Arizona Corporation Commission

Docket No. E-00000D-13-0002

2014-2023 8th Biennial Transmission Assessment - Workshop II

August 28, 2014

Agenda

1. **Introductions and Workshop II Overview**
2. **Review of BTA Workshop I Action Items**
3. **Summary of Comments Received on First Draft BTA 8th Report**
4. **Overview of Second Draft 8th BTA Report**
   - Significant Additions/Modifications
   - Responses to Docketed Comments Not Incorporated in Second Draft
   - Update by CRATF
5. **Workshop II Participants' Responses to Second Draft 8th BTA**
6. **Closing Remarks Regarding 8th BTA Process**

Recap of BTA Process To Date

- **Ten Year Plans filed with ACC on or before January 31, 2014**
- **Presentations of Ten Year Plan occurred at Workshop I at ACC office on May 15, 2014**
- **First draft BTA report posted for public comment on July 9, 2014**
- **Three week review and comment period which ended on July 31, 2014**
- **Clean and redline versions of second draft BTA report posted to ACC website on August 19, 2014 (http://www.azcc.gov/divisions/utilities/electric/biennial.asp)**
- **Review of second draft changes – Workshop II - Today**

Workshop I Action Items

- APS agreed to file with the Commission the SAIC report accessing the transmission system impacts of EE and DG – Completed

- APS and SRP agreed to confirm there were no transmission delays due to EE or DG. Specifically, APS and SRP would examine if EE or DG affected their lowered load forecasts and thus transmission impacts. APS and SRP will file their findings with the Commission – Completed

- SWAT agreed to file the final Coal Reduction Assessment report with the Commission when completed later this year - Pending Completion of CRATF Study

Parties Commenting on First Draft BTA Report

Appreciate the thoughtful and comprehensive comments received from the following entities:

- Arizona Public Service
- Interstate Renewable Energy Council
- Salt River Project
- Southwest Transmission Cooperative
- Tucson Electric Power / UniSource Electric

Summary of Comments Received on First Draft

Comments to the First Draft Report revealed six specific areas of key concern:

1. Guiding Principles
2. Recommendation 2a – Ten Year Snapshot
3. Recommendation 2b – Load Level Reporting
4. Recommendation 2c – Coal Reduction Efforts
5. Recommendation 2d – EE/DG Study
6. Other Non-Adequacy Related Comments

Guiding Principles Revisions
- Comments and Responses -

Report Location	Comment	Response	Action Taken
Appendix A - Page Appendix A-6, T.1.	Change "Western Systems Coordinating Council" to "Western Electricity Coordinating Council". In addition, to ensure that entities that aren't registered as reliability entities are subject to the same standards as those that are, SRP suggests a sentence be added to the end of T.1 that states "Such Standards, Criteria, and Regional Business Practices will apply to all entities, regardless of their FERC-jurisdictional status."	Agree	Modified
Appendix A, page A-6, T.1.:	The Companies suggest that this section be revised to clarify that WECC criteria and regional business practices are not approved by FERC. Typically, only regional standards included as a "regional difference" to a NERC standard are approved by FERC. Nevertheless, the Companies do plan to comply with WECC criteria and regional business practices.	Agree	Modified
Appendix A - Page Appendix A-6, T.3.	Should refer to §40-360.02.A rather than B. Paragraph A states year." SRP suggests the first sentence be changed to read "Per §40-360.02.A a transmission line applicant must file a plan with the ACC on or before January 31 of each year in which the transmission line is contemplated and per §40-360.02.C7 that filing must include the results of power flow and stability studies." "Every person contemplating construction of any transmission line within the state during any ten year period shall file a ten year plan with the commission on or before January 31 of each	Agree	Modified
Appendix A - Page Appendix A-7, T.4.	SRP suggests that the phrase "to resolve transmission constraints" in T.4 should be expanded upon to more specifically identify what and whose constraints should be resolved.	Agree this is ambigous. After reviewing I don't see a need for this language	Modified
Appendix A - Page Appendix A-7, T.5.	At the end of the sentence, SRP suggests the phrase "and WECC regional criteria" be added.	Agree this needs to be clarified. I think SRP misunderstood	Modified
Appendix A - Page Appendix A-7, T.6.	SRP believes T.6, the CEC requirement that a standard cathodic study be performed when a project is located parallel to and within 100 feet of any existing natural gas or hazardous liquid pipeline, should not be a standard CEC requirement in the Guiding Principles as some circumstances do not warrant such a study and the Siting Committee should be given the latitude to determine the appropriate language for the particular situation. Should the ACC not agree with SRP's recommendation to remove T.6. in its entirety, SRP requests the following redlines be incorporated in any final principle. When project facilities are located parallel to and within 100 feet of any existing natural gas or hazardous liquid pipeline a standard cathodic electrical induction study condition shall be included in the CEC requiring the evaluation of the risk to any existing natural gas or hazardous liquid pipelines. The study shall recommend appropriate remediation to address any material adverse impact that is found.	Do not agree to remove. Agree to modified language	Modified
Appendix A - Page Appendix A-8, G.2.	At the end of the sentence, SRP suggests the phrase "and WECC regional criteria" be added. Also, in the third line, "Organization" should be changed to "Corporation" in identifying NERC.	Agree Clarification is needed	Modified
Appendix A, page A-7, T.5.:	The Companies suggest that the phrase "as approved by FERC" be deleted for the reasons articulated in our comment to Appendix A, Page A-6, Tal., above.	Agree	Modified

