

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

**Docket No. 08I-227E**

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**IN THE MATTER OF THE INVESTIGATION OF ELECTRIC TRANSMISSION  
ISSUES AND THE OPENING OF AN INVESTIGATORY DOCKET**

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**COLORADO INDEPENDENT ENERGY ASSOCIATION'S INTRODUCTORY  
COMMENTS REGARDING SCOPE OF INVESTIGATORY DOCKET**

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The intervention group collectively referred to as the Colorado Independent Energy Association ("CIEA"), a non-profit corporation and trade association of independent power producers ("IPPs"), by and through its undersigned counsel, respectfully submits the following introductory comments regarding the scope of this proceeding as solicited by the Public Utilities Commission of the State of Colorado's (Commission") in Decision No. C08-0607, ("Order Opening An Investigatory Docket" or "Order") issued by the Commission on June 13, 2008. CIEA states as follows:

1. On June 13, 2008, the Commission issued Decision No. C08-0607 through which the Commission opened this investigatory docket concerning electric transmission issues. (Commission Decision No. C08-0607 at ¶II., A. 1, p. 2)
2. In Decision No. C08-0607, the Commission invited interested persons to submit comments regarding the scope of the proceeding on or before July 18, 2008. (Commission Decision No. C08-0607 at ¶II, A. 4, p. 3). In its Order, the Commission included a Preliminary Statement of Goals, which more particularly describes the proposed transmission planning activities that merit more active involvement by the Commission, and serves to suggest the scope of this proceeding. (See Attachment, Decision No. C08-0607, pp. 1-7)

3. CIEA applauds the Commission for initiating this investigation of topics that have been left unstudied for too long, very much appreciates the opportunity to submit comments on the scope of this very important docket, and looks forward to actively participating in this proceeding. CIEA believes that the proposed policies included in the Statement of Goals are appropriate. CIEA also wishes to encourage the Commission to facilitate and expedite the prospects for exporting to locations outside the state power generated by Colorado independent power producers (IPPs), who have been afforded little role to date in transmission planning, and urges the Commission to include consideration of this important and specific issue within the scope of this proceeding.

4. In particular, two related issues are critical to CIEA's members: One is the need for improved responsiveness and shorter timelines regarding interconnection requests and transmission service requests. At present, entities such as WAPA, Tri-State and Xcel Energy are failing to address such requests in a responsive and timely manner. It is imperative that Xcel, Tri-State and WAPA plan and implement together solutions that provide for the exporting of power from Colorado. This lack of planning and implementation together imposes a significant barrier on the export of power from Colorado. The second issue involves the need to enhance IPPs' ability to meaningfully participate in transmission planning processes, including those associated with SB 100 and the Colorado Long Range Transmission Planning Group ("CLRTPG"). To date, transmission planners have not adequately sought or listened to meaningful IPP input in transmission planning. Among the consequences of this lack of cooperation is a slow progression through interconnection queues, which further obstructs near-term export opportunities.

5. Among necessary efforts to encourage greater cooperation between relevant transmission planning groups for the purpose of expediting IPP export opportunities, CIEA urges the Commission to adopt a more active role in overseeing the participation and progress of such planning groups. Specifically, CIEA urges the Commission to adopt, within the scope of this proceeding, more vigorous approaches to facilitating such groups' efforts to both adopt joint transmission plans and implement them on improved timelines.

6. Additionally, CIEA understands that Interwest Energy Alliance ("IEA") has suggested that the Commission investigate the appropriateness of having only one rather than two control areas in Colorado. CIEA supports further consideration by the Commission of this issue within the scope of this proceeding.

7. CIEA requests that notice of matters relating to this proceeding and copies of orders, prefiled testimony, exhibits and all pleadings, discovery and other communications be served upon the following:


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WHEREFORE, CIEA respectfully requests that the Commission (1) address relevant policies within the scope of this proceeding from the perspective of encouraging expedited IPP power export opportunities, and (2) adopt a more vigorous role in facilitating the joint efforts of transmission planning groups to plan and implement projects in a timely manner.

DATED: July 18, 2008.

Respectfully submitted,  
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