

May 12, 2022

**VIA ELECTRONIC FILING**

The Honorable Kimberly D. Bose,  
Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**RE: Public Service Company of Colorado  
Interconnection Study Metrics Processing Time Exceedance Report Q1  
2022  
Docket No. ER19-1864**

Dear Secretary Bose:

Pursuant to Rule 1907 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure<sup>1</sup>, Public Service Company of Colorado ("PSCo"), submits this transmittal letter and the attached Interconnection Study Metrics Processing Time Exceedance Report Q1 2022 (the "Report"). PSCo submits this informational report consistent with the requirements set forth in Order Nos. 845 and 845-A<sup>2</sup> and Section 3.5.3 of Attachment N of Xcel Energy Operating Companies Open Access Transmission Tariff, which contains PSCo's Large Generator Interconnection Procedures.

**1. Background**

PSCo is a wholly owned utility operating company subsidiary of Xcel Energy Inc. PSCo is a vertically-integrated electric utility and, *inter alia*, owns and operates transmission facilities in the State of Colorado. PSCo provides wholesale transmission service, *inter alia*, pursuant to the Xcel Energy Operating Companies Joint Open Access Transmission Tariff ("Xcel Energy OATT") on file with and accepted by the Commission.<sup>3</sup> Individual PSCo service agreements are on file with the Commission in PSCo's FERC Electric Tariff Second Revised Volume No. 5.

**2. Description of the Report**

The exceedance report explains that in the Q3 2021 and Q4 2021 exceedance reports, a higher queued customer with two suspended executed Large Generator Interconnection Agreements ("LGIA"'s) were withdrawn and terminated in Q2 2021 because the three-year suspension terms in

---

<sup>1</sup> 18 C.F.R. 385.1907 (2019)

<sup>2</sup> Reform of Generator Interconnection Procedures and Agreements, Order No. 845, 163 FERC ¶ 61,043 ("Order No. 845"), order on reh'g, 166 FERC ¶ 61,137 (2019) ("Order No. 845-A").

<sup>3</sup> The Xcel Energy OATT was restated in eTariff and accepted for filing in *Public Service Company of Colorado*, Docket No. ER16-1422-000, unpublished letter order (August 16, 2016).

the LGIAs elapsed. These withdrawals had an impact on the ongoing Spring 2020 Phase 2 Definitive Interconnection System Impact Study and the study analysis needed to be redone. Attachment N Section 7.6 states that the Transmission Provider is allowed an additional 150 Calendar Days from the withdrawal notification to complete the restudy, but because of the restudy, the total time elapsed for the Spring 2020 Phase 2 Definitive Interconnection System Impact Study exceeded 150 days. PSCo completed the Phase 2 study report on August 19, 2021, which is a total of 275 total days from the initial Spring 2020 Phase 2 Definitive Interconnection System Impact Study start date.

PSCo continued to work through complexities for the Spring 2020 Interconnection Facilities Study reports in order to ensure the reports contained complete and accurate information. This was the first set of reports completed under the DISIS process and additional time was required to develop the Cluster Facilities Study Reports, which detailed the Network Upgrades that are allocated to multiple Interconnection Requests in addition to the Individual Interconnection Facilities Study reports. The Spring 2020 Interconnection Facilities Study reports were delayed and the total time exceeded the 90 calendar day study timeframe. The draft Interconnection Facilities Study reports were issued on March 31, 2022, which is a total of 157 total days from the initial Spring 2020 Interconnection Facilities Study start date.

PSCo continued to work through complexities for the Fall 2020 Interconnection Facilities Study reports. This cluster experienced similar issues to the Spring 2020 cluster including the complexity of developing Cluster Interconnection Facilities Study reports while simultaneously developing Individual Interconnection Facilities Study reports for each Interconnection Request. Because of the restudy that was caused by the withdrawal of a higher queued request, the seven (7) Spring 2020 and five (5) Fall 2020 Interconnection Facilities Study reports were all due approximately at the same time. The Fall 2020 Interconnection Facilities Study reports were delayed and the total time exceeded the 90 calendar day study timeframe. The draft Interconnection Facilities Study reports were issued April 8, 2022, which is a total of 163 total days from the initial Fall 2020 Interconnection Facilities Study start date.

### **3. Communications and Correspondence**

Communications and correspondence with respect to this filing should be directed to each of the following:<sup>4</sup>

---

<sup>4</sup> XES requests waiver of Section 385.203(b)(3) of the Commission's regulations to permit the designation of more than two persons upon whom service is to be made in this proceeding. 18 C.F.R. § 385.203(b)(3) (2018).

The Honorable Kimberly D. Bose

May 12, 2022

Page 3 of 6

Mark C. Moeller  
Manager, Transmission Business Relations  
Xcel Energy Services Inc.  
414 Nicollet Mall, 414-6  
Minneapolis, MN 55401  
Phone: (612) 330-7663  
Email: [mark.c.moeller@xcelenergy.com](mailto:mark.c.moeller@xcelenergy.com)

Timothy T. Mastrogiacono  
Lead Assistant General Counsel  
Xcel Energy Services Inc.  
701 Pennsylvania Ave. NW Suite 250  
Washington, DC 20004  
Phone: (202) 661-4481  
Email: [tim.t.mastrogiacono@xcelenergy.com](mailto:tim.t.mastrogiacono@xcelenergy.com)

Connie Paoletti  
Manager, Transmission Planning  
Xcel Energy Services Inc.  
1800 Larimer Street  
Denver, CO 80202  
Phone: (303) 571-2741  
Email: [connie.paoletti@xcelenergy.com](mailto:connie.paoletti@xcelenergy.com)

Liam D. Noailles  
Manager, Federal Regulatory Affairs  
Xcel Energy Services Inc.  
1800 Larimer Street  
Denver, CO 80202  
Phone: (303) 571-2794  
Email: [liam.d.noailles@xcelenergy.com](mailto:liam.d.noailles@xcelenergy.com)

#### 4. Conclusion

Because this Report is for informational purposes and will not be formally noticed nor require Commission action<sup>5</sup>, PSCo respectfully requests that the Commission accept this Report for filing and take no further action on the Report.

