

TUCSON ELECTRIC POWER COMPANY

P. O. Box 711, MS-OH217
Tucson, AZ 85702

Ed Beck, Superintendent
TEP Planning

TEL. 520-745-3276
FAX 520-571-4032

November 28, 2005

Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585

Enclosed please find The United States Department of Energy West-Wide Energy Corridor Programmatic EIS Comments by UniSource Energy Corporation as submitted electronically November 28, 2005. Also, please see a copy of the TEP Proposed Corridors map on CD.

Thank you,

Ed Beck
Superintendent, Planning
Tucson Electric Power Co.
Mailstop SC210
P.O. Box 711
Tucson, AZ 85702
(520) 745-3276
ebeck@tep.com

**The United States Department of Energy
West-Wide Energy Corridor Programmatic EIS
Comments by UniSource Energy Corporation
Submitted November 28, 2005**

Introduction

UniSource Energy Corporation (UniSource) appreciates this opportunity to comment on the West-wide Energy Corridor Programmatic Environmental Impact Statement (PEIS). UniSource includes several subsidiaries including Tucson Electric Power Co. (TEP) and UniSource Energy Services Electric (UNSE) and UniSource Energy Services Gas (UNSG). TEP is the load serving entity for Tucson, AZ and participates in the electric utility business throughout the Western States. UNSE and UNSG are the load serving entities for Santa Cruz County and Mohave County for electric and gas services respectively.

UniSource praises the various Federal departments that are preparing to identify and designate corridors for energy facilities in the West. TEP has been a strong supporter of the energy corridor concept in the West for many years, beginning with the Western Utility Group efforts in the late 1970s, the follow-up efforts of 1986 and 1992, and the revised efforts of the BLM in recent years.

Due to the large federal ownership of lands in the West and their location, it is critical that the federal agencies be a partner in the development of energy corridors to allow an efficient development of energy transmission systems that minimize adverse environmental impacts. The very fast load growth in the West coupled with the large distances between load centers and various generation resources increase this need. The designation of corridors will improve the public's knowledge and understanding of the needs for utilities as well as identify the locations of future facilities to assist in the development of their various projects. Due to a lack of construction of energy infrastructure in recent years and an attendant need to develop new projects, a streamlined process for permitting such projects is critical and designated energy corridors is a step in the right direction.

Comments

- 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 planning groups.

- 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.
- UniSource is also a member of SWAT and supports the comments made on behalf of SWAT

Attachments

Attached in PDF format is a map showing corridors that are important to UniSource. These corridors are related to the three subsidiaries of UniSource and include:

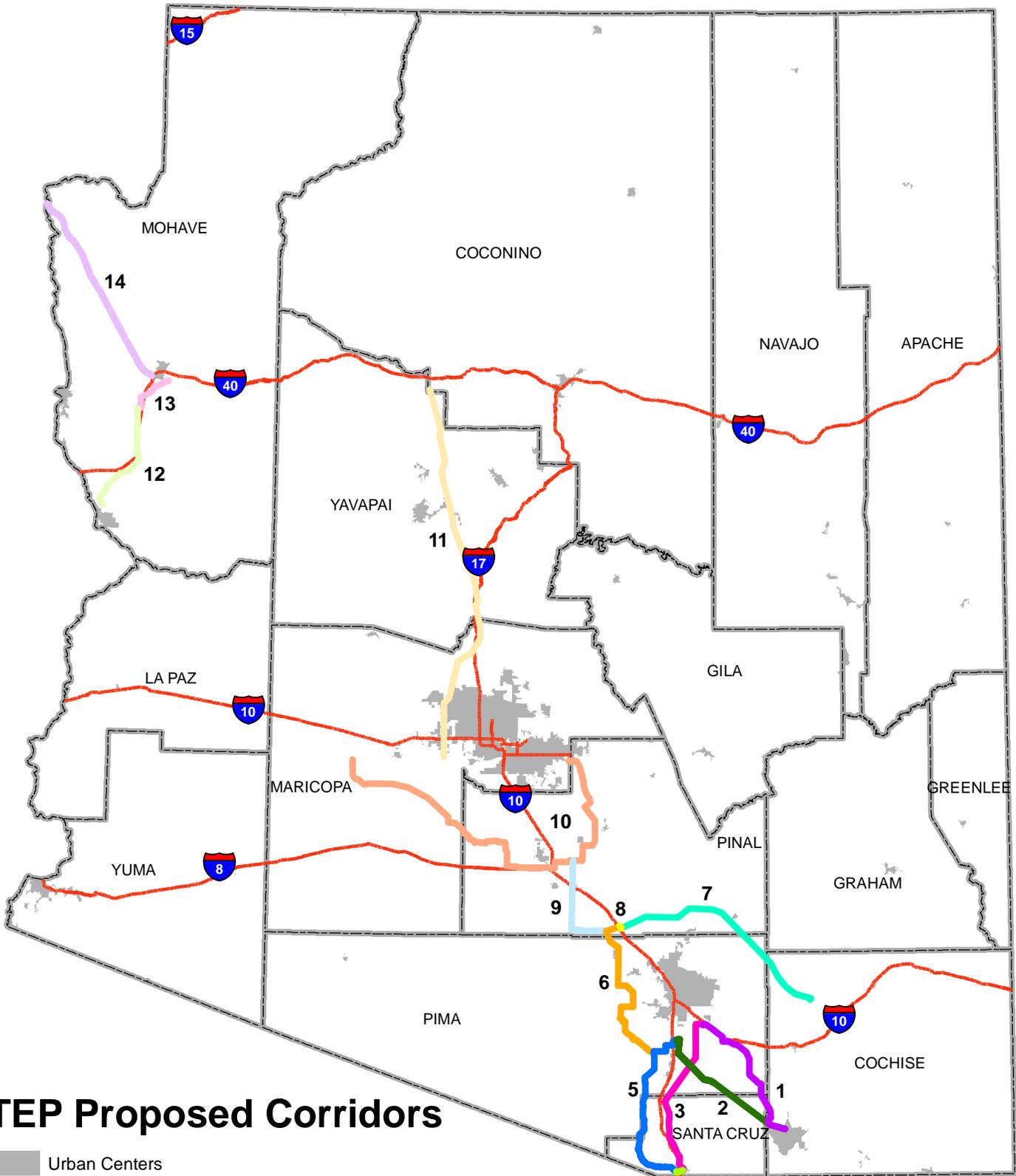
1. Vail Substation to Fort Huachuca 138 kV electric transmission line
2. South Substation to Fort Huachuca 46/138 kV electric transmission line
3. Vail Substation to Valencia Substation 115/138 kV electric transmission line
4. Valencia Substation to Gateway Substation 115 kV electric transmission line
5. South Substation to Gateway Substation 345 kV electric transmission line
6. Tortolita Substation to South Substation 345 kV electric transmission line
7. Winchester Substation to Tortolita Substation 230/345 kV electric transmission line
8. Saguaro Substation to Tortolita Substation 500 kV electric transmission line
9. Pinal South Substation to Tortolita Substation 500 kV electric transmission line
10. Hassayampa Substation to Browning Substation 500/230 kV electric transmission line (Joint project with Salt River Project and others)
11. Maricopa Gas transmission line (El Paso Natural Gas Project)
12. Havasu Substation to Griffith Substation 69/230 kV electric transmission line
13. Griffith Substation to Hilltop Substation 230 kV electric transmission line
14. Kingman Substation to Hoover Substation 230 kV electric transmission line

The above corridors are primarily future projects which UniSource will either develop on its own or in cooperation with other utilities in the region.

Contact Information

Ed Beck
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Tucson Electric Power Co.
Mailstop SC 210
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Tucson, AZ 85702
(520) 745-3276
ebeck@tep.com

UniSource can provide more detailed information on the location of the proposed corridors if required.



TEP Proposed Corridors

Urban Centers

- 1. Vail Ft Huachuca 138 kV
- 2. South Ft Huachuca 46/138 kV
- 3. Vail Valencia 115/138 kV
- 4. Valencia Gateway 115 kV
- 5. South Gateway 345 kV
- 6. Tortolita South 345 kV
- 7. Winchster Tortolita 230/345 kV
- 8. Saguaro Tortolita 500 kV
- 9. Pinal South Tortolita 500 kV
- 10. Hassayampa Browning 500/230 kV
- 11. Maricopa Gas
- 12. Havasu Griffith 69/230 kV
- 13. Griffith Hilltop 230 kV
- 14. Kingman Hoover 230 kV

November 23, 2005

Data for use in maps with scales of 1:750,000 to 1:3,000,000



A UniSource Energy Company

UTM 12N NAD83 HARN Meters

1:3,000,000

