

OPEN MEETING ITEM



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COMMISSIONERS
BOB STUMP - Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH



ARIZONA CORPORATION COMMISSION

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ARIZONA CORPORATION COMMISSION
DOCKET CONTROL

DATE: OCTOBER 4, 2013
DOCKET NO.: E-04100A-12-0353

TO ALL PARTIES:

Enclosed please find the recommendation of Administrative Law Judge Teena Jibilian. The recommendation has been filed in the form of an Opinion and Order on:

SOUTHWEST TRANSMISSION COOPERATIVE, INC.
(RATES)

Pursuant to A.A.C. R14-3-110(B), you may file exceptions to the recommendation of the Administrative Law Judge by filing an original and thirteen (13) copies of the exceptions with the Commission's Docket Control at the address listed below by 4:00 p.m. on or before:

OCTOBER 10, 2013

The enclosed is NOT an order of the Commission, but a recommendation of the Administrative Law Judge to the Commissioners. Consideration of this matter has tentatively been scheduled for the Commission's Open Meeting to be held on:

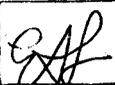
OCTOBER 16, 2013 AND OCTOBER 17, 2013

For more information, you may contact Docket Control at (602) 542-3477 or the Hearing Division at (602) 542-4250. For information about the Open Meeting, contact the Executive Director's Office at (602) 542-3931.

Arizona Corporation Commission

DOCKETED

OCT 04 2013

DOCKETED BY 


JODI JERICH
EXECUTIVE DIRECTOR

1200 WEST WASHINGTON STREET; PHOENIX, ARIZONA 85007-2927 / 400 WEST CONGRESS STREET; TUCSON, ARIZONA 85701-1347
www.azcc.gov

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1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 COMMISSIONERS

3 BOB STUMP - Chairman
4 GARY PIERCE
5 BRENDA BURNS
6 BOB BURNS
7 SUSAN BITTER SMITH

8 IN THE MATTER OF THE APPLICATION OF
9 SOUTHWEST TRANSMISSION COOPERATIVE,
10 INC. FOR A HEARING TO DETERMINE THE
11 FAIR VALUE OF ITS PROPERTY FOR
12 RATEMAKING PURPOSES, TO FIX A JUST AND
13 REASONABLE RETURN THEREON AND TO
14 APPROVE RATES DESIGNED TO DEVELOP
15 SUCH RETURN.

DOCKET NO. E-04100A-12-0353

DECISION NO. _____

OPINION AND ORDER

11 DATE OF HEARING: July 22 (pre-hearing conference) and 29, 2013

12 PLACE OF HEARING: Phoenix, Arizona

13 ADMINISTRATIVE LAW JUDGE: Teena Jibilian

14 APPEARANCES: Mr. Michael M. Grant and Ms. Jennifer A.
15 Cranston, GALLAGHER & KENNEDY, on
16 behalf of Southwest Transmission Cooperative,
17 Inc.;

Messrs. Michael W. Patten and Jason D.
18 Gellman, ROSKA DEWULF & PATTEN,
19 PLC, on behalf of Trico Electric Cooperative,
20 Inc.;

21 Mr. Jeffrey W. Crockett, BROWNSTEIN
22 HYATT FARBER SCHRECK, on behalf of
23 Sulphur Springs Valley Electric Cooperative,
24 Inc.;

25 Messrs. Mr. William P. Sullivan and Michael A.
26 Curtis, CURTIS, GOODWIN, SULLIVAN,
27 UDALL & SCHWAB, PLC, on behalf of
28 Mohave Electric Cooperative, Incorporated; and

Messrs. Scott Helsa and Charles Hains, Staff
Attorneys, Legal Division, on behalf of the
Utilities Division of the Arizona Corporation
Commission.

1 **BY THE COMMISSION:**

2 * * * * *

3 Having considered the entire record herein and being fully advised in the premises, the
4 Arizona Corporation Commission (“Commission”) finds, concludes, and orders that:

5 **FINDINGS OF FACT**

6 **Procedural History**

7 1. On August 3, 2012, Southwest Transmission Cooperative, Inc. (“SWTC” or
8 “Cooperative”) filed with the Arizona Corporation Commission (“Commission”) an application for a
9 revenue decrease. The application included the Direct Testimony of SWTC witnesses Gary E.
10 Pierson and Peter Scott.

11 2. On August 22, 2012, Trico Electric Cooperative, Inc. (“Trico”) filed a Motion to
12 Intervene.

13 3. On September 4, 2012, the Commission’s Utilities Division (“Staff”) filed a letter of
14 sufficiency.

