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ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

August 24, 2012

Arizona Corporation Commission  
**DOCKETED**  
AUG 24 2012

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

DOCKETED BY  
*JM*

Re: 2012 Biennial Electric Transmission Assessment for 2012-2021  
Docket No. E-00000D-11-0017

Dear Sir/Madam:

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

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

Sincerely,

Jana Brandt

Attachment

cc: Margaret Little, ACC Staff (via email)  
Prem Bahl, ACC Staff (via email)  
David Korinek, DNV KEMA Inc. (via email)  
Robert R. Taylor, SRP  
Steve Cobb, SRP

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

Submitted August 24, 2012

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.

Specific Comments

**General Conclusions**

Page vii - Item 3b. Remove "Extra High Voltage" and then "EHV" from (CATS-EHV). The HV and EHV groups combined and are now known only as "CATS". All references to "CATS-HV" and "CATS-EHV" throughout the document should be changed to "CATS."

Page ix – Item 9. Remove item 9 in its entirety. The conclusion is baseless given the documents reviewed for the BTA. Further, it appears to predict a benefit from a process that is not yet complete.

**Recommendations**

Page xi – Item 6. SRP suggests removal of item 6 in its entirety. The recommendation that the Arizona utilities inform interconnectors of their responsibilities regarding state filing requirements is inappropriate. The utilities cannot be held responsible for not informing independent generators or transmission developers of State filing requirements.

Page xi – Item 8. SRP suggests the following redlined changes to Recommendation 8.

8) Staff recommends the Commission suspend the requirement for performing RMR studies in every BTA and implement criteria for restarting such studies on a biennial basis such as:

- An increase of more than 2.5% in the load forecast since the previous BTA (e.g., relative to the final RMR study year for which RMR studies were last filed).
- Planned retirement of (or an expected ~~long-term~~ outage during summer months of June, July, August) of a ~~key~~ transmission or substation facility ~~supplying an~~ required to serve an RMR load pocket
- Planned retirement of (or an expected long term outage during summer months) of a generating unit in an RMR load pocket that has been utilized in the past for RMR purposes
- A significant customer outage ~~or adverse operating event~~ in an RMR load pocket

**Section 1.3.2**

Page 5 – Table 1. "CATS-HV Study" should be "CATS Study." Footnote 12 should read "Filed on behalf of CATS study group."

**Section 2**

Page 7 - Second paragraph. SRP suggests deletion of "In addition, utilities who are signatories to the WECC Reliability Agreement are also obligated to comply with certain technical performance standards." SRP is not certain the agreement is still in place.

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Page 8 – Table 3. Remove SRP from table and add a footnote in Utility column to read “While SRP is not a jurisdictional utility, SRP voluntarily included such audit results in its Ten Year Plan.”

**Section 2.1**

Page 10 – Table 4. SRP suggests deleting this table as it is more confusing than helpful. The “Post 2021” column shows nothing but zeros for all voltage classes and is not needed. It is also unclear what the “Approximate mileage” column is attempting to show. Does it reflect the average length of the projects or the sum of each project’s length?

Page 13 – First paragraph. Remove “Staff recommends that the Commission issue an order that directs Arizona utilities to inform each interconnection applicant of the appropriate ACC filing requirements at the time the applicant files for interconnection”. This recommendation is a burden inappropriately placed on the utilities. If the recommendation remains, it must be modified to reflect only A.R.S. §360.02 A and B requirements. It is not the utility’s responsibility to inform an interconnection of “appropriate ACC filing requirements”.

Further, the gap between utility queues and the ACC ten year plan filings will always exist. Some generators don’t need gen ties, some may connect at voltages lower than 115kV, and some don’t know what transmission may be required until after completion of the studies required by the generator interconnection queue. At best, if this provision is implemented, the Commission will unnecessarily receive useless filings from companies indicating transmission is planned but the location, voltage level, amount of capacity and expected in-service date is unknown.

**Section 2.2**

Page 15 – Table 8. The final column indicating “In-service date change from TBD to set date” conflicts with the sentence below the table indicating “In addition, no project in-service dates were advanced”. Suggest deletion of “In addition, no project in-service dates were advanced”.

Page 15 - Second paragraph under Table 8. Add “with” before “the reduced demand forecast shown in Figure 1.”

**Section 3.3**

Pages 20-21 – Last sentence of the last paragraph. After “sustainable resources” add “, including energy efficiency,” to clearly define SRP’s sustainable portfolio as including renewables and energy efficiency since the overall title of Section 3 is a discussion of renewable exports.

**Section 5.2.5**

Page 45 – Second and third bullets. Delete “of” following the phrase in () as it is duplicative.

**Section 5.3**

Page 48 – Remove all references to CATS EHV in Section 5.3. CATS EHV is now “CATS”.

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Page 48 – Last sentence of first paragraph. The Snapshot study was approved by CATS, not SWAT.

Page 50 – Item 7. The last sentence is incomplete and ends with 20.

**Section 5.4**

Page 50 – First paragraph, second sentence. Replace the sentence “The 7<sup>th</sup> BTA Extreme Contingency Study was conducted by the SWAT Sub-regional Transmission Planning Group and was filed by APS.” with “The 7<sup>th</sup> BTA extreme contingency study was performed and filed by APS on behalf of CATS.”

