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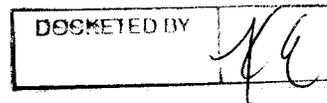
VIA HAND DELIVERY

Arizona Corporation Commission
DOCKETED

September 9, 2016

SEP 09 2016

Thomas K. Chenal
Assistant Attorney General
Chairman



Arizona Power Plant and Transmission Line Siting Committee
1275 West Washington St.
Phoenix, Arizona 85007

Re: *In the Matter of the Application of White Wing Ranch North, LLC, in Conformance with the Requirements of Arizona Revised Statutes 40-360.03 and 40.360.06, for a Certificate of Environmental Compatibility Authorizing Construction of the White Wing Gen-tie Project, an Approximately 3.5 mile Gen-tie Transmission Line and Associated Substation Facilities Interconnecting to the Existing Hoodoo Wash Substation Approximately 10 miles north and 3 miles East of Dateland, Yuma County, Arizona,*

*Docket No. L-00000ZZ-16-0269-00172,
Case Number 172*

Dear Chairman Chenal:

This law firm represents the Imperial Irrigation District ("IID"), which has a concern regarding the gen-tie line that is the subject of this proceeding. We have, as of yesterday, been retained to represent IID in this Docket, so please excuse the late involvement. As explained below, I understand that some off-the-record negotiations recently broke down.

I am requesting late intervention so that a representative of IID can provide testimony on the record. Because of the late notice, I will not be able to be in Yuma in person on the 12th. I am requesting that Robert Laurie, and attorney with IID, be allowed to participate *pro hac vice*. Mr. Laurie is a member of the California bar, in good standing, and is well versed in the issues at hand and the environmental siting process. Mr. Laurie's contact information is:

ROBERT A. LAURIE
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Imperial Irrigation District
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Cell: (760) 791-1094

Phoenix ▶ Peoria ▶ Washington, DC

If the request for pro hac vice status is not granted, then I ask that the IID witnesses (including Mr. Laurie) simply be allowed to take the witness stand and provide testimony along the lines of this letter. In the event that you determine that this request for intervention is too late, I am requesting that this letter, and the statement of the IID representative, be accepted as public comment.

As discussed below, the matter at issue here involves the impact of the line on reliability as well as public safety. The concern of IID can be addressed by the addition of simply one condition to the CEC order. The requested condition is:

Prior to construction of the gen-tie line, Applicant shall execute an Affected System Construction and Operation Agreement with the Imperial Irrigation District to mitigate impacts on the safety and reliability of the transmission system owned by the Imperial Irrigation District attributable to the connection of the Applicant's generating facility, via the gen-tie line, to the Arizona Transmission System and report back to the Commission to confirm that the Applicant has executed such Agreement.

I. DESCRIPTION OF IID AND ITS INTEREST IN THIS PROCEEDING

IID is an irrigation district organized under the Water Code of the State of California and, as such, is a political subdivision of the State of California. Due to its status as a political subdivision of the State, IID is not a "public utility" regulated by the Federal Energy Regulatory Commission ("FERC"). Instead, IID is governed by a publicly-elected Board of Directors. IID provides both electric and irrigation services to retail customers in Southeastern California, including in Imperial and Riverside Counties. It serves those customers, in part, by the transmission of electric energy generated in Arizona. IID is a co-owner of the Arizona Transmission System ("ATS") in Arizona and IID's transmission system interconnects with the Arizona transmission systems of both Arizona Public Service Company ("APS") and the Western Area Power Administration.

The Applicant is seeking to interconnect a 200 MW photovoltaic solar generating facility, via the proposed gen-tie line, to the Hoo Doo Wash 500 kV Switchyard. That Switchyard is a component of the ATS. IID has a direct and substantial interest in this proceeding because IID is a co-owner of the ATS, including the Switchyard. Specifically, the ownership shares of each ATS co-owner are: (1) IID - 12.78 percent; (2) APS - 11.00 percent; and (3) San Diego Gas & Electric Co. ("SDG&E") - 76.22 percent. In other words, the Applicant is proposing to connect the gen-tie line to a transmission facility co-owned by IID in Arizona.