15 4. On September 5, 2012, Staff filed its Proposed Schedule for Filing Dates and a Notice
16 of Errata.

17 5. On September 11, 2012, SWTC filed a Response to Staff’s Proposed Schedule
18 requesting that the hearing be on the same date as the hearing in the rate case of AEPCO in Docket
19 No. E-01773A-12-0305, but that the SWTC hearing begin at the conclusion of the rate case hearing
20 in that docket.

21 6. On September 11, 2012, a Rate Case Procedural Order was issued setting the hearing
22 to begin on July 29, 2013, and setting associated procedural deadlines. The Rate Case Procedural
23 Order also granted intervention to Trico.

24 7. On September 21, 2012, SWTC filed an Affidavit of Mailing of the Notice of Hearing
25 indicating that it mailed notice to each of its Class A Members on September 19, 2012.

26 8. On December 20, 2012, Sulphur Springs Valley Electric Cooperative, Inc. (“SSVEC”)
27 filed an Application for Leave to Intervene.

28

1 9. On January 17, 2013, SWTC filed its Affidavit of Publication confirming that Notice
2 of the Hearing was published on November 30 and December 14, 2012, in the *Sierra Vista Herald*
3 and *Bisbee Daily Review*, the *Kingman Daily Miner*, and the *Arizona Daily Star*, and on December 1,
4 2012, and December 15, 2013 in the *Eastern Arizona Courier*.

5 10. On February 13, 2013, a Procedural Order was issued granting SSVEC intervention.

6 11. On April 4, 2013, Staff filed the Direct Testimony of its witnesses Randall Vickroy,
7 Dennis M. Kalbarczyk, and Richard Mazzini.

8 12. On April 22, 2013, Staff filed the Direct Testimony on Rate Design of its witness
9 Dennis M. Kalbarczyk.

10 13. On April 24, 2013, Staff filed a Notice of Errata.

11 14. On May 20, 2013, SWTC filed the Rebuttal Testimony of its witness Gary E. Pierson.

12 15. On May 23, 2013, Mohave Electric Cooperative, Inc. ("Mohave") filed a Motion to
13 Intervene.

14 16. On May 29, 2013, by Procedural Order, Mohave was granted intervention.

15 17. On June 17, 2013, Staff filed the Surrebuttal Testimony of its witness Dennis M.
16 Kalbarczyk.

17 18. On July 8, 2013, SWTC filed the Rejoinder Testimony of its witness Gary E. Pierson.

18 19. On July 22, 2013, a pre-hearing conference convened as scheduled for the purpose of
19 scheduling witnesses. SWTC, Trico, SSVEC, Mohave and Staff appeared through counsel, and
20 reported that they had reached agreement on all issues.

21 20. On July 23, 2013, SWTC filed Supplemental Rejoinder Exhibits and a revised page 1
22 to the Direct Testimony of its witness Peter Scott to reflect his new position as Chief Financial
23 Officer for Sierra Southwest Cooperative Services.

24 21. On July 25, 2013, SWTC filed summaries of testimonies of Peter Scott and Gary E.
25 Pierson.

26 22. On July 25, 2013, Staff filed the summary of testimony of its witness Candrea Allen,
27 indicating that she would testify at the hearing that Staff and SWTC had reached agreement on all
28 issues.

1 23. The hearing on the application convened as scheduled on July 29, 2013. Prior to the
2 taking of evidence, members of the public appeared and provided comments in favor of the requested
3 revenue decrease. SWTC, Trico, SSVEC, Mohave, and Staff appeared through counsel, presented
4 evidence for the record through witnesses, and had an opportunity to cross-examine the witnesses of
5 other parties. At the close of the hearing, parties were given an opportunity to provide closing
6 statements, and the matter was taken under advisement.

7 **Description of SWTC**

8 24. SWTC is a non-profit electric transmission cooperative that provides transmission
9 service primarily to its six Class A Member distribution cooperatives, who provide electricity to their
10 retail member-owners at retail. Arizona Electric Power Cooperative, Inc. ("AEPCO") and Sierra
11 Southwest Cooperative Services ("Sierra"), affiliates of SWTC, are Class B Members of SWTC.

12 25. SWTC was formed in 1998 in anticipation of the restructuring of AEPCO, which the
13 Commission approved in Decision No. 63868 (July 25, 2001). On August 1, 2001, AEPCO's
14 transmission assets were transferred to SWTC and SWTC commenced operations. Through that
15 restructuring in 2001, AEPCO was reorganized into three entities: AEPCO, which serves the power
16 supply needs of the member cooperatives; SWTC; and Sierra, which provides services and personnel
17 for both AEPCO and SWTC.

