



414 Nicollet Mall
Minneapolis, MN 55401

February 11, 2021

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 4Q
2020
Docket No. ER19-1864**

Dear Secretary Bose:

Pursuant to Rule 1907 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure¹, Public Service Company of Colorado ("PSCo"), submits this transmittal letter and the attached Interconnection Study Metrics Processing Time Exceedance Report Q4 2020 (the "Report"). PSCo submits this informational report consistent with the requirements set forth in Order Nos. 845 and 845-A² 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

The Report explains that in Q3 2020, one (1) Definitive Interconnection Phase 1 Study report for Public Service Company of Colorado (PSCo) was initially completed and delivered to

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was restated in eTariff and accepted for filing in *Public Service Company of Colorado*, Docket No. ER16-1422-000, unpublished letter order (August 16, 2016).

the Interconnection Customers within 90 days, however, after further review the report was withdrawn and reissued 47 days later (in Q4 2020) and thus the Phase 1 report was delivered after the 90 day deadline. The Report describes the reason for each study exceeding the deadline in the LGIP. Finally, the Report describes steps PSCo is taking to remedy issues and prevent future delays.

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 action⁵, 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

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 11th day of February, 2021.

/s/ Elizabeth Walkup

Elizabeth Walkup

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Interconnection Study Metrics Processing Time Exceedance Report Q4 2020

February 11, 2021

Contents

Section 1 Metrics Report Requirements	3
Section 2 Study Timeline Study Metrics.....	3
Section 3 Reasons for Delays	3
Section 4 Steps to Remedy Issues and Prevent Future Delays	4

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)

In Q3 2020, the first (1) Definitive Interconnection Phase 1 Study report for the Public Service Company of Colorado (PSCo) was delivered to the seven (7) Interconnection Customers in the Spring 2020 DISIS Cluster. The Definitive Interconnection Phase 1 Study Report was initially completed and delivered to the Interconnection Customers within 90 days, however, after further review the report was withdrawn and reissued 47 days later (in Q4 2020). The average mean time (in days), from the execution of the Phase 1 Study Agreement to the delivery of the completed Phase 1 Study report was 137 days. Thus, the Q3 2020 OATT 3.5.1.1 Definitive Study Phase 1 Processing Time reflected that 100% of the Phase 1 Studies exceeded ninety (90) Calendar Days to complete for that reporting quarter.

In Q4 2020, no additional Phase 1 studies were late and, as noted above, the study reported late for Q3 2020 was completed in Q4 2020. Due to the way the metrics are computed as described in Section 3.5.1 of Attachment N, the “Definitive Study Phase 1 Processing Time” reflected that 100% of the Phase 1 Studies exceeded ninety (90) Calendar Days to complete for that reporting quarter. Note that this study identified as late in the Q4 metrics report is the same study that was reported as late in Q3.

Since two (2) consecutive quarters exceeded the 25% threshold for late studies, this report to the Commission and additional metrics reporting are triggered.

Section 3

Reasons for Delays

Definitive Interconnection Phase 1 Study Report was initially completed and delivered to the Interconnection Customers within 90 days; however, after further internal review the report was

withdrawn and reissued 47 days later. The delay is attributed to a quality control check that identified needed updates to the base case modeling assumptions.

Section 4

Steps to Remedy Issues and Prevent Future Delays

PSCo has included detailed quality control evaluations to earlier in the study process so that base case modeling assumptions or changes to assumptions will be validated before the study commences. PSCo expects that this change will prevent future delays arising from base case modeling assumptions.