

Submitted by email, 3.22.2024:

I wanted to provide a comment regarding the assumption being made for the May Valley – Longhorn Extension (MVLE). It was stated that since this line has not been approved, it would not be part of the base case but rather an alternative to be considered. Relative to other transmission alternatives that have not been as well defined to date, this line should have priority consideration given its initial inclusion in the CPP, the interest of PSCo in Phase II of the ERP, and the treatment of the line by the CoPUC in Decision C24-0161. In that Decision, the Commission states that while MVLE is not approved in this proceeding, its CPCN remains in place through the 2024 JTS solicitation and requests that PSCo update its cost in Phase I of the JTS. Thus, it appears that its chances of eventually being approved in the future are reasonable and consideration should be made to include this line in the base case or as a high priority alternative in the CETA study.

Regards,

Scott

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We appreciate the time and effort that the team has put together in forecasting generation development locations that will inform the transmission needs assessment. Of greatest importance to Avangrid Renewables (“Avangrid”) is updating RESOLVE resource assumptions and relocating projects selected in RESOLVE to better reflect actual commercial interest. Gathering the most up to date data on developer interest is important to provide a reality check on the model forecasts. While the information presented in the 22 March workshop is a good first step, Avangrid believes that additional efforts should be undertaken to better reflect the locations of development interest.

Slide 28 from the 22 March workshop states that commercial interest information was gathered from the 2023 LBNL Queued Up study, which provides data on projects in the utility interconnection queues as of the end of 2022. Solely using this data leads to an incomplete picture of developer interest for two main reasons. First, developers have been told by the state’s utilities to refrain from entering the interconnection queues until offtake interest has been expressed by the utility or other parties. As a result, there are many projects well into the development stage bidding into utility RFPs and working on bilateral agreements that are not in utility interconnection queues. Second, the LBNL data ends in 2022, excluding more recent development projects.

Avangrid recommends gathering data from additional sources to rectify the shortfalls in the LBNL queue data. The most up to date source of development interest would come from bids

into utility RFPs, such as the most recent bids into Phase II of the PSCo ERP. To protect confidential information, the project team could request data from the utilities aggregated by resource type and geographic development zone. This data would be superior to solely using the interconnection queues which may contain projects no longer actively seeking PPAs. Another useful source of data for wind projects are Federal Aviation Administration (“FAA”) filings for met tower and turbine permits, which can be used to determine if the current level of development interest from FAA filings matches study assumptions.

Avangrid has also reviewed the Reference Case Expansion Plan by Zone (Slide 21) as well as the Example Busbar Mapping Results (Slide 27) that begins to adjust the reference case for commercial interest. While directionally the changes reflected in the busbar mapping are in the right direction, Avangrid believes that the level of wind mapped into the Rifle and Montrose areas of Western Colorado are unrealistic. First, the wind resource developable potential and capacity factors in the Western portions of the state are unlikely to be high enough to justify the forecasted RESOLVE buildout in those locations. NREL data on Colorado wind speeds (<https://windexchange.energy.gov/maps-data/373>) show generally higher wind speeds in the eastern portion of the state. High wind speed locations in the western portion of the state are typically on mountain ridges that are difficult to develop. For these reasons, the assumed capacity factors and developable potential in Western Colorado should be reviewed and modified. Second, commercial development data indicates higher interest in the eastern portion of the state, due to the strong wind resource, relative ease of development, and being near locations being supported by the Colorado Power Plan. Mapping 2.8 GW of wind resources to the Montrose zone (Slide 27) is much higher than expected; all Western Colorado development forecasts should be revisited as the CETA team gathers new data on developer interest.

Thank you for consideration of Avangrid’s input to this important study.

Regards,

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