Provisional Interconnection Study Report for PI-2023-2

4/15/2024

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1.0 Executive Summary

The PI-2023-2 project is a Provisional Interconnection (PI) request for a 10 MW Battery Energy Storage System (BESS) with a Point of Interconnection (POI) at the Comanche 345 kV substation.

The total estimated cost of the transmission system improvements required for PI-2023-2 to qualify for Provisional Interconnection Service is estimated to be $7.145 million (Table 7 and Table 8).

The initial maximum permissible output of PI-2023-2 Generating Facility is 10 MW. The maximum permissible output of the Generating Facility in the PLGIA[1] would be reviewed quarterly and updated, if there are changes to the system conditions assumed in this analysis, to determine the maximum permissible output.

Security: PI-2023-2 is a request for NRIS. For NRIS requests, security shall estimate the risk associated with the Network Upgrades and the Interconnection Facilities and is assumed to be a minimum of $25 million.

In addition, the Interconnection Customer would assume all risk and liabilities with respect to changes between the PLGIA and the LGIA[2], including changes in output limits and Interconnection Facilities, Network Upgrades, Distribution Upgrades, and/or System Protection Facilities cost responsibility.

Note that Provisional Interconnection Service in and of itself does not convey transmission service.

[1] Provisional Large Generator Interconnection Agreement (PLGIA): Shall mean the interconnection agreement for Provisional Interconnection Service established between Transmission Provider and/or the Transmission Owner and the Interconnection Customer. The pro forma agreement is provided in Appendix 8 and takes the form of the Large Generator Interconnection Agreement, modified for provisional purposes.

[2] Large Generator Interconnection Agreement (LGIA): Shall mean the form of interconnection agreement applicable to an Interconnection Request pertaining to a Large Generating Facility that is included in the Transmission Provider's Tariff.

2.0 Introduction

The PI-2023-2 is the Provisional Interconnection Service[3] request for a 10 MW BESS Generating Facility located in Pueblo County, Colorado.

- The POI of this project is the existing Comanche 345 kV substation.
- The Commercial Operation Date (COD) to be studied for PI-2023-2 as noted on the Provisional request form is 12/31/2025.

The geographical location of the transmission system near the POI is shown in Figure 1.

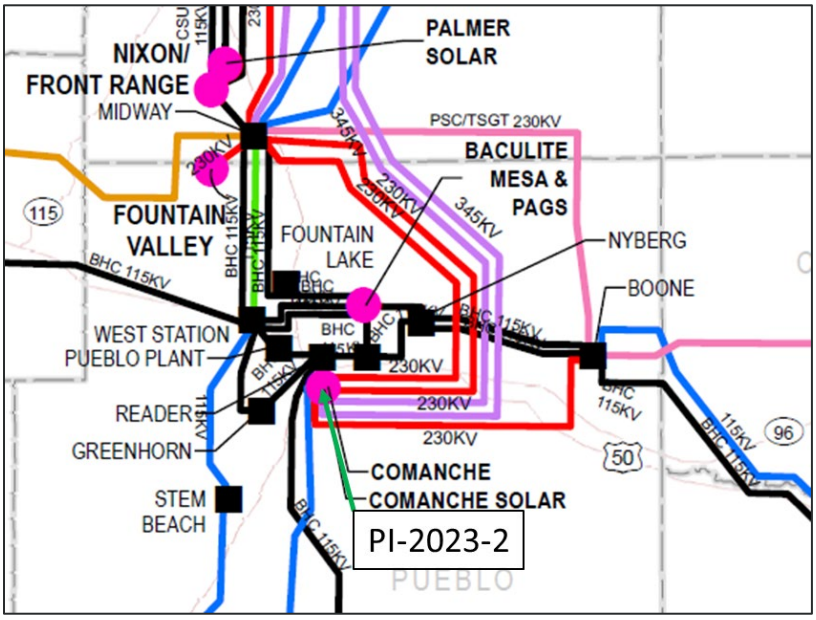

Figure 1: Point of Interconnection of PI-2023-2

[3] **Provisional Interconnection Service** shall mean an Interconnection Service provided by Transmission Provider associated with interconnecting the Interconnection Customer's Generating Facility to Transmission Provider's Transmission System and enabling that Transmission System to receive electric energy and capacity from the Generating Facility at the Point of Interconnection, pursuant to the terms of the Provisional Large Generator Interconnection Agreement and, if applicable, the Tariff.