Guiding Principles Findings and Summary of Changes

T.1. Transmission system adequacy will be evaluated based upon compliance with North American Electric Reliability Corporation ("NERC") and Western ~~Systems~~ Electricity Coordinating Council ("WECC"), or their successors, Standards, Criteria, and Regional Business Practices related to transmission system ~~planning as approved by the Federal Energy Regulatory Commission ("FERC")~~. Staff will evaluate all transmission plans and CEC applications based upon these Standards, Criteria, and Regional Business Practices regardless of the transmission owners or CEC applicants Federal Energy Regulatory Commission-jurisdictional status.

Guiding Principles Findings and Summary of Changes Continued

T.3. Per §40-360.02.~~B~~ A "Every person~~a transmission line applicant~~ contemplating construction of any transmission line within the state during any ten year period ~~must~~ shall file a ten year plan with the ~~ACC~~ commission ~~ninety days prior to filing a CEC application~~on or before January 31 of each year." ~~and~~ In addition, per §40-360.02.C.7

T.4. A transmission line applicant shall participate in good faith in state and regional transmission study forums to coordinate transmission expansion plans related to its transmission facilities. ~~and to resolve transmission constraints in a timely manner.~~

Guiding Principles Findings and Summary of Changes Continued

T.5. A transmission line applicant shall follow the most current NERC and WECC Standards, Criteria, and Regional Business Practices, ~~as approved by the FERC~~ applicable to Transmission Owners and Transmission Operators ~~as defined in the NERC Standards~~.

T.6. When project facilities are located parallel to and within 100 feet of any existing natural gas or hazardous liquid pipeline a standard ~~cathodic~~ electrical induction study condition shall be included in the CEC requiring the evaluation of the risk to any existing natural gas or hazardous liquid pipelines. The study shall recommend appropriate remediation to address any material adverse impact that is found.

Guiding Principles Findings and Summary of Changes Continued

G.2. The CEC is conditioned upon the plant applicant following the most current ~~Western Electricity Coordinating Council/North American Electric Reliability Organization~~NERC and WECC, or their successor's, Standards, Criteria, and Regional Business Practices applicable to Generation Owners and Generation Operators. ~~as defined in the NERC Standards.~~

Recommendation 2a – Ten Year Snapshot - Comments and Responses -

Report Location	Comment	Response	Action Taken
Page vi – Item 3; Section 6.2 Page 68 – Item 3; Page ix – Recommandations 2.a	Ten Year Snapshot Study – 115kV. SRP does not support this recommendation. It is our opinion that the additional work necessary to include projects at the 115kV and 138kV levels would result in little to no additional information for Staff to ascertain adequacy of the overall transmission system in Arizona	Will refine wording to address concerns.	Removed references to Pinal County and refined wording.

Recommendation 2a - Ten Year Snapshot Findings

- Previous Ten Year Snapshots (pre-2014) used 115 kV as the minimum monitored voltage
- Previous Ten Year Snapshots (pre-2014) identified issues in the 138 kV and 115 kV systems
- Pinal County is not the only 115 kV that Staff is interested in, but was the catalyst for this recommendation
- Subsequent discussions found that Recommendation 2a wording was misleading about intent; intent was for Ten Year Snapshot to be performed using previous (pre-2014) criteria including taking outages and monitoring down to 115 kV.

