

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

DOCKET NO. 08I-227E

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

Reply Comments of Western Resource Advocates

I. Introduction

Founded in 1989, Western Resources Advocates is a non-profit environmental law and policy organization dedicated to restoring and protecting the land, air, water and wildlife resources within the interior Western United States. Specifically, our team of lawyers, policy analysts and economists works to: (1) promote a clean energy future for the Interior West that reduces pollution and the threat of global warming; (2) restore degraded river systems and to encourage urban water providers to use existing water supplies more efficiently; and (3) protect public lands and wildlife throughout the region.

Transmission policy and planning brings all of these components under one umbrella: if sited and constructed improperly, electric transmission lines may have unacceptable impacts to sensitive land, water and wildlife resources; at the same time, new transmission lines also provide an opportunity to bring renewable energy sources like wind and solar on line so that we may achieve a balanced and sustained energy policy for Colorado. Transmission planning, if implemented properly, provides Colorado with an opportunity to dramatically increase the development of renewable energy and clean energy resources and move to a more sustainable energy supply. To this end, WRA is interested in transmission policy and its implementation to ensure that the transmission resources necessary to link up renewable energy resources are developed, and that this development proceeds in a manner that avoids and mitigates impacts to Colorado's landscapes, wildlife and other natural resources.

II. Comments

A. General

- Transitioning Colorado to a new energy economy based in large part on renewable energy sources will require significant expansion of the current transmission infrastructure. If the proper considerations for lands and wildlife protection are not taken into account, renewable energy transmission solutions will be impeded or unnecessarily delayed. In this sense, ensuring protection for Colorado's landscapes and wildlife is not only important for the continued vitality of these resources, but also, critically important for the successful transition to Colorado's new energy economy. It

is best to get out in front of lands and wildlife concerns, instead of traditional transmission processes that often consider these issues at the tail end of planning, WRA recommends the Commission be involved in considering sensitive lands and wildlife information as planning for future transmission occurs. This effort is essential in order to have a successful transmission build out for renewable energy resources in Colorado. Lands and wildlife concerns are best addressed early-on in the process so as to avoid any surprises later on. WRA offers its support and resources in this regard. Summarizing these key concepts, please find attached WRA's report *Smart Lines: Transmission for the Renewable Energy Economy*.

- WRA requests that transmission planning take into account information, besides LGIP requests, such as industry interest in developing an area (short of proprietary information or formal connection requests) in order to better focus transmission expansion into areas rich in renewable energy that are awaiting transmission access opportunities. Otherwise, the “chicken or the egg” situation will remain unchanged as renewable energy companies continue to wait for transmission access before expending significant resources on planning and constructing generation sites.
- WRA further contends that transmission planning can be improved by looking at transmission build-out scenarios holistically over a 10-year time frame. Presently, forecasting for load needs and the percentages required from renewable resources cover a decade time-frame – it only makes sense then to approach transmission expansion in the same manner. A master renewable transmission plan for the state should be developed. There is currently sufficient information available from in-depth consideration of transmission opportunities in the last couple of years to develop such a plan. Companies can then apply for CPCNs to implement the plan according to a comprehensive vision. Otherwise, filing for CPCNs every two years that are mostly tailored to immediate transmission needs for specific projects, may lose out on economies of scale and/or lead to duplicate power lines and rights-of-way than if transmission build-out had been planned in a comprehensive fashion. Such a master plan should also allow for flexibility and adaptations along the way for unforeseen developments.
- The Commission should also attempt to address the problem of aligning the longer planning horizon for transmission build-out with the much shorter planning horizon for renewable energy development projects. There is a timing disconnect between the seven to ten year planning for construction of transmission lines and the shorter time frame for completing renewable generation projects. A closer match would assist with renewable generation planning and development.
- The Commission should explore the possibility of having Colorado transmission lines dedicated exclusively for fulfilling the purpose of renewable energy generation development. This may be possible by relating the grant of a CPCN to the obligation to fulfill our state's renewable portfolio standards.

B. Public Service Company of Colorado

- WRA suggests that Public Service Company develop a likely renewable build out scenario for its renewable portfolio standards obligations and identify more specifically geographic resource zones over the next decade. SB 100 requires filings every two years. Those filings should be used to focus on implementation as well as planning. The Commission could take advantage of this biannual filing requirement to encourage Public Service Company to have detailed plans for the collector lines that will bring renewable generation projects onto the backbone transmission lines. Future backbone transmission upgrades that will beef up the overall carrying capacity of the grid system are important for future expansion into outlying areas, but these improvements offer little immediate transmission relief that would prompt the development of outlying renewable energy sources.

III. Conclusion

WRA appreciates the opportunity to provide comments and commends the Commission opening this investigatory docket and becoming more involved in Colorado transmission planning. Addressing the comments of WRA, as well as those raised by the others, in this docket will increase the likelihood that Colorado will be able to quickly and smoothly transition to an energy economy that is based on increased percentages of renewable and clean energy sources.

Sincerely,

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CERTIFICATE OF SERVICE

I hereby certify that **WRA's Reply Comments** were faxed-filed on this 15th day of August 2008, the original and 7 copies were sent to Doug Dean, Director, Colorado Public Utilities Commission, 1560 Broadway Suite 250, Denver CO 80202, and a copy was e-mailed to each of the following:

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