

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

DOCKET NO. 09M-616E

IN THE MATTER OF INTEGRATED PLANNING FOR CONSTRUCTION OF
ELECTRIC TRANSMISSION FACILITIES PURSUANT TO § 40-4-117, C.R.S.

COLORADO INDEPENDENT ENERGY ASSOCIATION COMMENTS

The Colorado Independent Energy Association (CIEA) files the following comments pursuant to the Commission's Order of Hearing Commissioner James K. Tarpey Concerning Draft Transmission Planning Proposal (the Proposal) mailed on January 28, 2010.

INTRODUCTION AND SUMMARY OF POSITION

CIEA applauds the Commission for its work on this important issue. In general CIEA supports the Draft Transmission Planning Proposal and believes that it is a positive first step towards coordinated, open and transparent planning. CIEA believes that the Commission has done an a good job of identifying the important issues and responds to the Reasons for Actions section of the Proposal in Section 1 of these comments. CIEA responds to specific requirements and details regarding the Proposal in Section 2. Generally in Section 2 CIEA supports the requirements contained in the Proposal and commends the Commission for including requirements related to short and long term plans and the need for studies of transmission impediments to economic dispatch. CIEA also suggests that the Commission consider hiring independent third party coordinators as

is suggested by FERC to strengthen the Proposal. In Section 3 CIEA attempts to answer some of the Commission's specific questions presented in its Order.¹

Initially, CIEA recommends that the Commission clarify that the suggestions contained in the Proposal will become a part of a formalized rulemaking in the near future and that cost allocation and implementation issues are addressed simultaneously. Without formal rules that include Commission authority to approve, deny, or modify submitted transmission plans, the Proposal may have little to no effect on actual transmission development.

Further, CIEA recommends that the Commission specifically refer to portions of this rulemaking that effect other current PUC rulemakings such as the long range planning requirements under proposed Rule 3206(h) in Proposed Rules Related to Construction or Extension of Electric Transmission Facilities, 4 Code of Colorado Regulations 723-3, Docket. No. 09R-904E. In the situation, where one proposed Rule affects or references another proposed rule, the PUC should provide placeholders or emergency rules where appropriate in order to facilitate rapid transmission build outs.

CIEA also points out that while this Proposal is a good first step to better transmission planning, there must also be better rules and policies in place to make sure that transmission plans are actually built in the lowest cost, most efficient manner. CIEA has presented some suggestions on this topic in Section 2 and urges the Commission to develop a similar plan to ensure that any unified plans are implemented in a timely manner. As such, the Commission should have a goal of addressing these issues to result in the construction of needed transmission by the next resource acquisition period.

¹ See, Order of Hearing Commissioner James K. Tarpey Concerning Draft Transmission Planning Proposal, Docket No. 09M-616E, p. 2.

COMMENTS

1. **The PUC has Properly Identified the Important Issues**

CIEA agrees with most of the Commission's Reasons for Action section beginning on page 3 of the Proposal. The Commission has properly identified many of the existing problems with the current transmission planning process. CIEA agrees, as it has stated previously, that future transmission and generation expenditures that directly affect ratepayers "need to be made in a strategic and cost effective manner".²

a. Local Government Opposition

CIEA also agrees that there needs to be a coherent, coordinated, and long range plan when applying for permits from local governments.³ Such an approach seems necessary in order to get local interests involved early in the planning process so as to avoid NIMBY'ism and other local opposition to last minute upgrades. Transmission providers' plans are often not known to local communities until significant money has been spent on planning at which point local opposition becomes costly and causes serious project delays. By utilizing more long term planning, local interests can be a part of the process early instead of being an obstacle to efficient development.

b. Synchronize Timeframe for Generation and Transmission Planning.

The Commission has also properly recognized that the time frame for generation planning and transmission planning needs to be synchronized.⁴ CIEA applauds this recognition and agrees with the Commission's conclusion that because generating

² Transmission Planning Proposal, Docket No. 09M-616E, Decision No. R10, Attachment A, p. 4.

³ *Id.*

⁴ *Id.*

resources can be constructed faster than associated transmission, too many radial, single purpose, and customer-owned transmission lines have had to be built.

