

ORIGINAL



0000115917

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

COMMISSIONERS

KRISTIN K. MAYES, Chairman
GARY PIERCE
SANDRA D. KENNEDY
PAUL NEWMAN
BOB STUMP

2010 AUG 26 P 3:00

AZ CORP COMMISSION
DOCKET CONTROL

IN THE MATTER OF THE SIXTH BIENNIAL
TRANSMISSION ASSESSMENT 2010-2019 DRAFT
REPORTS

Docket No. E-00000D-09-0020

Notice of Filing of Comments:

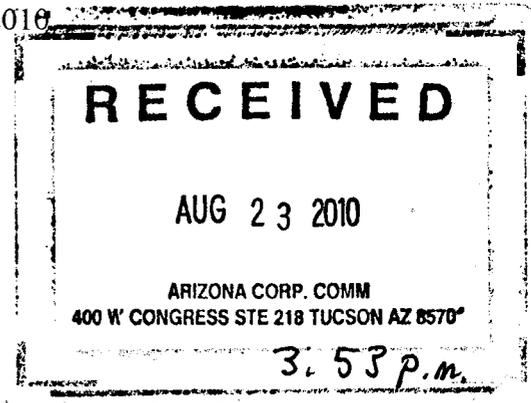
Delivered to Docket Control the 23rd day of August 2010

Sent Via Email to

David Korinek
Sr. Principal Consultant
KEMA Inc.
Email: David.Korinek@kema.com

And

Prem Bahl
ACC Staff
Email pbahl@azcc.gov



Arizona Corporation Commission
DOCKETED
AUG. 26 2010

Respectfully submitted,
Elizabeth Buchroeder-Webb
vailaz@hotmail.com
(520)247-3838

DOCKETED BY

Comments:

Excerpts taken from Sixth Biennial Transmission Assessment 2010-2019 Draft Report

(Pages 71-72) 5.8 FERC 890 Planning Principles

On June 17, 2010, FERC issued a Notice of Proposed Rulemaking (NOPR) addressing changes to its transmission planning and cost allocation policies. This action was taken to remedy a preliminary finding that deficiencies continue to exist in the rules previously established in FERC Order 890. Interested parties have 60 days to respond as of the June 17 issuing date.

FERC's NOPR calls for reforms in three specific areas, including:

□ **Participation in Regional Planning Processes.** Each transmission provider must participate in a regional transmission planning process that produces a regional transmission plan. The regional planning process should result in a plan that identifies the facilities that cost-effectively meet the needs of transmission providers, their customers, **and other stakeholders.**"

(Page 81) "SATS is the first SWAT Subcommittee to study and coordinate local HV and EHV transmission system plans in a common forum. This approach to subregional planning has produced useful study results in the 6th BTA and may be well suited for other local areas in Arizona."

(Page 83) Staff recommends that the Commission continue to support the use of the:

c. Collaborative study processes in Arizona and throughout the western region that are consistent with FERC Order 890.

My Comments:

1. Recommend that within the Sixth Biennial Transmission Assessment 2010-2019 there is a specific requirement for each SWAT Subcommittee to engage in outreach and inclusion of Non-Industry stakeholders in sub-regional transmission planning.

Excerpt from taken from Sixth Biennial Transmission Assessment 2010-2019 Draft Report

(Page 14)" Staff recommends that the Commission continue to support the use of the:

a) Guiding Principles for ACC Staff Determination of Electric System Adequacy and Reliability," but also direct transmission providers to include planned transmission line reconductor projects and bulk power transformer replacements (i.e., capacity upgrades) in filings for future ten year plans in order to foster a more comprehensive assessment process."

My Comment: add "sub-transmission projects, new substations for transmission lines with pre-existing CEC's," AFTER the words "to include planned" in the paragraph above.

IE:

(Page 14)" Staff recommends that the Commission continue to support the use of the:

a) Guiding Principles for ACC Staff Determination of Electric System Adequacy and Reliability," but also direct transmission providers to include planned **sub-transmission projects, new substations for transmission lines with pre-existing CEC's,** transmission line reconductor projects and bulk power transformer replacements (i.e., capacity upgrades) in filings for future ten year plans in order to foster a more comprehensive assessment process."