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November 17, 2014

VIA ELECTRONIC FILING

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

Re: *Arizona Public Service Company*, Docket No. ER 15-411-000
Rate Schedule No. 274 - WestConnect Planning Participation Agreement

Dear Secretary Bose:

Pursuant to Section 206 of the Federal Power Act¹ ("FPA"), and in compliance with the order of the Federal Energy Regulatory Commission² ("FERC" or "Commission") issued September 18, 2014 in Docket Nos. ER13-17-001, et al.,³ Arizona Public Service Company ("APS") hereby submits the WestConnect Planning Participation Agreement as Rate Schedule No. 274 for Commission review.

I. COMMUNICATIONS

The names and addresses of the persons upon whom all communications concerning this proceeding should be served are as follows:

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II. BACKGROUND OF FILING PARTY

APS, a wholly-owned subsidiary of Pinnacle West Capital Corporation ("PWCC"), is a vertically-integrated public utility doing business under the laws of the State of Arizona. APS is engaged in the business of generating, transmitting and distributing electricity to eleven of Arizona's fifteen counties. APS serves more than one million retail electric customers in Arizona, and participates in wholesale markets throughout

¹ 16 U.S.C. §824d.

² 18 C.F.R. Part 35 (2012).

³ *Public Service Company of Colorado, et al.*, 148 FERC ¶ 61,213 (2014).

the West. APS provides transmission service pursuant to its Commission-approved Open Access Transmission Tariff ("OATT") and owns facilities used for the sale and transmission of electric energy in interstate commerce. In addition, APS is authorized to sell wholesale power at both market-based rates (subject to certain restrictions) and cost-based rates. APS is also a transmission customer, taking service under its OATT as well as under the transmission tariffs of other transmission providers in the West. APS is registered with the North American Electric Reliability Corporation ("NERC") for purposes of compliance with the Electric Reliability Standards and performs twelve (12) of the possible fourteen (14) registered NERC functions.⁴

III. DESIGNATED FILER AND CONTENTS OF THIS FILING

Order No. 714 directs that in situations where multiple utilities are parties to the same tariff, the joint tariff may be filed by a single designated utility and any non-designated utilities must submit a certificate of concurrence and a single tariff page containing the name of the tariff and the utility designated to file the joint tariff on behalf of the other utilities.⁵ The other public utility transmission providers of the WestConnect regional transmission planning region will be submitting certificates of concurrence to this WestConnect Planning Participation Agreement, so that it may be recognized as a rate schedule of each of the FERC-jurisdictional members of the region.⁶ APS will serve as the designated filing utility for the agreement. The designation of APS as the designated filer for the agreement is for administrative convenience and in no way shall limit the other public utility transmission providers' filing rights under the FPA as they relate to the agreement.

IV. PROPOSED EFFECTIVE DATE

APS is submitting this tariff record with a proposed effective date of 12/31/9998, in accordance with the Commission's tariff filing protocols where the effective date is unknown.

⁴ APS is currently registered with NERC as a Balancing Authority, Transmission Operator, Transmission Owners, Transmission Planner, Transmission Service Provider, Planning Authority, Generation Operator, Generation Owner, Resource Planner, Purchasing Selling Entity, Load Serving Entity and Distribution Provider.

⁵ Order No. 714 at PP 61-63.

⁶ The WestConnect Public Utility transmission providers are: APS, Black Hills Power, Inc., Black Hills Colorado Electric Utility Company, LP, Cheyenne Light, Fuel, & Power Company, El Paso Electric Company, NV Energy, Inc., Xcel Energy Services, Inc., on behalf of Public Service Company of Colorado, Public Service Company of New Mexico, Tucson Electric Power Company, and UNS Electric, Inc.

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V. CONCLUSION

APS respectfully requests that the Commission accept this filing in the form tendered. If you have any questions regarding this filing, please feel free to contact me at the number listed herein.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Raymond C. Myford". The signature is fluid and cursive, with a large initial "R" and "M".

Raymond C. Myford
Director, Federal Affairs and Compliance