These radial lines do not contribute to system reliability and tend not to increase overall capacity to important Generation Development Areas (GDAs), but are paid for through PPAs and passed on to utility customers. If these radial lines were considered to be network upgrades, then the lines could be planned according to system needs and right-sized to open up access to needed transmission capacity to serve ratepayers and shippers. As such, CIEA urges the Commission to help assure that such lines are planned with the goal of contributing to system reliability and increasing overall transmission capacity. This is in the best interest of utility customers and will substantially improve system operation.

c. Colorado Needs A Coherent Long Term Plan That Will Be Implemented in Stages

CIEA also agrees that there should be a comprehensive long-term transmission plan that will be implemented in stages in order to meet renewable portfolio standard (RPS) requirements while meeting system reliability requirements.⁵ The Commission is correct that many factors must be taken into account in these long range plans including, possible future carbon reduction goals, possible increases to Colorado's RPS or a federal RPS, planned energy efficiency measures, and planned demand side management measures.

The Commission also correctly states that cost allocation issues have been a serious impediment to implementing major new transmission projects. This is especially

⁵ See *id.*

true when such projects cross state lines, cross utility regions, or are for projects specifically designed to integrate renewable resources.⁶

CIEA notes that while the Commission has drafted a workable transmission planning process, the Commission's Draft Transmission Planning Proposal presented here does not address how the plans will be implemented and built or how these cost allocation issues will be resolved. CIEA assumes that the Commission intends to address these issues in a separate filing, or workshop within this docket, but submits the following summary as a suggested course of action and as a way to open the door to these discussions.

d. Summary of Suggested Plan for Implementing Transmission Plans and Addressing Cost Allocation Issues.

CIEA believes that labeling transmission projects as network upgrades, economic upgrades, or any other label makes the whole building and CPCN process very complicated. CIEA urges the Commission to consider "starting from scratch" with regards to transmission build outs and to consider simply funding *all* new transmission in the state by a tariff that is applied to all retail load in the state, expressed as a charge per MWh - an amount that would be partially offset by revenues received for third-party usage of such transmission lines. In addition CIEA recommends that the implementation of approved transmission plans not be restricted exclusively to utilities, following recent precedents realized in Kansas and Texas where independent transmission developers have been awarded transmission expansion projects. We encourage the Commission to consider a process that would allow qualified companies to compete to build needed new

⁶ *Id.* at 5.

non-distribution level lines in a more timely and cost effective way for Colorado ratepayers. Competition generally helps to encourage innovation and technological advancement. If the Commission wishes to pursue this proven course of action, new legislation may be required.

To the extent that the Commission does not “start from scratch” but maintains traditional cost allocation methods, CIEA urges the Commission to begin considering multi-state or multi-utility lines as beneficial network upgrades and allow for cost based rate recovery. Cost recovery for such lines would come from both ratepayers and customers that use such lines for interstate commerce. We think that there is merit to the consideration of “special riders to transmission” rates as suggested by FERC. There are some significant benefits to local ratepayers who have access to high voltage interstate, inter-utility, and regional lines.

By integrating such cross-jurisdictional backbone transmission lines, Colorado utility customers would have increased access to additional generation resources, thereby increasing competition and potentially lowering power costs to those customers. In the same vein, Colorado generators would have the ability to sell power out of state and could substantially prosper from new market opportunities. Such increased generation would benefit all Colorado citizens (all of whom are ratepayers at some level) through higher tax revenues, and increased economic and job growth.

Lines built primarily to integrate renewable generation should also be considered beneficial because ratepayers benefit through reduced CO₂ and pollution emissions and the associated reduced health costs. Ratepayers also benefit from these lines if they are planned with an eye towards developing the cheapest generation resources for an entire

generation area, not just a single project. Such transmission upgrades can be viewed as an investment that sees a return for ratepayers through reduced future fuel costs as well.

CIEA recognizes that these comments regarding implementation of plans may exceed the scope of the current inquiry regarding transmission planning but does urge the Commission to address implementation and cost allocation issues in this Docket. CIEA believes that such issues must be addressed by the Commission in order to fulfill their statutory duty under C.R.S. 40-4-117.

The statute requires that the Commission address whether future legislative action is necessary to ensure continued progress with respect to the *transmission system* in Colorado.⁷ CIEA believes that the legislature is interested in assuring that long term plans be implemented, not just properly coordinated. As such, CIEA believes the Commission has a duty to address in its report to the legislature whether legislation is needed to assure that plans are actualized. In order to do that, the Commission should address these important cost allocation and implementation issues before the July 1, 2010 deadline.

