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STATE OF ARIZONA

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November 13, 1998

VIA FACSIMILE AND E-MAIL

Arizona Public Service Corporation
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Arizona Corporation Commission
DOCKETED

NOV 13 1998

Tucson Electric Power
c/o Bradley Carroll
P. O. Box 711
Tucson, Arizona 85702

DOCKETED BY 

***RE: SECOND DATA REQUEST re: November 4, 1998 Settlement Agreements
between APS and TEP and Arizona Corporation Commission, In re Docket E-
01933A-98-0471, E-01933A-97-0772, E-01345A-98-0473, E-01345A-97-0773 and RE-
00000C-94-0165***

Gentlemen:

The Attorney General, a party to this proceeding, hereby propounds his **second request** that Arizona Public Service provide answers to the following questions, and produce the requested documents within twenty-four (24) hours in accordance with the Commission's Procedural Order dated November 6, 1998. This may not be the last request for information submitted by the Attorney General. Given the short time permitted to complete discovery, prepare and file testimony, and prepare to participate in the hearings on the proposed Agreements, there may be errors or misunderstood matters contained in these requests that more time to analyze the Agreements would have prevented.

DEFINITIONS

"Agreements" shall mean the Settlement Agreement dated November 4, 1998, between Tucson Electric Power Company and Arizona Corporation Commission, and the Settlement Agreement dated November 4, 1998, between Arizona Public Service Company and the Arizona Corporation Commission. The "TEP Agreement" shall mean the agreement signed by TEP and the "APS Agreement" shall mean the agreement signed by APS.

"Affiliate" shall mean, with respect to any person, any other person directly or indirectly controlling, controlled by, or under common control with that person, and includes any agents of that person.

"ACC" or "Commission" shall mean the Arizona Corporation Commission.

"TEP" shall mean Tucson Electric Power Company, Inc. and all parents, subsidiaries and affiliates thereof.

"APS" shall mean Arizona Public Service Company and all parents, subsidiaries and affiliates thereof.

"SRP" shall mean Salt River Project and all parents, subsidiaries and affiliates thereof.

"Identify" shall mean to state the date, time, location with respect to an event, and to state the name, address and title of any individual.

"Person" or "you" shall mean the corporate entities TEP and APS and all of their affiliates.

"Staff" shall mean the staff of the Arizona Corporation Commission.

"Transmission capacity" shall mean simultaneous and non-simultaneous transmission capacities.

DATA REQUESTS

1. Identify each of your simultaneous and non-simultaneous transmission capacities and

transfer capabilities into and out of the State of Arizona.

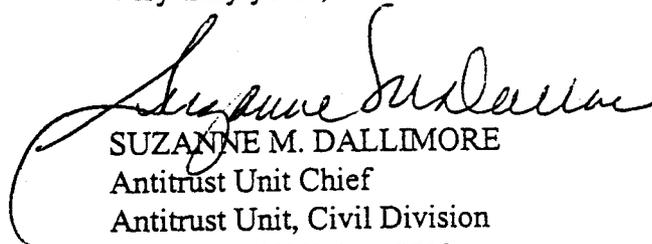
2. Identify each of your simultaneous and non-simultaneous transmission capacities and transfer capabilities into and out of your control area within the State of Arizona.
3. Identify each of your simultaneous and non-simultaneous transmission capacities and transfer capabilities into and out of each State contiguous to the State of Arizona.
4. Identify each facility that limits or is a constraint upon transmission capacity by name and geographic location.
5. Identify the nature of any transmission constraint and specifically state whether the constraint is thermal, voltage or stability.
6. Quantify your total transmission capacity:
 - a. Into and out of the State of Arizona,
 - b. Into and out of your control area,
 - c. Into and out of any state contiguous to the State of Arizona.
7. Identify all documents from which the transmission capacities and constraints requested in nos. 1. through 5. can be derived.
8. Produce your current five-year and ten-year resource plans whether called integrated resource plans or by any other name.
9. Produce all resource and strategic plan documents that contain information showing how Arizona electric utilities including, but not limited to, APS, TEP, SRP, AEPSCO, Citizens and any other electric service provider plan to meet transmission loads during the period 1994 through 2004.
10. Produce the last (most recent) document you filed with the ACC showing your plan to meet or handle transmission loads during any period of time.
11. Produce all transmission studies or other documents that deal with limits or constraints on transmission into or out of Arizona and into or out of your control area within Arizona and into or out of any State contiguous to Arizona.

12. Produce all reliability studies including, but not limited to all WSCC studies.
13. Produce your "path rating book" or any other document that provides transmission capacity information.
14. Produce any studies prepared by any third party such as consultants or experts regarding transmission constraints or capacity created from 1994 to the present.
15. Identify each transmission facility and state the simultaneous and non-simultaneous capacity of each.
16. Provide, in machine-readable form, all TTC and ATC and related transmission data posted on OASIS regarding transmission capacity including, but not limited to your estimates of transmission capacity for 12 months.
17. Produce every analysis, concerning any electric utility or electric service provider, by whatever name known, and every group of electric utilities or electric service providers relating to a) market power and/or b) the ability to effect prices in any of the following markets within the State of Arizona:
 - 1) Transmission
 - 2) Distribution
 - 3) Generation
 - 4) Metering
 - 5) Meter reading and customer service
18. Produce every analysis, concerning any electric utility or electric service provider, by whatever name known, and every group of electric utilities or electric service providers relating to a) market power and/or b) the ability to effect prices in any of the following markets within the Western Region of the United States:
 - 1) Transmission
 - 2) Distribution
 - 3) Generation
 - 4) Metering
 - 5) Meter reading and customer service.
19. Identify the person or persons who provided answers to these data requests.

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20. Produce all documents, not otherwise requested, that were reviewed, relate to or support any information contained in your answer to these data requests.

Very truly yours,



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cc: Parties of Record