



414 Nicollet Mall  
Minneapolis, MN 55401

May 15, 2023

**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 Q1  
2023  
Docket No. ER19-1864**

Dear Secretary Bose:

Pursuant to Rule 1907 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure<sup>1</sup>, Public Service Company of Colorado ("PSCo"), submits this transmittal letter and the attached Interconnection Study Metrics Processing Time Exceedance Report Q1 2023 (the "Report"). PSCo submits this informational report consistent with the requirements set forth in Order Nos. 845 and 845-A<sup>2</sup> 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.<sup>3</sup> 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**

The exceedance report explains that PSCo has continued to work through the challenges of queue withdrawals and the need for restudies. Delays were caused by withdrawals which required PSCo to stop studies already in progress and to put them on hold until the restudies of prior-queued clusters could be completed. Each cluster study requires the next-higher-queued study to be complete in order to include upgrades introduced in that higher-queued cluster in the model of the subsequent

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<sup>1</sup> 18 C.F.R. 385.1907 (2019)

<sup>2</sup> 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").

<sup>3</sup> 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).

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study. Prior to the start of the Fall 2021 Cluster Phase 2 study, two projects withdrew from the Spring 2020 Cluster and five projects withdrew from the Fall 2021 Cluster. Then, contemporaneously with the start of the Fall 2021 Cluster Phase 2 study, three projects from the higher queued Fall 2020 Cluster withdrew. PSCo determined that the combined impacts of these withdrawals would require restudies starting with the study of the Spring 2020 Cluster, as well as restudies of the subsequent cluster studies in queue order. As described in the attached report, most of the projects in subsequent clusters are affected by these restudies, with only limited exceptions.

### **Communications and Correspondence**

Communications and correspondence with respect to this filing should be directed to each of the following:<sup>4</sup>

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### **3. Conclusion**

Because this Report is for informational purposes and will not be formally noticed nor require Commission action<sup>5</sup>, 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.

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<sup>4</sup> 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).

<sup>5</sup> Order No. 845, 163 FERC ¶61,043 at P 305 n.567.A

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On behalf of Public Service Company of Colorado

## CERTIFICATE OF SERVICE

I, Stephanie Mayers, 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 15<sup>th</sup> day of May, 2023.

*/s/ Stephanie Mayers*

**Stephanie Mayers**

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# **Interconnection Study Metrics Processing Time Exceedance Report Q1 2023**

May 15, 2023

## **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 Public Service Company of Colorado (“PSCo”) to comply with specific reporting requirements when Interconnection Study timelines exceed 25% for two consecutive quarters.

Specifically, PSCo 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 days, 150 days, 90 days) for completion (excluding any allowance for Reasonable Efforts). In addition, PSCo 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**

#### **Spring 2021 Cluster Phase 4 Definitive Interconnection System Impact Study (DISIS)**

PSCo completed the Phase 4 study of four of the projects in the Spring 2021 cluster on December 13, 2022. While these four projects in this cluster had completed the Phase 4 study on time, there are two outstanding reports to still be issued. These two projects were impacted by higher queued withdrawals in the Spring and Fall 2020 clusters and therefore need to have the Phase 2 study redone. These two studies have exceeded the 90 Calendar Day deadline to complete the study due to the need for restudies.

#### **Fall 2021 Cluster Phase 2 Definitive Interconnection System Impact Study (DISIS)**

PSCo completed the Phase 1 study of the Fall 2021 cluster on July 29, 2022. Prior to the start of the Phase 2 study, two projects from the Spring 2020 cluster and five projects from the Fall 2021 withdrew their requests from the queue. The Phase 2 study started on August 30, 2022 with the remaining projects. Contemporaneously with the start of the Phase 2 study, three projects from the higher queued Fall 2020 cluster were withdrawn. After review of all of the withdrawals, it was determined that the higher queued Spring 2020 and Fall 2020 clusters needed to be restudied. The need to restudy the Spring 2020, Fall 2020, and Spring 2021 clusters has caused the delay of the Phase 2 study of Fall 2021 Cluster to exceed the 150 Calendar Day deadline.

### **Spring 2022 Cluster Phase 1 Definitive Interconnection System Impact Study (DISIS)**

PSCo has not yet completed the Phase 1 study of the Spring 2022 cluster. This study was expected to be completed in August of 2022 and then was delayed until November 2022 due to delays from the higher queued restudies. Due to the withdrawals and re-studies mentioned above, cascading effects have delayed this Phase 1 study and the earliest anticipated start date is in Q4 of 2024, which will cause the report to exceed the 90 Calendar Day deadline.

### **Section 3 Steps to Remedy Issues and Prevent Future Delays**

PSCo has filed proposed changes to Attachment N of its OATT to encourage only ready projects to enter the queue and allow an off ramp for early development projects to exit the queue. We anticipate this will reduce the complexity both in the existing queue for restudies due to withdrawals, and future study clusters by limiting the studies to only ready projects. This filing was submitted to the Commission on December 14, 2022, requesting a March 9, 2023 effective date. On March 1, 2023, FERC issued a Deficiency Notice to PSCo in Docket No. ER23-629-000. PSCo filed a Response to Deficiency Notice and Amended Filing on April 3, 2023. We expect to have a FERC Order by June 2, 2023.