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December 2, 2011

Kent Bolton Staff Engineer Western Electricity Coordinating Council 155 North 400 West Suite 200 Salt Lake City, Utah 84103-1114

Subject: Request of Waiver for the WECC Project Coordination Review for Southern Nevada Transmission Interface Path Rating Studies

Dear Kent.

Pursuant to the "Overview of Policies and Procedures for Project Coordination Review, Project Rating Review, and Progress Reports", Nevada Power Company, d/b/a NV Energy (NV Energy), acting as Project Sponsor for the Southern Nevada Transmission Interface (SNTI) expedited WECC path rating review, seeks a waiver of the requirement for a Project Coordination Review.

#### Background:

NV Energy owns and operates the Southern Nevada Transmission Interface connected to the Eldorado Valley in Southern Nevada. SNTI comprises the following lines (see Fig. 1):

# To WALC:

- Harry Allen Mead 500 kV,
- Henderson Mead 230 kV,
- Henderson BC Tap Mead 230 kV,
- Arden Mead 230 kV,

- Eastside Mead 230 kV,
- Newport Mead 230 kV,
- Equestrian Mead 230 kV # 1 & # 2,
- Greenway Mead 230 kV,
- Equestrian Mead 69 kV #1 & #2
- Lakes Las Vegas Mead 69 kV
- Mead Searchlight 69 kV

# To LADWP:

- Faulkner McCullough 230 kV,
- Tolson McCullough 230 kV,
- McCullough Nevada Solar One 230 kV

#### To SCE:

- Laughlin Mohave 500 kV #1 & #2
- Eldorado Nevada Solar One 230 kV
- Eldorado Magnolia 230 kV

All the SNTI lines are existing lines and are currently in service<sup>1</sup>. Harry Allen - Mead 500 kV is a part of Path # 81 ("Centennial") and all the above lines comprise the NV Energy seasonal SOL rating that is studied bi-directionally annually.

# Rated Paths Review

By a letter distributed by WECC on November, 11, 2011 NV Energy has notified all members of the PCC and TSS of the intention to obtain the SNTI rating by re-defining the existing Path #81, which currently comprises Harry Allen – Mead, Harry Allen – Crystal, and Lenzie – Northwest 500 kV lines, into SNTI as described above. SNTI is currently in service and its bi-directional transfer limits are studied annually. Furthermore, the path was studied extensively during Centennial Path rating studies. Up to date no adverse effects were identified on the WECC rated paths and no mitigation measures were required. Moreover, it should be noted that NV Energy is not seeking an expanded or upgraded rating for any path, merely a redefinition of the existing Centennial Path to ensure a clear consolidation of the NV |Energy transmission system after joining of its two Balancing Areas, with logical delineation of the rated paths along the interfaces with its neighbors. The November 11<sup>th</sup> letter notified the PCC and TSS of NV Energy's desire to expedite the Rating Process per Section 3.3 of the Procedures for Project Rating Review (page III-58).

We are currently in a process of creating a Comprehensive Progress Report and establishing a Project Review Group, called the SNTI Study Review Group (SSRG). The report will combine both Phase I and Phase II Rating reports to satisfy the WECC requirements for the Expedited Rating Process per Section 3.3 of the Procedures for Project Rating Review (page III-58). The results of the study

<sup>&</sup>lt;sup>1</sup> Except for Eldorado – NSO and Eldorado – Magnolia 230 kV, which are being constructed as part of the Eldorado Energy's "Merchant" Plant "re-arrangement out of the NPC BA", and will be in service in spring of 2012.

will be posted for 30 days review together with solicitation of interest in participating in SSRG.

### Waiver Request

Per PCC and TSS chairmen and WECC Staff recommendation, NV Energy is seeking a waiver of the requirement to initiate a "Project Coordination Review" ("PCR"). Per the WECC Guidelines, NV Energy understands that the PCR is to ensure a broad review of proposed transmission projects and engage a regional dialog of efficiency and alternatives. In particular, the purpose of the PCR is to identify "how transmission project sponsors should work and interact with other interested parties when developing a significant transmission project" (Process for Project Review Coordination ("PPRC") at page III-39). Further, the PPRC allows for a waiver of the requirement for this step if "the transmission project does not have a significant impact on the operation of the WECC interconnected electric system."

We request a waiver of this obligation pursuant to section 4, page III-42 of the PPRC. Given that the SNTI lines are all existing lines and currently are successfully operated in compliance with NERC/WECC Reliability Standards, granting this waiver of PPRC will merely confirm the existing status of these lines and will not have "a significant impact on the operation of the WECC interconnected system". Therefore NV Energy believes that our outreach to PCC, TSS and the formation of a Study Group adequately satisfies the objectives of the PRC that were designed predominantly for new and not existing transmission projects.

Please circulate our request as needed to PCC, TSS and WECC staff. Thank you for your prompt attention to this matter.

Sincerely,

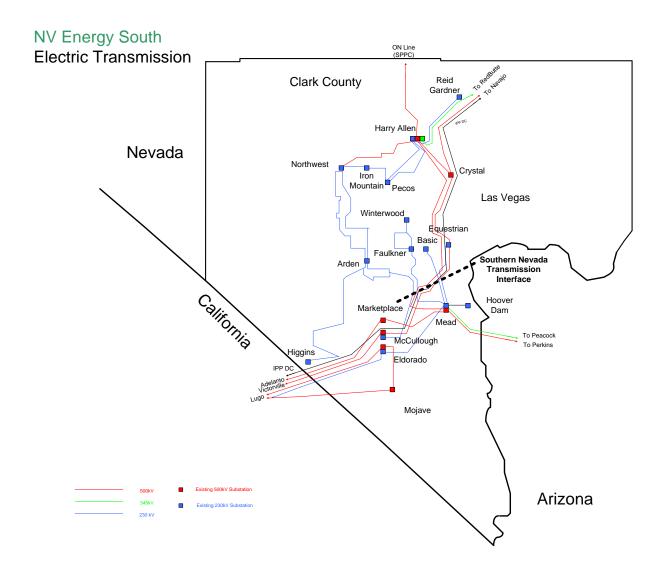
Alex Fratkin Staff Engineer, Transmission Planning NV Energy

CC:

Scott Waples, PCC Chair Robert Easton, PCC Vice Chair David Franklin, TSS Chair Tracy Rolstad, TSS Vice Chair

Mario Villar, NVE Brian J. Whalen, Jr., NVE Richard Salgo, NVE Rahn Sorensen, NVE

Mark Milburn, GBT



**Figure 1:** NV Energy South Bulk System (230 – 500 kV) with SNTI depicted (dashed line).