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Arizona Corporation Commission
DOCKET CONTROL

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August 24, 2012

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



RE: Arizona Public Service Company's Draft Comments - Seventh Biennial Electric Transmission Assessment for 2012-2021.
Docket No. E-00000D-11-0017

Arizona Public Service Company ("APS") appreciates the opportunity to provide comments on the First Draft (Draft - Version 1.0) of the Staff Report for the Seventh Biennial Electric Transmission Assessment. Attached are APS general comments.

If you have any questions regarding this information, please contact me at (602)250-2661.

Sincerely,

Jeffrey W. Johnson

JJ/cd
Attachment

cc: David Korinek - KEMA Consulting

Arizona Public Service Company
Comments on the First Draft of Staff Report in the 7th BTA
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Section in Report Draft Version 1.0	Proposed Change	Comment about Section or Explanation Supporting Proposed Change
Page v, second paragraph, third line	Replace the reference to “N-1-1 study” with “Ten Year Snapshot Study.” Make conforming changes.	
Page vii, Section (3)(b), first sentence	Revise sentence to read as follows: “The Ten Year Snapshot Study was performed by SRP and coordinated through the Central Arizona Transmission System (“CATS”) study group.....” Make conforming changes.	The CATS-EHV and CATS-HV groups have been merged into a single entity and are now referred to as the Central Arizona Transmission System (CATS) study group.
Page vii, Section (3)(b), second sentence	Revise sentence to read as follows: “The Extreme Contingency Study was performed by Arizona Public Service Company (“APS”) and TEP and coordinated through CATS. The study examined more severe contingency scenarios such as complete transmission corridor outages or major transmission element outages at extra high voltage (“EHV”) substations.....” Make conforming changes.	
Page viii, Section (3)(c), first sentence and Page 62, Section 3	Add the word “contained” between the terms “Participants” and “to” and add the word “that” between the term “definition” and “does” as follows: “The proposed transmission expansion plan identified in filings by the Cochise County Study Group (CCSG) Participants <i>contained</i> a “continuity of service” definition <i>that</i> does not appear to be economically justified .”	
Page xi, Section 6 and Page 13, first paragraph	Delete recommendation.	Utilities should not be responsible to interpret and advise interconnection applicants which potential “ACC filing requirements” are applicable to interconnecting entities.
Page xii, first and second bullet points and Page 44, first full paragraph, first and second bullet points	Delete the term “of” before the parenthesis.	
Page 5, last paragraph, line 3	Replace “WAPA” with “Western Area Power Administration.” Replace the reference to “WAPA” with “Western” throughout the report. Make conforming changes.	Western, rather than WAPA, is the common designation used in the industry.

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Page 10, second paragraph and Table 4 title	Replace the term “new” with “newly filed.”	The words “newly filed” more accurately describe the information being discussed.
Page 11, second paragraph, first sentence	Revise the first sentence by removing the words “large” and “(projects over 20 MW)” and adding a new footnote that reads, “Generators over 20 MW are interconnected pursuant to a Large Generator Interconnection Agreement; generators 20 MW or less are interconnected pursuant to a Small Generator Interconnection Agreement.”	All generators must file an interconnection request.
Page 11, second paragraph, last sentence	Delete the word “large” between “2012” and “generator interconnection.”	For APS, the information in Table 5 includes both large and small interconnections.
Page 11, Footnote 20	Remove the Hualapai Valley Solar project (340 MW) from the APS quantities shown in Table 5.	The Hualapai Valley Solar project is not currently in APS’s interconnection queue.
Page 12, first paragraph		<p>The Draft Report states that it is unclear why only 20% of the generator capacity in the utilities’ interconnection queues filed transmission plans in the 7th BTA.</p> <p>The large gap in generator 10-year plan filings vs. interconnection queues could be due to the nature of the FERC interconnection queue process. In addition, many of the projects in the interconnection queue phase may not yet be in the position to file a 10-year plan until the interconnection analyses are complete.</p>
Page 13, first paragraph, first sentence	Change the word “can” to “may” between the words “and” and “interconnect.”	Some projects built on existing plant sites may require network upgrades or in some instances “new transmission.”
Page 14, Table 7	Change the in-service date for the Palo Verde Hub-North Gila 500 kV #2 line from “2014” to “2015.” This change should be made throughout the report.	
Page 14, Table 7	In the “Description of Change” column for the Delaney-Sun Valley 500 kV line, replace the statement in its entirety with	