Proposed Change to Recommendation 2a – Ten Year Snapshot

a. Direct Arizona utilities to ensure the Commission-ordered Ten Year Snapshot study ~~includes and~~ monitors transmission elements down to and including the 115 kV level for thermal loading and voltage violations.

Recommendation 2b – Load Levels - Comments and Responses -

Report Location	Comment	Response	Action Taken
Page v, section 2	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. 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. 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.	Agree	Modify report to reflect in-service date and load-level range.
Page v, section 2	The Companies suggest revising language that would require utilities to report "the system load level at which a transmission project is needed" beginning with 10-year transmission plans filed on January 31,2015. This requirement seems to seek more information about why utilities pursue specific projects on a particular timeline. While system load may be a consideration, these decisions often depend on many factors, including generation dispatch, load allocation, penetration of distributed generation ("DG") and scheduling paths for remote resources. Accordingly, the Companies suggest that this language be revised to request that utilities describe the factor or factors that created a need for a transmission project. Also, because the Arizona Corporation Commission ("Commission") is not expected to issue an order in this docket until December and additional time will be required for the utilities to comply, the Companies request that implementation of this new requirement be delayed until the 10-year transmission plans filed on January 31,2016	Agree	Modify report to reflect in-service date and load-level range.

Recommendation 2b – Load Level Findings

- Staff and KRSA agree that a range of load levels is adequate for the needs of the BTA
- Staff and KRSA agree that only projects which are driven by load growth or reliability needs should have the load level range identified
- Staff and KRSA agree the load level range is not needed until the 9th BTA therefore not required for in filings until January 2016 filings.
- Intent on this recommendation is that load level range should not change from year to year BTA filings like the in-service date does. This allows better understanding of load growth/reduction impact on transmission needs.

Proposed Change to Recommendation 2b – Load Levels

b. Direct Arizona utilities to describe the driving factor(s) for each transmission project in the Ten Year Plan. For each load growth or reliability driven transmission project, direct Arizona utilities to report, ~~starting with their ten year plans filed in January 2015,~~ in addition to each transmission project in-service date, ~~the~~ a system load level range at which each transmission project is anticipated to be needed. This requirement should first occur with the ten year plans filed in January 2016.

Recommendation 2c – Coal Reduction Effort - Comments and Responses -

Report Location	Comment	Response	Action Taken
Page vi – Item 7	Coal Reduction Assessment. SRP supports this recommendation and agrees that this is a critical issue that must be addressed. Given the EPA's recently proposed Carbon rule, the impact of the study has changed and study improvements may be necessary to fully address the EPA rule. This additional study work will support the utilities' efforts in analyzing the impact of the EPA's Carbon rule.	Agree	None
Page ix, Section 2C:	Pursuant to an informal agreement reached among BTA stakeholders and Commission Staff, TEP will file the requested Southwest Area Transmission ("SWAT") coal plant retirement analysis on behalf of the Arizona utilities when it becomes available.	Agree	Make change
Page x, Section 2Ci:	The Companies recommend deleting the reference to the "current year" baseline in the proposed report because exclusive use of a fifth-year baseline is adequate and appropriate for this purpose. For this reason, the SWAT coal plant retirement analysis employs a 2019 fifth-year baseline but includes no current year analysis. The Companies also recommend adding language to specify that this report will identify "a range of minimum and recommended Arizona system inertia.'' More specific recommendations are beyond the scope of the SWAT analysis and cannot be established until specific plant retirement scenarios are established and determined feasible for implementation within the five-year planning horizon. Additionally, the Companies do not believe it is feasible for the report to recommend "the definition of the Arizona system boundaries," as the draft proposes. Instead, this definition should be provided by the Commission as part of any order directing production of the proposed report. Neither SWAT nor the individual Arizona utilities could begin to produce the requested recommendations without knowing at the outset whether the Commission seeks consideration of EHV transmission system components or coal-fired power plants located in New Mexico. Finally, the Companies note that any such future study could be influenced by changes to North American Electric Reliability Corporation ("NERC") and Western Electricity Coordinating Council	Agree with all	Make changes.
Page ix, Section 2c	Replace 2c with the following language: "Direct TEP to file the SWAT CRATF study report on behalf of the Arizona utilities when it becomes available."	Agree, with slight modification to	Make change

Recommendation 2c – Coal Reduction Effort Findings

- Staff and KRSA agree that TEP can file the study report on behalf of Arizona utilities
- Staff and KRSA agree that a baseline analysis of the current year will provide limited additional information related to the inertia of the system
- Staff and KRSA believe the Arizona utilities should be responsible for developing the establishing the boundaries of their systems, but have provided guidelines for the Arizona boundary development as a starting point.

