

Public Service Company of Colorado
Senate Bill 100

Summary of Confidential Comments received by May 15, 2007

By Joe Taylor, Manager Transmission Access
May 29, 2007

PSCo received seven sets of confidential comments on SB100. Each of the seven had information on one or more generation projects, all but one of which were wind, with the remainder a solar thermal project in Zone 4. These projects are shown on the Zone maps.

In addition to projects, some of the entities submitting these confidential comments made additional statements about the SB100 resource zone identification process. A summary of these comments follows.

- I am very concerned about the process and had hoped that Xcel would have developed plans based upon a more open and interactive process. I am also aware and agree with some of the comments regarding the nature of the information required – this is highly competitive information, especially in light of Xcel’s potential position in the marketplace. I do not think that using information gained from earlier bids and interconnection requests is the best way to develop transmission plans for the state of CO. Also I have heard that Xcel has already determined that the NE region should have preference over any other – I am not sure how this was agreed upon? I would appreciate that there is a rethink about the process, rather than presenting a predeveloped plan to the masses!
- We are not in agreement with Xcel’s plans to focus on the NE transmission grid – thereby delaying the development of plans for the other regions. We look forward to a much more open dialogue between utilities, developers and other interested parties before finalizing plans to gain PUC approval.
- There are over 1,500,000 acres in Baca County and a conservative estimate of land suitable for development is 33% to 50%. With this vast resource we believe Baca County should be the major resource area for wind development in the state.
- It is my understanding that Excel suggested in the April 24 meeting that it would not initially focus on Zone 3 because, 1) it did not feel it had time, and 2) it felt Tri-States would do it. We request that Excel reconsider this for the following reasons: First, it is unclear that Tri-States will be doing anything in Zone 3 based upon various recent events. Second, given that one of the purposes of SB 100 is to revitalize rural economies and Zone 3 is both a rural economy in need of revitalization and, importantly, perhaps the State’s richest wind resource, it should receive no less of a benefit than other Zones. As a consequence, we do not believe Excel’s stated intention to focus solely on Zone 1 satisfies SB 100.
- I am told that Excel also intends to base transmission strategies on either generation projects in the queue or otherwise identified somehow as being on the

drawing board. We request that Excel also reconsider this. Again, my understanding that the purpose of SB 100 is to, in effect, create a “field of dreams”, i.e. if the transmission is built, the generation will come. It seeks to solve the historical “chicken and egg” problem that has faced developers of, in particular, renewable energy, whereby the utilities do not wish to build the transmission because there are insufficient current projects to pay for it, and the renewable developers cannot achieve any kind of critical mass because there is inadequate transmission. So nothing happens, which is exactly what the people of Colorado seek to avoid by implementing SB 100. It is our view that Excel should seek to develop a reasoned assessment of potential wind energy projects in the Zones based upon the characteristics of the wind resource in the Zones (and on this basis, Zone 3 appears to be Colorado’s most robust and promising wind resource area).