

February 14, 2023

**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 Q4  
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 Q4 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 has continued to work through the challenges of withdrawals and the need for restudies to occur. The Spring 2021 Cluster Phase 4 report was completed on time for four of the projects, however, two of the projects have not been completed due to ongoing restudies. This has forced two of the studies to exceed the 90

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was restated in eTariff and accepted for filing in *Public Service Company of Colorado*, Docket No. ER16-1422-000, unpublished letter order (August 16, 2016).

Calendar Day deadline to complete the study due to the need for restudies. Prior to the start of the Fall 2021 Cluster Phase 2 study, five projects withdrew their requests. Contemporaneously with the start of the Phase 2 study, three projects from the higher queued Fall 2020 cluster were withdrawn. Due to all of the withdrawals and restudies needed, the Phase 2 study report has exceeded the 150 Calendar Day deadline and is expected to be completed in Q4 of 2024.

The exceedance report also explains that PSCo is experiencing delays all the way down to the lowest queued cluster. The Spring 2022 Cluster Phase 1 study was expected to be completed in August of 2022 and then delayed until November of 2022. Due to the restudies, the cascading effects have caused this Phase 1 study to exceed the 90 Calendar Day deadline. This study is now expected to be completed in Q4 of 2024, exceeding the 90 Calendar Day deadline.

### **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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### **3. 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

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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).

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

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

## CERTIFICATE OF SERVICE

I, Stephanie Mayers, 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 14<sup>th</sup> day of February, 2023.

*/s/ Stephanie Mayers*

**Stephanie Mayers**

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# **Interconnection Study Metrics Processing Time Exceedance Report Q4 2022**

February 14, 2023

## **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 2021 Cluster Phase 4 Definitive Interconnection System Impact Study (DISIS)**

PSCo completed the Phase 4 study of four of the projects in the Spring 2021 cluster on December 13, 2022. While these four projects in this cluster had completed the Phase 4 study on time, there are two outstanding reports to still be issued. These two projects were impacted by higher queued re-studies in the Spring and Fall 2020 clusters and therefore need to have the Phase 2 study redone. These two studies have exceeded the 90 Calendar Day deadline to complete the study due to the need for restudies.

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

PSCo completed the Phase 1 study of the Fall 2021 cluster on July 29, 2022. Prior to the start of the Phase 2 study, five projects from the Fall 2021 withdrew their requests. The Phase 2 study started on August 30, 2022 with the remaining projects. Contemporaneously with the start of the Phase 2 study, three projects from the higher queued Fall 2020 cluster were withdrawn. After review of all of the withdrawals, it was determined that the higher queued Spring 2020 and Fall 2020 clusters needed to be restudied. The need to restudy the Spring and Fall 2020 clusters has caused the delay of the Phase 2 study to exceed the 150 Calendar Day deadline. The Phase 2 study is expected to be completed in Q4 of 2024.

#### **Spring 2022 Cluster Phase 1 Definitive Interconnection System Impact Study (DISIS)**

PSCo has not yet completed the Phase 1 study of the Spring 2022 cluster. This study was expected to be completed in August of 2022 and then was delayed until November 2022 due

to delays from the higher queued Fall 2021 cluster Phase 1 study. Due to the withdrawals and re-studies mentioned above, cascading effects have delayed this Phase 1 study report which is now expected to be issued in Q4 of 2024, exceeding the 90 Calendar Day deadline.

### **Section 3**

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

PSCo has filed proposed changes to Attachment N of its 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 restudies due to withdrawals, and future study clusters by limiting the studies to only ready projects. This filing was submitted to the Commission on December 14, 2022 and PSCo has requested a March 9, 2023 effective date.