BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

DOCKET NO. 081-227E

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

COMMENTS OF PUTNAM ROBY WILLIAMSON COMMUNICATIONS, INC.

Mailed Date: July 16, 2008

Putnam Roby Williamson Communications, Inc. (PRW) is a strategic communications firm located in Madison, Wisconsin. PRW provides strategic project communications services to clients as well as media relations expertise and government affairs consulting. Our principals have been involved in the siting, permitting and construction of extensive high-voltage electric transmission projects in Wisconsin, Michigan and Minnesota.

One of our principals, Mark Williamson, is the former vice president of major projects for American Transmission Company (ATC), headquartered in Waukesha, Wisconsin, and was principally responsible for the Arrowhead-Weston project, a critically needed but contentious 220-mile 345 kV transmission line from Minnesota to central Wisconsin (*see award-winning DVD attached: "Arrowhead-Weston: From Concept to Completion"*).

PRW is happy to submit these comments pursuant to the commission's invitation of June 13, 2008.

Like Colorado, Wisconsin, Michigan and Minnesota have made extensive recent policy investments – and investments in actual hardware – to significantly increase the amount of renewable energy used to serve electric customers in those states. We (PRW) have been involved in the planning, siting, permitting and construction of many of these projects. We believe the commission's focus on effective planning is a key first step in persuading the public to accept necessary infrastructure improvements.

Because transmission lines are visible, (under grounding being too expensive for general application) the public takes more interest in the siting of transmission lines than in other energy infrastructure. We have executed extensive public opinion surveying, and in each instance we have found to a statistical certainty that people will accept new infrastructure only if they believe the project is needed and that their concerns have been heard.

To demonstrate need and benefit, effective planning is essential.

We invite the commission to study ATC's planning model which can be found at <u>www.atcllc.com</u>. ATC engages in an annual forward looking ten-year planning assessment that it distributes widely to state and local government officials, interested parties and as much of the public it can reach on a reasonable basis to alert the public to the probability that needed infrastructure may be coming their way in that ten-year timeframe.

When the project becomes "real", ATC allows five to ten years from project announcement to needed in-service date in order to have an active and highly involved public participation process that begins well in advance – often years in advance – of regulatory submittals and anticipation of regulatory approvals. I directed the ATC team when the timeframe system was designed and I fully believe it was, and remains, a critical tool in getting our projects online, on time and on budget.

In literally hundreds of projects we have found that involving the affected public, giving them time to interact with the project particulars, and especially giving them time to digest the need, is essential to successful project development. We urge the commission to allow sufficient time for this absorption process to occur for any particular project that might be forthcoming.

Recently in Wisconsin we have discovered that the public does understand that needed infrastructure can bring both renewable resources and a lower cost of electricity by making more regional generation available and thereby widening the supply pool for delivered energy. Like discussing specific infrastructure projects, these concepts require a significant and sophisticated communications plan as well as sufficient time for the plan to work.

We have found that radio advertising can be a remarkably effective and cost-efficient tool to deliver these messages.

The commission also inquired about incentives to get required infrastructure built. We believe that assurance that a utility will be able to recover its invested capital is sufficient incentive. And, in the jurisdictions in which we've been active, the PSCs act on project approvals in advance of project construction. These detailed regulatory proceedings result in orders approving construction of the projects at specific dollar amounts with specific scopes and specific tolerances that allow the public, the regulators and the utility to know that if the utility performs within the order the utility can recover its money.

This mechanism seems self-evident but has allowed the construction of billions of dollars of infrastructure to be brought on-line and paid for in a timely manner.

The commission also asked what its level of involvement should be in bringing transmission improvements to Colorado. We commend the commission on its proactive

involvement to date and urge it to be a leader in continuing to advance the building of necessary infrastructure.

In Wisconsin the commission has taken a leadership role in policy while still being able to effectively adjudicate contested cases involving specific projects. The commission has set policy goals both in policy and rate-case dockets and has been able to affectively administer contested cases. Our courts have supported the dual nature of the commission's responsibilities as a policy and quasi-judicial body. Colorado enabling law for the commission appears quite similar to Wisconsin in this respect. Absent active commission oversight, legitimate competing interests for different solutions to the problem often forestall the ability to get any specific project done. Our experience has shown us it's hard enough to persuade the public something is necessary without an extended debate during the project phase as to which one of many alternatives might be the best. Some guidance from the commission can often clear up these debates before the public becomes confused.

Thank you for the opportunity to comment; we would be happy to follow up with answers to any questions or additional discussion the commission desires.

Respectfully submitted,

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Mark C. Williamson Chairman Putnam Roby Williamson Communications, Inc.