Proposed Change to Recommendation 2c – Coal Reduction

c. Direct ~~Arizona utilities~~ Tucson Electric Power ("TEP") to file the SWAT CRATF study report on behalf of the Arizona utilities within 30 days of completion ~~to supplement the coal reduction assessment information filed with this BTA~~.

i. If the CRATF study does not include specific recommendations on maintaining Arizona transmission system reliability, Staff recommends the Commission direct Arizona utilities to jointly produce or procure an informational report to identify minimum transmission requirements to maintain adequate system reliability in a fifth year coal reduction scenario. Specific recommendations should include, but not be limited to, the definition of the Arizona system ~~boundaries~~ boundary, ~~current year and~~ fifth year baseline Arizona system inertia, and identification of a range of minimum and recommended Arizona system inertia to maintain Arizona transmission system reliability under various system conditions.

ii. Staff provides the following guidelines to the Arizona utilities for the Arizona system boundary definition.

(1) Transmission lines or generation station assets located wholly or partially located in Arizona;

(2) Transmission lines or generation station assets owned wholly or partially owned by Arizona utilities;

(3) Generating station assets located outside of Arizona, but connected to a transmission line that meet requirements in 2.c.ii.(1) or 2.c.ii.(2).

Recommendation 2d – EE/DG Recommendation - Comments and Responses -

Report Location	Comment	Response	Action Taken
Page x, Recommendations, Paragraph 2d	SWTC wishes to clarify that, unlike APS, SRP and TEP, SWTC does not own and operate a distribution system (implied or service retail load)	Agree	Suggest language that makes it only necessary for TOs that serve retail load in Arizona
Page v – Item 6	DG and EE programs tend to have more of an impact on the distribution system which does not fall under the purview of the BTA. In addition, modeling the effects of DG and EE on the transmission system will not provide accurate results as DG and EE would be generally evenly distributed across the system as the actual location of DG and EE cannot be accounted for properly in such studies.	Considered, but disagree	None
Page 58 – Last paragraph.	SRP does not agree with Staff's conclusion that the impact of DG and EE on specific transmission needs has not been specifically identified and that such information would benefit the ACC.	Considered, but disagree	None
Page v, Section 6:	The Companies note that TEP and UNSE have, in fact, assessed the impact of DG and energy efficiency ("EE,") standards on specific transmission needs. TEP included a list of specific local projects deferred due to DG and EE in its current 10-year plan, though these projects had minimal impact on the utility's extra-high voltage ("EHV") systems. UNSE, meanwhile, reported in its 10-year plan that no projects had been deferred due to DG or EE in its service territory. The Companies anticipate providing updates to these assessments in their future 10-year plans. If the Commission seeks additional information beyond these disclosures, the Companies would request clarification to the language in this section of the draft BTA to make that expectation clear.	Agree	Added clarifying langauage
Page x, Section 2d:	The study proposed in this section differs somewhat from those conducted by TEP and UNSE to produce the impact assessments that appear in their current 10-year plans. For this reason, the Companies ask that the Commission clarify whether it prefers this proposed process to those already employed by TEP and UNSE.	Agree	Clarify or refine to allow for some objectivity in the methodology

Recommendation 2d – EE/DG Recommendation Findings

- Staff found SWTC has no retail load and should be excluded from requirement
- Current year (2014) EE/DG impact is relatively small (approximately 2% with some regulated utilities)
- Reviewed latest regulated utilities IRP's to determine projected impact of EE/DG
- In 2021, (year 2016 + fifth year study) the projected impact of EE/DG in IRP of regulated utilities showed 10 - 14% of load at peak
- Staff and KRSA concluded that impact of EE/DG is growing and the study requirement as crafted is considered significant

Proposed Change to Recommendation 2d – EE/DG

d. Direct Arizona utilities with retail load to report, as part of the Ninth BTA, the effects of DG and EE installations and/or programs on future transmission needs. Staff recommends the Commission direct utilities to conduct or procure a study to more directly identify the effects of DG and EE installations and/or programs.

i. The technical study should be performed on the fifth year transmission plan by disaggregating the utilities' load forecasts from effects of DG and EE ~~programs~~ and performing contingency analysis with and without the disaggregate DG and EE. The technical study should at a minimum discuss DG and EE forecasting methodologies and transmission loading impacts. The study should include and monitor transmission down to and including the 115 kV level.

ii. Alternative methodologies or study approaches will be acceptable on condition that the study results satisfy the minimum requirements as outlined in 2.d.i.

iii. The study should be filed at the Commission ~~no later than~~ in January ~~31,~~ 2016 in the Ninth BTA docket.

iv. This study is supplemental to the previous Commission Decision No. 72031 requiring Arizona utilities to address the effects of DG and EE on future transmission needs in their ten year plan filings.