18 26. SWTC's Class A Member distribution cooperatives are the same as AEPCO's -
19 SSVEC, Trico, Mohave, Graham County Electric Cooperative, Inc., and Duncan Valley Electric
20 Cooperative, Inc., which provide electricity primarily to rural communities throughout Arizona, and
21 Anza Electric Cooperative, Inc., which is located in south-central California.

22 27. SWTC has a thirteen member Board of Directors; twelve members of which represent
23 SWTC's six Class A member distribution cooperatives. The remaining Board member represents
24 AEPCO and Sierra.

25 28. SWTC is a "transmitting utility" under Section 211 of the Federal Power Act, and as
26 such is subject to the jurisdiction of the Federal Energy Regulatory Commission ("FERC"). In order
27 to meet the requirements for reciprocity under FERC Order No. 888, SWTC maintains an Open
28 Access Transmission Tariff ("OATT"). SWTC has umbrella service agreements under its OATT,

1 which enable entities to conduct real-time transactions on SWTC's Same Time Information System.
2 SWTC also provides OATT-based wholesale transmission service to the City of Safford and the
3 Town of Thatcher, and has pre-OATT transmission agreements with the Avra Valley Irrigation and
4 Drainage District and the Silverbell Irrigation and Drainage District. From time to time, SWTC also
5 enters into Firm Network and Firm and Non-Firm Point-to-Point Network transmission service
6 agreements with other Eligible Customers pursuant to the terms of its Commission-approved tariffs
7 and its OATT.

8 29. As a borrower from the Rural Utilities Service ("RUS"), a division of the United
9 States Department of Agriculture, SWTC is subject to the mortgage requirements and regulations of
10 RUS.

11 30. SWTC owns approximately 622 miles of transmission lines and 24 substations, some
12 of which are jointly owned with the Salt River Project ("SRP") and Tucson Electric Power ("TEP").
13 SWTC has contracts to receive transmission service from SRP, TEP, Arizona Public Service
14 Company, the Western Area Power Administration and Southern California Edison.

15 31. SWTC's current rates were set in Decision No. 72030 (December 10, 2010).

16 **Overview of Rate Application**

17 32. In the test year ended December 31, 2011, SWTC had total adjusted operating revenue
18 of \$44,022,391, and adjusted net operating income (margin) of \$21,686,801, which resulted in a debt
19 service coverage ratio of 1.35, and a 22.07 percent rate of return on an original cost rate base
20 ("OCRB") of \$97,658,808.¹

21 33. The application requested an overall 28.98 percent decrease in SWTC's revenue
22 requirement.

23 34. SWTC subsequently modified its request to reflect a revenue decrease of
24 \$12,596,041, or approximately a 28.61 percent decrease over its current revenues.²

25 35. The application also requests approval of new depreciation rates, and authorization of
26 a new Network Transmission Revenue Adjustor mechanism.

27 ¹ Rebuttal Testimony of SWTC witness Gary E. Pierson, Hearing Exhibit ("Exh") SWTC-3 at Exhibit GEP-4; Tr. at 24-
28 25. Total Electric Revenue was \$44,022,391. (See Exh. SWTC-3 at Exhibit GEP-4, p. 3 of 4, lines 4 and 6.)

² Rejoinder Testimony of SWTC witness Gary E. Pierson, Exh. SWTC-4 at Exhibit GEP-10.

Rate Base

36. The parties agree that SWTC's OCRB is \$97,658,808.

Test Year Revenues

37. There was no disagreement with SWTC's adjusted test year revenues of \$44,022,391.

Expenses

38. SWTC proposed, and no party disputed, adjusted test year expenses of \$24,747,485.

Revenue Requirement

39. SWTC proposes a revenue decrease of \$12,596,041, or a decrease of 28.61 percent from adjusted test year revenues of \$44,022,391, to produce operating income (margin) of \$9,090,760, for a 9.31 percent return on OCRB.³ The proposed revenue decrease would provide a revenue level of \$31,426,350. The DSC ratio resulting from the requested revenues is 1.35,⁴ the same DSC as that produced by the revenues approved in Decision No. 72030.

40. Staff's witness stated that considering the business environment and risk profile of SWTC, and recognizing the need to provide sufficient margins, coverage and cash generation, SWTC's proposed DSC of 1.35 is within a range of acceptable levels.⁵

41. No party objects to SWTC's requested revenue requirement.

Rate Design

42. SWTC prepared a fully allocated cost of service study ("COSS"), which it used to design its proposed rates.⁶

43. Staff's witness analyzed SWTC's COSS and rate design based thereon.⁷ He found the COSS and proposed rate design is reasonably consistent with the methods approved in the prior rate case.

