

PINNACLE WEST
CORPORATION
LAW DEPARTMENT

Christina V. Bigelow
Senior Attorney
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Direct Line

August 9, 2017

Rae McQuade
President
NAESB
801 Travis, Suite 1675
Houston, Texas 77002

RE: Arizona Public Service Company's Comments on the Proposed Revisions to WEQ-004,
Coordinate Interchange

Dear Ms. McQuade:

Arizona Public Service Company (APS) thanks the Wholesale Electric Quadrant (WEQ) Business Practices and Coordinate Interchange Scheduling Subcommittees ("the Subcommittees") for the opportunity to comment on their proposed revisions to WEQ-004, Coordinate Interchange. APS has reviewed the proposed revisions and provides the following comment for the consideration of the OASIS Subcommittee:

1. APS is concerned that the provision proposed to be added at Section xxx-1.8 may introduce some ambiguity without a corresponding provision to ensure communication between the applicable entities, which include the native AND attaining balancing authorities, regarding the congestion management procedures to be utilized. APS proposes the following revisions to reduce the potential for ambiguity and increase clarity:

xxx-1.8 A Pseudo-Tie may be implemented without an RFI if all relevant information about the Pseudo-Tie is included in congestion management procedure(s) via an alternate method.

xxx-1.8.1 Entities implementing a Pseudo-Tie shall confirm the method to be utilized to include the requested Pseudo-Tie in congestion management procedures with both affected Balancing Authorities prior to commencing operation of the Pseudo-Tie.

APS appreciates the opportunity to provide this comment. Please do not hesitate to contact me should you have any questions or concerns.

APS • El Dorado • Bright Canyon

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Rae McQuade, President
NAESB
August 9, 2017
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Sincerely,

A handwritten signature in black ink, appearing to read 'Christina V. Bigelow', with a large, sweeping flourish at the end.

Christina V. Bigelow

CVB/jj

cc: Jana Bordenkircher
Twyana Blair
Tyler Moore