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June 5, 2018

Arizona Corporation Commission

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JUN 5 2018

DOCKETED BY

Mr. Thomas K Chenal, Chairman
Arizona Power Plant and
Transmission Line Siting Committee
Assistant Arizona Attorney General
2005 North Central Avenue
Phoenix, Arizona 85004-1592

RE: TUCSON ELECTRIC POWER ("TEP") IRVINGTON TO KINO 138 KV
TRANSMISSION LINE PROJECT, LINE SITING CASE #178 - APPLICATION FOR
CEC (DOCKET NO. L-00000C-18-0103-00178)

Dear Chairman Chenal:

On May 8, 2017, Staff received your letter regarding the Tucson Electric Power ("TEP") Application ("Application") for the issuance of Certificates of Environmental Compatibility ("CEC") for the Irvington to Kino 138 kV Transmission Line Project ("Project").

This letter is the Utility Division's response addressing the question of whether the proposed project improves the reliability and/or safety of the operation of the grid and the delivery of power in Arizona.

PROJECT DESCRIPTION

The Irvington to Kino Transmission Line Project consists of new 138 kV lines and structures totaling approximately 3.63 to 4.64 miles, depending on the route selected, to connect the existing Irvington Substation to the future Kino Substation. Approval to site Kino Substation has been issued by the City of Tucson. The Project will cross private and Pima County owned land, as well as City of Tucson and Pima County road rights-of-way. TEP is requesting a 300-foot corridor for the Preferred Route to allow for siting flexibility.

The transmission line will be constructed using tubular steel monopole structures, typically 75 to 110 feet above ground. Taller structures may be required for site specific clearance issues. The average span length between structures will be approximately 500 feet with departures from this span length as necessary to achieve site specific mitigation objectives.

The proposed transmission line will run from the Irvington Substation, located at East Irvington Road and South Alvernon Way, to the future Kino Substation, to be located at South Kino Parkway and East 36th Street in Tucson, Arizona. TEP has stated in its application that the Project as proposed will provide increased capacity to serve anticipated future load increases, reduce the load on part of the aging existing 46 KV system serving the area, and provide increased reliability under contingency conditions. The Application states that the existing 46 and 138 KV systems do not provide sufficient capacity to serve the new developing load, which includes a large mixed-use development in the vicinity of 36th Street and Kino Boulevard.

IMPACTS OF THE PROPOSED PROJECTS ON IMPROVED RELIABILITY AND/OR SAFETY OF OPERATION OF THE GRID AND THE DELIVERY OF POWER IN ARIZONA.

The Project has been included in TEP Ten-Year Plans as a Planned High-Voltage Transmission Project (under different names in previous Ten-Year Plans and under this name in the most recent Ten-Year Plan) since 2011. As such, it has been included in all area transmission studies, including the Seventh, Eighth, and Ninth BTAs (Biennial Transmission Assessments), and all studies performed under the auspices of the Southwest Area Transmission Group and WestConnect.

The Project was included in the studies required to support the last three BTAs as well as the one currently in progress. Power flow, facility loading limit, single contingency outage, extreme contingency, and transient stability studies were conducted for the interconnected Arizona system. The results show no negative impacts on grid reliability and safety, provided they are constructed in compliance with, and operated in accordance with good utility practice and applicable reliability standards.

CONCLUSION AND RECOMMENDATION

Based on Staff's review of the Application and the Impact Studies, from an engineering perspective the routes proposed by TEP appear to be technically sound. Staff believes that the proposed Project will improve the reliability, resilience, and safety of the grid as well as the delivery of power in Arizona.

The Utilities Division recommends inclusion, as a condition to any CEC the Siting Committee may issue, of the standard cathodic study condition to evaluate the risk to any existing natural gas or hazardous liquid pipelines as follows:

When project facilities are located parallel to and within 100 feet of any existing natural gas or hazardous liquid pipeline, Applicant shall:

- (a) Ensure grounding and cathodic protection measurements are performed to show that the project's location parallel to and within 100 feet of such pipeline results in no material adverse impacts to the pipeline or to public safety when both the pipeline and the project are in operation. The Applicant shall take appropriate steps to ensure that any material adverse impacts are mitigated. The Applicant shall provide to the Commission Staff and file with Docket Control a copy of the measurements performed and additional mitigation, if any, that was implemented as part of its annual compliance-certification letter; and
- (b) Ensure that measurements are taken during an outage simulation of the project that may be caused by the collocation of the project parallel to and within 100 feet of the existing natural gas or hazardous liquid pipeline. The measurements should either: i) show that such simulated outage does not result in customer outages; or ii) include operating plans to minimize any resulting customer outages. The Applicant shall provide a copy of the measurement results to the Commission Staff and file it with Docket Control as part of its annual compliance-certification letter.”

If there are any questions, please feel free to contact me, at (602) 542-6935, or Toby Little at (520) 560-1051.

Sincerely,



Elijah O. Abinah
Director
Utilities Division

On this 5th day of June, 2018, the foregoing document was filed with Docket Control as a Utilities Division – Miscellaneous filing, and copies of the foregoing were mailed on behalf of the Utilities Division to the following who have not consented to email service. On this date or as soon as possible thereafter, the Commission's eDocket program will automatically email a link to the foregoing to the following who have consented to email service.

J. Matthew Derstine
Snell & Wilmer
One Arizona Center
400 East Van Buren, Suite 1900
Phoenix, Arizona 85004-2202

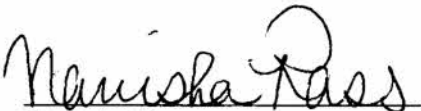
Megan J. DeCorse
Tucson Electric Power Company
88 East Broadway, MS HQE910
Post Office Box 711
Tucson, Arizona 85702

Michael Ortega
City Manager
City of Tucson
City Hall, 10th Floor
255 West Alameda
Tucson, Arizona 85701

Chuck Huckelberry
County Administrator
Pima County
County Administrator's Office
130 West Congress Street, 10th Floor
Tucson, Arizona 85701

Andy Kvesic
Director/ Chief Counsel, Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Elijah Abinah
Director, Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

By: 
Nanisha Ross
Administrative Support Specialist