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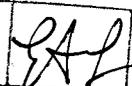
Mail Station 9712
PO Box 53999
Phoenix, Arizona 85072-3999
Tel 602-250-5671
Elisa.Malagon@aps.com

July 31, 2014

Arizona Corporation Commission
DOCKETED

JUL 31 2014

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

DOCKETED BY 

RE: Arizona Public Service Company's ("APS") Comments to Staff Draft Report in the Commissions Eighth Biennial Transmission Assessment
Docket No. E-00000D-13-0002

Attached please find Arizona Public Service Company's comments to Staff's first draft of the Eighth Biennial Transmission Assessment in the above-referenced matter. APS appreciates this opportunity to comment.

APS will also be providing confidential comments under separate cover pursuant to a protective agreement in this matter.

If you have any questions regarding this information, please contact Gregory Bernosky at (602)250-4849.

Sincerely,

Lisa Malagon

LM/sb

cc: Ed Stoneburg, Staff Engineer
Chris Fecke-Stoudt, K.R. Saline

2014 JUL 31 PM 4:32
AZ CORP COMMISSION
DOCKET CONTROL

Arizona Public Service Company
Comments on the First Draft Copy of the Eighth BTA
Docket No. E-00000D-13-0002

Section in Report	Proposed Change	Comment About Section or Explanation Supporting Proposed Change
Page v, section 2		<p>There are a multitude of factors that determine the need and timing of transmission projects. Increased load growth is only one of those factors; along with factors such as load dispersion, need to import resources, response to new or retiring resources, changes to reliability criteria or standards, or other changes in system conditions. Attempting to assign a specific load level to the need of a project in a networked system is difficult at best and provides incomplete information.</p> <p>APS offers an alternative approach: each project in our Ten Year Transmission Plan would state the reason(s) or need(s) for the project. Projects that are determined to be driven, in part, by the need to serve load would also include the forecasted load level for the identified in-service year.</p> <p>Additionally, because the Arizona Corporation Commission is not expected to issue an order in this docket until December 2014 and additional time will be required for the utilities to comply, APS requests that implementation of this new requirement start with the Ten Year Transmission Plan filed on January 31, 2016.</p>

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Page viii, 1.f.	<p>Cochise County Study Group (“CCSG”) should be replaced with LSEs responsible for serving load in Cochise County.</p> <p>Suggested language: “The policy that the Load Serving Entities (“LSE”) in Cochise and Santa Cruz Counties continue to monitor the reliability in Cochise and Santa Cruz Counties, respectively, and propose any modifications that they deem to be appropriate in future Ten Year Plans.”</p>	As formed, the CCSG consisted of a larger group of stakeholders. The CCSG has fully performed its function, therefore it is no longer needed.
Page ix, Section 2c	Replace 2c with the following language: “Direct TEP to file the SWAT CRAFT study report on behalf of the Arizona utilities when it becomes available.”	
Page 9, second paragraph	In the listing of 500kV total transmission miles, replace “Palo Verde-Saguaro.” with “Palo Verde-Delaney-Sun Valley-Morgan 500kV.”	Palo Verde-Saguaro is a conceptual project that does not have a specific plan or sponsor. The Palo Verde-Delaney-Sun Valley-Morgan projects are listed as separate projects in the Ten Year plan, but are actually components of the overall 500kV project.
Page 14, first sentence	In the phrase, “Table 9 shows that over 10 GW of generation capacity is still <i>planned</i> for development”, change the word “planned” to “contemplated.”	Generation that is in an interconnection queue is not considered “planned for development.” The term “contemplated” better describes the concept.

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Page 14, second half of the paragraph	Replace the sentence that starts with, "However, the filed Eighth BTA..." with the following: "Arizona utility interconnection queues include a significant level of generation exports to California. If the interconnection queues were to fully develop, then the transmission plans filed in the Eight BTA may not support that level of generation exports. Additional transmission development or reinforcement would be needed."	The end of the paragraph signals that the utilities may not have adequately planned for transmission development. Rather, the statement should reflect the level of generation in the Arizona generator queues.
Page 16, Table 10	Strike "Violations" from Category A and Category B header and replace with "Issues." Strike "Mitigations" from Mitigations Developed for all Violations header and replace with "Planned Upgrade."	These changes are consistent with language contained within NERC Standards TPL-001-1 and TPL-002-0b.
Page 21, section 3.3.1.4	In the first sentence, change the word "operated" to "operate" or "be operated."	
Page 31, throughout section 4	Replace "considered for the adequacy analysis" with "considered for the adequacy assessment."	The phrase "considered for the adequacy analysis" is used to describe each project. This phrase gives the impression that the project has been or is included or excluded in a reliability/adequacy study.