3.0 Study Scope

The purpose of this study is to determine the impacts to the PSCo system and the Affected Systems from interconnecting PI-2023-2 for Provisional Service. Consistent with the assumption in the study agreement, PI-2023-2 selected Network Resource Interconnection Service (NRIS)[4].

The scope of this report includes voltage and reactive capability evaluation, steady state (thermal and voltage) analysis, transient stability analysis, short-circuit analysis, and cost estimates for Interconnection Facilities and Station Network Upgrades. The study also identifies the estimated Security[5] and Contingent Facilities associated with the Provisional Service.

3.1 Steady State Criteria

The following Criteria are used for the reliability analysis of the PSCo system and Affected Systems:

P0—System Intact conditions:

Thermal Loading: <=100% of the normal facility rating

Voltage range: 0.95 to 1.05 per unit

P1 & P2-1—Single Contingencies:

Thermal Loading: <=100% Normal facility rating

Voltage range: 0.90 to 1.10 per unit

Voltage deviation: <=8% of pre-contingency voltage

P2 (except P2-1), P4, P5 & P7—Multiple Contingencies:

Thermal Loading: <=100% Emergency facility rating

Voltage range: 0.90 to 1.10 per unit

Voltage deviation: <=8% of pre-contingency voltage

[4] **Network Resource Interconnection Service** shall mean an Interconnection Service that allows the Interconnection Customer to integrate its Large Generating Facility with the Transmission Provider's Transmission system (1) in a manner comparable to that in which the Transmission Provider integrates its generating facilities to serve native load customers; or (2) in an RTO or ISO with market-based congestion management, in the same manner as all other Network Resources. Network Resource Interconnection Service in and of itself does not convey transmission service.

[5] **Security** estimates the risk associated with the Network Upgrades and Interconnection Facilities that could be identified in the corresponding LGIA.

3.2 Transient Stability Criteria

The transient voltage stability criteria are as follows:

a. Following fault clearing, the voltage shall recover to 80% of the pre-contingency voltage within 20 seconds of the initiating event for all P1 through P7 events for each applicable Bulk Electric System (BES) bus serving load.
b. Following fault clearing and voltage recovery above 80%, voltage at each applicable BES bus serving load shall neither dip below 70% of pre-contingency voltage for more than 30 cycles nor remain below 80% of pre-contingency voltage for more than two seconds, for all P1 through P7 events.
c. For Contingencies without a fault (P2.1 category event), voltage dips at each applicable BES bus serving load shall neither dip below 70% of pre-contingency voltage for more than 30 cycles nor remain below 80% of pre-contingency voltage for more than two seconds.

The transient angular stability criteria are as follows:

a. P1—No generating unit shall pull out of synchronism. A generator being disconnected from the system by fault clearing action or by a special Protection System is not considered an angular instability.
b. P2–P7—One or more generators may pull out of synchronism, provided the resulting apparent impedance swings shall not result in the tripping of any other generation facilities.
c. P1–P7—The relative rotor angle (power) oscillations are characterized by positive damping (i.e., amplitude reduction of successive peaks) > 5% within 30 seconds.

3.3 Breaker Duty Analysis Criteria

Fault Current after PI addition should not exceed 100% of the Breaker Duty rating. PSCo can only perform breaker duty analysis on the PSCo system. Before the PI goes in-service the Affected Systems may choose to perform a breaker duty analysis to identify breaker duty violations on their system.

3.4 Study Methodology

For PSCo and non-PSCo facilities, thermal violations attributed to the request include all new facility overloads with a thermal loading >100% and increased by 1% or more from the benchmark case overload post Generator Interconnection Request (GIR) addition.

The voltage violations assigned to the request include new voltage violations which resulted in a further variation of 0.01 per unit.

Since the request is for Provisional Service, if thermal or voltage violations are seen, the maximum permissible Provisional Interconnection before violations is identified. For voltage violations caused by reactive power deficiency at the POI, voltage upgrades are identified.

