

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Information Requirements for Available)	
Transfer Capability)	Docket No. RM05-17-000
)	
)	

COMMENTS OF WESTCONNECT UTILITIES

The WestConnect Public Utilities¹ hereby submit these Comments pursuant to the Notice of Inquiry (“NOI”), issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”) on May 27, 2005 in the above-captioned proceeding.² In the NOI, the Commission seeks comments on a broad range of questions related to a report produced by the Long-Term AFC/ATC Task Force of the North American Electric Reliability Council (“NERC”). The WestConnect Public Utilities submit these comments to discuss, briefly, the WestConnect activities to develop more transparency in the development of total transfer capability and available transfer capability within the

¹ The WestConnect Public Utilities include Arizona Public Service Company, El Paso Electric Company, Public Service Company of New Mexico, Public Service Company of Colorado, and Tucson Electric Power Company. Also participating in the effort to develop the WestConnect program of market enhancements are the Salt River Project Agricultural Improvement and Power District, the Western Area Power Administration, Tri-State Generation and Transmission Association, Inc., Imperial Irrigation District, and Southwest Transmission Cooperative, Inc. (the “Non-Public Utility Entities”). The Non-Public Utility Entities are generally supportive of these comments, but have concluded it would not be appropriate to formally participate in this filing.

² The WestConnect Public Utilities respectfully request that the Commission accept these comments even though they are being filed late. The WestConnect Steering Committee had previously scheduled a meeting for August 17th, and was not able to finalize and file these comments prior to that meeting. The utilities have filed these comments as soon as practically possible after their August 17th meeting.

WestConnect region, and to request that the Commission allow the NERC industry group to continue working on the development of AFC/ATC standards.

WestConnect consist of several jurisdictional and non-jurisdictional entities that have been engaged in collaborative efforts to develop regional market enhancements for the Southwest region. These efforts have included development and participation in a common use OASIS cite, known as “wesTTrans” (www.wesTTrans.net), which is currently in operation for a number of jurisdictional and non-jurisdictional transmission providers in the Southwest and Rocky Mountain West.

First, the WestConnect Public Utilities note that – at least within the Western Interconnection, transmission providers already use a uniform methodology for the determination of ATC. The Western Electricity Coordinating Council (“WECC”) developed an ATC methodology entitled *Determination of Available Transfer Capability Within the Western Interconnection*, which can be located at www.wecc.biz. This document is relied on by transmission providers in the West to compute their ATC.

In addition, WestConnect has adopted a protocol for involving stakeholders in the process for determining the total transfer capability for regional facilities in the Southwest. Presently, there is a well-established process within WECC for determining the TTC of inter-regional WECC qualified paths. In addition, the WestConnect transmission providers adhere to all applicable WECC and NERC approved criteria when setting transfer capabilities for regional facilities. In order to ensure that stakeholders have knowledge of and input into this process, WestConnect has developed and implemented a protocol that makes the determination of the transfer capability

transparent to the stakeholders. The WestConnect protocol will continue to use the WECC path-rating methodology, with a process for public input layered into the methodology.

With regard to the NERC AFC/ATC Task Force Report, the WestConnect Public Utilities believe that it would be most efficient for the Commission to allow NERC to continue to work on the development of regional solutions to address the issues raised in the Task Force report. The WestConnect Public Utilities encourage the Commission not to initiate any new formal proceeding on AFC/ATC, but instead allow the industry to focus its resources on the NERC process. The Commission should follow its long-standing tradition of supporting formal industry bodies for developing appropriate technical standards for maintaining system safety and reliability, and corresponding wholesale electric sector business practices.

In light of the NERC activity and the WestConnect Public Utilities' conclusion, we have not included formal responses to the series of questions posed in the NOI in these comments.³ However, we do believe that the NERC AFC/ATC process will develop answers to these questions if it is allowed to run its course.

Respectfully submitted

³ The Commission lists a series of questions in its NOI at p. 13.

Antoine P. Cobb
Senior Counsel, Regulatory
Pinnacle West Capital Corporation
400 N. 5th St., MS8695
Phoenix, Arizona 85004

*Counsel for Arizona Public Service
Company*

John D. Rhea
Assistant General Counsel and
Director of Corporate Compliance
and Risk Management
El Paso Electric Company
123 W. Mills
El Paso, Texas. 79901

Counsel for El Paso Electric Company

Robin Kittel
Director, Transmission Business Relations
Xcel Energy - Transmission Services
550 15th Street
Denver, CO 80202

Public Service Company of Colorado

Charles V. García
Senior Counsel, Regulatory Policy
Public Service Company of New Mexico
Alvarado Square MS-0806
Albuquerque, New Mexico 87158

*Counsel for Public Service Company of
New Mexico*

Erik Bakken
Corporate Counsel
Tucson Electric Power Company
1 South Church Ave., Suite 201
Tucson, Arizona 85701

*Counsel for Tucson Electric Power
Company*

Dated: August 22, 2005

Submission Contents

WestConnect comments re NOI

NOIATCComments.DOC..... 1-4