

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

PROCEEDING NO. 22M-0514E

IN THE MATTER OF THE COMMISSION'S INVESTIGATION INTO TRANSMISSION  
SOLUTIONS FOR THE SAN LUIS VALLEY.

INITIAL COMMENTS OF THE COLORADO ELECTRIC TRANSMISSION AUTHORITY

The Colorado Electric Transmission Authority (“CETA”) hereby files comments related to the matter of increasing electricity transmission into the San Luis Valley (“SLV”), pursuant to Public Utilities Commission (“Commission”) Decision No. C22-0734.1

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.

On April 2, 2023, CETA hired Maury Galbraith to be its first Executive Director. Mr. Galbraith is tasked with implementing the powers of CETA listed above, including facilitating multi-state, multi-utility, and multi-stakeholder partnership agreements to develop new electric transmission lines and storage facilities needed to enable Colorado to achieve its clean energy goals. Mr. Galbraith represents the interests of CETA in state, regional, and federal transmission planning processes.

CETA provides these initial comments to inform the Commission and interested stakeholders of its role in Colorado and in investigating options and alternatives to increase transmission capacity to the SLV. CETA joins the Colorado Solar and Storage Association, the Solar Energy Industries Association, and the San Luis Vally Ecosystem Council in wanting to ensure the San Luis Valley is positioned to participate in the clean energy transition. Solar development in the SLV could provide a new source of economic livelihood to local communities and help Colorado achieve its clean energy goals. But these objectives require the development of additional electric transmission capacity to export solar resources from the valley. CETA is aware of the obstacles previously encountered by Tri-State and Xcel in completing a 230 KV line between the San Luis Valley and Walsenburg through La Veta Pass. CETA looks forward to collaborating with these utilities and other stakeholders to explore transmission options and routes not considered in 2016.

On May 19, 2023, CETA assisted the Colorado Energy Office (“CEO”) and the Rocky Mountain Region Transmission Coalition (“RMR-TC”) in submitting a Grid Innovation Grant application to the U.S. Department of Energy. The grant application requests \$38.8 million in grant funding for an \$82.5 million investment to unlock clean energy resources in rural and remote communities, support energy resiliency for disadvantaged populations, and invigorate economies. The goals of the grant request include increasing electrical transmission capacity to the San Luis Valley and adjacent rural and remote communities in northern New Mexico and investing in new, advanced technologies to support clean energy integration in the Colorado Springs area.

If the grant is awarded, CETA will have a central role in its implementation. CETA will lead an integrated stakeholder engagement and technical planning process over the course of 12-14 months to identify and evaluate potential routes of interconnection for the SLV. A key priority of the stakeholder engagement is to identify the desired outcomes for the wide array of impacted parties to develop solutions that provide the highest level of benefits to impacted communities and that avoid pitfalls, such as the landowner opposition that was pivotal to preventing the previous attempt to build new transmission line out of the SLV. CETA and the RMR-TC partners present an innovative approach to working with state and local governments, community members, landowners, and utilities to break the logjam of previous efforts to find an alternative transmission route and interconnection plan for the SLV.

CETA is prepared to lead the integrated stakeholder engagement and technical planning process outlined in the RMR-TC grant application. CETA is hopeful that this process will lead to a decision by Colorado’s transmission utilities to pursue development of new transmission to the SLV. CETA is also prepared to consider using its own authorities to plan, finance, acquire, and construct eligible electric transmission facilities to the SLV if other entities decline to do so.

CETA appreciates the opportunity that the Commission has created through this proceeding to collect information from the wide array of participants who are interested in increasing transmission capacity to the SLV. CETA looks forward to working with the Commission and these stakeholders in the future.

Respectfully submitted, COLORADO ELECTRIC TRANSMISSION AUTHORITY

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