69 kV line that the 23 kV line would be able to service some of the residents. Who/where are the some?

SSVEC has stated that the existing distribution line from the Huachuca Substation will remain in place and will be used as a feeder tie to the new Sonoita Substation. SSVEC assures all residents that outages will be restored in a timely manner.

Just to make sure I understand your terminology: The current 23kV line will connect with both the Huachuca Substation and the Sonoita Substation?

11. SSVEC has told us that they must install a 69 kV line because this is their standard and they are doing this everywhere. (The current line carries 23 kV, about 22 MW. Elgin, Sonoita, and Patagonia use about 10 MW). They have told us that the line to Patagonia will not be upgraded to 69 kV; they will be replacing the poles and lines at the current voltage. Patagonia historically has had the most outages in this area. Why is Patagonia not getting this upgrade?

SSVEC has stated the 69kV sub-transmission voltage is standard for connection between its substations. The new substation is located in Sonoita. Therefore, the Proposed Line will terminate at that location. The current

ARIZONA CORPORATION COMMISSION
UTILITY COMPLAINT FORM

line serving Patagonia will remain as is, although SSVEC is working on an unrelated pole maintenance project in that area.

Thank you.

Regards,
Deborah White
Right of Way Services Manager
Cc: Reg Lopez, ACC Utilities Division

Thank you for your attention to this.

Sincerely,

Jeanne Horsmann
[REDACTED]

Sonoita, AZ [REDACTED]

Cc: Creden Huber
Arizona Corporation Commission

Att: Special Status Species Occurrences
End of Complaint

Utilities' Response:

Investigator's Comments and Disposition:

2-9 @ 2:58pm. I called the customer at her cell number 520-604-2096. I provided my name and acknowledged her e-mail to me. She stated she just needed to have her info docketed and the ACC Commissioners made aware of her concerns. I asked if she was going to attend the Public Comment Meeting ("PCM") on Wednesday Feb. 11, 2009 @ 6pm. She replied she was. I clarified that the PCM was not a hearing. I advised I would have her comments docketed against the SSVEC rate case being that there is no separate docket for the 69 kV line. I suggested that she present her material during the PCM to ensure that the Commissioners are made aware of her comments.

I e-mailed this OPINION to Lupe Ortiz @ ACC Phoenix Office to please have this docketed towards the Sulphur Springs Valley Cooperative rate case E-01575A-08-0328. File closed.
End of Comments

Date Completed: 2/9/2009

Inquiry No. 2009 - 75546

ARIZONA CORPORATION COMMISSION
UTILITY COMPLAINT FORM

75506.

I e-mailed Lupe Ortiz @ ACC Phoenix Office to please have this docketed towards docket no. WS-03478A-08-0454 under Far West Water & Sewer. File closed.
End of Comments

Date Completed: 2/9/2009

Opinion No. 2009 - 75502
