

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Monday, July 10, 2006 1:23 PM
To: corridoreisarchives,
Subject: Preliminary Draft Corridor Map Comment M0085

Attachments: UNS_Comments_on_Preliminary_DOE_Map_Final_M0085.doc



JNS_Comments_or
_Preliminary_DO...

Thank you for your comment, Ron Belval.

The comment tracking number that has been assigned to your comment is M0085. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 01:23:03PM CDT

Preliminary Draft Corridor Map Comment: M0085

First Name: Ron

Middle Initial: P

Last Name: Belval

Organization: UniSource Energy Corporation

Address: 3950 East Irvington Road

Address 2: Mail Stop SC210

City: Tucson

State: AZ

Zip: 85702

Country: USA

Email: rbelval@tep.com

Privacy Preference: Don't withhold name or address from public record

Attachment: C:\Documents and Settings\UA03428\My Documents\WECC Corridors\UNS Transmission Line Corridors\UNS Comments to DOE_071006\UNS Comments on Preliminary DOE Map_Final.doc

Comment Submitted:

I am submitting the attached comments on behalf of Mr. Ed Beck, Superintendent, Planning at UniSource Energy Corporation. Mr. Beck's comments reference attachments including a map in pdf format and shapefile information. The attachments will be submitted separately through the mail due to the limits described in the Attachment Instructions.

Please do not hesitate to contact me via email or telephone at (520) 745-3269.

Regards,
Ron Belval

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Preliminary Draft Corridor Map Webmaster at
(630)252-6182.

**Western Energy Corridors Designation
EPAct 2005 Section 368
Comments on DOE Draft Corridor Map
July 10, 2006**

Ed Beck
Superintendent, Planning
UniSource Energy Corporation

UniSource Energy Corporation (UniSource) appreciates this opportunity to comment on the Preliminary Draft Map of Potential Energy Corridors on Federal Lands (Map). The Department of Energy (DOE), on behalf of the U.S. Departments of Energy, Interior, Agriculture and Defense, all designated as the Agencies, proposes to prepare a West-wide Energy Corridor Programmatic Environmental Impact Statement (PEIS) to identify the impacts associated with designating energy corridors as shown on the Map. The Agencies will designate energy corridors based upon the information developed in the PEIS.

UniSource has several subsidiaries including Tucson Electric Power Co. (TEP) and UNS Electric, Inc. (UNSE) and UNS Gas Inc. (UNSG). TEP is the load serving entity for Tucson, AZ and participates in electric utility business throughout the Western States. UNSE and UNSG are both electric and gas load serving entities for portions of southern and northern Arizona.

UniSource submitted comments and proposed corridors of interest during the scoping meetings that were held in October and November 2005. We appreciate the ongoing efforts the Agencies are putting into identification of the designated corridors, including encouraging public comment on these proposed corridors. Additionally, UniSource has participated in various management plan drafting sessions to recognize existing utility corridors within the boundaries of newly designated National Monuments in central and southern Arizona. UniSource suggests that DOE consider these existing corridors as it develops the final Map.

UniSource supports the concept of designating energy corridors. Unprecedented load growth in the west, driven by a high level of economic development activity is expected to continue indefinitely. The challenge of meeting increasing needs is becoming more complex and multifaceted. New supply resources are becoming more remotely located, requiring extra high voltage (EHV) transmission lines to traverse the long distances to the load centers. At the same time, growth in the load centers and immediately surrounding areas is effectively “choking off” critical passages from the EHV points of receipt to the distribution networks. In other words, new construction is virtually filling in corridors for lower voltage transmission lines that otherwise could have been economically viable had they been secured a few years earlier. UniSource views the designated corridors proposal as one that encompasses a much broader scope than federal lands, and one that demands well thought out actions be taken immediately.

Therefore it is critical for the federal agencies to take the lead in the development of energy corridors. This is primarily due to the large federal ownership of lands in the west and other locations. UniSource supports a process which allows for thorough consideration of environmental impacts and other important and relevant factors, including reliability, in land use planning as proposed in EPLA 2005. The concept of designating energy corridors in such a fashion, and incorporating these corridors in relevant land use planning forums is critical to allow the efficient development of energy transmission systems in order to maintain system reliability while minimizing adverse environmental impacts. A streamlined process for permitting energy infrastructure projects is critical. Designating energy corridors sets the right example, and may become the model for coordinating with other entities that have siting and land use responsibility.

Designation of corridors will improve the public's knowledge of transmission system impacts as well as increase understanding of why utilities need these corridors. Early identification of the corridors combined with coordinated land use planning will assist in the development of future transmission projects.

