



**Sulphur Springs Valley  
Electric Cooperative, Inc.**

**Creden W. Huber**  
Chief Executive Officer

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July 10, 1998

Ray T. Williamson  
Acting Director, Utilities Division  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

RE: Proposed amendments to the rules

Dear Mr. Williamson:

I am writing separately to emphasize a matter that may be unique to Sulphur Springs Valley Electric Cooperative (SSVEC) concerning the impact of the new rules.

SSVEC owns and operates 300 miles of 69 kV lines that are used for distribution purposes. To include those lines in any ISO/ISA would cause severe operational problems and inefficiencies in SSVEC's system. For examples, the switching is changed as required to minimize the distribution energy losses of SSVEC. The switching and operational settings are changed at will to resolve distribution contingency situations that arise, such as substation equipment problems or feeder outages, rerouting power to other distribution facilities owned by SSVEC. The 69 kV breaker operational features are changed to meet distribution needs, such as blocking breaker closing operations, whenever crews are maintaining distribution circuits attached to the same poles. These lines are not available to serve normal bulk transmission purposes.

This matter can be simply solved by revising the definition for "Distribution Primary Voltage" to include 69 kV. If this change is overly broad, it would be feasible to define specific 69 kV lines meeting specific operating criteria as "distribution lines" and other lines not meeting this criteria could remain as "transmission" lines. We would be glad to assist in developing satisfactory criteria.



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Director of Utilities



Ray T. Williamson, ACC  
Sulphur Springs Valley Electric Cooperative  
July 10, 1998  
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Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "Creden W. Huber".

Creden W. Huber  
Chief Executive Officer