44. No party objects to SWTC's COSS and proposed rate design.

45. The rates proposed by SWTC and agreed to by all parties are set forth in Exhibit A, attached hereto and incorporated herein.

³ Rejoinder Testimony of SWTC witness Gary E. Pierson, Exh. SWTC-4 at Exhibit GEP-10.

⁴ *Id.*

⁵ Direct Testimony of Staff witness Randall Vickroy, Exh. S-1 at 14.

⁶ Direct Testimony of SWTC witness Gary E. Pierson, Exh. SWTC-2 at 13-15 and Schedules G-1, G-2 and G2A.

⁷ Direct Testimony of Staff witness Dennis M. Kalbarczyk, Exh. S-3 at 3-8.

1 **Depreciation Rates**

2 46. SWTC retained a contractor to conduct a life assessment study of the SWTC
3 transmission system.⁸ Based on the results of that study, SWTC requests approval of the depreciation
4 rates appearing in Exhibit PS-2 to the testimony of SWTC's witness Peter Scott.

5 47. No party objects to SWTC's proposed depreciation rates.

6 **Network Transmission Revenue Adjustor ("TRA")**

7 48. SWTC requests that the Commission authorize a new Network Transmission Revenue
8 Adjustor ("TRA"). The proposed TRA provides a mechanism by which transmission network rates
9 can be adjusted down, with Commission approval, to account for the increased revenue from new
10 Firm Point-To-Point transmission agreements, so that SWTC can pass the rate relief through to its
11 distribution cooperatives without the need for a full rate case.⁹ SWTC had originally proposed that
12 the TRA could also function to increase transmission rates, but after discussions with Commission
13 Staff, SWTC determined that the TRA should function only to decrease rates,¹⁰ and filed the TRA
14 and TRA Plan of Administration ("TRA POA") attached hereto and incorporated herein as Exhibit B.

15 49. The TRA is designed to apply only in the limited circumstance of the addition of a
16 Firm Point-To-Point Contract, which is defined as a firm (*i.e.*, includes a monthly capacity charge),
17 non-energy based, point-to-point contract that is or was of a term one year or longer.¹¹

18 50. The TRA would impact only two categories of SWTC's rates - its monthly Network
19 Transmission Service ("NTS") Revenue Requirement and its monthly Mohave 2 NTS.¹² If the
20 proposed TRA is approved, whenever SWTC enters into an additional Firm Point-To-Point contract
21 in the future, SWTC will file an application with the Commission that includes a copy of the contract,
22 along with calculations and documentation showing how the monthly NTS Revenue Requirements in
23 effect at the time the contract takes effect should be adjusted downward, by the amount of the
24 expected monthly revenue from the new Firm Point-To-Point contract.¹³ The proposed TRA POA

25 _____
26 ⁸ Direct Testimony of SWTC witness Peter Scott, Exh. SWTC-1 at 6-7 and Exhibit PS-1 at III-1 through III-7.

27 ⁹ Rejoinder Testimony of SWTC witness Gary E. Pierson, Exh. SWTC-4 at 5; Hearing Tr. ("Tr.") at 9.

28 ¹⁰ See Rejoinder Testimony of SWTC witness Gary E. Pierson, Exh. SWTC-4 at 4-6.

¹¹ Rejoinder Testimony of SWTC witness Gary E. Pierson, Exh. SWTC-4 at 4.

¹² *Id.*

¹³ *Id.* at 4-5.

1 provides that Staff will review the application, and within 60 days will prepare a Memorandum and
2 Proposed Order with a form of TRA Tariff Rider attached, for the Commission's consideration.¹⁴

3 51. SWTC's witness explained that if the TRA is approved, SWTC will need to file some
4 minor language changes to its NTS Tariff in conjunction with the TRA, in order to clarify how
5 network rates are calculated as a function of monthly revenue requirements and how the TRA will
6 work to adjust the NTS rates.¹⁵

7 52. No party objects to the TRA. Staff agrees with SWTC that the TRA and the TRA
8 POA should be approved.¹⁶

9 **Conclusions**

10 53. FVRB. SWTC did not request a Reconstruction Cost New Rate Base, and thus its fair
11 value rate base ("FVRB") is the same as its OCRB. A FVRB of \$97,658,808 is reasonable and
12 supported by the evidence, and should be adopted.

13 54. Test Year Revenues and Expenses. Adjusted test year revenues of \$44,022,391 and
14 operating expenses of \$24,747,485 are reasonable and supported by the evidence, and should be
15 adopted.

