



414 Nicollet Mall
Minneapolis, MN 55401

April 29, 2021

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
2021
Docket No. ER19-1864**

Dear Secretary Bose:

Pursuant to Rule 1907 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure¹, Public Service Company of Colorado ("PSCo"), submits this transmittal letter and the attached Interconnection Study Metrics Processing Time Exceedance Report Q1 2021 (the "Report"). PSCo submits this informational report consistent with the requirements set forth in Order Nos. 845 and 845-A² 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.³ 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 Report explains that in Q3 2020, one (1) Definitive Interconnection Phase 1 Study report for Public Service Company of Colorado (PSCo) was initially completed and delivered to the

¹ 18 C.F.R. 385.1907 (2019)

² 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").

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was restated in eTariff and accepted for filing in *Public Service Company of Colorado*, Docket No. ER16-1422-000, unpublished letter order (August 16, 2016).

Interconnection Customers within 90 days, however, after further review the report was withdrawn and reissued 47 days later (in Q4 2020) and thus the Phase 1 report was delivered after the 90 day deadline. Since two (2) consecutive quarters (identified above) exceeded the 25% threshold for late studies, this report to the Commission and additional metrics reporting must continue for the next four consecutive calendar quarters without the values exceeding 25 percent for two consecutive calendar quarters. Due to PSCo implementing quality control evaluations earlier in the study process in Q4 2020, there were no study report delays identified in the Q1 2021 metrics.

3. Communications and Correspondence

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

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4. Conclusion

Because this Report is for informational purposes and will not be formally noticed nor require Commission action⁵, 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.

⁴ 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).

⁵ Order No. 845, 163 FERC ¶61.043 at P 305 n.567.

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On behalf of

Public Service Company of Colorado

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 29th day of April, 2021.

/s/ Elizabeth Walkup

Elizabeth Walkup

Xcel Energy Services Inc.

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Interconnection Study Metrics Processing Time Exceedance Report Q1 2021

April 29, 2021

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 Xcel Energy to comply with specific reporting requirements when Interconnection Study timelines exceed 25% for two consecutive quarters.

Specifically, Xcel Energy 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, 150 days, 90 days) for completion (excluding any allowance for Reasonable Efforts). In addition, Xcel Energy 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

2020 Spring Cluster Phase 1 Definitive Interconnection System Impact Study (DISIS)

In Q3 2020, the first (1) Definitive Interconnection Phase 1 Study report for the Public Service Company of Colorado (PSCo) was delivered to the seven (7) Interconnection Customers in the Spring 2020 DISIS Cluster. The Definitive Interconnection Phase 1 Study Report was initially completed and delivered to the Interconnection Customers within 90 days, however, after further review the report was withdrawn and reissued 47 days later (in Q4 2020). The average mean time (in days), from the execution of the Phase 1 Study Agreement to the delivery of the completed Phase 1 Study report was 137 days. Thus, the Q3 2020 OATT 3.5.1.1 Definitive Study Phase 1 Processing Time reflected that 100% of the Phase 1 Studies exceeded ninety (90) Calendar Days to complete for that reporting quarter.

In Q4 2020, no additional Phase 1 studies were late and, as noted above, the study reported late for Q3 2020 was completed in Q4 2020. Due to the way the metrics are computed as described in Section 3.5.1 of Attachment N, the “Definitive Study Phase 1 Processing Time” reflected that 100% of the Phase 1 Studies exceeded ninety (90) Calendar Days to complete for that reporting quarter. Note that this study identified as late in the Q4 metrics report is the same study that was reported as late in Q3.

Since two (2) consecutive quarters (identified above) exceeded the 25% threshold for late studies, this report to the Commission and additional metrics reporting are triggered as required by OATT 3.5.3 reporting must continue for the next four consecutive calendar quarters and must continue reporting this information until PSCo reports four consecutive calendar quarters without the values calculated in 3.5.1.1(E), 3.5.1.2(E), or 3.5.1.3(E) exceeding 25 percent for two consecutive calendar quarters. PSCo did not have any study delays in Q1 2021, thus marking the first quarter not exceeding 25 percent.

Section 3

Steps to Remedy Issues and Prevent Future Delays

In Q4 2020, PSCo implemented quality control evaluations earlier in the study process so that base case modeling assumptions or changes to assumptions will be validated before the study commences. Due to these efforts, there were no study report delays identified in the Q1 2021 metrics.