UniSource would like to offer the following recommendations relative to the designation of Western Energy Corridors:

- Corridors should be designated on a regional network basis using input from regional, state and local planning groups;
- Federal maps should show the entire corridor for those having the potential to become designated corridors. The maps can clearly identify where the corridors cross federal lands to meet the Agencies' objectives. Showing the entire corridors provides continuity and offers an opportunity to coordinate designation of corridors on lands of other interested parties;
- Any corridors that are currently designated or identified as a utility corridor in governing Federal Agency plans should be designated on the appropriate DOE or Agency maps;
- All land use plans should incorporate designated corridors including all local plans such as city and county zoning as well as state siting processes. This is a critical item that was not fully implemented in previous western utility corridor work.
- A good starting point for corridor width was identified in the Western Regional Corridor Study work – 2 miles to 5 miles. The two mile corridor width is used in conjunction with existing facilities while the five mile width is selected where there is no existing facility.
- Clearly delineate what procedures will be required for use of a designated corridor.

Attached in PDF format is a map showing corridors that are critical to allow UniSource to reliably serve its load. These corridors, related to the three subsidiaries of UniSource, are important to UniSource for future projects. Please note that corridor 28 has already been designated as a utility corridor by the US Forest Service. Also, EHV corridors (2, 3, 5, 6, 10, 11, 13, 14, 16, 17 and 18) are the highest priority for inclusion on the DOE map:

1. Valencia Substation to Gateway Substation 115 kV Electric Transmission Corridor
2. South Loop Substation to Gateway Substation 345 kV Electric Transmission Corridor (F, S)* Priority and Already Designated
3. Pinal South Substation to Tortolita Substation 500 kV Electric Transmission Corridor (S) Priority
4. Tortolita Substation to Rillito Substation 138 kV Electric Transmission Corridor (S)
5. Tortolita Substation to East Loop Substation 345 kV Electric Transmission Corridor (S) Priority
6. Tortolita Substation to South Substation 345 kV or 500 kV Electric Transmission Corridor (F, S) Priority
7. DeMoss Petrie Substation to Tucson Substation 138 kV Electric Transmission Corridor
8. DeMoss Petrie Substation to South Substation 138 kV Electric Transmission Corridor (T, S)
9. East Loop Substation to Northeast Substation 138 kV Electric Transmission Corridor
10. Winchester Substation to Tortolita Substation 500 kV Electric Transmission Corridor (F, S) Priority
11. Winchester Substation to Vail Substation 345 kV or 500 kV Electric Transmission Corridor (S) Priority
12. Irvington Substation to Vail Substation 138 kV Electric Transmission Corridor (F, S)
13. Vail Substation to South Substation 345 kV or 500 kV Electric Transmission Corridor (S) Priority
14. East Loop Substation to Vail Substation 345 kV Electric Transmission Corridor (S) Priority
15. South Substation to Irvington Substation 138 kV Electric Transmission Corridor (S)
16. Hassayampa Substation to Pinal West Substation 500 kV Electric Transmission Corridor (Joint project with Salt River Project and others) (F, S) Priority
17. Pinal West Substation to Pinal South Substation 500 kV Electric Transmission Corridor (Joint project with Salt River Project and others) (F, S) Priority
18. Pinal West Substation to South Substation 345 kV or 500 kV Electric Transmission Corridor (F, T, S) Priority
19. Catalina Substation to Tortolita Substation 138 kV Electric Transmission Corridor (F, S)
20. Midvale Substation to San Joaquin 138 kV Electric Transmission Corridor (T, S)
21. Maricopa Gas Transmission Corridor (El Paso Natural Gas Project) (F, S)
22. North Havasu Substation to Griffith Substation 69/230 kV Electric Transmission Corridor (F, S)
23. Griffith Substation to Hilltop Substation 230 kV Electric Transmission Corridor (F, S)

24. Kingman Substation to Hoover Substation 230 kV Electric Transmission Corridor (F, S)
25. Vail Substation to Valencia Substation 138 kV Electric Transmission Corridor (S)
26. Cienega Tap to Cienega Substation 138 kV Electric Transmission Corridor (S)
27. Santa Cruz Substation to 22ND Street Substation 138 kV Electric Transmission Corridor
28. Existing Agency Designated Utility Corridor

* Preliminary estimates identify which corridors may cross Federal (F), Tribal (T) and State Trust (S) Lands. These corridors have F, T and/or S in parenthesis.

The above corridors are primarily future projects which UniSource will either develop on its own or in cooperation with other utilities in the region. UniSource can provide more detailed information on the location of these proposed corridors if required. For your convenience, UniSource has included shapefiles of the various corridors. Please contact the undersigned with any questions or if you would like additional information.

Sincerely,

Ed Beck
Superintendent, Planning
Tucson Electric Power Co.
P.O. Box 711
Tucson, AZ 85702
(520) 745-3276
ebeck@tep.com