16 55. Revenue Requirement. As of December 31, 2011, SWTC's equity as a percentage of
17 total capitalization was 10.84 percent, which represents an improvement since Decision No. 72030,
18 when its equity comprised about 8 percent of total capital. SWTC states that its requested revenues
19 should allow it to continue to improve its equity position.¹⁷ As in Decision No. 72030, we do not
20 make a determination that any particular equity ratio should be a goal for SWTC, except that SWTC
21 should continue to build equity from its current position. SWTC's proposed revenue level of
22 \$31,426,350 will yield operating cash flow adequate to cover ongoing expenses, meet the
23 Cooperative's principal and interest payments as they come due, and build working capital to support
24 future operating needs, while considering the effect of rates on its member distribution cooperatives.
25 As such, SWTC's proposed revenue level is just and reasonable and should be adopted.

26

27 ¹⁴ See Exhibit B, TRA POA at 3; Tr. at 17-18.

¹⁵ Rebuttal Testimony of SWTC witness Gary E. Pierson, Exh. SWTC-3 at 8 and Exhibit GEP-9; Tr. at 30-31.

¹⁶ Tr. at 33.

28 ¹⁷ Direct Testimony of SWTC witness Peter Scott, Exh. SWTC-1 at 6.

1 56. COSS and Rate Design. The COSS and the rate design based thereon are reasonable
2 and supported by the evidence, and should be adopted.

3 57. TRA. The TRA as proposed provides a means for SWTC to pass on the effect of
4 increased revenues from any new Firm Point-To-Point contract that SWTC enters into a pursuant to
5 its OATT. Based on the evidence presented, we find that the TRA and the TRA POA provide a fair
6 and reasonable means for SWTC to address a revenue-neutral fluctuation in revenues to the benefit of
7 its Member cooperatives and in turn, their end-use retail customers, and will therefore approve it.

8 58. Depreciation Rates. The proposed depreciation rates set forth in Exh. SWTC-2 at
9 Exhibit PS-2 are reasonable and supported by the evidence, and should be adopted.

10 59. Limitation of Patronage Capital Refunds. In Decision No. 72030, the Commission
11 ordered that SWTC not make any patronage refunds while its equity remains below 20 percent of
12 total capitalization and that patronage refunds be limited to 25 percent of net earnings if its equity is
13 between 20 and 30 percent of its capitalization. It is reasonable that this directive remain in force.

14 60. Engineering Issues. Staff did not identify any compliance issues or areas of urgent
15 operational concern. The Staff consultant charged with the engineering analysis concluded that
16 SWTC's technical performance and facilities are sound.¹⁸ He found that facilities are in good
17 condition and functioning as expected, that maintenance conforms to industry standards, that
18 reliability performance is good, and SWTC has taken several corrective steps to reduce outages due
19 to errors.¹⁹ He noted that cost performance could be improved by bettering budget estimating
20 practices.²⁰ SWTC responded that the Staff engineering conclusions and observations are being
21 reviewed by SWTC's senior management and engineering personnel for further process
22 improvements or refinements, and that SWTC has recently added a new position of Operation
23 Engineer to further assist in the analysis and prevention of outages.²¹

24 ...

25 ...

26 _____

27 ¹⁸ Direct Testimony of Staff witness Richard Mazzini, Exh. S-4 at Engineering Analysis Report at 1-2.

¹⁹ *Id.*

²⁰ *Id.*

28 ²¹ Rebuttal Testimony of SWTC witness Gary E. Pierson, Exh. SWTC-3 at 7.

CONCLUSIONS OF LAW

1
2 1. SWTC is a public service corporation pursuant to Article XV of the Arizona
3 Constitution and A.R.S. §§ 40-250 and 40-251.

4 2. The Commission has jurisdiction over SWTC's operations and the subject matter of
5 the application.

6 3. Notice of the proceeding was provided in conformance with law.

7 4. SWTC's FVRB is \$97,658,808.

8 5. The rates and charges set forth in Exhibit A and authorized herein are just and
9 reasonable.

10 6. It is just and reasonable and in the public interest to approve the depreciation rates set
11 forth in Exh. SWTC-2 at Exhibit PS-2.

12 7. It is just and reasonable and in the public interest to approve the TRA and TRA POA
13 as they appear in Exhibit B.

14 8. It is just and reasonable and in the public interest to continue to limit patronage
15 refunds while SWTC's equity remains below 20 percent of total capitalization, and to limit patronage
16 refunds to 25 percent of net earnings if SWTC's equity is between 20 and 30 percent of its
17 capitalization

18 **ORDER**

19 IT IS THEREFORE ORDERED that Southwest Transmission Cooperative, Inc. is hereby
20 authorized and directed to file with the Commission, on or before October 31, 2013, a revised
21 Network Transmission Service Tariff and schedules of rates and charges consistent with Exhibit A
22 and the discussion herein.

