414 Nicollet Mall
Minneapolis, MN 55401

February 7, 2022

VIA ELECTRONIC FILING

The Honorable Kimberly D. Bose,
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

RE: Public Service Company of Colorado
Interconnection Study Metrics Processing Time Exceedance Report Q4 2021
Docket No. ER19-1864

Dear Secretary Bose:

Pursuant to Rule 1907 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure[1], Public Service Company of Colorado ("PSCo"), submits this transmittal letter and the attached Interconnection Study Metrics Processing Time Exceedance Report Q4 2021 (the "Report"). PSCo submits this informational report consistent with the requirements set forth in Order Nos. 845 and 845-A[2] and Section 3.5.3 of Attachment N of Xcel Energy Operating Companies Open Access Transmission Tariff, which contains PSCo's Large Generator Interconnection Procedures.

1. Background

PSCo is a wholly owned utility operating company subsidiary of Xcel Energy Inc. PSCo is a vertically-integrated electric utility and, *inter alia*, owns and operates transmission facilities in the State of Colorado. PSCo provides wholesale transmission service, *inter alia*, pursuant to the Xcel Energy Operating Companies Joint Open Access Transmission Tariff ("Xcel Energy OATT") on file with and accepted by the Commission.[3] Individual PSCo service agreements are on file with the Commission in PSCo's FERC Electric Tariff Second Revised Volume No. 5.

2. Description of the Report

In Q2 2021, a higher queued customer with two suspended executed Large Generator Interconnection Agreements (LGIA's) were withdrawn and terminated because the three-year suspension terms in the LGIAs elapsed. These withdrawals had an impact on the ongoing Spring 2020

1 18 C.F.R. 385.1907 (2019)

2 Reform of Generator Interconnection Procedures and Agreements, Order No. 845, 163 FERC ¶ 61,043 ("Order No. 845"), order on reh'g, 166 FERC ¶ 61,137 (2019) ("Order No. 845-A").

3 The Xcel Energy OATT was restated in eTariff and accepted for filing in *Public Service Company of Colorado*, Docket No. ER16-1422-000, unpublished letter order (August 16, 2016).

DISIS Phase 2 study and the study analysis needed to be redone. Attachment N Section 7.6 states that the Transmission Provider is allowed an additional 150 Calendar Days from the withdrawal notification to complete the restudy, but because of the restudy, the total time elapsed for the Spring 2020 DISIS Phase 2 study exceeded 150 days. PSCo completed the Phase 2 study report on August 19, 2021, which is a total of 275 total days from the initial Spring 2020 DISIS Phase 2 start date.

3. Communications and Correspondence

Communications and correspondence with respect to this filing should be directed to each of the following:[4]

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4. Conclusion

Because this Report is for informational purposes and will not be formally noticed nor require Commission action[5], PSCo respectfully requests that the Commission accept this Report for filing and take no further action on the Report.

Respectfully submitted,

/s/ Mark C. Moeller

Mark C. Moeller
Manager, Transmission Business Relations
Xcel Energy Services Inc.
On behalf of
Public Service Company of Colorado

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[4] XES requests waiver of Section 385.203(b)(3) of the Commission's regulations to permit the designation of more than two persons upon whom service is to be made in this proceeding. 18 C.F.R. § 385.203(b)(3) (2018).

[5] Order No. 845, 163 FERC ¶61.043 at P 305 n.567.

CERTIFICATE OF SERVICE

I, Elizabeth Walkup, hereby certify that I have this day served a notice of the enclosed filing via electronic mail on each party designated on the official Service List.

Dated at Minneapolis, Minnesota this 7^{th} day of February, 2022.

/s/ Elizabeth Walkup

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Interconnection Study Metrics Processing Time Exceedance Report Q4 2021

February 7, 2022

Section 1
Metrics Report Requirements

Section 3.5.3 of Attachment N of Xcel Energy Operating Companies (Xcel Energy) Open Access Transmission Tariff (OATT) requires Xcel Energy to comply with specific reporting requirements when Interconnection Study timelines exceed 25% for two consecutive quarters.

Specifically, Xcel Energy must submit a report to the Federal Energy Regulatory Commission (the Commission) describing the reason for each study pursuant to an Interconnection Request that exceeded its deadline (i.e., 90, 150 days, 90 days) for completion (excluding any allowance for Reasonable Efforts). In addition, Xcel Energy must describe any steps taken to remedy these specific issues and, if applicable, prevent such delays in the future. The report must be filed at the Commission within 45 days of the end of the calendar quarter.

Section 2
Study Timeline Metrics Summary

2020 Spring Cluster Phase 1 Definitive Interconnection System Impact Study (DISIS)

As previously reported in Q3 2021, a higher queued customer with two suspended executed Large Generator Interconnection Agreements (LGIA's) were withdrawn and terminated because the three-year suspension term in the LGIA elapsed. These withdrawals had an impact on the ongoing Spring 2020 DISIS Phase 2 study and the study analysis needed to be redone. Attachment N Section 7.6 states that the Transmission Provider is allowed an additional 150 Calendar Days from the withdrawal notification to complete the restudy, but because of the restudy, the total time elapsed for the Spring 2020 DISIS has exceeded 150 days. The Phase 2 study report was completed on August 19, 2021. The report took a total of 275 days from the initial Spring 2020 DISIS Phase 2 start date.

Section 3
Steps to Remedy Issues and Prevent Future Delays

As previously reported in the Q3 2021 metrics exceedance report, PSCo implemented quality control measures to ensure consistency in base case modeling assumptions and changes to assumptions will be validated before the study commences.

The Q3 2021 exceedance occurred due to the time extension allowed to perform the restudy because of the withdrawals. The withdrawn customer entered into the LGIA's prior to the Revised LGIP being approved in December 2019. The Revised LGIP has financial penalties for customers withdrawn following the execution of an LGIA, but it is not clear if these penalties will sufficiently limit projects from withdrawing after being placed in suspension for a number of years.