2. **CIEA's General Comments on the Proposal**

In general CIEA applauds the Commission for taking this step towards a more transparent, open, and sensible transmission planning process. Overall, the Proposal is a positive first step towards the planning, construction and operation of a more integrated, efficient, and coordinated transmission system. Many of the recommendations contained in the Proposal would help to promote transparency, coordinate planning, and encourage

⁷ COLO. REV STAT. 40-4-117(c) (2009).

competition in Colorado's generation industry and help to facilitate the retirement of Colorado's oldest and dirtiest power plants.

Where it is not stated otherwise below, CIEA agrees with the details of the Commission's Proposal or has no strong opinion at this time. However CIEA does have a few additional suggestions and will highlight a few of what it sees as the most important aspects of the Commission's Proposal.

a. *Basic Premise of the Plan*

The Proposal states, "all transmission providers in a geographic region within Colorado will collectively analyze the needs of the region and develop a unified plan for that region. Local issues will be studied on a local level and statewide issues will be studied on a statewide level."⁸ The Commission also states that the Proposal places increased emphasis on the single-system planning concept. CIEA believes that this general approach is a good first step towards more unified single-system planning and is the right course of action for the near term future. However, CIEA asks the Commission to consider whether requiring reports to be submitted through six separate planning regions is the best way to achieve such a unified single-system planning regime? CIEA is concerned that six reports could mean six separate opportunities for intervention, appeal, and other delays. CIEA urges the Commission to simply require one unified state-wide plan.

CIEA generally supports the requirements that the Proposal requests regarding submission of Reliability Criteria, Voltage Coordination Guidelines, and Transmission Studies to be Performed. CIEA applauds this move towards increased transparency and

⁸ Transmission Planning Proposal, p. 11.

fully supports making this information more available to the public and to the Commission through one common website.⁹ CIEA agrees that currently it is very difficult to find data on the websites of the various transmission providers and that without such access, open and transparent transmission planning required by FERC Order 890 cannot occur.

b. Coordination Among Geographic Regions within Colorado

In the section entitled “Coordination Among Geographic Regions within Colorado” the Commission proposes that comprehensive transmission planning efforts be conducted under the auspices of CCPG, WestConnect, or WECC and that such studies be made available to the Commission. In its discussion the Commission considers the notion of compensating CCPG members who take on studies on behalf of all of CCPG.¹⁰ CIEA supports this notion and agrees that compensation would reduce reluctance to accept study responsibilities.

The Commission also notes that FERC has encouraged transmission providers to consider a mechanism for regional cost recovery of expenses incurred in a regional planning process. CIEA again suggests that simply funding *all* new transmission in the state including planning costs by a tariff that is applied to all retail load in the state expressed as a charge per MWh and ultimately offset by third-party customers of the transmission system, could be a sensible and simple solution to what is now a complicated and contentious problem.

⁹ *Id.* at 19.

¹⁰ *Id.* at 12.

c. Short and Long Range Planning

The Proposal does a good job of laying out both short and long term planning horizons with sensible objectives and varying requirements. CIEA has consistently stated in the past that both short term and long term planning studies should be performed together by the same transmission planners. The five and ten-year planning studies and the 20 and 30-year long range conceptual plans proposed by the Commission provide sensible timeframes for transmission planning purposes. Requiring that these be submitted to the Commission every two years ensures openness and transparency in the process.

The ten-year studies are intended to identify those transmission additions that have a longer lead-time solution and also to encourage planners to have a longer perspective and discourage them from only focusing on short term solutions.¹¹ CIEA believes that 10 year plans, if properly crafted and made publicly available, could reduce local land use conflicts, better facilitate development of Colorado's GDAs, and better ensure that lines are right sized for forecasted load growth.

The five-year studies will allow planners to modify assumptions that may have been incorrect in ten-year studies due to changed circumstances. The Proposal correctly points out that there is more certainty regarding forecasted loads, planned generation, and planned transmission additions on a five-year planning horizon.¹² CIEA believes this is a good timeframe to give planners a "last chance" to identify problems and to present solutions.¹³

¹¹ *Id.* at 14.