The Provisional Interconnection request should meet the Transient stability criteria stated in Section 3.1. If the addition of the GIR causes any violations, the maximum permissible Provisional Interconnection Service before violations is identified.

3.5 Contingency Analysis

The transmission system on which steady state contingency analysis is run includes the WECC designated areas 70 and 73.

The transient stability analysis is performed for the following worst-case contingencies shown in Table 1.

Table 1 – Transient Stability Contingencies

Ref. No.	Fault Location	Outage(s)	Clearing Time (Cycles)
1	Comanche 345 kV	Comanche - Daniels Park 345 kV ckt 2	4
2	Comanche 345 kV	Comanche - Tundra 345 kV ckt 1	4
3	Comanche 345 kV	Comanche Unit 3	4
4	Comanche 345 kV	Comanche 345/230 kV Transformer T3	4
5	Comanche 345 kV	PI-2023-2 Generation	4
6	Daniels Park 345 kV	Daniels 345/230 kV Transformer T3	4
7	Daniels Park 345 kV	Daniels Park - Harvest Mile 345 kV ckt 1	4
8	Daniels Park 345 kV	Daniels Park - Missile Site 345 kV ckt 1	4
9	Daniels Park 345 kV	Daniels Park - Tundra 345 kV ckt 1	4
10	Daniels Park 345 kV	Neptune Generation	4
11	Comanche 230 kV	Bighorn Generation	5

Ref. No.	Fault Location	Outage(s)	Clearing Time (Cycles)
12	Comanche 230 kV	Comanche - Huckleberry 230 kV ckt 1 Huckleberry - Walsenberg 230 kVckt 1 Walsenberg - Valent 230 kV ckt 1 HessBDW Generation Rosebud Generation	5
13	Comanche 230 kV	Comanche - Boone 230 kV ckt 1	5
14	Comanche 230 kV	Mirasol - GI_2020-10 POI 230 kV ckt 1 Comanche - GI_2020-10 POI 230 kV ckt GI-2020-10 Generation	17
15	Comanche 345 kV	Comanche - Tundra 345 kV ckt 1 Comanche 345/230 kV Transformer T4	12
16	Comanche 230 kV	Comanche - CF&I Furnace 230 kV ckt 1 Comanche - Midway 230 kV ckt 1	17
17	Comanche 230 kV	Comanche - Huckleberry 230 kV ckt 1 Comanche - Boone 230 kV ckt 1	17
18	May Valley 345 kV	May Valley - Goose Creek 345 kV ckt 1 May Valley 345 kV shunt capacitor bank	12
19	Mirasol 230 kV	Mirasol - GI_2020-10 POI 230 kV ckt 1 Comanche - GI_2020-10 POI 230 kV ckt 1 Mirasol - Midway 230 kV ckt 1 Mirasol - Thunderwolf 230 kV ckt 1 Thunderwolf Generation GI-2020-10 Generation	17

3.6 Study Area

The Southern Colorado study area includes WECC designated zones 704, 710, 712, 751, 757, 785. The study did not identify any impacts to Affected Systems.

4.0 Base Case Modeling Assumptions

The study was performed using the 2026 HS WECC base case. The following planned transmission projects are modeled in the Base Case:

- Canal Crossing 345 kV substation
- Fort Saint Vrain 345 kV substation
- Goose Creek 345 kV substation
- May Valley 345 kV substation
- Kestrel 230 kV substation
- Coyote 230 kV substation
- Poder 115 kV substation
- Metro Water 115 kV substation
- Pintail 115 kV substation
- DCPL Tap 115 kV substation

- Carl Tap 69 kV substation

The following additional changes were made to the Intermountain Regional Electric Co-Op (CORE) model in the Base Case:

- Citadel 115 kV substation
- Spring Valley 115 kV substation
- Deer Trail 115 kV substation

The Base Case model includes higher-queued and existing PSCo and Affected System generation resources.

4.1 Benchmark Case Modeling

The Benchmark Case was created from Base Case described in Section 4.0 by changing the study pocket generation dispatch to reflect heavy generation in the Southern Colorado study pocket. This was accomplished by adopting the stressed generation dispatch given in Table 2.

