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July 19, 2016

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

RE: Arizona Public Service Company's ("APS") Comments to Staff's First Draft
Report in the Ninth Biennial Transmission Assessment
Docket No. E-00000D-15-0001

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

If you have any questions regarding this information, please contact me at
(602)250-3341.

Sincerely,

Kerri A. Carnes

KC/js
Attachment

cc: Zachary Branum
Kent Simer

Arizona Corporation Commission
DOCKETED

JUL 19 2016

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**Arizona Public Service Company's Comments
on the First Draft of the Ninth BTA Report
Docket No. E-00000D-15-0001**

Section in First Draft of Report dated July 5, 2016	Proposed Change	Comment About Section or Explanation Supporting Proposed Change
Page iv, paragraph #3, last paragraph on page	Change "low" to "lower"	"Low" implies there is a possible low voltage issue (voltage below acceptable); APS does not believe this is the intended reference
Page xii, Listing of Exhibits	Change titles for Exhibits 1, 2, 9, 12 and 20	Correct either the titles on this page or the titles on the exhibits so that they match
Pages 1 to 6, footer at bottom right	Change the footer to read Overview and not Ten Year Plan, which begins on page 7	Match the footer with the title for Section 1
Page 5, Table 2	Use consistently either "N/A" or "NA"	N/A
Pages 7 to 16, footer at bottom right	Change the footer to read Ten-Year Plans	Match the footer with the title for Section 2
Page 8	<p>Add the following:</p> <p>2. Staff recommends that the Commission suspend the requirement to describe the driving factor(s) for each transmission project, including the system load level range at which each transmission project is anticipated to be needed for each load growth of reliability driving transmission projects.</p> <p>Make conforming changes.</p>	This addition explicitly suspends a requirement that Staff concluded is not warranted in future Ten-Year Plans (<i>see</i> page 4 of draft report).
Page 8	<p>Add the following:</p> <p>3. Staff recommends that the Commission suspend the requirement for TEP to file the SWAT CRATF report on behalf of the Arizona utilities within 30 days of completion as directed in Decision No. 74785.</p>	After discussion with TEP and SRP and consistent with the CRATF presentation by TEP at the first 9 th BTA workshop, APS proposes that the requirement to file the CRATF report within 30 days after completion be suspended and replaced with proposed alternative language described below.

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	Delete related language in the Recommendations Section 1.d.f. Make conforming changes.	
Page 8	Add a new section that reads: Utilities shall participate in WestConnect Regional Planning process and coordinate the Arizona reliability study with WestConnect study and scenario results, and TEP will report relevant findings on behalf of the utilities in future BTA proceedings. Make conforming changes.	This alternative language more accurately describes the current state of the coal reduction work. The coal reduction assessment is ongoing and a report is anticipated in the future (potentially beyond the 10 th BTA). After discussion with TEP and SRP and consistent with the CRATF presentation by TEP at the first 9 th BTA workshop, APS proposes that the requirement to file the CRATF report within 30 days after completion be suspended and replaced with the proposed alternative language. As previously reported, the SWAT CRATF study has morphed into a regional assessment under the auspices of WestConnect.
Page 9, last paragraph	Change section reference from Section 4.17 to Section 4.1.12	The incorrect section is referenced in the draft
Page 11, Table 8	Confirm consistent font point size	Some text is larger than other text
Page 13, last paragraph	Change section reference from section 3.3.4 to section 3.3.5	The incorrect section is referenced in the draft
Page 17, Section 3.1, last paragraph on page	Change "...required technical study work is in compliance with NERC Transmission	Considering that the study work has been completed, we propose that "is" is more

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	Planning ("TPL") Standards."	appropriate than "should be"
Page 20, Footnote 36	"...refers to the time period (0-30 seconds) after..."	Transient time frame is not specifically defined. General rule of thumb is between the first 10 to 30 seconds after an event. New WECC criteria references dampening within 30 seconds, therefore using 0-30 seconds may be a more appropriate time period to use.
Page 37, Section 4.1.1 and Page 73, Footnote 97	Change switchyard to substation.	Delaney is a substation, not a switchyard as referenced in multiple sections.
Pages 37 to 50	Correct footer so that title of section is flush right and matches other pages	N/A
Page 68, Section 5.4.3, second paragraph	"APS continues to follow its coal strategy that was outlined in a September 2014 IRP Supplement. APS has ended operations of Units 1-3 at the Four Corners Generating Station as a mitigation strategy to making a \$586 million capital investment for environmental upgrades. As proposed in the supplement, APS shut down Unit 2 at the Cholla Power Plant in October 2015 and has no plans to operate units 1 and 3 beyond 2025; however, APS reserves the right to convert units 1 and 3 to natural gas, rather than retire them, depending upon future needs and the economics of a coal to gas conversion at that time.	As indicated in the footnote on page 2 of the September 2014 IRP supplement referenced, APS would like to include the language "...however, reserves the right to convert Units 1 and 3 to natural gas, rather than retire them, depending upon future needs and the economics of a coal to gas conversion at that time.", as it more accurately represents the footnote in the September 2014 IRP Supplemental Filing
Page 83, Section 7	Confirm bullet numbering is correct – starts at "2."	N/A

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Page 85, Table of Exhibits	Correct the titles for Exhibits 1, 2, 9, 12 and 20	Make Table of Exhibits titles consistent with the headings on the exhibits
Page 87, Exhibit 1	HANG2 project should be in-service – solid line Palo Verde-Delaney-Sun Valley 500kV project should be in-service – solid line Sun Valley-Trilby Wash 230kV project should be in-service – solid line	N/A
Page 92, Exhibit 4	Remove label TBD-C07 near Orchard	Label is misleading in that it indicates the Orchard substation in-service is TBD when it should come in-service with the North Gila – Orchard 230 kV line
Page 103 and Page 105, both marked Exhibit 7	Resolve duplicate Exhibit 7	Both Exhibits on these two pages are marked Exhibit 7; the second Exhibit 7 (map) is listed earlier as Exhibit 1
Page 111, Exhibit 10, ninth project in the list	Change 200 to 150	The interconnection request in APS's Generator Interconnection Queue at the Gila Bend Substation 230kV and should be 150MW, not 200MW