

Public Service Company of Colorado

**Contemporaneous Disclosure
 In Compliance with 18 C.F.R . Section 358.7(a)(1)(2)**

If an employee of the Transmission Provider discloses information in a manner contrary to the requirements of § 358.5(b)(1) and (2), the Transmission Provider must immediately post such information on the OASIS or Internet website.

#	Contemporaneous Disclosure
1	<p>In the Matter of the Application of) Thirty-sixth set of General Audit of Public Service Company of Colorado) Commission Staff – Larry Shiao For approval of its 2003 Least-Cost) Dated August 20, 2004 Resource Plan) Consolidated Dockets CONSOLIDATED 04A-214E, 215, 216E</p> <p><u>GENERAL DISCOVERY REQUEST NO. CPUC36-4:</u></p> <p>Does PSCo have any plan to improve TOT3 and TOT5 transfer limits in the next 5-10 years? If yes, please provide a copy of the study plan. If no, please explain how PSCo is planning to meet the RMRG reserve requirements if the 750 mw Comanche #3 unit has a two weeks outage during the peak period.</p> <p>RESPONSE: PSCo has no specific plans to upgrade TOTs 3 and 5. However, work currently being conducted through regional study groups may lead to the upgrade of either of these paths. These paths have not been constrained during the past several years in that they have not had flows at or near their limits under system intact conditions. With N-1 conditions the path flows have been closer to the reduced limits. Lack of constraints under system intact conditions is due in large part to the additional generation installed in the Front Range. In January of next year PSCo will have an additional path for power imports; the Lamar DC tie to the east. The reserve requirements with Comanche #3 off will be met by bringing PSCo resources on-line including those under contract, with purchases from neighboring utilities, and from power imports across the Lamar DC tie.</p> <p>Sponsored by: Robert K. Johnson</p> <p>Date Responded:</p>
2	<p>Xcel Energy's Wholesale Merchant function raised a concern regarding counter scheduling across the Lamar HVDC tie. Xcel Energy Transmission plans to post the business practice associated with scheduling across the Lamar HVDC tie by the end of this month. (Posted 4/11/05)</p>
3	<p>On June 7, 2006, a Wholesale Merchant Function employee was invited to meet with a Transmission Function employee in a PSCo transmission-restricted office area during business hours. The Wholesale Merchant employee entered the area with another employee without waiting for his official escort and as a result was unescorted for a very brief period (less than three minutes). The Wholesale Merchant Employee did not have access to any nonpublic transmission information during his visit. He and his management have been reminded of the SOC requirements. (Posted June 8, 2006)</p>
4	<p>October 4, 2006: As a result of an administrative oversight after an organizational change, an Xcel Energy</p>