Table 2 – Generation Dispatch Used to Create the Southern Colorado Benchmark Case (MW is Gross Capacity)

Generator Bus No.	Bus Name/kV	Base kV	ID	Status	Pgen (MW)	Max power (MW)
70120	COMAN_2	24.00	C2	1	365.00	365.00
70577	FTNVL1&2	13.80	G1	1	36.00	40.00
70577	FTNVL1&2	13.80	G2	1	36.00	40.00
70578	FTNVL3&4	13.80	G3	1	36.00	40.00
70578	FTNVL3&4	13.80	G4	1	36.00	40.00
70579	FTNVL5&6	13.80	G5	1	36.00	40.00
70579	FTNVL5&6	13.80	G6	1	36.00	40.00
70777	COMAN_3	27.00	C3	1	804.90	804.90
70934	COMAN_S1	0.42	S1	1	102.00	120.00
70017	SI_GEN 0	0.60	1	1	25.60	30.10
70878	BIGHORN_S	0.63	S1	1	210.40	247.50
70756	NEPTUNE_B1	0.48	B1	1	106.30	125.00
70758	NEPTUNE_S1	0.66	S1	1	212.90	250.50
70761	THNDWLF_B1	0.48	B1	1	80.00	100.00
70763	THNDWLF_S1	0.66	S1	1	170.00	200.00
70859	SUN_MTN_S1	0.66	S1	1	172.30	202.70
700142	GI_2020_10	0.63	S1	1	115.00	118.30
700146	GI_2020_10	0.63	S2	1	115.00	118.30

70256	CO_GRN_W	0.58	W2	1	64.80	81.00
70708	CO_GRN_E	0.58	W1	1	64.80	81.00
70704	TBI_GEN	0.58	W1	1	60.00	75.00
70663	GLDNWST_W1	0.69	W1	1	199.50	249.40
70010	TBII_GEN	0.69	W	1	60.00	75.00
700119	REPL_21_1	0.66	S1	1	108.33	121.22
700120	REPL_21_1	0.66	S2	1	108.33	121.22
700121	REPL_21_1	0.66	S3	1	108.33	121.22
Total					3469.49	3847.36

4.2 Grid Charging Benchmark Case Modeling

The Grid Charging Benchmark Case was created from Base Case described in Section 4.0 by changing the study pocket generation dispatch to reflect a Grid Charging scenario as outlined in Section 3.16 of the BPM. This was accomplished by adopting the stressed generation dispatch given in Table 3.

Table 3 – Generation Dispatch Used to Create the Southern Colorado Grid Charging Benchmark Case (MW is Gross Capacity)

Generator Bus No.	Bus Name/kV	Base kV	ID	Status	Pgen (MW)	Max power (MW)
70120	COMAN_2	24.00	C2	1	365.00	365.00
70577	FTNVL1&2	13.80	G1	1	36.00	40.00
70577	FTNVL1&2	13.80	G2	1	36.00	40.00
70578	FTNVL3&4	13.80	G3	1	36.00	40.00
70578	FTNVL3&4	13.80	G4	1	36.00	40.00
70579	FTNVL5&6	13.80	G5	1	36.00	40.00
70579	FTNVL5&6	13.80	G6	1	36.00	40.00
70777	COMAN_3	27.00	C3	1	804.90	804.90
70934	COMAN_S1	0.42	S1	1	0.00	120.00
70017	SI_GEN 0	0.60	1	1	0.00	30.10
70878	BIGHORN_S	0.63	S1	1	0.00	247.50
70756	NEPTUNE_B1	0.48	B1	1	-112.90	125.00
70758	NEPTUNE_S1	0.66	S1	1	0.00	250.50
70761	THNDWLF_B1	0.48	B1	1	-50.00	100.00
70763	THNDWLF_S1	0.66	S1	1	0.00	200.00
70859	SUN_MTN_S1	0.66	S1	1	0.00	202.70
700142	GI_2020_10	0.63	S1	1	115.00	118.30
700146	GI_2020_10	0.63	S2	1	115.00	118.30
70256	CO_GRN_W	0.58	W2	1	13.61	81.00

