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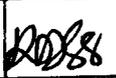
ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

August 4, 2010

Arizona Corporation Commission  
**DOCKETED**

AUG 4 2010

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

DOCKETED BY 

RE: In the matter of the Sixth Biennial Transmission Assessment  
Docket No. E-00000D-09-0020

As requested, APS has provided comments for the Commission's 2010 BTA Draft Report. Attached are APS's general comments on the first draft of the report. APS will participate in further discussion of issues at the August 4<sup>th</sup>, 2010 BTA workshop and, if warranted, will file additional comments with sufficient time to be considered in the final report.

If you have any questions regarding this information, please contact Jennie Vega at (602)250-2038.

Sincerely,

Susan Casady

Attachments

## 6<sup>th</sup> BTA First Draft: APS Comments

### Typos/Edits:

Page viii – Last sentence in 3b “...Mohave County RMR cut **plan**...” should be cut “**plane**”. In fact, this correction needs to be made throughout the whole report.

Page 11 – In Table 4 the 4<sup>th</sup> project, “Moenkopi-Eldorado Series Capacitor” should say “Moenkopi-Eldorado Series Capacitor **Replacement**”

Page 20 – Section 2.4.4, the last full sentence on the page says, “...additional loop-in of the line through **Gila River Substation** en route to **Gila Bend Substation**, ...” should be changed to “additional loop-in of the line through **Gila Bend Substation** en route to **Gila River Substation**, ...” The Gila Bend and Gila River need to be switched around.

Page 21 – Section 2.4.6, the end of the second sentence says, “...the planned **Delaney** Substation.” **Delany** is spelled wrong. This is an on and off problem throughout the report. A word search should be done to correct all of the instances.

Page 22 – Section 2.4.9, “The filing described a loop in of the existing **APS** Hassayampa – North Gila 500kV line into a new **APS** 500kV switchyard to ...” This is a joint participation line. It should say, “The filing described a loop in of the existing Hassayampa – North Gila 500kV line into a new 500kV switchyard to ...”

Page 22 – Section 2.5.1, “... WMIDD plans to participate as a minority owner in APS’ PV-North Gila No. 2 500kV line project.” Again, this is going to be a joint participation project. There are many ways this could be re-written, “... WMIDD plans to participate as a minority owner in the Hassayampa-North Gila No. 2 500kV line project, which is being managed by APS.” The point is to not make it sound like a 100% APS only project.

Page 24 – the bullet point under “The following path upgrade is in-progress in 2010:” The very end of that bullet point says the new path rating will be 4,000 MW. It should say 2850 MW.

Page 25 – section 3.1.1, second sentence... “In response, **to the directive in the 5<sup>th</sup> BTA**, the RTTF...” to clarify the ARRTIS was created in response to the 5<sup>th</sup> BTA – not the 4<sup>th</sup>.

Page 26 – section 3.1.2, second paragraph, third sentence – “In coordination with **the** RTTF Subcommittee, and ...” using “the” instead of “the companion” as RTTF created the Finance subcommittee.

Page 27 – second to last sentence...should read “ These maps were used by SWAT **RTTF** to identify...” “RTTF” should be added.

Page 27 – prior to last sentence – a sentence should be added that states: “These corridors served as options for the utilities’ consideration in their response to the 5<sup>th</sup> BTA Order.”

Page 30 – section 3.2.1.1 – add sentence to end of second paragraph that states “This project also provides access to the Palo Verde hub for potential use for export of renewable resources out of state.”

Page 31 – section 3.2.1.2 – at end of first paragraph add sentence: “This project also provides access to the Palo Verde hub for potential use for export of renewable resources out of state.”

Page 31 – section 3.2.1.3 – second paragraph – second sentence – replace “completion” with “development.”

Page 31 – Section 3.2.1.5, in the middle of the paragraph it says, “APS’s selected the RTPs ...” It should be APS, not APS’s.

Page 32 – end of section 3.2.1.5 – APS would like to sit down with KEMA to discuss the questions around the cost analysis and the connection between the costs and projects.

Page 35 – where is the discussion of SWTC RTAP projects?

Page 36 – section 3.3.1 – beginning of first sentence should have “Many of the projects identified...” since not all of the projects were previously identified in transmission plans.

Page 36 – section 3.3.1 – last paragraph – “...of renewable resources to either the load centers of the Arizona utilities or the Palo Verde hub.” The highlighted language is important because the renewable projects do not only serve Phoenix and Tucson when you include SWTC.

Page 37 – the second paragraph under number 1. The first sentence says, “...should also be largely be for ...” There is an extra “be.”

Page 42 – section 4.2.1, the end of the second sentence says “...four radial transmission lines (115kV and 230kV).” It should say “(115kV, 138kV, and 230kV).”

Page 47-49 – In Section 4.2.6 and section 4.2.7 there are a few references to Table 7. They should be referencing Table 8.

Page 50 – The beginning of the second paragraph says, “The APS Yuma area 2008 RMR study ...” Change 2008 RMR study to 2010 RMR study.

Page 52 – Section 4.3, the middle of the first paragraph says, “The CATS EHV workgroup was included representatives...” Remove the word “was.”

Page 54 – Section 4.3.1, the end of the first sentence says, “...improvements **is** necessary.” Replace “is” with “are.”

Page 54 – Section 4.3.1 the second paragraph, first sentence says, “...transformer outages analyzed chosen based upon...” Needs to say, “...transformer outages analyzed **were** chosen based upon...”

Page 58 – Section 5.3.1, first paragraph last sentence says, “...New Mexico are **both** transmission providers and ...” Replace “**both**” with “**all**.” “...New Mexico are **all** transmission providers and ...”

Page 74 – In item 5 last sentence on the page it says, “...**Raceway**-Pinnacle Peak 500kV line...” It should say “...**Morgan**-Pinnacle Peak 500kV line....”

Page 76 – number 3...second sentence – “Therefore, many of the RTP’s...” Insert the word “many” because not all the RTP’S were in previous 10-year plans

Page 77 – number 4 – same comment as previous comment for page 76, no.3. Should state “Because **“many”** of the selected projects...”