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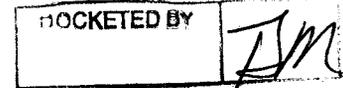
September 14, 2012

Arizona Corporation Commission

DOCKETED

SEP 14 2012

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



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 second 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
2nd Draft of Seventh BTA Report

Submitted September 14, 2012

General Conclusions

Page v – Second paragraph. The first sentence reads: “Staff and KEMA reviewed all ten-year plans and filings submitted to Docket No. E-00000D-11-0017”. In Table 2 on page 8 several companies filed under Docket Number E-00000D-09-0020. SRP suggests adding the additional docket number to the sentence appearing on page v or include a footnote that some plans were filed under Docket Number E-00000D-09-0020. Please note that the docket number has been corrected.

Page vii – Conclusion 2. Insert a space between “(EHV)” and “transmission”.

Page ix – Conclusion 8. Delete “special”.

Page ix – Conclusion 9. Revise second sentence to read “Generally, the RTPs improved exports to California by less than 500 MW.”

Page x – Conclusion 10. Replace the word “Inconsistencies” with “Differences”. The CTPG has its own study requirements and stakeholders that differed from the study the Arizona utilities performed in responding to a specific directive of the 6th BTA. The resultant differences in the studies are not inconsistent because they served different purposes. In Section 6.6, it is noted that CTPG studied a 2020 system whereas the Arizona study was representative of 2014. Further the CTPG report indicates only 3663MW (of which 50% or 63% comes from Arizona, depending on the scenario) import whereas the Arizona report injected as much as 6700MW. Rather than highlighting inconsistencies, the two reports may actually be showing the natural growth in systems and similarities.

Recommendations

Page xi – Recommendation 2. Insert a space between “(CEC)” and “only”.

Section 1.3.2

Page 6 – Second Paragraph. Broken sentence. Needs to be combined with Third Paragraph, so that it reads “As indicated in Table 1, technical studies ...”.

Section 1.3.3

Page 6 – Last sentence. Two periods appear in the last sentence. Delete one of the periods.

Section 2.0

Page 8 – Table 2. The docket number contained in the * should be corrected to “E-00000D-09-0020”.

Page 9 – First paragraph following Table 3. Insert a space between “standards” and “compliance” in the last line of the sentence.

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Section 2.1

Page 10 – Figure 1. Suggest changing the scale of the plot to start at 10,000 rather than zero and add more granularity to the y-axis to better show the data.

Page 10 – Second paragraph. In the third sentence, insert “was” between “this” and “due”.

Page 12 – Table 4 and Footnote 25. Footnote 25 should be removed and the capacity for Hualapai Valley Solar should not be included in SRP's queue totals. While Hualapai was in SRP's Mead-Phoenix queue at one time, their current official status is “Withdrawn”.

Page 12 – First paragraph. In the first sentence, change “as reported in filed transmission plans” to “are reported in filed transmission plans”.

Section 2.2

Page 14 – Table 6. Remove blank line between 2013 and 2014 in-service date projects.

Page 16 – Table 8. Change current name for “RS-24” to “Pfister”.

Section 3.3

Page 20 – Arizona paragraph. In third sentence, remove parentheses and question mark from “2020”.

Page 21 – California paragraph. In last sentence of second full paragraph, insert “an” between “on” and “annual”.

Page 23 – Last sentence. Revise sentence to read “The following buses, based on ARRTIS activities, were selected to represent renewable generation injection points:”, followed by the list of 7 buses.

Section 3.5

Page 29 – First paragraph following Table 9. In the first sentence, “obstacles” should be changed to “solutions”.

Section 3.6

Page 30 – First paragraph. Revise second sentence to read “Generally the RTPs improved exports to California by less than 500 MW.”

Page 30 – First paragraph. In last sentence of paragraph, change “Table 10” to “Table 9”.

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Section 3.6

Page 30 – Last paragraph. Delete the last sentence on the page and its associated footnote, “However, it’s unclear if the 2011 Arizona Study was adequately vetted with out-of-state stakeholders.” Since this is an ACC requirement and is directed at the Arizona jurisdictional utilities, it is always difficult to engage out-of-state participation in such efforts. The utilities encouraged broad participation and shared the report and workshop announcement with a large distribution list, including the service list from the 6th BTA and the CATS distribution list, both of which include a number of out-of-state stakeholders. The material was also posted on the WestConnect CATS website. Lastly, while all stakeholders were encouraged to participate in the process, there was no specific ACC directive for out-of-state participation.