¹² *Id.*

¹³ *Id.*

The Proposal would also require that all transmission providers in Colorado collectively prepare long range conceptual 20 and 30 year plans and submit them to the Commission every two years. The goal of this requirement would not be to develop a consensus on a specific scenario, but to identify commonalities among planners that may inform short term decisions.¹⁴

CIEA agrees with the Proposal's conclusions that these long-term studies will help to alleviate localized land use issues that have often been a major impediment to developing new transmission infrastructure.¹⁵ In addition, CIEA believes that the information in the long range plan should provide the Commission with the necessary information to support decisions on rights of way, and will allow them to make better decisions regarding the size of new lines. CIEA applauds the Commission for its statements in this Proposal that indicate its efforts to right size new lines at voltages higher than is needed in the near term or with more circuits than are needed in the near term.¹⁶

d. Specific Studies to be Performed

CIEA supports requiring transmission planners to submit studies created under NERC, FERC, CCPG, WestConnect or WECC to the Commission as it has proposed. In particular CIEA believes that studies of the transmission impediments to economic dispatch is a crucial requirement and that the Commission should eventually formalize this requirement in a rulemaking.

¹⁴ *Id.* at 17.

¹⁵ *Id.*

¹⁶ *Id.*

The Proposal requires transmission planners to make an assessment of transmission obstacles to a statewide economic dispatch of generation for 5 and 10 year planning horizons. By requiring transmission planners to ignore institutional ownership of generating facilities and to assume that the goal is to have the most efficient generation be dispatched first, the Commission can ensure that the best GDA's are developed to facilitate cleaner, more efficient and cheaper power for Colorado ratepayers.¹⁷

The transmission impediments to economic dispatch studies would also have to include assessments of any transmission limits that prevent optimal dispatch. The costs of the required transmission upgrades would have to be compared to the costs of sub-economic dispatch, and where the costs of transmission additions are cheaper but the utilities choose not to go through with the additions, a thorough explanation of the decision should be required.¹⁸ CIEA believes that this is a key requirement to getting cheaper electricity and to building the grid efficiently to take advantage of the best generation resources.

Also, CIEA believes that it is appropriate and beneficial to require that planners prepare studies that evaluate alternate scenarios or potential public policy initiatives such as carbon reduction goals or new RPS goals. These measures encourage proactive planning, which is necessary to ensure that our transmission system is reliable, efficient, and adequate in the future.

e. Commission Involvement

The Proposal envisions an evidentiary proceeding after the transmission plans are filed. This proceeding would be open to interventions by stakeholders in each of the

¹⁷ *Id.* at 16.

¹⁸ *Id.* at 16-17.

projects included in the plan.¹⁹ CIEA supports this recommendation because this will give the public and all of the many stakeholders an opportunity to challenge assumptions, incorrect facts, or the transmission plans themselves. Presumably the Commission would hold this evidentiary proceeding once every two years to review the five and ten year plans as well as the long range conceptual 20 and 30 year plans. This would help to ensure that any important or incorrect planning assumptions are quickly identified.

The Proposal suggests that at the conclusion of the evidentiary hearing the Commission would approve or reject each of the transmission plans. If the plans were approved this would create a rebuttable presumption of need for all projects consistent with that plan, subject to changed circumstances.²⁰ This is intended to fast-track the jurisdictional utility's future application for a Certificate of Public Convenience and Necessity (CPCN).

This requirement appears to be tied to proposed Rule 3206(h) in the Commission's recent Notice of Proposed Rulemaking for CPCNs for transmission facilities.²¹ As stated in CIEA's reply comments in that rulemaking Docket, CIEA believes that Rule 3206(h) should reference whatever final rule comes from this Draft Transmission Planning Proposal's long range planning requirements.

f. Including an Independent Third Party Coordinator Should be Considered as Part of the Commission's Planning Proposal

CIEA's biggest criticism of the Proposal is that the Commission did not incorporate an independent third party coordinator to be a part of the new planning

¹⁹ *Id.* at 20.

²⁰ *Id.*

²¹ *See*, Proposed Rules Related to Construction or Extension of Electric Transmission Facilities, 4 Code of Colorado Regulations 723-3, Docket. No. 09R-904E.

process. The Proposal recognizes that FERC acknowledges that an independent third-party coordinator would provide benefits for transmission planning. The Proposal goes on to state that it is possible to comply with FERC 890 planning principles without the use of an independent third party.²²

CIEA believes that the benefits of a third party coordinator in transmission planning are akin to the benefits of having an independent evaluator in the resource acquisition (RFP) process. A third party coordinator could independently evaluate the plans of the transmission providers from a neutral, non-biased, technical and economic perspective. The Commission's Proposal already requires that all of the information necessary to conduct a third party evaluation be submitted as part of this planning process.