Generator Bus No.	Bus Name/kV	Base kV	ID	Status	Pgen (MW)	Max power (MW)
70708	CO_GRN_E	0.58	W1	1	13.61	81.00
70704	TBI_GEN	0.58	W1	1	12.60	75.00
70663	GLDNWST_W1	0.69	W1	1	41.90	249.40
70010	TBII_GEN	0.69	W	1	12.60	75.00
700119	REPL_21_1	0.66	S1	1	108.33	121.22
700120	REPL_21_1	0.66	S2	1	108.33	121.22
700121	REPL_21_1	0.66	S3	1	108.33	121.22
Total					1872.30	3847.36

4.3 Study Case Modeling

A Study Case was created from the Benchmark Case by adding the PI-2023-2 BESS Generating Facility. The additional 10 MW output from PI-2023-2 was dispatched against generation outside of the Southern Colorado study pocket.

A Grid Charging Study Case was created from the Grid Charging Benchmark Case by adding the PI-2023-2 BESS Generating Facility modeled as a load.

4.4 Short-Circuit Modeling

The Transmission Planning Department has requested Fault Studies for a Provisional Interconnection request. This request is for the Comanche Long Duration Energy Storage (LDES) project (PI-2023-2), installed in two phases. Approximately 15 MVA Battery Energy Storage System (BESS) will be installed in phase 1. Phase 2 is not being studied currently. The output will be 10 MW at the POI.

This project assumes the use of five DynaPower CPS-3000 inverters rated at 3.0 MVA operating at +/-0.9pf. Each of the 3 MVA inverters is connected to a collector transformer, 0.6/34.5 kV, rated at 3 MVA. A single 345/34.5/13.8 kV main GSU transformer rated at 7.5/10/12.5 MVA steps the voltage up from the collector transformer voltage to the POI voltage. A 0.15-mile-long generation tie line interconnects the project to the Comanche 345 kV substation. The power to the POI will not exceed 10 MW.

All connected generating facilities were assumed capable of producing maximum fault current. As such, all generation was modeled at full capacity, whether NRIS or ERIS is requested. Generation is modeled as a separate generating resource in CAPE and included at full capacity

in the short-circuit study, regardless of any limitations to the output that would be imposed otherwise.

5.0 Provisional Interconnection Service Analysis

5.1 Voltage and Reactive Power Capability Evaluation

The following voltage regulation and reactive power capability requirements are applicable to non-synchronous generators:

- Xcel Energy's OATT requires all non-synchronous generator Interconnection Customers to provide dynamic reactive power within the power factor range of 0.95 leading to 0.95 lagging at the high side of the generator substation. Furthermore, Xcel Energy requires every Generating Facility to have dynamic voltage control capability to assist in maintaining the POI voltage schedule specified by the Transmission Operator.
- It is the responsibility of the Interconnection Customer to determine the type (switched shunt capacitors and/or switched shunt reactors, etc.), the size (MVar), and the locations (on the Interconnection Customer's facility) of any additional static reactive power compensation needed within the generating plant in order to have adequate reactive capability to meet the +/- 0.95 power factor at the high side of the main step-up transformer.
- It is the responsibility of the Interconnection Customer to compensate their generation tie-line to ensure minimal reactive power flow under no load conditions.

All proposed reactive devices in customer provided models are switched favorably to provide appropriate reactive compensation in each test, therefore identified deficiencies are in addition to any proposed reactive compensation.

All the summary tables representing GIRs' Voltage and Reactive Power Capability tests adhere to the following color formatting representing the different aspects of the tests:

- Values highlighted in red indicate a failed reactive power requirement.
- Voltages outside the range of 0.95 p.u. to 1.05 p.u. are highlighted in yellow to provide additional information.

The PI-2023-2 GIR is modeled as follows:

BESS Generator: Pmax = 14.25 MW, Pmin = -14.25 MW, Qmax = 9.87 MVar, Qmin= -9.87 MVar

The summary for the Voltage and Reactive Power Capability Evaluation for PI-2023-2 is:

- The GIR is capable of meeting ±0.95 pf at the high side of the main step-up transformer while maintaining a normal operating voltage at the POI.
- The GIR is capable of meeting ±0.95 pf at its terminals while meeting the interconnection service request.
- The reactive power exchange and voltage change across the gen-tie are acceptable under no load conditions.

The Voltage and Reactive Power Capability tests performed for PI-2023-2 are summarized in Table 4.

