

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 24M-0050E

IN THE MATTER OF THE JOINT FILING OF THE 10-YEAR AND 20-YEAR TRANSMISSION REPORTS OF PUBLIC SERVICE COMPANY OF COLORADO, TRI STATE GENERATION AND TRANSMISSION, INC., AND BLACK HILLS COLORADO ELECTRIC, LLC PURSUANT TO 4 CCR 723-3-3627.

INITIAL COMMENTS OF THE COLORADO ELECTRIC TRANSMISSION AUTHORITY

The Colorado Electric Transmission Authority (“CETA”) hereby files comments related to the matter of the Joint 10-Year Transmission Plan and 20-Year Conceptual Scenario Report filed by Public Service, Tri-State, and Black Hills on February 1, 2024, pursuant to Public Utilities Commission (“Commission”) Decision No. C24-0311-1.

CETA is an independent, political subdivision of the state. It was created in 2021 by Colorado lawmakers to enable the development of electric transmission facilities that will deliver clean energy resources to Coloradans and our neighbors. The powers of CETA are vested in its nine-member Board of Directors, as delegated to its Executive Director as described below. CETA has the power to:

- Engage in transmission planning activities that would increase grid reliability, help Colorado meet its clean energy goals, and aid in economic development.
- Identify and establish corridors for the transmission of electricity with the state.
- Coordinate, investigate, plan, prioritize, and negotiate with entities within and outside Colorado for the establishment of interstate transmission corridors.
- Consider options and alternatives to increase the efficient use of the transmission system. Options and alternatives may include storage and advanced transmission technologies.
- Issue and sell electric transmission bonds to undertake projects.
- Exercise the power of eminent domain for acquiring property or rights-of-way necessary for projects.
- Enter into partnerships with public or private entities to develop projects.
- Conduct a transparent and competitive process to select a qualified transmission operator to carry out all required financing, planning, acquisition, maintenance, and operation of electric transmission facilities and related infrastructure.
- Collect payments of reasonable rates, fees, interest, or other charges from operating or leasing existing facilities to finance future projects and render other services.

In Decision No. C24-0311-1, the Commission waived the requirement in Rule 3627(h) to hold workshops or hearings and the requirement to issue a written decision regarding the adequacy of the Joint 10-Year Transmission Plan and 20-Year Conceptual Scenario Report and the process used in formulating the plan. Instead, the Commission solicited written comments on the Joint 10-Year Transmission Plan and 20-Year Conceptual Scenario Report to be used by Commission

staff in the development of the future notice of proposed rulemaking contemplated by the Commission in its Transmission Pre-Rulemaking Decision (Decision No. C23-0640). Proceeding No. 23M-0472E serves as a repository for the filing of comments, responses, proposed rule changes and other relevant information to be used by Commission staff.

CETA filed initial comments in Proceeding No. 23M-0472E on December 1, 2023.¹ CETA responded to general issues raised in Decision No. C23-0640, to specific questions in the list attached to the Commission's order, and to the call for topics for discussion at a staff-led workshop. CETA submits comments in this proceeding to reiterate its support for staff-led workshop(s) to inform the future notice of proposed rulemaking.

In 2023, the State of Colorado directed CETA to study the need for expanded transmission capacity in the state, including:

(b) Whether and how expanded transmission capacity will:

(I) Improve the system reliability of the electric grid and provide optimal utilization of electricity flows in the state;

(II) Support the state's emission reduction goals set forth in section 25-7-102 (2)(g);

(III) Support the state's forecasted electricity needs; and

(IV) Reduce land impacts by using existing rights-of-way, including for large capacity transmission lines; co-locating multiple transmission lines; reconductoring transmission lines; and strategically siting new transmission corridors.²

The initial report of the study is to be presented to the Colorado Public Utilities Commission on or before September 1, 2024. The final report of the study is to be presented to the Joint Committee of the House of Representatives Energy and Environment Committee and the Senate Transportation and Energy Committee on or before January 31, 2025.

CETA is clearly tasked with ensuring that transmission planning in Colorado supports the state's clean energy and emission reduction goals. CETA relied on the Joint 10-Year Transmission Plan and 20-Year Conceptual Scenario Report as an input into its transmission capacity expansion transmission study for Colorado.³ CETA reiterates that it looks forward to collaborating with the Commission, regulated utilities, and all other stakeholders in ensuring that needed electric transmission is being planned and developed. CETA continues to support a staff-led workshop on the issue of ensuring that transmission planning is supporting Colorado public policy goals.

CETA believes that the respective roles and responsibilities of the Colorado Public Utilities Commission and CETA are well documented and clearly distinguished in Colorado Revised

¹ CETA Initial Comments are available at: <https://www.cotransmissionauthority.com/resources>

² The CETA Act, Colorado Revised Statutes 40-42-109(1)(b).

³ CETA Transmission Study webpage: <https://www.cotransmissionauthority.com/transmission-study>

Statutes. CETA continues to support a staff-led workshop to discuss how to further improve communications and coordination regarding respective roles and responsibilities.

In conclusion, CETA appreciates the opportunity to submit comments related to transmission planning in Colorado in this proceeding. Representatives of CETA look forward to participating in the staff-led workshop(s) and to further assisting the Commission in its future rulemaking.

Respectfully submitted, COLORADO ELECTRIC TRANSMISSION AUTHORITY

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