Third party evaluation could provide the Commission and the public with valuable non-biased information. CIEA believes that an independent evaluator would help ensure that Colorado ratepayers are getting the lowest cost most efficient energy production and transmission. CIEA urges the Commission to take the next step and to further investigate the benefits of hiring a third party coordinator to assist in this complicated process.

3. Answer to Specific Commission Questions

The Following section is intended to address specific questions posed by the Commission in its Order:²³

²² The Proposal, p. 9.

²³ See, Order of Hearing Commissioner James K. Tarpey Concerning Draft Transmission Planning Proposal, Docket No. 09M-616E, p. 2.

- a. ***Under the Draft Transmission Planning Proposal, would the Commission have all of the information necessary to assess whether the existing transmission infrastructure is adequate, efficient, and reliable, and will continue to be so in the future?***

CIEA believes at this point that under the Draft Transmission Planning Proposal, the Commission would appear to have all of the information necessary to assess whether the existing transmission infrastructure is adequate, efficient, and reliable, and will continue to be so in the future. CIEA has no further suggestions for additional reporting requirements at this time.

- b. ***Does the Draft Transmission Planning Proposal request information that is necessary for the assessment mentioned above?***

Yes, CIEA believes that the information requested by the Commission is important to facilitate better system planning, increased transparency, and more efficient grid development.

- c. ***Does the Draft Transmission Planning Proposal request information not otherwise needed to fulfill the requirements promulgated by FERC in Order 890, the NERC Reliability Standards, the policies and procedures of WECC or CCPG, or good utility practices?***

No, CIEA does not believe that the Proposal requests information that is not otherwise needed to fulfill the requirements promulgated by FERC in Order 890, the NERC Reliability Standards, the policies and procedures of WECC or CCPG, or good utility practices.

d. *Will the Transmission Planning Proposal result in coordinated, open, and transparent planning?*

Yes, CIEA believes that the Proposal is a positive step forward that will encourage coordinated, open, and transparent planning. CIEA sees this Proposal as the right first step to improving transmission in the State by suggesting a workable process for planning.

However, CIEA believes that the Proposal will not resolve all of the issues that must be addressed to actually implement substantial new build outs. CIEA recommends that the Commission formalize this Proposal in a formal rulemaking to guide transmission planning in Colorado. CIEA further recommends that the Commission initiate a rulemaking to help fund and implement the transmission plans that will be generated by this new planning process.

e. *Will all transmission providers in Colorado fully co-operate in the transmission planning process envisioned by the Proposal?*

Maybe. CIEA does not have an answer to this question but suggests that this may be an area where new legislation may be required to insure compliance.

f. *In addition to the questions contained the Draft Transmission Planning Proposal, should the Commission ask any additional questions to fulfill its responsibilities under § 40-4-117, C.R.S.?*

No, not that CIEA knows of at this time.

CONCLUSION

In conclusion, CIEA applauds this effort and encourages the Commission to institute a formal rulemaking to implement these proposed planning policies as soon as

possible. CIEA, believes that the addition of a third party evaluator could greatly improve the proposed planning process and suggests the Commission investigate incorporating a third party evaluator into the process. Generally CIEA supports the measures suggested here and views this proposed transmission-planning process as a positive first step towards a better, more unified transmission planning process.

CIEA eagerly anticipates further action on this critically important topic including further plans and rules to address building and implementation issues. Colorado needs new transmission infrastructure now in order to facilitate economic growth, meet out RPS goals, facilitate interstate commerce, eliminate transmission constraints, and strengthen our aging grid. CIEA urges the Commission to act quickly to ensure that adequate plans are in place and *implemented* in a timely manner.

Respectfully Submitted,



Nicholas G. Muller, Executive Director
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CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of February 2010, a disk and an original and ten (10) copies of **COLORADO INDEPENDENT ENERGY ASSOCIATION COMMENTS** in Docket No. 09M-616E , **COMMISSION'S ORDER OF HEARING COMMISSIONER JAMES K. TARPEY CONCERNING DRAFT TRANSMISSION PLANNING PROPOSAL** mailed on January 28, 2010 was served to the following:

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