Table 4 – Reactive Capability Evaluation for PI-2023-2

Reactive Power Capability - Project PI-2023-2 - MPT High Side PF Checks												
Generator Terminals					High Side of Main Transformer				POI			
Pgen (MW)	Qgen (MVar)	Qmax (MVar)	Qmin (MVar)	V (p.u.)	P (MW)	Q (MVar)	V (p.u.)	PF	P (MW)	Q (MVar)	V (p.u.)	PF
11.1	2.7	9.9	-9.9	1.01	10.0	3.3	0.98	0.9496	10.0	3.3	0.98	0.9496
11.1	-1.6	9.9	-9.9	0.95	10.0	-4.0	0.98	-0.9285	10.0	-4.0	0.98	-0.9285
0.0	1.2	9.9	-9.9	1.00	0.0	1.2	0.98	0.0000	0.0	1.2	0.98	0.0000

5.2 Steady State Analysis

Contingency analysis was performed on both Discharging and Grid Charging scenarios.

The System Intact and Single Contingency analysis on the Study Cases did not identify any overloads in either scenario.

The Multiple Contingency analysis on the Study Case did not identify any overloads in either scenario.

Per TPL-001-5, multiple contingency overloads are mitigated using system adjustments, including generation redispatch (includes GIRs under study) and/or operator actions. None of the multiple contingency overloads are attributed to the study GIR in either scenario.

Single contingency and multiple contingency analysis showed no voltage violations attributed to the study GIR in either scenario.

5.3 Transient Stability Results

The following results were obtained for the disturbances analysed:

- ✓ No machines lost synchronism with the system.
- ✓ No transient voltage drop violations were observed.
- ✓ Machine rotor angles displayed positive damping.

Note there are instances of PI-2023-2 tripping during several of the multiple contingency runs. This is being caused by the unit's relay trip setting (0.879 p.u., 0.2 seconds). Per the BPM, relay tripping is not considered a stability issue, however, these relay settings will require adjustment.

The results of the contingency analysis are shown in Table 5. The transient stability plots are shown in Appendix A and Appendix B in Section 10.0 of this report.

Table 5 – Transient Stability Results

Ref. No.	Fault Location	Outage(s)	Clearing Time (Cycles)	Discharging		Grid Charging	
				Post-Fault Voltage Recovery	Angular Stability	Post-Fault Voltage Recovery	Angular Stability
1	Comanche 345 kV	Comanche - Daniels Park 345 kV ckt 2	4	Stable	Stable	Stable	Stable
2	Comanche 345 kV	Comanche - Tundra 345 kV ckt 1	4	Stable	Stable	Stable	Stable
3	Comanche 345 kV	Comanche Unit 3	4	Stable	Stable	Stable	Stable
4	Comanche 345 kV	Comanche 345/230 kV Transformer T3	4	Stable	Stable	Stable	Stable
5	Comanche 345 kV	PI-2023-2 Generation	4	Stable	Stable	Stable	Stable
6	Daniels Park 345 kV	Daniels 345/230 kV Transformer T3	4	Stable	Stable	Stable	Stable
7	Daniels Park 345 kV	Daniels Park - Harvest Mile 345 kV ckt 1	4	Stable	Stable	Stable	Stable
8	Daniels Park 345 kV	Daniels Park - Missile Site 345 kV ckt 1	4	Stable	Stable	Stable	Stable
9	Daniels Park 345 kV	Daniels Park - Tundra 345 kV ckt 1	4	Stable	Stable	Stable	Stable
10	Daniels Park 345 kV	Neptune Generation	4	Stable	Stable	Stable	Stable

