

ORIGINAL



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January 15, 2010

RECEIVED

Sue Downing
HC 1 Box 197
Elgin, Arizona 85611

2010 JAN 21 A 9:56

AZ CORP COMMISSION
DOCKET CONTROL

Snell and Wilmer
Bradley S. Carroll, Esq.
One Arizona Center
400 East Van Buren Street
Phoenix, Arizona 85004-2202

Re: Docket Control # E-01575A-09-0453

A Request to Obtain All Responses to Data Request Set One -dated November 2, 2009

Dear Mr. Bradley:

As an intervenor in the above matter, I have still not gotten a satisfactory response to my request for discovery from Sulphur Spring Valley Electric Cooperative (SSVEC). My data request was sent November 2, 2009. While some information was provided in the package I received December 31, 2009, much is still missing. My questions directly pertain to the matter at hand. The argument that my data request is burdensome is pure nonsense since in recent weeks SSVEC has bombarded my community with a costly and extremely time consuming propaganda campaign. All my discovery questions were carefully thought out and were structured to answer questions on maintenance, design, load or history. One cannot help but to conclude that SSVEC does not want to answer these questions because the facts will not support their motive.

As a cooperative owner/member and intervenor in this case I deserve answers, all of which pertain to the moratorium case. I have included an updated list of the data I still expect to receive from SSVEC. Your client is a member owned "cooperative" and transparency is of the utmost importance, as is being cooperative to their members. I look forward to receiving all the answers to my data request and I urge you to do so quickly or I'll be forced to ask for additional time for discovery. Thank you for your attention in this matter.

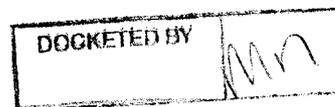
Sincerely,

Sue Downing

Cc: Docket Control (original and 13 copies)
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007-2927

Arizona Corporation Commission
DOCKETED

JAN 21 2010



Jane Rodda, Administrative Law Judge
Hearing Division
Arizona Corporation Commission
400 West Congress
Tucson, Arizona 85701-1347

Data Request Set One for Sue Downing

DR 1-1 Please provide five years of monthly load data, segregated by phases (A,B and C) for the V-7 feeder, from 1 October 2004 through 1 October 2009. (MS Excel format acceptable)

DR 1-3 Based on utility bills or other sources of data, please provide the kWh usage data by rate category for each physical zip code. Provide monthly data for five years from 1 October 2004 through 1 October 2009.

DR 1-4 Customer meter data.

- d. For each total number of active meters in a,b and c, provide how many of those are known to service water wells.

DR 1-5 Huachuca West Substation.

- a. Provide the original operational date for the Huachuca West Substation.
- b. Provide a list of all major components of the Huachuca West Substation to include serial numbers, specifications and manufacturer dates.
- c. Provide a list of all major improvements to the Huachuca West Substation to include type of improvements, dates and cost.
- d. Provide manufactures design capacities of all major equipment in the Huachuca West Substation. **Some photos of equipment nameplates were illegible.**
- g. Has any of this equipment exceeded its operational lifecycle?

DR 1-6 Huachuca East Substation.

- a. Provide original operational date for Huachuca East Substation.
- b. Provide list of all major components of the Huachuca East Substation to include serial numbers, specifications and manufacture dates.
- c. Provide list of all major improvements to the Huachuca East Substation to include type of improvements, dates and cost.
- d. Provide manufacturers design capacities of all the major equipment in the Huachuca East Substation.
- e. Provide conductor capacity segregated by phases (A, C, and B) after the two feeders leave the Huachuca East Substation by distribution feeder.
- f. Provide a detailed map of the area served by the Huachuca East Substation showing the two different distribution feeders.
- g. Provide all rational for all expansions at the Huachuca East Substation.

DR 1-7 V-7 Feeder Data for the area from Huachuca Substation to the proposed substation in Sonoita at the intersection of State Highway 83 and Papago Springs Road

- b. Provide locations of public and private lands the feeder crosses.
- c. Provide locations of all prescriptive easements.
- d. Provide locations of all written easements.

Data Request Set One for Sue Downing

DR 1-8 Provide a list of all pending electric applications that the moratorium would impact including demand requirements for each. **SSVEC objected and instead provided a summary, but did not provide the raw data as requested.**

DR 1-9 Inquiries made by developers, corporations, ranches, government agencies, mining and development companies.

- a. Provide a detailed list of any and all prospective customers that have made written or verbal inquires requesting electric service in SSVEC's service area west of Arizona State Route 90 for any time in the future, which have been received in the past 10 years. This list needs to include location, type or size of service and anticipated start up dates.
- b. Please provide a list of any of those in a. above that have declined to develop in the V-7 feeder area because of issues concerning electricity.
- c. For that in b. above, please provide a copy of all documentation between SSVEC and any potential customers that concerns electrical issues in the V-7 feeder area.
- d. Provide detailed list of all prospective customers as of October 1, 2009 that have executed contracts for electrical service in SSVEC's service area west of Arizona State Route 90 in the past ten years that have not yet received an energized service.

DR 1-10 Peak Data for the V-7.

- a. Provide a definition of "peak" as it relates to the V-7 feeder. **SSVEC did not answer the question as asked.**
- b. List and describe what criteria SSVEC uses to determine "peak" for the V-7 feeder? **SSVEC did not answer the question as asked.**
- c. Is this criteria in b. adopted from documented manufacturer technical information and/or SSVEC practices or policies, if so, provide a copy of the relevant part of this documentation? If your answer is yes, identify the source and any modifications if made thereto. If your answer is no, describe who then drafted the criteria and upon what that was based.
- d. Has the criteria for peak on the V-7 changed in the last 20 years? If so, describe the changes made and when they occurred. **SSVEC did not answer the question as asked.**
- e. Describe the technical modifications that have been made to the substation equipment, feeder distribution line and/or support equipment to specifically address this issue?
- f. Provide a list that includes date and time of day, "peak" readings or whenever capacity has exceeded 7 MW, circumstances if known and duration of when peak was reached for the V-7 feeder from 1 October 2004 to 1 October 2009. **SSVEC did not answer the question as asked.**

DR 1-11 Provide a detailed list of all outages or "brown outs" from October 1, 2004 through October 1, 2009 which have occurred on the V-7 feeder. Detailed description of each occurrence needs to include the following:

- a. Physical location of problem. **Locations were not defined, a nine digit number was used**
- d. Copies of crew logs responding to outage.