



Colorado Office of Consumer
Counsel

Comments on Public Service's
November 24, 2008 Informational
Report on SB-100

Colorado Office of Consumer Counsel Comments

- We believe that the priority ranking of future transmission lines needs to incorporate the expected projects which Public Service intends to contract/build from its 2007 Electric Resource Plan
- Partnering with other entities to share costs and excess capacity should be pursued



Colorado Office of Consumer Counsel Comments

- Public Service customers should not be viewed as the funding mechanism for transmission projects which will be used in the export of power to other states
- If the State of Colorado wants to build the infrastructure for a “super highway” transmission exporting network then all State residents should financially contribute to this goal



Colorado Office of Consumer Counsel Comments

- The Transmission Cost Adjustment allow a utility to pre-collect (prior to transmission lines being used to provide service to customers) and some recognition of this preferred cost recovery treatment needs to be reflected in the ratemaking process



Colorado Office of Consumer Counsel Comments

- Commission recognizes that current CPCN process for transmission lines needs to be improved so that the regulatory approval process does not excessively delay the construction of new lines
- Commission has indicated that its proposed NOPR might have a “fast track” and a “traditional track” for CPCN applications



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- Both “tracks” need to have appropriate level of flexibility which can account for uniqueness of the proposed line with respect to the Commission-approved criteria
 - Noise levels in excess of stated criteria due to low customer density along the line or due to excessive costs of larger conductors
 - Smaller right-of-ways due to excessive land acquisition costs



Colorado Office of Consumer Counsel Comments

- Additional information which should be considered in both “tracks” include:
 - Converting the overall construction costs into an annual revenue requirement amount
 - An average bill impact for typical Residential and Commercial customers for the project



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- Could a “traditional track” application be filed under § 40-2-126(4) and thus require a 180 day Commission approval time?
- Would a “fast track” application mean that the Commission has determined that the line is needed for “beneficial energy resources” as set forth in § 40-2-126(2)(b)?



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- With respect to Rule 3206, the Commission may want to consider two levels of informational reporting:
 - near-term (within next year or two)
 - long-term (3 to 7 years out)
- For the near-term projects the level of detail is expanded to include:
 - conductor size
 - pole design
 - placement in ROW
 - estimated noise and EMF levels
 - cost estimates for various design criteria



We appreciate your attention to
our presentation