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	"Changed In-Service date from 2014 to 2015."	
Page 30, Section 4.1, first paragraph and Footnote 30	Correct spelling of "Delany" to read "Delaney."	The spelling of "Delaney" was changed from "Delany" between the 6 th and 7 th BTAs.
Page 43, Section 5.2.5, first paragraph, third line	Delete the word "system" between the words "the" and "import" and delete "(SIL)" so that it reads "...exceeds the import limit of the local..."	The acronym "SIL" is used twice and defined differently in the same paragraph.
Page 43, Section 5.2.5, third bullet	Revise to read as follows: "RMR at peak demand - The maximum amount of capacity that the RMR generators would be required to produce to meet the peak demand."	
Page 43, Footnote 39	For clarity, revise to read as follows: "Out-of-merit order generation is generation that is run outside the economic dispatch order. It is typically more expensive than generation run in the economic dispatch order for reliability needs."	
Page 45, first paragraph, second and third bullets	Delete the word "of" after the word "retirement."	
Page 45, Section 5.2.5.1, second paragraph	Revise the sentence to read as follows: "The Phoenix area 2012-2021 RMR study performed detailed RMR analysis for 2014 and 2021."	
Page 46, Section 5.2.5.3, second paragraph	Delete the words "Yuma, Mohave and Santa Cruz County" at the end of the sentence.	
Page 47, Section 5.3, first paragraph, last sentence	Replace the acronym "SWAT" with the acronym "CATS".	The Ten-Year Snapshot Study report was approved by CATS, not SWAT.
Page 49, sub-section 6		During the presentation at the first Workshop on July 10, 2012, APS stated that the differences between the 2021 Snapshot case and the current 2021 plans in the 7th BTA would have no impact on the performance results. Because a 2021 case was used in the analysis, all the major transmission projects are included in the case. Certain projects' initial in-service dates have

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		changed, however, since the base case was for the last year of the ten year plan time frame, all projects were in-service at that time. Any adjustments in the 2012 plans would serve to alleviate some of the local overloads/voltage issues noted in the study in the TEP/UNS system.
Page 52, Section 6.1, first paragraph, first sentence	Add the words "on July 21, 2011" to the end of the sentence after "Public Utilities."	
Page 52, Section 6.1, second paragraph, first sentence	Add Western Area Power Administration (Western) to the list of Arizona transmission owners and WestConnect members.	
Page 52, Section 6.1, second paragraph, second sentence	Delete the following sentence in its entirety: "FERC recently accepted WestConnect as a regional transmission planning organization."	The WestConnect jurisdictional utilities have not yet filed their Order 1000 compliance filings so a regional planning organization has not yet been proposed. In addition, FERC has not yet accepted WestConnect as a regional transmission planning organization.
Page 52, Section 6.1.1, first paragraph, first sentence	Revise the sentence to read as follows: "Transmission providers are establishing a WestConnect FERC Order 1000 compliant regional planning process for Regional Transmission Planning."	FERC Order 1000 work is ongoing and will apply to "regional" rather than "subregional" planning.
Page 53, Section 6.1.2(2)(b)	Delete this section in its entirety.	The FERC decision referred to in this section applies to PJM, not to the WECC.
Page 57, top of page	Correct number sequence of sections-- Sections 6.2.6 and 6.2.7 should be renumbered to 6.2.5 and 6.2.6 respectively.	
Page 65, Section 7.5, second paragraph	Revise by replacing the term "6 th BTA" with "7 th BTA."	
Exhibit 6	Path 63 should be removed from the map. Make conforming changes.	There is no Path 63.
Exhibit 7	Add CEC case numbers to the Permitting/Siting Status column identified below: <ul style="list-style-type: none"> • Project B2: add "Case #128" • Project A36: add "Case #135" 	

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	<ul style="list-style-type: none"> • Project A24: add “Case #160” • Project A31: add “Case #128” • Project A40: add “Case #127” • Project A43: add “Case #122 and #127” • Project A49: add “Case #138” • Project A68: add “Case #102” • Project A71: add Case #127” • Project A85: add “Case #138” • Project A97: add “Case #9” • Project A98: add “Case #120” <p>In the Permitting/Siting Status column make the changes below:</p> <ul style="list-style-type: none"> • Project A24: delete “CEC not required” and replace with “CEC Approved” “Decision No. 72302”. • Project A98: delete “Decision # 64473” and replace with “CEC Decision No. 65997”. <p>Project A36: Change the in-service date for Palo Verde Hub-North Gila 500 kV #2 line from “2014” to “2015”.</p> <p>Make conforming changes.</p>	
Exhibit 9	<p>Change the in-service date for Palo Verde Hub-North Gila 500 kV #2 line from “2014” to “2015”. Add “Changed In-Service date from 2014 to 2015” to the Status column.</p> <p>Make conforming changes.</p>	
Exhibit 12	<p>Project A36: Change the in-service date for Palo Verde Hub-North Gila 500 kV #2 line from “2014” to “2015”.</p> <p>Make conforming changes.</p>	
Exhibit 14	<p>Add project A32 – “Desert Basin - Pinal Central 230 kV”.</p> <p>Make conforming changes.</p>	SRP is a participant in the line.