Respectfully submitted,

*/s/ Mark C. Moeller*

Mark C. Moeller  
Manager, Transmission Business Relations  
Xcel Energy Services Inc.  
On behalf of  
Public Service Company of Colorado

---

<sup>5</sup> Order No. 845, 163 FERC ¶61.043 at P 305 n.567.

## CERTIFICATE OF SERVICE

I, Elizabeth Walkup, hereby certify that I have this day served a notice of the enclosed filing via electronic mail on each party designated on the official Service List.

Dated at Minneapolis, Minnesota this 12<sup>th</sup> day of May, 2022

*/s/ Elizabeth Walkup*

**Elizabeth Walkup**

Xcel Energy Services Inc.

414 Nicollet Mall, 414-6

Minneapolis, MN 55401

Phone: (612) 330-6780

Email: [elizabeth.a.walkup@xcelenergy.com](mailto:elizabeth.a.walkup@xcelenergy.com)



# **Interconnection Study Metrics Processing Time Exceedance Report Q1 2022**

May 12, 2022

## **Section 1**

### **Metrics Report Requirements**

Section 3.5.3 of Attachment N of Xcel Energy Operating Companies (“Xcel Energy”) Open Access Transmission Tariff (“OATT”) requires Public Service Company of Colorado (“PSCo”) to comply with specific reporting requirements when Interconnection Study timelines exceed 25% for two consecutive quarters.

Specifically, PSCo must submit a report to the Federal Energy Regulatory Commission (“the Commission”) describing the reason for each study pursuant to an Interconnection Request that exceeded its deadline (i.e., 90 days, 150 days, 90 days) for completion (excluding any allowance for Reasonable Efforts). In addition, PSCo must describe any steps taken to remedy these specific issues and, if applicable, prevent such delays in the future. The report must be filed at the Commission within 45 days of the end of the calendar quarter.

## **Section 2**

### **Study Timeline Metrics Summary**

#### **Spring 2020 Cluster Phase 2 Definitive Interconnection System Impact Study (DISIS)**

As previously reported in Q3 2021 and Q4 2021, two higher queued customers with suspended executed Large Generator Interconnection Agreements (“LGIA”s) were withdrawn in Q1 2021 because the three-year suspension term in the LGIA’s elapsed. These withdrawals had an impact on the ongoing Spring 2020 Phase 2 Definitive Interconnection System Impact Study and the study analysis needed to be redone. Section 7.6 of Attachment N of the OATT, states that the Transmission Provider is allowed an additional 150 Calendar Days from the withdrawal notification to complete the restudy, but because of the restudy, the total time elapsed for the Spring 2020 Phase 2 Definitive Interconnection System Impact Study report exceeded 150 days. The Phase 2 study report was completed on August 19, 2021. The report took a total of 275 days from the initial Spring 2020 Phase 2 Definitive Interconnection System Impact Study start date.

#### **Spring 2020 Cluster Interconnection Facilities Study**

PSCo continued to work through complexities for the Spring 2020 Interconnection Facilities Study reports in order to ensure the reports contained complete and accurate information. This was the first set of reports completed under the DISIS process and additional time was required to develop the Cluster Facilities Study Reports, which detailed the Network Upgrades that are allocated to multiple Interconnection Requests in addition to the Individual Interconnection Facilities Study reports. Additional time was required to verify appropriate treatment of Network Upgrade costs for expanding a substation where the expansion was required to mitigate an overloaded transmission line. Due to these issues, the Spring 2020 Interconnection Facilities Study reports were delayed and the total time exceeded the 90 calendar day study timeframe. The draft Interconnection Facilities Study reports were issued on March 31, 2022, which is a total of 157 total days from the initial Spring 2020 Interconnection Facilities Study start date.

## **Fall 2020 Cluster Interconnection Facilities Study**

PSCo continued to work through complexities for the Fall 2020 Interconnection Facilities Study reports in order to ensure the reports contained complete and accurate information. This cluster experienced similar issues to the Spring 2020 cluster including the complexity of developing Cluster Interconnection Facilities Study reports while simultaneously developing Individual Interconnection Facilities Study reports for each Interconnection Request. Because of the restudy that was caused by the withdrawal of a higher queued request, the seven (7) Spring 2020 and five (5) Fall 2020 Interconnection Facilities Study reports were all due approximately at the same time. Quality control review of the reports and data required additional time and delayed the publication of the reports. As part of the quality control review, it was identified that new cost estimates were required for certain Network Upgrades. Due to these issues, the Fall 2020 Interconnection Facilities Study reports were delayed and the total time exceeded the 90 calendar day study timeframe. The draft Interconnection Facilities Study reports were issued April 8, 2022, which is a total of 163 total days from the initial Fall 2020 Interconnection Facilities Study start date.

### **Section 3 Steps to Remedy Issues and Prevent Future Delays**

PSCo has developed a new template that will be used going forward for any future Interconnection Facilities Study reports which will streamline the process of identifying the allocation Network Upgrades that impact multiple Interconnection Requests.

PSCo has hired a dedicated OATT manager to help facilitate the processing of OATT requests including the Large Generator Interconnection requests. PSCo has also assigned a dedicated project manager to oversee Interconnection Requests and help coordinate with other internal groups assisting with Interconnection Requests.