
ATTACHMENT A
QUESTIONS FOR COLORADO TRANSMISSION UTILITIES AND
OTHER STAKEHOLDERS

Purpose/Value of Rule 3627 Proceedings (Transmission Planning)

1. Is there a need for coordinated statewide transmission planning?
2. If so, what are the goals of coordinated statewide transmission planning?
3. Is there value to stakeholders in the current ten-year report format?
4. Is the coordination that jurisdictional utilities engage in in preparation for their bi-annual Rule 3627 filings sufficient to develop reasonably optimized ten-Year Transmission Plans that provide for the “efficient use of the transmission system on a best cost basis”?
 - a. If not, how do the rules need to change to encourage the development of better-optimized transmission Plans?
5. Do the utilities provide sufficient information in their Rule 3627 filings about the costs and other attributes of transmission alternatives to assess whether the submitted plan provides for “efficient use of the transmission system on a best cost basis”? If not, what additional information is needed in the Rule 3627 filing?
6. Does the joint planning required by Rule 3627 provide value to the utilities?
7. Do the Rule 3627 proceedings enable greater stakeholder participation than that afforded by FERC Order 1000?
8. Do current transmission planning rules provide adequate forum for consideration of stakeholder transmission alternatives? If not, what needs to change?
9. If a Rule 3627 proceeding is ever used as the basis for a subsequent CPCN application, is the burden placed on any challenging party by Rule 3627(i) to demonstrate that the Commission’s decision in the Rule 3627 proceeding is no longer applicable or valid reasonable? Why or why not?
10. Has Rule 3627 resulted in any jointly planned, jointly built transmission projects since its adoption?
11. Are there statutory or regulatory provisions that inhibit joint transmission planning and/or construction?
12. Would the Commission be better served with the parties able to review and comment on the 3627 reports and scenarios as part of a litigated proceeding?
13. Would the Commission be better served if Commission Staff was allowed to participate in the 3627 process as an intervening party?
14. Do the utilities provide sufficient information in their Rule 3627 filings to assess whether the submitted plan supports advancement of the state’s emission reduction or equity goals? If not, what additional information is needed in the Rule 3627 filing?

20-Year Conceptual Plans

15. Is there value to stakeholders in the 20-year Report required by Rule 3627(e)? If so, please describe how the information provided in the 20-year Report is useful to your organization.
16. Does the process used by the utilities to develop the 20-year Report provide value to the utilities?
17. Is there a need for coordinated, state-wide process to anticipate transmission needs 20 or more years in the future akin to the 20-year study jointly developed by the California ISO, California Energy Commission and the California PUC [available here](#)? If so:
 - a. Are either the CCPG or the Colorado Electricity Transmission Authority (CETA) the proper entity to assess those needs? Why or why not?
 - b. If neither the CCPG nor the CETA are the proper organization for longer-term transmission planning, is there an existing organization that in your view is better suited to assessing the state's long-term transmission needs?

Transmission Modeling Transparency

18. Is it possible for the Commission or any stakeholder to complete a thorough assessment of utility transmission plans without access to modeling inputs and results?
19. The utilities have consistently indicated that modeling inputs would be made available to any party that has executed the necessary non-disclosure agreement with WECC. Does this requirement pose an insurmountable barrier to stakeholders? If so, please describe why.
20. Would the provision of a "data room" for review of transmission modeling inputs and results, as previously suggested by the utilities, be of value to stakeholders in furthering an understanding of the utility plans and rendering judgment as to their adequacy?
21. If the utilities were to provide access to such a "data room" to intervenors who had signed the necessary non-disclosure agreement, what additional requirements, if any, would be necessary to ensure compliance with WECC concerns?