The ATS and another jointly-owned transmission system, called the California Transmission System, together form what is known as the Southwest Power Link ("SWPL"). SWPL is a major transmission corridor in which power is transmitted in an east-west direction from generators in Arizona, through the IID retail service territory, and then into the San Diego area. When the Applicant's generating facility is placed into operation, power is projected to flow over the gen-

tie through the SWPL and, in certain contingency scenarios, onto IID's individually-owned transmission system.

II. IID'S RELIABILITY AND PUBLIC SAFETY CONCERN

As the Committee may recall, on September 8, 2011, there was a major power outage in the Southwest affecting service to customers in both Arizona and California. A report issued by the staff of the North American Reliability Corporation and FERC on that power outage describes in detail the interconnected nature of the ATS operated by APS and the transmission systems of IID and SDG&E in California.¹ It is IID's goal to prevent a recurrence of an outage affecting service to customers in Arizona and California. To do so, generation project developers, such as the Applicant, need to mitigate impacts attributable to the interconnection of their generating facilities on the safety and reliability of IID's transmission system.

APS is the Operating Agent for the ATS on behalf of the co-owners. Therefore, APS conducted a study to determine the impacts of the proposed interconnection, via the gen-tie line, to the safety and reliability of the jointly-owned ATS and whether any upgrades were necessary to the ATS to mitigate those impacts before the interconnection can be safely and reliably allowed. IID, in turn, conducted a study, known as an Affected System Study, to determine the impacts of the proposed interconnection, via the gen-tie line, to the safety and reliability of IID's individually-owned transmission system and whether any upgrades were necessary to that system to mitigate the impacts before the interconnection can be safely and reliably allowed. Due to power flows over the gen-tie and ultimately onto IID's transmission system, IID concluded that upgrades were necessary to an IID transmission line, known as the "S" Line, before the generating facility can be safely and reliably interconnected, via the gen-tie line, to the ATS.

Recently, APS reported to IID that the Applicant requested a letter from APS, on behalf of the ATS co-owners and the California Independent System Operator ("CAISO"), which would be submitted for hearing record in this proceeding, confirming that studies have been completed and all parties are proceeding amicably and professionally in negotiations of a Large Generator Interconnection Agreement ("LGIA"). IID proposed to include the following status report in the draft letter:

The LGIA requires an Affected System Study to be performed by IID to analyze impacts on its individually-owned system and determine whether IID Network Upgrades are required to accommodate the interconnection of the White Wing Generating Facility. IID reports that it also performed that study and determined that upgrades are necessary to IID's "S" Line to accommodate the interconnection. IID and White Wing are in the process of scheduling a study

¹ The report is available publicly at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=12973367>.

review meeting, after which IID and White Wing must enter into an Affected System Construction and Operation Agreement.

Yesterday, however, the CAISO refused to approve the draft letter containing this status report by IID and IID understands that APS therefore did not submit the letter for reporting to the Committee. Accordingly, IID is submitting this individual letter.

IID is not a member of the CAISO and IID is concerned, in particular, that the CAISO is allowing generators that sell energy to members of the CAISO to flow energy onto IID's transmission system without IID's authorization and appropriate mitigation of the impacts. Before the Applicant is authorized to construct the gen-tie, IID therefore respectfully submits that the Applicant should be required to negotiate in good faith and execute an Affected System Construction and Operation Agreement with IID for the purpose of mitigating impacts on the safety and reliability of IID's transmission system.

III. IID'S PROPOSED CONDITION

Specifically, to protect the public safety and system reliability, IID proposes that the following condition be adopted by the Committee:

Prior to construction of the gen-tie line, Applicant shall execute an Affected System Construction and Operation Agreement with the Imperial Irrigation District to mitigate impacts on the safety and reliability of the transmission system owned by the Imperial Irrigation District attributable to the connection of the Applicant's generating facility, via the gen-tie line, to the Arizona Transmission System and report back to the Commission to confirm that the Applicant has executed such Agreement.

Thank you and the Committee for considering these comments and the proposed condition.

Very truly yours,

JENNINGS, STROUSS & SALMON, P.L.C.

By



Kenneth C. Sundlof, Jr.