

To: WECC Studies Subcommittee (StS) Chair,  
WECC StS Members,  
WECC Operating Committee (OC) Members,  
WECC Reliability Assessment Committee (RAC) Members

Date: September 3, 2019

Re: Notification of APS Plans to Delist WECC Paths 22, 23, 50, 51

A part of broad coordination and communication plan, Arizona Public Service (APS) is notifying WECC members of plans to delist WECC Paths. The WECC Paths planned for delisting are WECC Paths 22, 23, 50, 51 and are illustrated in Attachment A for reference. APS plans to complete the delisting of WECC Paths 22, 23, 50, and 51 effective January 1, 2020, subject to resolution of any unforeseen objections at the WECC. APS is planning to provide a presentation at the September 17, 2019 StS meeting to provide WECC members information on the delisting.

#### Primary Drivers for Delisting

APS began examining the impacts of WECC Path 51 due to Navajo Generating Station (NGS) retirement. This began a broader examination into the impacts on other APS and WECC Paths. With the inability to maintain existing WECC Path ratings with planned coal retirements and the difficulty in the WECC Path rating process for timely rating changes, resulted in the decision to delist the WECC Paths.

#### Study Efforts

APS has completed a number of reliability studies confirming reliable system operations after the coal units are retired and with the WECC Path delistings including: TPL-001-4 and FAC-013-2/MOD-029.

#### Coordination History

Through coordinated efforts on joint ownership WECC paths (Path 23, 51) the delisting of these WECC paths were approved by the joint ownership management committees (E&Os). Specifically, the Navajo E&O approved delisting of WECC Path 51 on April 22, 2019 and Four Corners E&O for Path 23 on June 14, 2019.<sup>1 2</sup> Further, the

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<sup>1</sup> A number of coordination meetings occurred with Navajo South Transmission System (NSTS) owners to discuss the options related to delisting prior to gaining the formal approval.

<sup>2</sup> Even though Path 22 is owned 100% by APS, the Four Corners E&O was notified and informed

Mead-Phoenix Project (MPP) E&O was provided an update on the delisting of WECC Path 51 at the May 1, 2019 MPP E&O meeting and no comments or concerns were raised at that time or subsequently. Further, APS has direct one-on-one communications with Salt River Project (SRP) on Path 50 delisting on August 9, 2019. Most recently, APS provided a presentation to the Southwest Area Transmission (SWAT) Oversight group on August 21, 2019 and didn't receive any specific concerns.

APS also posted notification of investigating the WECC Path delisting to its OATI OASIS website on August 15, 2019.<sup>3</sup>

#### Next Steps for APS WECC Path Delisting

In order to complete the delisting process APS plans the following three communication steps (including a general time frame of when APS expects to complete them):

1. (September 2019) WECC Notification and StS Presentation – APS will notice and present information to the StS requesting concerns related to the delisting. APS will provide a 30-day comment period (ending October 17, 2019) and work to address any concerns.
2. (October 2019) WECC Notification – A final letter stating the WECC Paths being delisted, documentation of the previous processes, and the effective date.
3. (November 2019) FAC-013 Results – Final FAC-013 results on the delisted (and dependent) segments to neighboring utilities.

APS plans for the delisting of WECC Paths 22, 23, 50, and 51 to become effective January 1, 2020 after the coordination and communication efforts are completed.

#### Questions or Concerns

APS is committed to addressing any questions or concerns. APS would like to address questions or concerns in a timely manner and is requesting any issues be brought forward in the 30 days following APS's presentation to the StS. For general questions about the delisting, please contact David Wiley [David.F.Wiley@aps.com](mailto:David.F.Wiley@aps.com). For questions about the technical study effort please contact Chris Fecke-Stoudt [Christopher.FeckeStoudt@aps.com](mailto:Christopher.FeckeStoudt@aps.com). For OASIS transmission related questions, please send an email to [OASISADM@apsc.com](mailto:OASISADM@apsc.com).

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<sup>3</sup> <https://www.oasis.oati.com/azps/index.html>

Attachment A