23 IT IS FURTHER ORDERED that the revised rates and charges shall be effective for all
24 service rendered on and after November 1, 2013.

25 IT IS FURTHER ORDERED that Southwest Transmission Cooperative, Inc. shall notify its
26 members of the revised schedules of rates and charges authorized herein within 30 days of the
27 effective date of this Decision.

28 ...

1 IT IS FURTHER ORDERED that Southwest Transmission Cooperative, Inc. shall use the
2 proposed depreciation rates set forth in Exh. SWTC-2 at Exhibit PS-2 on a going forward basis.

3 IT IS FURTHER ORDERED that the Network Transmission Revenue Adjustor and the
4 Network Transmission Revenue Adjustor Plan of Administration as they appear in Exhibit B are
5 hereby approved, and that Southwest Transmission Cooperative, Inc. shall file a conforming tariff
6 and Plan of Administration on or before October 31, 2013.

7 IT IS FURTHER ORDERED that Southwest Transmission Cooperative, Inc. shall not make
8 any patronage refunds while its equity remains below 20 percent of total capitalization and that
9 patronage refunds shall be limited to 25 percent of net earnings if its equity is between 20 and 30
10 percent of its capitalization.

11 IT IS FURTHER ORDERED that this Decision shall become effective immediately.

12 BY ORDER OF THE ARIZONA CORPORATION COMMISSION

13
14
15 CHAIRMAN

COMMISSIONER

16
17 COMMISSIONER

COMMISSIONER

COMMISSIONER

18
19 IN WITNESS WHEREOF, I, JODI JERICH, Executive
20 Director of the Arizona Corporation Commission, have
21 hereunto set my hand and caused the official seal of the
22 Commission to be affixed at the Capitol, in the City of Phoenix,
23 this _____ day of _____ 2013.

24
25 _____
26 JODI JERICH
27 EXECUTIVE DIRECTOR

28 DISSENT _____

DISSENT _____

TJ:tv

1 SERVICE LIST FOR: SOUTHWEST TRANSMISSION COOPERATIVE,
2 INC.
3 DOCKET NO.: E-04100A-12-0353
4 Michael M. Grant
Jennifer Cranston
5 GALLAGHER & KENNEDY P.A.
2575 E. Camelback Road
6 Phoenix, AZ 85016-9225
Attorneys for AEPCO
7
8 Michael W. Patten
ROSHKA, DEWULF & PATTEN PLC
400 E. Van Buren, Suite 800
9 Phoenix, AZ 85004
Attorneys for Trico
10
11 Russell E. Jones
WATERFALL ECONOMIDIS CALDWELL
HANSHAW & VILLAMANA P.C.
12 5210 E. Williams Circle, Suite 800
Tucson, AZ 85711
13 Attorneys for Trico
14
15 Vincent Nitido
Karen Cathers
TRICO ELECTRIC COOPERATIVE, INC.
8600 W. Tangerine Road
16 P.O. Box 930
Marana, AZ 85653
17
18 Jeffrey W. Crockett
BROWNSTEIN HYATT FARBER
SCHRECK LLP
19 One E. Washington St., Suite 2400
Phoenix, AZ 85004
20 Attorneys for SSVEC
21
22 Kirby Chapman
SSVEC
311 E. Wilcox Dr.
23 Sierra Vista, AZ 85635
24
25 Michael A. Curtis
William P. Sullivan
501 East Thomas Road
Phoenix, AZ 85012-3205
26 Attorneys for Mohave
27
28

1 Tyler Carlson
2 Peggy Gilman
3 MOHAVE ELECTRIC COOPERATIVE
4 INCORPORATED
5 PO BOX 1045
6 Bullhead City, AZ 86430

7 Janice Alward, Chief Counsel
8 Legal Division
9 ARIZONA CORPORATION COMMISSION
10 1200 West Washington Street
11 Phoenix, AZ 85007

12 Steven M. Olea, Director
13 Utilities Division
14 ARIZONA CORPORATION COMMISSION
15 1200 West Washington Street
16 Phoenix, AZ 85007

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EXHIBIT A**Transmission Services**

Firm Network Service - \$ Monthly Rev. Req.*	\$ 1,579,106
Firm Network Service - \$ Annual Rev. Req.	18,949,274
Firm Network Service - Moh Elec 2 \$ Monthly Rev. Req.*	1,260,481
Firm Network Service - Moh Elec 2 \$ Annual Rev. Req.	15,125,776
Firm Point-to-Point Network Transmission (\$/kW)	2.572
Non-Firm Point-to-Point Network Transmission (\$/kW)	2.572

* Member Rate: \$ annual revenue requirement/12 x ratio of member's current month average load to that of same sum of total members' load.

