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ARIZONA CORPORATION  
DOCKET CONTROL

July 30, 2010

Arizona Corporation Commission  
DOCKETED

JUL 30 2010

Arizona Corporation Commission  
Docket Control  
1200 W. Washington  
Phoenix, AZ 85007

DOCKETED BY 

Re: 2010 Biennial Electric Transmission Assessment for 2010-2019  
Docket No. E-00000D-09-0020

Dear Sir/Madam:

Attached are SRP's initial comments to the first draft of the Sixth Biennial Transmission Assessment Report.

Please feel free to contact me at (602) 236-5028 if you have any questions.

Sincerely,



Jana Brandt

Attachment

cc: Prem Bahl, ACC Staff (via email)  
Ray Williamson, ACC Staff (via email)  
David Korinek, KEMA Inc. (via email)  
Kelly Barr, SRP  
Jim Pratt, SRP

**SRP's Comments on  
1<sup>st</sup> Draft of Sixth BTA Report**

**Submitted July 30, 2010**

**General Comments**

SRP appreciates the opportunity to voluntarily participate in the Commission's BTA process. Following are SRP's initial comments on the first draft report. Please note that SRP has not provided any written comments on the report's conclusions and recommendations pending further discussion of the issues at the August 4, 2010 BTA workshop. SRP reserves the right to file additional comments following the August 4 workshop and commits to filing such comments on a timely basis for consideration in the final report.

**Specific Comments**

**Page 2 – Section 1.2, last paragraph before item no. 1**

Change “four key public...” to “five key public...”.

**Page 4 – Table 1**

Footnote 13 should include SRP in the list of study participants.

**Page 5 – 1<sup>st</sup> & 2<sup>nd</sup> paragraph**

SRP believes the reference to the statute, ARS § 40-360.02 (C) (7), is taken out of context. The lead in paragraph requires that ‘Each plan . . . shall set forth the following information with respect to the proposed facilities to the **extent such information is available** [emphasis added].’ For projects that are not planned for several years, it may not make sense to perform stability analysis at this time for inclusion in the 10 year plan and should not be inferred that such omission is out of compliance.

**Page 7 Table 2**

Remove horizontal line in the middle of the second column in Table 2.

**Page 15 - Section 2.3.2, last paragraph**

Change “refilling” to “refiling”.

**Page 15, Section 2.3.3, first paragraph**

Remove capitalization from “Miles”.

**Page 19 – Section 2.3.10**

The Eldorado Valley Study Group is a subcommittee of SWAT. This paragraph doesn't belong under the Interstate, Merchant and Generation Transmission Projects section of the report.

**Page 20 - 2.4.3**

SRP does not believe it is appropriate that SRP's 10 year plan is being relied on for this project as SRP has no association with Sonoran Solar Energy. SRP suggests that Staff obtain any relevant information directly from the company.

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**Page 21 - 2.4.5, second sentence**

SRP suggests that the second sentence be rewritten as there is no spare transformer at Hassayampa. We believe the intent is to indicate that the project intends to connect to a bay in the Hassayampa yard.

**Page 23 – Section 2.5.2, first full paragraph on page**

Change “turndown” to “downturn”.

**Page 24 – Section 2.5.3, first bullet**

The Coronado to Silver King 500 kV path rating is now 1494 MW, not 1533 MW.

**Page 24 – Section 2.5.3, second bullet**

Add “direction” following “North to South”.

**Page 24 – Section 2.5.3, last paragraph**

In the sentences, change “ratings” to “rating” and add “changes”. The sentence should read “No other WECC path rating changes in Arizona . . . “

**Page 25 – Section 3.1.1, second paragraph**

In the second sentence, change “sensitivity” to “sensitive” and delete “would” from the phrase “excluded by statute or law would”.

**Page 30 - Section 3.2.1.1, second paragraph**

Remove “which should result in competitive pricing of solar resources compared to other available solar resource pricing” as this is an unsubstantiated value judgment and is outside the scope of this report.

**Page 30 - Section 3.2.1.2, second paragraph**

Remove “which should result in comparably good pricing of solar resources” as this is an unsubstantiated value judgment and is outside the scope of this report.

**Page 33 - Section 3.2.2, second bullet**

Change bullet to “Permitting issues” to be consistent with SRP’s RTP Report and BTA powerpoint presentation.

**Page 34 - Section 3.2.2.1**

For consistency, please add the distance of the project which is 50 miles.

**Page 61 - Section 5.3.4, first bullet**

Remove “and C” from the list of NERC categories as N-2 (Category C) was not performed in this study.

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**Submitted July 30, 2010**

**Page 65 – Section 5.5.2, first paragraph**

SRP suggests changes to this paragraph to clarify that the WGA formed the SPSC and WECC formed the SPSG.

In the fourth sentence, change “Committee” to “Group” and change acronym from “SPSC” to “SPSG”.

In the fifth sentence, change “\$12 million of” to “\$12 million to”.

In the last sentence, capitalize state-provincial steering committee and insert the acronym (“SPSC”). The last acronym referenced in the sentence should be changed to SPSG, not SPSC.

**Page 65 – Section 5.5.2, second paragraph**

Change “WECC” to “WGA”.

**Page 65 – Section 5.5.2, third paragraph**

Change “state-provincial” to “SPSC”.

**Page 68 – Section 5.7, second paragraph**

Change “6.112” to “6,112”.

**Page 73 – Section 6.2, item 2 and 3**

Change the reference to “cut plan” to “cut plane”. A global search should be done to make this correction throughout the document.

**Page 74 – Section 6.2, item 4b**

In the third sentence, delete “does”.

**Page 76 – Section 6.3, first full paragraph**

The paragraph points to a High Plains Express exhibit showing transfer capability between and within WECC areas. The diagram from High Plains Express is undated so it is unclear if the diagram is showing capability for 2008, 2010, or 2020. Further High Plains Express was not included in the Ten Year plan filings (noted on page 16 section 2.3.5). SRP does not believe it is appropriate to justify the adequacy of the Wholesale Market using a diagram for a project that was not included.

**Page 78 – item 2**

Change reference to “Table 9” to “Table 10”.

**Page 79, Table 10**

Remove “X” from Category C column for the SWAT Ten Year Snapshot Study.