Other Significant Additions/Modifications

- Removed Exhibit 7 (Extreme Contingency Map and Table) and remove specific outages related to the study work in the body of the report

- Addition of updated details on CRATF study effort (Ron Belval to provide detailed update shortly)

- Update to Delaney – Colorado River discussion; D – CR has been approved by CAISO for public bidding.

Other Non-Adequacy Related Items
- Comments and Responses -

Report Location	Comment	Response
Report	IREC recommends that the Draft 8th BTA, and future BTAs include more information on overarching developments across the WECC. One of the most significant recent events in this regard is the development CAISO/PacifiCorp Energy Imbalance Market, which is scheduled to go live in October 2014. Additionally, according to a presentation made to the Commission in August by Arizona Public Service Company's Brad Albert, APS is conducting an active examination of the potential benefits of the EIM, and is weighing possible entry into the EIM. In addition to developing information as part of this BTA, the Commission should require all Class A utilities to present to the Commission as part of the 9th BTA a cost-benefit analysis of entry into the CAISO/PacifiCorp EIM.	Policy Concern
Report	The Draft 8th BTA addresses the requirement of all BTAs to assess the adequacy of the transmission system in Arizona "to meet the present and future energy needs of Arizona in a reliable manner".3 Past BTAs have generally hewed to a definition of reliability that centers around in-state energy needs; however, increasingly, as evidenced by the September 8,2011 outage that impacted multiple utilities across two states and left millions without power, reliability does not stop at the state's edge. Additionally, with increasing focus by FERC on regional and inter-regional planning through Order 1000, and the EPA on carbon emissions reduction through the Carbon Pollution Standard and Rule 111(d), it is clear that adequacy can no longer be addressed simply by examining intrastate transmission and intra-state load requirements. The Commission should require that as part of the 9th BTA, utilities analyze adequacy by including an assessment of seams issues, the need for bolstering the connections between utility service territories, including service territories in different states, and the need for new interstate transmission lines.	Policy Concern
Report	IREC agrees with recommendation 2d. -- that the approach to incorporating EE and DG (ie."non-transmission alternatives" or NTAs) needs to be revised. As such we recommend that the Commission establish a methodology for identifying alternatives to specific (primarily local) transmission projects that provide comparable benefits to traditional transmission projects in terms of enhanced system reliability or increased resource deliverability. In addition we note that FERC Order 1000 planning requires transmission owners to consider NTAs within the regional transmission planning process, yet NTAs are not eligible for cost allocation and therefore unable to compete on an equal footing with traditional projects. This is partly because FERC does not have jurisdiction over NTAs, which are largely under the jurisdiction of state commissions. In the next BTA process, the Commission should explore how Arizona could provide a cost allocation solution to NTAs, through retail rates, in coordination with the FERC Order 1000 planning process.	Policy Concern
Report	IREC strongly encourages the Commission to require, as part of the 9th BTA, an update of the Renewable Energy Transmission Project (RTP) assessment, which was launched as part of the 5th BTA. The RTP receives relatively little discussion in the Draft 8th BTA, and would benefit from additional information, in particular, an assessment of how interstate renewable energy projects would assist the utilities in accessing lower-cost renewable energy, as well as in meeting the requirements of the EPA's Carbon Pollution Standard. In particular, the RTP update should seek to answer the question: Which transmission projects can deliver renewable resources that best match Arizona's load profile particularly as solar penetration increases)? This assessment could take in information derived from WestConnect's efforts over the next several years to implement FERC Order 1000, which will likely result in new "policy-driven" transmission projects designed to carry renewable energy across the Southwestern region to meet public policy requirements (e.g. AZ's REST, EPA's Carbon Pollution Standards).	Policy Concern