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	<p>Wholesale Merchant Function employee received the weekly reports of a Transmission Function employee for three weeks in September 2006. The reports contained the following transmission information:</p> <p><u>Fort St. Vrain-Niwot Line Uprate Project:</u> This line uprate is required as delivery infrastructure upgrades for the Spindle Gas Project. As part of the scope, breakers need to be replaced and upgraded at the FSV Switchyard. PSCo must procure equipment and materials to meet contractual back feed and commercial ISD's. <u>Lamar HVDC:</u> Siemens was notified on September 7th that they did not "successfully complete" the 60-day converter evaluation period based on the contractual requirement for 99.5% availability. Actual unavailability was 692 minutes vs. 432 minutes allowed. There was also one protection equipment fault, which by itself is cause for failure to meet the contract. Work continues with Siemens to resolve issues on checklist of items remaining for final completion. The contractual "summer peak" season for converter availability (Siemens contract) ends on Sept 15. <u>FAC 003-1 Vegetation Management Program</u> - Two separate 230kV line outages caused by tree contact due to tree growth in the right of way. The first line outage was caused by a tree contact where in the previous maintenance cycle the United States Forest Service allowed only selective tree removal on the line that suffered an outage. The second line outage was on a right of way where the property owner had refused tree removal/replacement offer in 2004. The Mitigation plan will be completed by the end of the 2006. Removal of all tall-growing trees that could grow too close to the conductors in section of the first line where the outage was caused has been completed. Maintenance on the second line is underway and expected to be done by the end of September 2006. All trees are being trimmed or removed that could grow too close to the conductors to risk contact with the line before the next maintenance cycle. <u>Daniels Park Load Interconnection:</u> The Construction and O&M Agreement for the Daniels Park Substation with IREA has been fully executed. IREA will pay for all high-side facilities (except metering) consistent with our new policy. The requested in-service is May 2007 and is expected to be met. <u>Akron Wind LGIA:</u> The LGIA for the 250MW Akron Wind Project has been fully executed.. The agreement calls for an immediate suspension.</p> <p>The distribution list for the Transmission Function employee's weekly reports was corrected immediately after the error was discovered.</p>
5	<p>October 20, 2006: A Shared employee sent out a weekly activities report of recent and upcoming FERC regulatory matters to their usual distribution, which included several Wholesale Merchant Function employees. The report on 10/20/06 contained the following transmission information:</p> <p>Proposed OATT Revisions to clarify Network Transmission rights across Lamar DC tie: Finalized filing approach which clarifies that Network customers have access to all operating company systems for a single rate as consistent with Service Schedule E of Xcel Energy Operating Companies' Joint Operating Agreement which governs transactions between SPS and PSCo across the tie line.</p> <p>The employee was immediately reminded of the SOC No Conduit Rule, and the employee's future weekly reports will exclude non-public information on pending Xcel Energy transmission rate/tariff matters.</p>
6.	<p>January 29, 2007: A Wholesale Merchant Function employee inadvertently accessed a general Transmission webpage on Xcel's intranet, due to a minor glitch in IT security. The employee only accessed the main Transmission webpage, which does not contain any sensitive transmission information. The problem has been corrected.</p>
7	<p>February 13, 2007: On Feb. 12, 2007, a Wholesale Merchant Function employee was inadvertently copied on a communication regarding the details of line clearances and outages relating to a new substation going into service. Upon discovery, the information was posted today on OASIS at this link: http://www.oatioasis.com/psco/index.html</p>
8	<p>On September 11, 2007, Public Service Company of Colorado discovered that as-built line drawings of transmission system switching maps were located on application servers in shared folders that could potentially be accessed by wholesale merchant function (WMF) employees of PSCo if the WMF personnel had the specialized software necessary to read the diagrams. The files are of no commercial value to the WMF employees. As of September 14, 2007, access to the folders has been restricted to prevent WMF employee access.</p>
9	<p>May 9, 2008 – On May 8, 2008 the following information was inadvertently distributed by email to Xcel Energy WMF employees as part of a weekly report by regulatory employee. Please note that the PSCo transmission formula rate calculations discussed are preliminary and are being refined. PSCo will post the final PSCo transmission formula rate calculations on or before May 15, 2008.</p>

