

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 24A-0442E

IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR APPROVAL OF ITS 2024 JUST TRANSITION SOLICITATION.

**INTERIM COMMISSION DECISION GRANTING
UNOPPOSED MOTION FOR INTERVENTION OUT OF
TIME AND WAIVER OF RESPONSE TIME**

Issued Date: March 28, 2025

Adopted Date: March 26, 2025

I. BY THE COMMISSION

A. Statement, Findings, and Conclusions

1. On October 15, 2024, Public Service Company of Colorado (“Public Service” or the “Company”) filed a Verified Application of Public Service Company of Colorado for Approval of its 2024 Just Transition Solicitation (“Application”). Through Decision No. C24-0872-I, issued on November 22, 2024, the Commission, among other things, set the Application for hearing before the Commission *en banc* and established parties to the Proceeding.

2. Through Decision No. C24-0956-I, issued December 31, 2024, the Commission directed the Company to file supplemental direct testimony on various topics. Among these topics was alternative capacity expansion and dispatch optimization modeling to evaluate the benefits and costs of two new transmission lines, including the Three Corners Connector project being developed by Grid United LLC (“Grid United”).¹

¹ Decision No. C24-0956-I at ¶ 14.

3. On February 21, 2025, Public Service filed supplemental direct testimony that discussed the results of new Regional Transmission Interconnection portfolio optimizations completed at the Commission’s direction.²

4. On March 21, 2025, Grid United filed an Unopposed Motion to Intervene Out of Time and for Waiver for Response Time (“Motion”).

5. Grid United is a privately-owned transmission development company with the stated goal of uniting the North American grid by building long-distance, interregional transmission lines that improve grid reliability and resiliency, offering consumers access to low-cost electricity, and supporting society in reaching its energy policy objectives.

6. Grid United states it is currently working to develop multiple projects in Colorado, with a particular focus on high-voltage direct current (“HVDC”) lines. Among these projects is the Three Corners Connector project, which it describes as a 300-mile, 525 kV HVDC transmission line connecting Public Service’s existing electric system near Pueblo, Colorado with the Southwest Power Pool system near Guymon, Oklahoma.

7. Grid United, while recognizing the Motion is out of time, asserts there is good cause for late intervention in this Proceeding because the modeling of Three Corners Connector was unforeseeable at the time interventions were originally due and that no parties will be prejudiced by its intervention at this juncture. Additionally, Grid United states it has conferred with Public Service and the other intervening parties and that no party opposes its Motion. Accordingly, Grid United also requests the Commission waive response time to its Motion.

² Hr. Ex. 111, Supplemental Direct Testimony of Jon T. Landrum, pp. 80-90; Hr. Ex. 113, Supplemental Direct Testimony of Stephen Martz, pp. 19-27.

8. Grid United states it seeks to intervene in this Proceeding for the very limited purpose of providing the Commission, the parties, and the public with additional information regarding Three Corners Connector in order to help contextualize the modeling performed by Public Service in its Supplemental Direct Testimony. More specifically, Grid United states it intends to introduce through testimony an additional study regarding Three Corners Connector that supports and provides contexts for the assumptions used by Public Service in its Encompass modeling of the project. Grid United asserts it does not intend to take a position on other issues in the Proceeding.

9. Grid United states it has tangible and pecuniary interests in the outcome of this Proceeding due to its commercial interest in the development of the Three Corners Connector, which has now been included in the Company's modeling. Grid United further states that how the benefits and impacts of Three Corners Connector are presented and discussed in this Proceeding could significantly influence future commercial discussions regarding the Three Corners Connector. As the developer of project, Grid United asserts it is the only entity positioned to provide useful information specific to this project or advocate for the presentation of evidence or positions that affect the Three Corners Connector.

10. Pursuant to Rule 1401(a), 4 *Code of Colorado Regulations* ("CCR") 723-1, the Commission may grant a late-filed intervention for good cause shown, provided the intervention satisfies Rule 1401(c)'s substantive requirements.

11. Under Commission Rule 1401(c), the Commission has discretion in granting permissive intervention where the prospective intervenor: (1) identifies the specific interest that justifies intervention; (2) demonstrates that the intervenor will represent that interest in the

proceeding; (3) explains how the proceeding will substantially impact its pecuniary or tangible interests; and (4) explains why its interests are not adequately represented by other parties.

12. We find Grid United has sufficiently demonstrated that this Proceeding may substantially affect its pecuniary or tangible interests and that these interests would not otherwise be adequately represented, as required by Rule 1401(c). Additionally, Grid United has shown good cause for the Commission to grant its late intervention under Rule 1401(a), and since this Motion is unopposed, we waive the remaining response time.

13. Grid United is a party to this Proceeding. We require Grid United to take the case as it stands and make its case within the established party pleadings and processes.

II. ORDER

A. The Commission Orders That:

1. The Unopposed Motion to Intervene Out of Time and for Waiver of Response Time filed by Grid United LLC on March 21, 2025, is granted, consistent with the discussion above.

2. This Decision is effective immediately upon its Issued Date.

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING
March 26, 2025.**

(S E A L)



ATTEST: A TRUE COPY

Rebecca E. White,
Director

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

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MEGAN M. GILMAN

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Commissioners