

August 15, 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 Q2  
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 Q2 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 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 issues including the complexity of developing Cluster

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was restated in eTariff and accepted for filing in *Public Service Company of Colorado*, Docket No. ER16-1422-000, unpublished letter order (August 16, 2016).

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 deadline. 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.

PSCo completed the Phase 2 study of the Spring 2021 cluster on June 8, 2022. This study was completed in 254 days, exceeding the 150 calendar day deadline. The study took longer than expected for several reasons. First, PSCo hired a new planning consultant that needed to be trained on the PSCo interconnection process. Because the consultant was new, they needed to rebuild models and the models needed to be revalidated to ensure accuracy and consistency. The review identified modeling errors and required rerunning the steady state analysis. Then stability analysis using detailed and updated contingencies showed severe system responses that required additional time to resolve. Finally, the report format was updated to provide customers improved clarity of results and requirements.

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

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

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<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

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#### 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

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<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 15<sup>th</sup> day of August, 2022

*/s/ Elizabeth Walkup*

**Elizabeth Walkup**

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# **Interconnection Study Metrics Processing Time Exceedance Report Q2 2022**

August 15, 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**

### **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 issues 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 deadline. 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.

### **Spring 2021 Cluster Phase 2 Definitive Interconnection System Impact Study (DISIS)**

PSCo completed the Phase 2 study of the Spring 2021 cluster on June 8, 2022. This study was completed in 254 days, exceeding the 150 calendar day deadline. The study took longer than expected for several reasons. First, PSCo hired a new planning consultant that needed to be trained on the PSCo interconnection process. Because the consultant was new, they needed to rebuild models and the models needed to be revalidated to ensure accuracy and consistency. The review identified modeling errors and required rerunning the steady state analysis. Then stability analysis using detailed and updated contingencies showed severe system responses

that required additional time to resolve. Finally, the report format was updated to provide customers improved clarity of results and requirements.

### **Section 3**

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

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. Additionally, the experience the new consultant gained through performing the both the Spring 2021 Phase 2 and Fall 2021 Phase 1 studies has positioned them to improve study processing time. PSCo has asked the consultant to bring additional resources as necessary.

PSCo is preparing to file proposed changes to Attachment N of the OATT to encourage only ready projects to enter the queue and allow an off-ramp for early development projects to exit the queue. We anticipate this will reduce the complexity both in the existing queue for required restudies to account for withdrawals, and future study clusters by limiting the studies to ready projects. We are currently working with stakeholders through public meetings to prepare a final draft of the proposed changes to file later this year.