

**Western Energy Corridors Designation  
EPA Act Section 368  
Programmatic EIS Scoping  
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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 Gas (UNSG). TEP is the load serving entity for Tucson AZ and participates in 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.

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.

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. UniSource can provide more detailed information on the location of these proposed corridors if required. Just contact the undersigned with any questions.

Sincerely,

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