Mandatory Ancillary Services

Sch. 1 - Network - System Control & Load Dispatch - (\$/kW)	\$ 0.173
Sch. 1 - Point-to-Point - System Control & Load Dispatch - (\$kW)	0.173
Sch. 2 - Network - Var Support/Voltage Control - (\$kW)	0.096
Sch. 2 - Point-to-Point - Var Support/Voltage Control - (\$/kW)	0.070

FERC Optional Ancillary Services - AEPCO

Sch. 3 - Network - Req. & Freq. Resp (\$/kW)	\$.2575
Sch. 4 - Network - Energy Imbalance - Eng In-Kind +/-1.5% (\$/MW)	
AEPCO Pays Positive Imbalance	32.63
Customer Pays Negative Imbalance	100.00
Sch. 5 - Network - Oper. Reserves - Spinning (\$kW)	0.7157
Sch. 6 - Network - Oper. Reserves - Supplemental (\$/kW)	0.4959

Direct Assignment Facilities

Direct Assignment Facilities - (\$/Month)	\$ 33,210
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EXHIBIT B

SOUTHWEST TRANSMISSION COOPERATIVE, INC.

NETWORK TRANSMISSION REVENUE ADJUSTOR (TRA)

TARIFF RIDER

TEMPORARY*

Effective Date: [INSERT]

APPLICABILITY OF NETWORK TRANSMISSION REVENUE ADJUSTOR (TRA)

Applicable to all customers that receive service under SWTC's Network Transmission Service Tariff.

TERMS AND CONDITIONS OF TRANSMISSION REVENUE ADJUSTOR (TRA)

The TRA adjusts SWTC's monthly Network Transmission Service Revenue Requirement and its monthly Mohave 2 Network Transmission Service Revenue Requirement (collectively, the "NTS Revenue Requirements") in the event of the addition of a long term point-to-point transmission service agreement ("Firm Point-To-Point Contract"), defined as a firm (i.e., includes a monthly capacity charge), non-energy based, point-to-point contract that is of a term one year or longer.

In the event that an additional Firm Point-To-Point Contract is entered into, the Company's monthly NTS Revenue Requirements in effect at the time the contract takes effect will be adjusted downward.

Only those revenues derived from the actual transmission service component of a Firm Point-To-Point Contract shall be used in calculating the TRA adjustment. System Control and Load Dispatch revenues and any other Ancillary Service revenues associated with the Firm Point-To-Point Contract(s) will not be included in the calculation of the TRA adjustment.

RATE

As of the Effective Date of this Rider, the following TRA amounts would be applied as credits to the NTS Revenue Requirements as specified in the Network Transmission Service Tariff:

[insert cumulative amount of downward adjustment].

*These revised rates will remain in effect until Commission approval of a subsequent TRA adjustment in response to an additional Firm Point-To-Point Contract.

**Southwest Transmission Cooperative,
Inc.**

**Transmission Revenue Adjustor (TRA)
Plan of Administration**

1 **Transmission Revenue Adjustor - Plan of Administration**

2 **General Description:**

3 The purpose of the Southwest Transmission Cooperative, Inc. ("SWTC") Network
4 Transmission Revenue Adjustor ("TRA") is to track changes in SWTC's firm point-to-
5 point transmission contract revenue and to return increases in those revenues through an
6 adjustor mechanism applied to the Network Transmission Service and Mohave 2
7 Network Transmission Service Revenue Requirements.

8 **Key Definitions:**

- 9 1. Annual Network Transmission Service Revenue Requirement – Annual network
10 transmission service revenue requirement as authorized by the Arizona
11 Corporation Commission in the Company's most recent rate filing, Decision No.
12 [insert].
- 13 2. Annual Mohave 2 Network Transmission Service Revenue Requirement – Annual
14 network transmission service revenue requirement related to service under the
15 Mohave 2 contract as authorized by the Arizona Corporation Commission in the
16 Company's most recent rate filing, Decision No. [insert].
- 17 3. Monthly Network Transmission Service Revenue Requirement – Annual Network
18 Transmission Service Revenue Requirement divided by 12 and as specified in
19 SWTC's Network Transmission Service Tariff, Exhibit A.
- 20 4. Monthly Mohave 2 Network Transmission Service Revenue Requirement –
21 Annual Mohave 2 Network Transmission Service Revenue Requirement divided
22 by 12 and as specified in SWTC's Network Transmission Service Tariff, Exhibit
23 A.
- 24 5. Long Term Point-to-Point Transmission Service Agreement (Firm Point-to-Point
25 Contract) - Firm (i.e., includes a monthly capacity charge), non-energy based,
26 point-to-point contract that is or was of a term one year or longer.
- 27 6. Network Transmission Service Revenue – Revenues collected under the terms
28 and conditions of SWTC's Network Transmission Service Tariff and as recorded
29 in Rural Utilities Service ("RUS") Accounts 447 and 456.