Section 4.1

Page 31 – Second paragraph. For consistency, change “PVD2” to “DPV2”.

Section 4.5

Page 34 – First sentence. Correct spelling of “Boquillas”.

Section 4.7

Page 35. SRP suggests deleting this project description from the BTA report since Hualapai’s last ten-year plan was filed in 2011 and there is limited information available on the project. At a minimum, the third sentence should be modified to remove the potential interconnection into SRP’s Mead-Phoenix line as the official status of that interconnection request is “Withdrawn”.

Section 4.10

Page 36 – Heading. The font should match the other section headings.

Page 36 – Footnote 41. Footnote 41 is missing text.

Section 4.11

Page 36. No section numbered as 4.11. Following sections should be renumbered.

Section 4.12

Page 36 – Last line. Remove “[To be added]”.

Section 5.2.5

Page 49 – Make sure bullets are consistent with executive summary.

Section 5.2.5.1

Page 50 – Last paragraph. In last line, insert “is” between “capacity” and “needed”.

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Section 5.3

Page 53 – First full paragraph. In first sentence, change “Snap Shot Study” to “Snapshot Study” for consistency.

Page 54 – First paragraph. Change “Snap Shot Study” to “Snapshot Study” for consistency.

Section 6.1

Page 56 – First paragraph, first sentence. Remove “-“ following (FERC) and replace with a space.

Section 6.1.1

Page 56 – Second paragraph. Add “Area” between “Southwest” and “Transmission”.

Section 6.1.2

Page 58 – Paragraph following Item 3. Beginning with “Transmission providers must ...”, insert “a)” before the sentence as this is intended to expand on Item 3).

Page 58 – Paragraph following Item 3. Beginning with the third sentence that begins “While Order 1000 encourages regional planning and cost sharing...”, SRP suggests deleting the remainder of the page since this appears to be commentary that isn’t germane to the BTA proceedings.

Section 6.2.3

Page 61 – Heading. The font should match the other section headings.

Section 6.3

Pages 63 and 64. Spacing before and after bullets needs to be fixed to be consistent.

Section 6.4

Page 65 – First bullet. Bold “Topic A” to be consistent with formatting of the other bullets.

Page 66 – First bullet. Unbold “a” in the first bullet.

Page 67 – Second paragraph, second bullet. Replace “BA” with “balancing area” for consistency.

Section 6.5

Page 68 – bottom of the page. Remove “Error! Reference source not found” from text.

Page 70 – First sentence. Insert “year” following “10-20”.

Page 70 – First sentence. Change “and a collection of information” to “and collect information”.

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Section 6.6

Page 71 – First sentence. Correct spelling of “pubically-owned” to “publicly-owned”.

Page 72 – Table 14. Change “fro” to “for” in second line of Table 14.

Page 72 – Second sentence. Replace “appears to be inconsistent” with “differs” such that the statement reads, “This lack of planned EHV expansion in southern California differs with the findings of the 2011 Arizona study...” See SRP comment provided for page x, Conclusion 10.

Section 7.2

Page 76 – continuation of Conclusion 4. Remove the duplicate “,” in the last sentence of conclusion 4.

Section 7.4

Page 78 – Conclusion 1. Similar to page ix, Conclusion 8, delete “special” from second sentence.

Page 79 – Conclusion 4. Similar to page x, Conclusion 10, change “inconsistencies” to “differences”.

Section 8

Page 81 – Recommendation 2. Insert a space between “(CEC)” and “only”.

Section 9

Page 86 – delete page since it is blank.

Exhibit 7

Page 16 - Last Project Listed in Table. For Project ID C28, please include “RS25 Project” as the Project Description.

Exhibit 11

Page 36 - Last Project Listed in Table. For Project ID C28, please include “RS25 Project” as the Project Description.

Exhibit 12

Page 42 - Project ID C28. Please include “RS25 Project” as the Project Description.

Exhibit 14

Page 47 - Project ID C28. Please include “RS25 Project” as the Project Description.