



goals. Mr. Galbraith represents the interests of CETA in state, regional, and federal transmission planning processes.

CETA supports the U.S. DOE effort to establish a process to designate applicant-driven route-specific NIETCs. CETA recognizes that the Infrastructure Investment and Jobs Act and Inflation Reduction Act contain new public-private partnership and loan authorities that DOE can use to spur construction of transmission projects in NIETCs. CETA also recognizes that the Federal Energy Regulatory Commission has the authority to issue permits to site transmission facilities within NIETCs.

The Secretary of the DOE may designate as a NIETC “any geographic area that – (i) is experiencing electric energy transmission constraints or congestion that adversely affects consumers; or (ii) is expected to experience such energy transmission capacity congestion.”<sup>1</sup> The Federal Power Act directs DOE to conduct a study of electric transmission constraints and congestion on a triennial basis and, on the basis of that study and other information, to designate geographic areas as NIETCs.<sup>2</sup>

The Colorado Legislature has tasked CETA with conducting a study of the need for expanded transmission capacity in Colorado.<sup>3</sup> The study is to consider the ability to expand transmission capacity through the construction of new transmission lines, improvement of existing transmission lines, and connections to organized wholesale electricity markets. The initial report of the study must be completed before September 1, 2024.

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 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. 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 to identify and evaluate potential routes of interconnection for the San Luis Valley. CETA is hopeful that this process will lead to a decision by Colorado’s transmission utilities to pursue development of new transmission to the San Luis Valley. CETA is also prepared to consider using its own authorities to plan, finance, acquire, and construct eligible electric transmission facilities to the San Luis Valley if other entities decline to do so.

In recognition of the close alignment between CETA’s mission and proposed NIETC designation process, CETA offers two responses to the DOE’s request for information. As requested, we have copied the RFI questions, including the original question numbers, below to organize our response.

---

<sup>1</sup> 16 U.S.C. 824p(a)(2).

<sup>2</sup> Section 216(a) of the FPA.

<sup>3</sup> Colorado Senate Bill 23-016.

6. Are there other potential Applicants beyond those listed in Section II.A.i that should be considered when developing final guidance, or whose specific needs should be considered when developing this process?

Yes, governmental entities, such as political subdivisions of the State, and quasi-governmental entities created to facilitate the expansion of electric transmission facilities in a specific state should be allowed to be Applicants for the designation of route-specific NIETCs in the final guidance. CETA is a political subdivision of the State that has the power to carry out the planning, financing, acquisition, maintenance, and operation of electric transmission facilities and related infrastructure. CETA and similar governmental and quasi-governmental entities should be allowed to be Applicants.

11. Are there other forms of outreach and/or consultation that should be included in this process to ensure adequate participation of and notice to Tribal authorities, State, local, the public, and appropriate regional authorities? For example, should regional planning entities or grid operators be included in outreach or consultation?

Yes, governmental entities, such as political subdivisions of the State, and quasi-governmental entities created to facilitate the expansion of electric transmission facilities in a specific state should be included in outreach and consultation. CETA is a quasi-governmental public instrumentality that has the power to identify and establish corridors for the transmission of electricity within Colorado and to coordinate and negotiate with entities within and outside Colorado for the establishment of interstate transmission corridors. CETA and similar governmental and quasi-governmental entities should be included in outreach and consultation.

Thank you for the opportunity to submit comments to inform the designation of National Interest Electric Transmission Corridors.

/s/ Kathleen Staks

Kathleen Staks, Board Chair  
Colorado Electric Transmission Authority

/s/ Maury Galbraith

Maury Galbraith, Executive Director  
Colorado Electric Transmission Authority