

Cross RMP 3

October 4, 2017

**Glen Canyon Solar's Data Request 1.1:**

Please produce documents sufficient to show the last five (5) years of APS's firm and non-firm hourly transmission schedules on the PACE-Four Corners transmission contract path in both directions. In your response, please identify those schedules made by APS under the Restated Transmission Agreement.

**Arizona Public Service Company's Response:**

APS objects to GC-APS-1.1 on the grounds of relevancy. APS's contractual rights under the Restated Transmission Agreement are not limited to its actual usage of the PACE-Four Corners transmission contract path, nor is APS's past usage of the PACE-Four Corners transmission contract path necessarily indicative of its future usage. Furthermore, given the proposed location of the Glen Canyon projects, APS's use of the PACE-Four Corners transmission contract path is not relevant to this proceeding. APS further objects to this request to the extent that the request requires the creation of new data, documents or studies. APS also objects to this request on the grounds that the production of the information requested would impose on APS an undue burden that outweighs the probative value of the information requested, particularly where at least some of the information sought has been previously provided in these proceedings by PacifiCorp and is equally available to Glen Canyon Solar.