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Page 31, section 4.1	In the second paragraph, change Delaney 500kV “substation” to Delaney 500kV “switchyard.”	
Page 31, footnote 55	Change footnote to read, “The Arizona portion of the prior planned Palo Verde-Devers #2 Project, of which SCE has already built the California portion.”	
Page 51, section 5.3.1, first bullet		The description of the project does not accurately convey the true project scope. Expand upon the description to state that a portion of the 109 miles includes participation in other existing or planned transmission and not new transmission.
Page 57, Table 15	In the “Current Status” column of the Delaney-Palo Verde 500kV project change the in-service date to 2016.	
Page 61, section 5.7.1	Change last sentence of the first paragraph to add the words Peak Reliability as follows: “In response the WECC Reliability Coordinator (“RC”) has developed monitoring procedures and established a website that provides a status of WECC’s [Peak Reliability] compliance to NERC’s Key Categories of Findings and Recommendations.”	This change addresses the bifurcated status of WECC.

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Page 69, section 6.3, 1. c.	Change "Palo Verde to North Gila No. 2" to "Hassayampa to North Gila No. 2"	
Exhibit 1 & Exhibit 2 (maps)	Correct the routing for the Delaney-Sun Valley 500kV project. Please see APS 2014-2023 Ten-Year Transmission System Plan-Page 10 of 167 Attachment A.	The maps show an incorrect route for the Delaney-Sun Valley 500kV project.
Exhibit 2 (map)	Clarify or indicate that Watermelon substation is part of the TBD-C23 project.	The map appears as if the Watermelon switchyard currently exists.
Exhibit 6, pages 9-14	Add the heading "Exhibit 6 – Arizona Planned Project Lookup Table"	This clarifies that these pages are a continuation of Exhibit 6.
Exhibit 6, Page 10, Project A35	Remove APS as a participant	
Exhibit 6, Page 10, Project A23	Add CAWCD as a participant	
Exhibit 6, Page 11, Project A48	Remove APS as a participant	
Exhibit 6, Page 14, Project C11	Remove APS as a participant	
Exhibit 6, Page 14, Project C23	Remove APS as a participant	
Exhibit 9, page 20	Add the heading "Exhibit 9 – Arizona Demand Forecast Data"	This clarifies that this page is a continuation of Exhibit 9.
Exhibit 10, pages 22-23	Add the heading "Exhibit 10 – Plan Changes Between Seventh and Eighth BTA"	This clarifies that these pages are a continuation of Exhibit 10.

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Exhibit 11, page 24	Add date references, i.e., when information represented in Exhibit 11 was taken from the utility's queues. Any reference or reproduction of a generation interconnection queue should include a reference date.	The interconnection queues are continuously changing and having a reference date is important.
Exhibit 11, page 24	Change the heading of the last column to read: "Requested In-service Date."	Generator interconnection customers request a specific in-service date, which may or may not be feasible. That date should not be referenced as an absolute.
Exhibit 11, page 25	Add the heading "Exhibit 11 – Listing on Queue Interconnection Generation Projects"	This clarifies that this page is a continuation of Exhibit 11.
Exhibit 12, pages 27-32	Add the heading "Exhibit 12 – Listing of Projects Sorted by In-Service Date and Voltage"	This clarifies that these pages are a continuation of Exhibit 12.
Exhibit 13, pages 34-39	Add the heading "Exhibit 13 – Listing of Projects Sorted by Voltage Class and In-Service Date"	This clarifies that these pages are a continuation of Exhibit 13.
Exhibit 14, page 41	Add the heading "Exhibit 14 – Arizona Public Service Project Summary by Voltage and In-service Date"	This clarifies that this page is a continuation of Exhibit 14.
Exhibit 18, pages 46-47	Add the heading "Exhibit 18 – Tucson Electric Power Project Summary by Voltage and In-service Date"	This clarifies that these pages are a continuation of Exhibit 18.

MAKE ALL CONFORMING CHANGES