Ref. No.	Fault Location	Outage(s)	Clearing Time (Cycles)	Discharging		Grid Charging	
				Post-Fault Voltage Recovery	Angular Stability	Post-Fault Voltage Recovery	Angular Stability
11	Comanche 230 kV	Bighorn Generation	5	Stable	Stable	Stable	Stable
12	Comanche 230 kV	Comanche - Huckleberry 230 kV ckt 1 Huckleberry - Walsenberg 230 kVckt 1 Walsenberg - Valent 230 kV ckt 1 HessBDW Generation Rosebud Generation	5	Stable	Stable	Stable	Stable
13	Comanche 230 kV	Comanche - Boone 230 kV ckt 1	5	Stable	Stable	Stable	Stable
14	Comanche 230 kV	Mirasol - GI_2020-10 POI 230 kV ckt 1 Comanche - GI_2020-10 POI 230 kV ckt GI-2020-10 Generation	17	Stable	Stable	Stable	Stable
15	Comanche 345 kV	Comanche - Tundra 345 kV ckt 1 Comanche 345/230 kV Transformer T4	12	Stable	Stable	Stable	Stable
16	Comanche 230 kV	Comanche - CF&I Furnace 230 kV ckt 1 Comanche - Midway 230 kV ckt 1	17	Stable	Stable	Stable	Stable
17	Comanche 230 kV	Comanche - Huckleberry 230 kV ckt 1 Comanche - Boone 230 kV ckt 1	17	Stable	Stable	Stable	Stable
18	May Valley 345 kV	May Valley - Goose Creek 345 kV ckt 1 May Valley 345 kV shunt capacitor bank	12	Stable	Stable	Stable	Stable
19	Mirasol 230 kV	Mirasol - GI_2020-10 POI 230 kV ckt 1 Comanche - GI_2020-10 POI 230 kV ckt 1 Mirasol - Midway 230 kV ckt 1 Mirasol - Thunderwolf 230 kV ckt 1 Thunderwolf Generation GI-2020-10 Generation	17	Stable	Stable	Stable	Stable

5.4 Short-Circuit and Breaker Duty Analysis Results

The fault currents at the POI for three-phase and phase-to-ground faults can be found in below, along with the Thevenin impedance at the POI. Both the base case and the case with the PI added are shown.

Table 6 – Short-Circuit Parameters at PI-2023-2 POI (Comanche 345 kV Substation)

	Before the PI Addition	After the PI Addition
Three Phase		
Three Phase Current	13920 A	13940 A
Positive Sequence Impedance	1.15013 + j15.6526 ohms	1.15013 + j15.6526 ohms
Negative Sequence Impedance	1.19036 + j15.6861 ohms	1.19036 + j15.6861 ohms
Zero Sequence Impedance	0.66559 + j11.1682 ohms	0.66266 + j11.1332ohms
Phase-to-Ground		
Single Line to Ground Current	14160 A	14200 A
Positive Sequence Impedance	1.15013 + j15.6526 ohms	1.15013 + j15.6526 ohms
Negative Sequence Impedance	1.19036 + j15.6861 ohms	1.19036 + j15.6861 ohms
Zero Sequence Impedance	0.66559 + j11.1682 ohms	0.66266 + j11.1332ohms

A breaker duty study on the PSCo transmission system did not identify any circuit breakers that became over-dutied because of adding the BESS generation PI-2023-2.

5.5 Affected Systems

The study did not identify any impacts to Affected Systems.

5.6 Summary of Provisional Interconnection Analysis

The study did not identify any voltage or thermal overloads attributed to the GIR in discharge mode. The maximum allowable output without any additional System Network Upgrades for PI-2023-2 is 10 MW.

Additionally, a Grid Charging study was performed. The study did not identify any voltage or thermal overloads attributed to the GIR. Grid Charging capabilities without any additional System Network Upgrades for PI-2023-2 is 10 MW.

6.0 Cost Estimates

The POI is existing, and the Provisional Interconnection study did not identify any new Interconnection Facilities or Station Network Upgrades required to accommodate the 10 MW output.

The total cost of the required upgrades for PI-2023-2 to interconnect for Provisional Interconnection Service at the Comanche 345 kV Substation is estimated to be **$7.145 million.**

- **Cost of Transmission Provider's Interconnection Facilities is $2.125 million** (Table 7)
- **Cost of Station Network Upgrades is $5.020 million** (Table 8)
- **Cost of System Network Upgrades is $0**

The list of improvements required to accommodate the Provisional Interconnection of PI-2023-2 are given in Table 7 and Table 8.

