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Jerry Stellern  
Tom Green  
Xcel Transmission  
550 15<sup>th</sup> Street  
Denver, CO 80202

Re: Requests for Transmission Plans

Dear Tom and Jerry:

At your recent (March 11, 2008) transmission planning meeting, held to implement Xcel's FERC Order 890 open and transparent planning procedures, you suggested that written requests for transmission planning work to be considered by Xcel could be submitted.

This submission is intended to provide you with such a request. Accordingly, the American Wind Energy Association and the Interwest Energy Alliance request:

1. That Xcel provide a coordinated, statewide five and ten year transmission plan on which stakeholders can rely. See our comments on the CCPG CLRTPG 2006 plan, posted at: [http://www.interwest.org/documents/documents/2007-02-09\\_ccpg\\_ltr\\_9feb07.pdf](http://www.interwest.org/documents/documents/2007-02-09_ccpg_ltr_9feb07.pdf) These plans should consider scenarios that analyze the impact of improved energy efficiency and demand management programs, incorporate analysis of distributed generation resources, assume utilities will meet renewable energy standard goals, take into consideration wildlife and land conservation issues, and assume that generation development areas identified in the SB07-91 report ([http://www.colorado.gov/energy/in/uploaded\\_pdf/RenewableResourceGeneration.pdf](http://www.colorado.gov/energy/in/uploaded_pdf/RenewableResourceGeneration.pdf)) will be providing power for export in substantial quantities to regional markets over the long term.
2. That Xcel provide a coordinated, statewide transmission plan that supports its utility-level transmission plans to provide adequate and economic transmission service in response to C.R.S. Section 40-2-126 (SB07-100) on timelines settled in the agreement in support of Colorado

Public Utilities Commission Docket No. 07A-421E (Pawnee-Smoky Hill CPCN) and as filed in Xcel Supplemental Transmission Testimony in Docket No. 07A-447E (Xcel Electric Resource Plan).

3. That Xcel provide for public review the transmission budgets that were referenced in your presentations in the Order 890 meeting. If Xcel refuses to provide these budgets for public review, would it agree to do so under appropriate confidentiality agreements? If not, would it agree to provide them for review by Colorado Public Commission and Colorado Office of Consumer Counsel staff?
4. That Xcel study each Tot constraint and each limited transmission path within Colorado and between Colorado and adjoining electric resource areas, loads, and markets in aid of identifying why such constraints exist, what benefits might flow to consumers from investment to lessen or eliminate constraints, and what transmission planning solutions might apply.
5. That Xcel provide its analysis of each of the transmission plans that would require investment of \$50 million or more made by other entities that interconnect with its system or impact its import or export of power to markets, such as, but not limited to, Wyoming Colorado Intertie, Eastern Plains Transmission Project, High Plains Express, and SPP transmission plans in Kansas and Oklahoma.
6. That Xcel analyze and report on what incentives are present for it to invest in transmission and the market reforms that would be necessary to create regional markets with RTO functionalities and suggest improvements in its reported incentives that would cause it to plan and provide transmission more effectively and efficiently.

We request that these plans focus on both reliability and economic issues, so that consumers can be assured that Xcel's transmission plans will provide both reliable service and power supplies that increase consumer benefits.

Thanks for considering these requests.

Sincerely,

Craig Cox  
IEA

Ronald L. Lehr

AWEA

Tom Darin  
WRA