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	<p>PSCo Formula Transmission Rate Update: The calculations have been completed for this rate update, which will be effective June 1. The new PSCo system transmission rate is essentially the same as the current rate (\$1.54 per kw-mo.), as load growth offset our increased revenue requirement, resulting in a very small decrease (.3 cents) in the unit rate.</p>
10	<p>On September 18, 2008, the PSCo Transmission Function conducted a conference call with the Xcel Energy wholesale merchant function to discuss the scheduled outage of the Lamar HVDC converter. (The outage schedule is posted on OASIS, and a notice of the conference call was similarly posted on OASIS.) During the conference call, the following information was disclosed:</p> <p>The Lamar HVDC tie will be unavailable due to maintenance and testing. The outage is necessary to replace a component of the HVDC converter. During the outage, it will not be possible to place the HVDC converter and Tie Line to Southwestern Public Service Company (SPS) in service temporarily, even in the event of an emergency condition on the PSCo or SPS systems.</p> <p>PSCo considers this information reliability information, but is making this contemporaneous disclosure to facilitate comparable information access.</p>
11	<p>On March 17, 2010, the PSCo Transmission Function participated in a meeting to discuss three finalists in the photovoltaic (PV) generation pool from the PSCo All Source RFP. The generation selected from the PV finalist(s) would serve PSCo native load. The Transmission Function prepared a draft special study that included these three PV projects. The PSCo Resource Planning function invited a PSCo Wholesale Merchant Function employee to address geographic diversity and related issues associated with the PV projects congregated in similar locations. During the course of the meeting, the following non-public transmission information was inadvertently disclosed to the PSCo Merchant Function: the existing MVA line rating for an approximately 6-mile long segment of the existing 69kV transmission line, as listed in the Special Study Report; and that there is one open position available at the San Luis Valley 115 kV substation and a 25 MVA limit at the Alamosa 115/69 kV transformer.</p> <p>In addition to this contemporaneous disclosure, the draft Special Study Report - 2009 PSCo Solar RFP dated March 10, 2010 is also posted on the PSCo Transmission Internet Website (http://www.oatioasis.com/PSCO/).</p>
12	<p>On Tuesday, 5/31 an employee inadvertently emailed a wholesale merchant function employee that the transmission upgrade from Keenesburg to Green Valley is estimated to be completed by Thursday, 6/9/11. The wholesale merchant function employee read this email on Wednesday, 6/1. This information was posted on OASIS on Thursday, 6/2.</p>
13	<p>On June 2, 2011, an employee inadvertently emailed a WMF employee the following non-public transmission function information: a two week outage will occur this September at the Alamosa Terminal Sub to replace some ELR relaying and installing wave trap, line tuner and communication equipment. This information was posted on OASIS on June 3, 2011.</p>
14	<p>On April 11, 2012, a non-transmission employee inadvertently emailed a WMF employee the following potentially non-public transmission function information in response to a question about why the output of two non-affiliated wind farms has been curtailed:</p> <p>Last month, the Comanche-Boone 230 kV line was being reconductored. This opened the 230 kV ring bus at Boone which provided a connection of the line to Lamar DC/Wind directly to the Midway-Boone 230 kV line and indirectly to the Boone 230/115 kV auto. A subsequent loss of the Midway-Boone line would have broken the connection to the auto. That would have meant that all the power coming from the DC and Wind would have had to flow through the 100 MVA auto at Lamar. That would have likely resulted in loss of the all of the loads for the City of Lamar, Springfield and surrounding area if the DC and Wind was running above 100 MVA.</p> <p>The Boone ring was closed after disconnecting the Comanche line jumpers. This allowed the transmission to be firm up to 150 MW (the Boone auto rating is 150 MVA) with the loss of the Midway-Boone line. The loss of the Boone-Lamar 230 kV line would have removed the DC and Wind and still left the</p>

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	<p>Lamar/Springfield area with a good 115 kV source from Boone.</p> <p>The Comanche-Boone line outage and the 150 MW limit was posted on OASIS. The wind curtailments would have occurred only when the wind generation was exceeding the limit , PSCo was importing power into Colorado through the Lamar DC tie, or a combination of both.</p>
15	<p>On October 27, 2015, an Xcel Energy Merchant Function employee was copied on an email that contained Public Service Company of Colorado ("PSCo") transmission outage information prior to the outage being posted on the PSCo OASIS site. Specifically the email contained the following: "The Ridge 230/115kV transformer outage got pushed to Friday." The outage was posted on the PSCo OASIS shortly thereafter. The Manager of Real Time Planning, a Transmission Function employee, noticed the error and contacted the Xcel Energy Standards of Conduct chief compliance officer regarding the inadvertent disclosure.</p>
16	<p>On November 29, 2017, a PSCo Transmission Function employee forwarded an email containing the identity of a generation interconnection requestor to several Xcel Energy employees, including two Xcel Energy Merchant Function employees. The Merchant Function employees were promptly directed by the Director of Federal Regulatory Affairs to delete the email, and not forward the email. The Merchant Function employees confirmed to the Xcel Energy Standards of Conduct chief compliance officer that they deleted the email. One of the Merchant Function employees confirmed that he had not read the email. The Transmission Function employee received a verbal reminder from Compliance personnel regarding the requirements of the Standards of Conduct rules.</p>