April 5, 2024

Maury Galbraith, Executive Director Roger Freeman, Transmission Planning Committee Member Tom Figel, Transmission Planning Committee Member Kathleen Staks, Board Chair Colorado Electric Transmission Authority 165 S. Union Boulevard, Suite 785 Lakewood, Colorado 80228

RE: Comments on CETA's Transmission Expansion Study

Dear Executive Director Galbraith and CETA Board Members:

Grid United LLC (Grid United) appreciates the opportunity to comment on the Colorado Electric Transmission Authority's (CETA) Transmission Expansion Study for Colorado. We are grateful for the Authorities' work to advance thinking on this topic, and we respectfully submit the following comments for consideration. We would welcome the opportunity to further discuss this with staff, should this be helpful to CETA.

## **Comments on Transmission Expansion Study for Colorado:**

We are pleased to see the progress made on the CETA Transmission Planning Study and support the proposed Regional Integration, High Demand, and Extreme Weather Transmission Resiliency Scenarios. With that context, we respectfully offer the following comments:

- 1. We respectfully suggest that the Extreme Weather Scenario study both a polar vortex event and a heat dome event as both will have large impacts and it would be useful to understand how the two different events impact the results differently.
- 2. If both an extreme summer and winter event are unable to be studied, we suggest that a prolonged winter event may be the worst-case scenario that would be the most beneficial to study. This scenario could utilize the increased demand from heating electrification in the High Demand Scenario for the load impacts. On the generation side, we suggest following a similar methodology to the SPP 2025 ITP Resiliency Criteria, by reviewing the generation performance during historic peak load/conservative operations events to develop a ratio for the derating of forecasted generation that is added to the case. This would include looking at any correlated outages of natural gas, fuel availability, and low profiles for both solar, wind, and duration limited assets (such as storage).

Grid United appreciates the chance to comment on the study and looks forward to engaging with CETA on these important issues for the State.

Sincerely,

*Michael Skelly* Chief Executive Officer Grid United

## Attachment: Grid United and its Projects in Colorado

Grid United is a privately owned transmission development company seeking to unite the North American grid by building long-distance, interregional transmission lines which improve grid reliability and resiliency, offer consumers access to low-cost electricity and support society in reaching its energy policy objectives.

Grid United's development approach seeks to foster long-term relationships with landowners, local stakeholders, and communities. These partnerships are a commitment to understand the unique characteristics of each community and property. Grid United believes that developing and maintaining landowner and community relationships enables the most efficient pursuit of projects and ensures we develop projects that create jobs, encourage local and regional economic development and provide positive long-term impacts on the communities in which they are developed. This approach is core to Grid United's mission.

Grid United is currently working to develop multiple projects in Colorado, with a particular focus on high-voltage direct current (HVDC) lines. The most advanced development Grid United is undertaking in Colorado is Three Corners Connector, an approximately 300-mile, 525 kV HVDC transmission line connecting existing electric systems near Pueblo and Guymon, Oklahoma. The project will provide an important new bulk power transfer link between the Western and Eastern Interconnections, helping alleviate congestion, increase reliability, mitigate the impacts of extreme weather events and lower costs to consumers. Three Corners Connector represents an approximately \$1.5 billion investment in Colorado and Oklahoma.

Significant siting and development work has already been completed for Three Corners Connector. Over 400 stakeholders have been actively engaged, including approximately 300 landowners as well as local and state governmental officials and local business and community leaders. Over the course of the last 20 months, Grid United secured 97% of the necessary survey permissions and 83% of site control agreements, all through close collaboration with landowners and communities. The team continues to develop the project route with the stakeholder-first approach, most recently conducting an analysis of over 300 route segments to seek feedback from environmental stakeholders on land use and species impacts. Grid United anticipates that the Three Corners Connector could be operational as early as 2031.