

RE: Comments on CETA's Transmission Expansion Study Stakeholder Meeting #2

Public Service (PSCo) appreciates the opportunity to provide a second round of comments on the CETA's Transmission Expansion Study. At the stakeholder #2 meeting on 3/22/24, Energy Strategies and Montara presented draft results for the 20-year resource plan and busbar mapping process, along with study scopes for three scenario studies. PSCo welcomes the opportunity to further discuss these comments with staff, should it be helpful to Montara, Energy Strategies, or CETA.

PSCo respectfully submits the following comments, which are based on the data sources Montara presented on Slide 28, and the Scenario Studies that Energy Strategies presented on Slide 31¹.

Commercial Interest

Per Slide 28, the Commercial Interest is sourced from a LBNL "Queued Up" study 2023.² The description of this study indicates that it "include[s] all "active" projects in these generation interconnection queues through the end of 2022, as well as data on "operational" and "withdrawn" projects where those data are available." PSCo wanted to bring awareness that the "Queued Up" study potentially doesn't include the generation interconnection requests received by PSCo during Y2023-24, available at [PSCo_Generation_Interconnection_Requests.pdf \(rmao.com\)](#). Note that several of these post-2022 requests seek interconnection to the Colorado Power Pathway (CPP) project³. PSCo would also like to highlight that a 'withdrawn' request status, doesn't imply there isn't commercial interest at that location. PSCo recommends Montara to take into consideration the PSCo Generation Interconnection (GI) Queue from 2023 since this information could influence the results of the Commercial Interest category.

Substation Locations

Per Slide 28, the candidate substation's geographic location is sourced from the U.S. Federal Homeland Infrastructure Foundation Level Data (HIFLD) 2020⁴. How does Montara plan to handle the busbar mapping in locations where existing substation(s) are absent from the HIFLD 2020 database? Also, shouldn't the busbar mapping process be aligned with the substations included in the 10-year (2035) study model? PSCo recommends that the substation database used for the busbar mapping process include the Planned substations expected to be in-service by 2035. If this data isn't publicly available, or cannot be added to the database, does Montara/Energy Strategies plan to develop a methodology for translating the Busbar Mapping's substation-level results into the WECC Seed Case's (2034 HS) buses?

Scenario Study Scopes

Regarding the proposed three scenarios on Slide 31, PSCo recommends CETA to consider including a high DER penetration model to the "High Demand" scenario. High DER penetration is a highly likely 2045-future scenario due to Colorado PUC's interest in promoting demand-side solutions, and the State of Colorado's EV adoption targets to support its 2040 decarbonization goal.

¹ [CETA Transmission Expansion Study for CO, Stakeholder Meeting #2](#); Gridworks, Energy Strategies. 3/22/24.

² [LBNL "Queued Up" Study | Energy Markets & Policy \(lbl.gov\)](#)

³ [Xcel Energy - Colorado Power Pathway](#)

⁴ [Geospatial Energy Mapper \(GEM\) \(anl.gov\)](#); Electrical Substations layer;