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Mail Station PAB221  
P.O. Box 52025  
Phoenix, AZ 85072-2025

**Adam McAnally**  
Regulatory Analyst  
Regulatory Policy & Public Involvement  
Phone: (602) 236-3854  
Fax: (602) 236-3458  
Adam.McAnally@srpnet.com

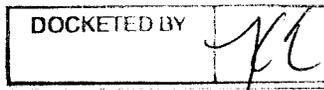
July 19, 2016

Arizona Corporation Commission

DOCKETED

JUL 19 2016

Mr. Tom Broderick  
Director, Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007



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Re: 2016 Biennial Electric Transmission Assessment for 2016-2025  
Docket No. E-00000D-15-0001

Dear Mr. Broderick:

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

Please feel free to contact me at (602) 236-3854 if you have any questions.

Sincerely,

Adam McAnally  
SRP Regulatory Policy & Public Involvement

Attachment

cc: Docket Control, (Original, plus 13 copies)  
Zachary Branum, Arizona Corporation Commission (by e-mail)  
Kent Simer, K. R. Saline & Associates, PLC (by e-mail)

SRP's Comments on  
1<sup>st</sup> Draft of Ninth BTA Staff Report  
E-00000D-15-0001  
Submitted July 19, 2016

## 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:

### Substantive Comments:

- **Page v:** Item 3 reads "In June of 2014 SRP completed the Palo Verde – Southeast Valley – Browning 500kV project". SRP recommends to change the language to read "In June of 2014 SRP completed the following components of the Southeast Valley project: Pinal Central 500kV and 230kV substations, Duke 500kV substation, Pinal West – Duke – Pinal Central 500kV line, Pinal Central – Browning 500kV line, Pinal Central – Randolph 230kV line and the Pinal Central 500kV shunt reactor.
- **Page vii, 84:** SRP suggests replacing, "For TEP to file the SWAT CRATF study report on behalf of the Arizona utilities within 30 days of completion as directed in Decision No. 74785." with, "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. 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." This is consistent with TEP's presentation at the 9<sup>th</sup> BTA Workshop and after discussion with APS and TEP, SRP suggests suspending 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. As previously reported, the SWAT CRATF study has morphed into a regional assessment under the auspices of WestConnect. The assessment is ongoing and a report is anticipated in the future (potentially beyond the 10<sup>th</sup> BTA).
- **Page viii, 84:** SRP encourages Staff to add language to the "Recommendations" sections removing the requirement from the 8<sup>th</sup> BTA directing utilities to "describe the driving factor(s) for each transmission project in the Ten Year Plan..." SRP believes the statement on page 20 of the Draft Staff Report, "Based on the above responses, Staff and KRSA believe that the load level range may be an impractical metric for inclusion in future Ten-Year Plans." supports SRP's recommendation to remove this requirement.
- **Page 12:** SRP recommends removing the word "likely" from the sentence, "SRP has reduced their forecast by approximately 5.11% over the planning period and is *likely* experiencing similar trends as APS." SRP is experiencing the same trends as APS therefore the word "likely" is not needed.
- **Page 14 (Table 9):** SRP believes for consistency both the 8<sup>th</sup> and 9<sup>th</sup> BTA's should show all projects in all queues for SRP. The numbers below show the active queued projects for the 8<sup>th</sup> and 9<sup>th</sup> BTAs in SRP's interconnection queues: SRP, ANPP HVS, ANPP VTS, Palo Verde – Pinal Central and the Southwest Valley.

Utility	Approximate Capacity (MW) of Generators in Utility Queue		Interconnection Queues from Eighth to Ninth
	Eighth BTA	Ninth BTA	
SRP	3824	1945	(1879)

- **Page 111 (Exhibit 10):** Based on previous comment, Exhibit 10 should be updated to include the following projects:

SRP Active	Hassayampa 500kV switchyard	175	PV	Oct 2014
SRP Active	Hassayampa 500kV switchyard	175	PV	Apr 2016
SRP Active	Hassayampa 500kV switchyard	175	PV	Oct 2017
SRP Active	Hassayampa 500kV switchyard	200	PV	May 2013
SRP Active	Hassayampa 500kV switchyard	150	PV	Dec 2016
SRP Active	Jojoba 500kV switchyard	300	PV	Dec 2018
SRP Active	Pinal Central 230kV	50	PV	Aug 2016

- **Page 14:** Arlington Valley I has not come on line. SRP requests removal of the reference to Arlington Valley I coming online from the paragraph below Table 9.
- **Page 20:** Footnote 36 includes a defined timeframe for transient stability of 0-10 seconds; this can be misleading as the time frame of a transient event can vary. SRP recommends removing the “(0-10 seconds)” reference.
- **Page 21 (Table 12):** Add, “The next NERC/WECC reliability audit is scheduled to occur October 2016.” under Comments Related to Transmission Planning Standards for SRP.
- **Page 102 (Exhibit 6):** For C49, SRP’s Abel 500kV Substation, replace, “CEC Status Not Provided. Project has not advanced since 8<sup>th</sup> BTA.” with, “CEC Approved – Case #126 – Decisions #68093/68291. Project has not advanced since 8<sup>th</sup> BTA.”
- **Page 107 (Exhibit 9):** Pinal Central – Randolph 500kV should be 230kV
- **Page 107 (Exhibit 9):** Need to add to the list for SRP the following:
  - Pinal West – Duke – Pinal Central 230kV and 500kV line

## Editorial Comments:

- **Page ii:** Last line on page references Western *Electric* Coordinating Council, should read Western *Electricity* Coordinating Council.
- **Page iv, viii, 77, 79, 84:** Utilities' EE/DG studies are not referenced in these sections. SRP recommends referencing the utilities' EE/DG studies in these sections.
- **Page 19:** Footnote should reference Table 11, not Table 12.
- **Page 30:** SRP recommends changing footnote 50 to reference new NERC Standard TPL-001-4 (in reference to outage categories P2 – P7).
- **Page 78:** Paragraph c. needs a space between “2025.” and “Delaying”.
- **Appendix C-1:** Daniel McGuire's email address should be changed to [dbmcguir@srpnet.com](mailto:dbmcguir@srpnet.com)
- **Appendix C-2:** Brian Keel's email address should be changed to [BKKeel@srpnet.com](mailto:BKKeel@srpnet.com) (not sprnet.com)