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~~BEFORE THE ARIZONA CORPORATION COMMISSION~~

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AZ CORP COMMISSION
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IN THE MATTER OF THE APPLICATION
OF SULPHUR SPRINGS VALLEY
ELECTRIC COOPERATIVE, INC. FOR AN
ORDER INSTITUTING A MORATORIUM
ON NEW CONNECTIONS TO THE V-7
FEEDER LINE SERVING THE
WHETSTONE, RAIN VALLEY, ELGIN,
CANELO, SONOITA, AND PATAGONIA,
ARIZONA AREAS.

DOCKET NO. E-01575A-09-0453

**ADDITIONAL INFORMATION
IN SUPPORT OF APPLICATION
AND REQUEST FOR
EXPEDITED COMMISSION
CONSIDERATION WITHOUT A
HEARING**

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I. INTRODUCTION AND BACKGROUND.

On September 18, 2009, Sulphur Springs Valley Electric Cooperative, Inc. (“SSVEC” or “Cooperative”) filed an Application for an Order Instituting a Moratorium (“Application”) in the above-captioned matter. As more fully described in the Application, this action was necessitated by the September 8, 2009, Arizona Corporation Commission (“Commission”) Decision No. 71274 (“Decision”) in Docket No. E-01575A-08-0328 (the “Rate Case Docket”) that expressly prohibits (until further Order of the Commission) the Cooperative from constructing a 69 kV sub-transmission power line (“69 kV line”) to serve the Whetstone, Rain Valley, Elgin, Canelo, Sonoita, and Patagonia, Arizona areas (collectively the “Affected Areas”). SSVEC had previously planned and scheduled principle construction of the 69 kV line in the fall of 2009 because the Cooperative’s documentation and analysis determined it necessary to alleviate significant power quality, reliability, and capacity constraints resulting in power fluctuations and outages in the Affected Areas that are currently served by the

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1 Cooperative's existing V-7 Feeder Line.

2 In light of the Commission's Decision ordering SSVEC to stop construction of the
3 69 kV line, SSVEC's Application requests the Commission to issue an order authorizing
4 the Cooperative to institute a moratorium on new and/or expanded service connections to
5 its V-7 Feeder Line so the power quality, reliability, and capacity problem resulting in
6 power fluctuations and outages that will continue to exist within the Affected Areas will
7 not further exacerbate or degrade service to existing members. The Application requests
8 the Commission to issue an order as expeditiously as possible that authorizes the
9 Cooperative to:

10 1. Immediately institute a moratorium on new and expanded service
11 connections that will be serviced by the existing V-7 Feeder Line within the Affected
12 Areas in the manner set forth in this Application; and

13 2. Maintain such moratorium until such time that SSVEC determines that a
14 long-term, safe, affordable, and reliable solution is defined and fully implemented. This
15 will allow SSVEC to provide the best possible service to existing customers (under the
16 circumstances) without further degrading the already marginal service in the area which
17 would result if additional load were allowed on the V-7 Feeder Line.

18 **II. ADDITIONAL INFORMATION IN SUPPORT OF THE APPLICATION.**

19 The Application describes the seriousness of the power quality, reliability, and
20 capacity problem resulting in power fluctuations and outages that will continue to exist
21 within the Affected Areas that will be further exacerbated and further degrade the service
22 to existing members if additional load is added to the V-7 Feeder Line. It also references
23 the concerns raised by Staff at the August 17, 2009, Open Meeting regarding the impacts
24 on health and safety resulting from the voltage drops that occur on the line.¹ Accordingly,

25 _____
26 ¹ Rate Case Docket Open Meeting Transcript at page 155, line 23 through page 157, line 15; Application
at page 5. lines 12-15.

1 it is imperative that the moratorium request be expeditiously granted so that no additional
2 voltage demands are placed on the line and for the status quo to be maintained until such
3 time SSVEC is permitted to alleviate the problem.

4 Since the filing of the Application on September 18, 2009, SSVEC has received 28
5 requests for new hook-ups to the V-7 Feeder Line and expects to receive even more
6 requests while the Application remains pending. These 28 additional requests for service
7 represent approximately 152 kW of demand on the line and will result in an acceleration
8 of the degradation of the quality and reliability of service to the Affected Areas.

9 It should also be noted that just since the August 17, 2009, Open Meeting where
10 the Commission voted to prohibit SSVEC from commencing construction of the 69 kV
11 line, the V-7 Feeder Line had eight (8) additional outages impacting various members
12 within the Affected Areas totaling 22.75 hours. This includes one (1) significant outage
13 that impacted all 2,589 members within the Affected Areas for nearly two hours. Further
14 demand on the line from new connections will only exacerbate the amount and length of
15 outages to members in the Affected Areas.

16 **III. THE APPLICATION SHOULD BE GRANTED WITHOUT A HEARING.**

17 The evidence presented by the Cooperative and Staff in the Rate Case Docket, as
18 well as the information set forth in the Application, clearly demonstrates that the V-7
19 Feeder Line has serious power quality, reliability, and capacity problems that result in
20 power fluctuations and outages that will continue to exist within the Affected Areas.
21 These facts have already been established in an evidentiary hearing and in the Decision.²
22 Accordingly, an evidentiary hearing relating to the Application is not necessary nor will it

23 ...

24 ...

25 ...

26 ² See discussion in Decision at pages 36-39.

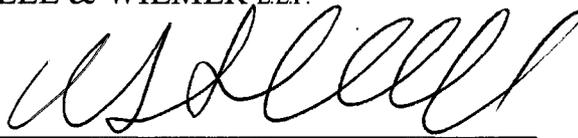
1 serve any legal purpose. The capacity issues relating to the V-7 Feeder Line are
2 uncontroverted. A hearing will only delay the Commission's consideration of the
3 Application, thereby prolonging and exacerbating the poor quality of service to the
4 Affected Areas.

5 **IV. CONCLUSION**

6 On the basis of the information set forth in the Application, as well as the
7 additional information set forth herein, SSVEC requests that the Commission grant its
8 Application at its next Open Meeting currently scheduled for November 19 and 20, 2009.

9 RESPECTFULLY SUBMITTED this 2nd day of November, 2009.

10 SNELL & WILMER, L.L.P.

11
12 By 

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18 Electric Cooperative, Inc.

16 ORIGINAL and 13 copies filed this
17 2nd day of November, 2009, with:

18 Docket Control
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20 COPIES of the foregoing hand-delivered
21 this 2nd day of November, 2009, to:

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23 Utilities Division
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