Purpose/Value of Rule 3206 Proceedings

22. Is there value to stakeholders in the current three-year report format?
23. Is the coordination that jurisdictional utilities engage in in preparation for their annual Rule 3206 filings sufficient to develop reasonably optimized three-Year Transmission Plans that provide for the “efficient use of the transmission system on a best cost basis”?
24. If not, how do the rules need to change to encourage the development of better optimized transmission Plans?
25. Do the utilities provide sufficient information in their Rule 3206 filings about the costs and other attributes of transmission alternatives to assess whether the submitted plan provides for “efficient use of the transmission system on a best cost basis”? If not, what additional information is needed in the Rule 3627 filing?
26. Does the planning required by Rule 3206 provide value to the utilities?
27. Do the Rule 3206 proceedings enable greater stakeholder participation than that afforded by FERC Order 1000?
28. Are there statutory or regulatory provisions that inhibit joint transmission planning and/or construction?
29. Do current transmission planning rules provide adequate forum for consideration of stakeholder transmission alternatives? If not, what needs to change?
30. Would the Commission be better served with the parties able to review and comment on the 3206 reports as part of a litigated proceeding?
31. Would the Commission be better served if Commission Staff was allowed to participate in the 3206 process as an intervening party?
32. Do the utilities provide sufficient information in their Rule 3206 filings to assess whether the submitted plan supports advancement of the state’s emission reduction or equity goals? If not, what additional information is needed in the Rule 3627 filing?

Consideration of Advanced Transmission Technologies (ATT) and Non-Wire Alternatives (NWA) in Transmission Planning

33. Do the utilities provide adequate analysis of ATT or NWA as alternatives in creating the 10-year plan or in CPCN applications?
34. Are the utility planning processes that support the 3627 filing the proper processes where ATT and NWA should be considered, or should they be considered only in the context of individual CPCN applications?
35. Do the Commission’s current rules provide sufficient direction to motivate full evaluation of system-wide opportunities to utilize ATT and NWA where they are cost effective? If not:

- a. What additional rules are needed to ensure such full evaluation?
 - b. How frequently should utilities be required to assess cost-effective opportunities for deployment of ATT and NWA on their systems?
- 36. How can the Commission ensure that the range of ATT and NWA required for analysis remains sufficiently broad as technology evolves?
 - 37. Should the scope of Rule 3627 be extended to examine the role that rebuilding or reconducting existing transmission lines, or operating them at higher voltages, could play in optimizing the transmission system?
 - 38. Should transmission planning rules contain one or more generic PIMs designed to promote adoption of cost-effective ATT or NWA, or should any PIMs promoting them be determined in specific CPCN proceedings?
 - 39. If one or more generic PIMs are appropriate for inclusion in transmission planning rules, what form should they take?
 - 40. Are there cost-effective opportunities to deploy ATTs or NWAs presented when transmission asset renewal or replacement projects (*i.e.*, those not requiring a CPCN) are conducted? If so, are any new rules needed to ensure that utilities fully evaluate such opportunities?
 - 41. Does consideration of dynamic line rating have a role in transmission planning, or should it be considered solely an operational procedure?

Potential Modification of CPCN Rules

- 42. Should transmission CPCN rules be modified to require that utility CPCN applications include a minimum level of cost certainty?
- 43. Should transmission CPCN rules be modified to require that utility CPCN applications include a minimum level of technical completion?
- 44. Should transmission CPCN rules be modified to require that utility CPCN applications include a proposal for one or more PIMs? If so:
 - a. Should such requirement be limited to specific types of projects, or should there be a minimum threshold budget below which no PIM would be considered?
 - b. Should the Commission adopt a generic PIM structure for all relevant transmission CPCNs or should the PIM structure (as opposed to its magnitude) be tailored to the specifics of each proposed project?
 - c. Should any generic PIM structure include both cost-control and timing elements?
 - d. Should any generic or specific PIM structure consider other dimensions of the technical completion, such as maximization of ratepayer benefits (*e.g.*, through application of ATT to minimize losses or reduce curtailment) or emission reductions (*e.g.* via reduced curtailment)?
 - e. Must any generic or specific PIM structure be symmetrical?