**Section 6.1**

Page 52 – Second paragraph, first sentence. Replace the sentence with “Arizona’s largest transmission owners—APS, SRP, SWTC, and TEP – participate in WestConnect transmission planning under the 2007 WestConnect Regional Planning Project Agreement.” as WestConnect is not a membership organization.

Page 52 – Second paragraph, second sentence. Delete the sentence “FERC recently accepted WestConnect as a regional transmission planning organization.” as this determination has not yet been made for FERC Order 1000 planning purposes.

**Section 6.1.1**

Page 52 – Last paragraph. The Sierra Subregional Planning Group (SSPG) should be added as one of the three subregional planning groups under WestConnect.

**Section 6.1.2**

Page 53 – Item 2a:

- Rephrase first sentence to read “Public utility transmission providers must participate in a regional transmission planning process in which certain transmission projects may be chosen for cost allocation.” Not all projects selected in a regional plan will have costs allocated and the original sentence suggests that they will.
- In the second sentence, delete “as a result of the BTA process.” Much transmission was built to the mutual agreement of utilities prior to the BTA.

Page 53 – Item 2b. SRP suggests deleting item 2b.

**Section 7.2**

Page 61 – Delete “CATS-EHV” and replace with “CATS.” Make a similar language change to APS filing the Extreme Contingency study in conjunction with SWAT to read: “The 7<sup>th</sup> BTA Extreme Contingency Study was performed and filed by APS on behalf of CATS.”

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**Section 7.5**

Page 66 – Item 5. SRP suggests deletion of item 5. The conclusion is baseless given the documents reviewed for the BTA. Further, it appears to predict a benefit from a process that is not yet complete.

**Section 8**

Page 68 – Item 7. SRP suggests deleting recommendation 7. The recommendation that the Arizona utilities inform interconnectors of their responsibilities regarding state filing requirements is inappropriate. The utilities cannot be held responsible for not informing independent generators or transmission developers of their filing requirements.

Exhibits

**Exhibit 7**

Page 7 – for SRP's Superior-Silver King 115kV re-route (C3) with an in-service date of 2013, change the permitting/siting status to "Application for CEC filed June 2012".

Page 7 – for SRP's Pinal Central-Abel 230kV project (A16) with an in-service date of 2014, change "Decision #69291" to "Decision #68291" in the permitting/siting status.

Page 7 – for SRP's Pinal West-Pinal Central-Randolph-Abel-Browning 500kV project (A38) with an in-service date of 2014, change "Decision #69291" to "Decision #68291" in the permitting/siting status.

Please add the following SRP Project to the list:

RS25 Project, Participants – SRP, Length – TBD, Permitting/Siting Status – CEC Not Yet Filed, Year – TBD, Voltage – 115/230/345

**Exhibit 9**

Page 18 – for the 2019-2021 in-service date for the Abel-Pfister-Ball 230kV #1, the 3<sup>rd</sup> and 4<sup>th</sup> status changes are duplicative to the first 2 and should be removed.

**Exhibit 11**

Page 23 – for SRP's Superior-Silver King 115kV re-route (C3) with an in-service date of 2013, please change the permitting/siting status to "Application for CEC filed June 2012".

Page 23 – for SRP's Pinal Central-Abel 230kV project with an in-service date of 2014, change "Decision #69291" to "Decision #68291" in the permitting/siting status.

Page 23 – for SRP's Pinal West-Pinal Central-Randolph-Abel-Browning 500kV project (A38) with an in-service date of 2014, change "Decision #69291" to "Decision #68291" in the permitting/siting status.

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RS25 Project, Participants – SRP, Length – TBD, Permitting/Siting Status – CEC Not Yet Filed,  
Year – TBD, Voltage – 115/230/345

**Exhibit 12**

Page 30 – for SRP's Pinal West-Pinal Central-Randolph-Abel-Browning 500kV project (A38) with an in-service date of 2014, change "Decision #69291" to "Decision #68291" in the permitting/siting status.

Page 32 – for SRP's Pinal Central-Abel 230kV project (A16) with an in-service date of 2014, change "Decision #69291" to "Decision #68291" in the permitting/siting status.

Page 36 – for SRP's Superior-Silver King 115kV re-route (C3) with an in-service date of 2013, please change the permitting/siting status to "Application for CEC filed June 2012".

Please add the following SRP Project to the list:

RS25 Project, Participants – SRP, Length – TBD, Permitting/Siting Status – CEC Not Yet Filed,  
Year – TBD, Voltage – 115/230/345

**Exhibit 14**

Page 38 – for SRP's Pinal West-Pinal Central-Randolph-Abel-Browning 500kV project (A38) with an in-service date of 2014, change "Decision #69291" to "Decision #68291" in the permitting/siting status.

Page 38 – for SRP's Pinal Central-Abel 230kV (A16) project with an in-service date of 2014, change "Decision #69291" to "Decision #68291" in the permitting/siting status.

Page 38 – for SRP's Superior-Silver King 115kV re-route (C3) with an in-service date of 2013, please change the permitting/siting status to "Application for CEC filed June 2012".

Please add the following SRP Projects to the list:

RS25 Project, Participants – SRP, Length – TBD, Permitting/Siting Status – CEC Not Yet Filed,  
Year – TBD, Voltage – 115/230/345

Desert Basin – Pinal Central, Participants – SRP, APS, Length – 21 miles, Permitting/Siting Status – CEC Approved – Decisions #68093, #68291, #69183 and #69647, Year – 2014, Voltage - 230