Other Non-Adequacy Related Items - Comments and Responses – Continued

Report Location	Comment	Response
Report	The Draft 8th BTA identifies that more generation currently exists in the transmission queue than there is transmission to support i t 2 IREC recommends that given this backlog, the Commission should request that utilities, as part of the next BTA, determine reasons for the backlog and identify steps that would be necessary to reduce it - including the construction of transmission that would be adequate to fully deliver resources in the queue.	Policy Concern
Report	System Load Level Requirement - IREC agrees with this proposed requirement but would request that the Commission also include as a requirement of the next BTA that utilities submit an assessment of Load levels on a wider, more regional basis, which would better comport with policy trends in transmission planning, like FERC Order 1000, and would better respond to the deficiencies highlighted by the September 8,2011 outage. This reporting should also include information "net load" - that is, any load requirements that remain after accounting for wind, solar, or demand side resources. This kind of wider analysis of system load requirements could be achieved through Westconnect, a forum in which utilities and other stakeholders share data and information regularly.	Policy Concern
Report	The Draft 8th BTA references the work of the CRA TF in analyzing the impact of potential coal retirements in anticipation ofthe recent EPA Carbon Pollution Standard _and Rule Illd, and concludes that the utilities should report their findings from CRATF in the next BTA.l IREC believes that, additionally, as part of the 9th BTA, utilities should be asked to report on how interstate transmission could help provide frequency response, voltage support or otherwise alleviate reliability issues related to coal plant retirements that are planned by load serving entities as a result of the Carbon Pollution Standard requirements. The 9th BTA should examine how any of the transmission projects reported in the 8th BT A - some of which are interstate and regional in nature - could assist in addreSSing the coal plant retirements, by facilitating the transport of both new renewable energy, as well as natural gas replacement energy. IREC notes that CRATF initially had some difficulty obtaining input from transmission owners regarding which specific plant retirements and replacement resources should be included in their analysis. We suggest that future BTA processes could facilitate this step by requiring transmission	Policy Concern
Report	Given the importance of regional cooperation on transmission both for reliability and for fostering the ability of Western states to address the EPA's new Carbon Pollution Standard, the Commission should require utilities to formally report on the activities and progress of the California Interface Group as part of the 9th BT A. This could include key insights from the CAISO Transmission Planning Process that have a direct impact on Arizona (e.g. what AZ resource assumptions are used by CAISO?). Additionally, the Draft 8th BTA should encourage the participation ofload serving entities in the California Interface Group, particularly in light of FERC Order 1000, and the developing Energy Imbalance Market, both of which will bring new attention to the Arizona/California transmission system. With respect to specific transmission The Draft 8th BTA notes that the Hassayampa to North-Gila #2 line "will help strengthen the Arizona-California transmission path."s Given the importance of the connectivity between Southwestern states, and in light of the September 8,2011 outage, IREC would like to suggest that the Commission require utilities to report, as part of the 9th BTA, on any other transmission projects that would strengthen the transmission paths between Arizona and California.	Policy Concern

Other Non-Adequacy Related Items
- Response -

- Staff agrees the comments raise important policy questions, but found them to be outside the statutory focus of the BTA on system adequacy over the ten year planning period
- Staff believes certain areas are being or should be raised in other Commission forums such as the Commission's IRP docket and Technology and Innovation docket. (EIM, NTAs, and RTP study comments)

Other Non-Adequacy Related Items
- Response Continued -

- Staff believes that the comments related to regional and inter-regional planning issues are better handled through those forums. (Seams, net load, AZ/CA interface, CRAFT, and queue comments)
- Staff acknowledges in the BTA the importance of the regional and inter-regional forums and encourages the continued participation of all utilities and Staff. In addition, Staff has traditionally reached out to these forums for their involvement in the BTA process and incorporation of information from their study work.

Update by CRATF

- TEP (Ron Belval) to provide update
- Will TEP be willing to file this presentation in the docket?

Workshop II
Participants' Response

- Has the Second Draft BTA adequately addressed your concerns with the First Draft?
- Does the Second Draft BTA raise any new issues or concerns?
- Additional Comments or Concerns regarding Second Draft?

Conclusions

- Utilities Division expects to submit Final Report and Proposed Order to the Commission by September 23, 2014.
- Open Meeting date for Commission consideration of the 2014 BTA is expected to be the second week of October.
- This presentation and CRATF presentation are posted to ACC BTA website at http://www.azcc.gov/Divisions/Utilities/Electric/BTA-Index.ASP
- Thank you for your participation and feedback. Please ensure you have signed in so we have a record of your attendance.