- f. Should any generic or specific PIM structure consider the cost certainty and technical completion of an application (The Northern Greely project CPCN is based on “scoping” estimates and had an expected cost accuracy of +/- 30 percent) ?
- 45. Should Rule 3206(d)(i)(D) be modified to require reporting on feasibility and cost-effectiveness analyses of advanced technology or non-wires alternatives to the conventional solutions to the problem being addressed by the proposed project? If so:
 - a. Should any such requirement(s) include a cost (or other) threshold below which such evaluation of alternatives would not be required? If so, what should that threshold be?
 - b. How can the Commission ensure that the range of ATT and NWA required for analysis remains sufficiently broad as technology evolves?
 - c. What cost-effectiveness framework(s) should be applied for such analyses?
- 46. What other rule modifications (if any) are needed to ensure that all reasonably feasible and potentially beneficial alternatives to the proposed transmission project have been adequately analyzed prior to CPCN application submission?
- 47. Should the Commission require cost-effectiveness analysis for all or a subset of proposed transmission projects? If so:
 - a. What project characteristics should be used as the basis for determining the necessity of cost-effectiveness analysis?
 - b. What thresholds of these characteristics should trigger the requirement for a cost-effectiveness analysis?
 - c. What framework should be used for the cost-effectiveness analysis? In other words, what specific costs and benefits should be included in the analysis?
- 48. Should Rule 3206(f) be modified to include an acceptable level of noise for areas zoned as agricultural land? If so, what should that noise level be?
- 49. Are there other land zonings not currently listed in Rule 3206(f) that should have explicit noise level thresholds?

Transmission Cost Adjustment (TCA)

- 50. What transmission facilities costs are to be recovered through the TCA?

Evaluation of Regional and Inter-regional Transmission Resources

- 51. Should the Commission promulgate rules requiring cost-effectiveness analysis of AC and DC transmission links to regional and interregional transmission resources to promote reliability, resilience, environmental, enhanced economic import/export capabilities and other benefits? If so:

- a. Should such analysis be a component of the joint bi-annual 3627 report?
- b. What conditions should trigger such an analysis?
- c. What existing or planned transmission resources exist for which such analysis should be required?
- d. What cost-benefit framework should be utilized in conducting such analysis?
- e. How might such investigations overlap with the work of the Colorado Electricity Transmission Authority (CETA)?

Delineating the Roles and Responsibilities of the Commission vs. CETA

- 52. Are any rule revisions or new rules needed to clarify or distinguish the respective roles and responsibilities of the PUC and the CETA?

Adequacy of the CCPG Process

- 53. Has the existing CCPG process resulted in optimal state-wide or regional transmission planning? If not, Please provide examples of missed opportunities for greater coordination between CCPG members.
- 54. Does the existing CCPG process provide adequate consideration of alternatives proposed by non-utility stakeholders? If not:
 - a. Which party (utility or stakeholder) should bear the burden of demonstrating that an alternative has or has not been adequately considered?
 - b. What objective criteria should the Commission apply in determining whether a stakeholder-proposed alternative has or has not been adequately considered?
 - c. Should the Commission promulgate rules establishing a process for fair consideration and analysis of stakeholder-proffered alternatives as a precondition to a determination of completeness of CPCN applications?
 - d. What minimum requirements are or should be required of a proposed alternative to make it eligible for analysis by CCPG?
 - e. Should any requirements in addition to those required by CCPG be imposed on proposed alternatives before any further analysis is required of jurisdictional utilities as a precondition to the Commission's determination of completeness of a CPCN application?
- 55. Within the past five years, has the CCPG initiated and/or completed any analyses of high voltage links to transmission assets in other WECC regions or in the Eastern Interconnect or ERCOT for the purpose of promoting reliability, resilience, environmental, enhanced economic import/export capabilities or other benefits? If so, please provide citations and links to such analyses.

56. Has CCPG initiated and/or completed any analyses or surveys of opportunities for the cost-effective application of ATT across its footprint? If so, please provide reports, citations and/or links.

Standards and Definitions

57. Do existing Rules 3206 and 3267 contain references to industry standards that are outdated?
58. Do any of the definitions that apply to Rules 3206 and 3267 need to be revised?
59. Should any new definitions be established in Rule 3206 or Rule 3267?

General

60. In what other ways should the Commission's transmission planning rules be modified to better promote "The efficient utilization of the transmission system on a best-cost basis, considering both the short-term and long-term needs of the system"?