1 7. Firm Point-to-Point Transmission Service Revenue – Revenues collected under
2 the terms and conditions of SWTC’s Point-to-Point Transmission Service Tariff
3 for Firm Point-To-Point Contract customers and as recorded in RUS Accounts
4 447 and 456, but not including Ancillary Service Revenues.

5 8. Ancillary Service Revenues – Revenues associated with services provided by
6 SWTC which are necessary to support the transmission of electric power from a
7 seller to a purchaser given the obligations of control areas and transmitting
8 utilities within those control areas to maintain reliable operations of the
9 interconnected transmission system as defined by the Federal Energy Regulatory
10 Commission (“FERC”). The FERC identifies six different kinds of ancillary
11 services.

12 **Test Year Data:**

13 Based on the most recent test year data and as ordered by the Commission, initial values
14 to be used for the computation of the revised Monthly Network Transmission Service
15 Revenue Requirement and revised Monthly Mohave 2 Network Transmission Service
16 Revenue Requirement are as follows:

17 1. Monthly Network Transmission Service Revenue Requirement = [Insert
18 Value]

19 2. Monthly Mohave 2 Network Transmission Service Revenue Requirement =
20 [Insert Value]

21 **Computations:**

22 The revised Monthly Network Transmission Service Revenue Requirement and Monthly
23 Mohave 2 Network Transmission Service Revenue Requirement shall be calculated as
24 follows:

25
26 **Revised Monthly Network Transmission Service Revenue Requirement**

27
28 The Revised Monthly Network Transmission Service Revenue Requirement = the
29 Monthly Network Transmission Service Revenue Requirement as specified in
30 Exhibit A of the Network Transmission Service Tariff minus the monthly
31 revenue(s) to be received as the result of service supplied pursuant to the
32 Additional Firm Point-to-Point Contract(s) (but not including Ancillary Service
33 Revenues)
34
35
36

1
2 Revised Monthly Mohave 2 Network Transmission Service Revenue Requirement
3

4 The Revised Monthly Mohave 2 Network Transmission Service Revenue
5 Requirement = the Monthly Mohave 2 Network Transmission Service Revenue
6 Requirement as specified in Exhibit A of the Network Transmission Service
7 Tariff minus the monthly revenue(s) to be received as the result of service
8 supplied pursuant to the Additional Firm Point-to-Point Contract(s) (but not
9 including Ancillary Service Revenues)
10

11
12 ACC Revised Network Transmission Service Tariff Filing Requirements:

13 In the event of the addition of a Firm Point-To-Point Contract, SWTC will file a Network
14 Transmission Revenue Adjustor Tariff Rider ("TRA Rider") that reflects the amount of
15 the adjustment to the revenue requirements shown in Exhibit A to the Network
16 Transmission Service Tariff along with the contract documentation and calculations
17 supporting the TRA Rider. The TRA Rider will be subject to a sixty (60) day Arizona
18 Corporation Commission Staff review period and shall become effective upon
19 Commission approval.
20

21
22 Compliance Reports:

23 Six months following the effective date of the first TRA Rider, SWTC will file a report
24 containing the following information:
25

- 26 1. The customers and their associated revenues collected under the terms and
27 conditions of SWTC's Network Transmission Service Tariff.
28
- 29 2. The customers and their associated revenues collected under the terms and
30 conditions of SWTC's Point-to-Point Transmission Service Tariff for Firm Point-
31 To-Point Contract customers.
32

33 SWTC will file these compliance reports every six months thereafter. In order to provide
34 SWTC with sufficient time to compile the data, the reports will contain data for the
35 twelve month period ended two months prior to the report date.

36 In addition, each report will be accompanied by a certification from SWTC's Chief
37 Executive Officer or Chief Financial Officer that all information provided in the filing is
38 true and accurate to the best of his or her information and belief.
39

1 **Notification:**

2 Within fifteen (15) days of the Commission's approval of a TRA Rider, SWTC will
3 provide its Network Transmission Service customers a notice of the revised Monthly
4 Network Transmission Service Revenue Requirement and revised Monthly Mohave 2
5 Network Transmission Service Revenue Requirement.