Table 7 – Transmission Provider's Interconnection Facilities

Element	Description	Cost Est. (million)
PSCo's Comanche 345 kV substation	Interconnection PI-2023-2 at the Comanche 345 kV substation. The new equipment includes: • (1) 345 kV dead end structure • (1) 345 kV 3-phase arrester • (1) 345 kV 3000 A line disconnect switch • (1) 345 kV 3-phase CT for metering • (1) 345 kV 3-phase CCVT • Dual fiber communication equipment • Associated electrical equipment, bus, wiring and grounding • Associated foundations and structures • Associated transmission line communications, fiber, relaying and testing	$2.075
PSCo's Comanche 345 kV substation	Transmission line tap into substation from customer's dead-end structure on gen-tie. Three spans, conductor, insulators, hardware, and labor.	$0.050
Total Cost Estimate for Interconnection Customer-Funded, PSCo-Owned Interconnection Facilities		**$2.125**

Table 8 – Station Network Upgrades – Comanche 345 kV

Element	Description	Cost Est. (million)
PSCo's Comanche 345 kV substation	Interconnection of PI-2023-2 at Comanche 345 kV substation on a new breaker-and-a-half bay. The new equipment includes: • (2) 345 kV dead end structures • (2) 345 kV 3000 A SF6 circuit breakers • (5) 345 kV 3000 A double end break disconnect switches • Associated electrical equipment, bus, wiring and grounding • Associated foundations and structures	$4.965
PSCo's Comanche 345 kV substation	Install communication equipment in the Comanche 345 kV EEE to accommodate PI-2023-2	$0.055
Total Cost Estimate for PSCo-Funded, PSCo-Owned Interconnection Facilities		**$5.020**

PSCo has developed cost estimates for Interconnection Facilities and Network/Infrastructure Upgrades required for the interconnection of PI-2023-2 for Provisional Interconnection Service. The estimated costs provided in this report are based upon the following assumptions:

- The estimated costs are in 2024 dollars with escalation and contingencies applied.
- Allowances for Funds Used During Construction (AFUDC) is not included.
- The estimated costs include all applicable labor and overheads associated with the siting, engineering, design, and construction of these new PSCo facilities.
- The estimated costs do not include the cost for any Customer owned equipment and associated design and engineering.
- Labor is estimated for straight time only—no overtime included.
- PSCo (or its Contractor) will perform all construction, wiring, testing, and commissioning for PSCo owned and maintained facilities.

The customer requirements include:

- Customer will install two (2) redundant fiber optic circuits (one primary circuit with a redundant backup) into the Transmission Provider's substation as part of its interconnection facilities construction scope.
- Power Quality Metering (PQM) will be required on the Customer's generation tie-line terminating into the POI.
- The Customer will be required to design, procure, install, own, operate and maintain a Load Frequency/Automated Generation Control (LF/AGC) RTU at their Customer substation. PSCo will be provided with indications, readings and data from the LF/AGC RTU.
- The Interconnection Customer will comply with the Interconnection Guidelines for Transmission Interconnected Producer-Owned Generation Greater Than 20 MW, as amended from time to time, and available at: XEL-POL-Transmission Interconnection Guideline Greater 20MW

6.1 Schedule

This section provides proposed milestones for the interconnection of PI-2023-2 to the Transmission Provider's Transmission System. The customer requested a back-feed date (In-

Service Date for Transmission Provider Interconnection Facilities and Station Network Upgrades required for interconnection) for the Provisional Interconnection of September 2025. This is not attainable by the Transmission Provider, based upon the current schedule developed for this interconnection request. The Transmission Provider proposes the milestones provided below in Table 9.

Table 9 – Proposed Milestones for PI-2023-2

Milestones	Responsible Party	Estimated Completion Date
LGIA Execution	Interconnection Customer and Transmission Provider	July 2024
In-Service Date for Transmission Provider Interconnection Facilities and Network Upgrades required for interconnection	Transmission Provider	January 14, 2026
In-Service Date & Energization of Interconnection Customer's Interconnection Facilities	Interconnection Customer	February 16, 2026
Initial Synchronization Date	Interconnection Customer	February 16, 2026
Begin trial operation & testing	Interconnection Customer and Transmission Provider	February 16, 2026
Commercial Operation Date	Interconnection Customer	April 17, 2026

Some schedule elements are outside of the Transmission Provider's control and would impact the overall schedule. The following schedule assumptions provide the basis for the schedule milestones:

- Construction permitting (if required) for new facilities would be completed within 12 months of LGIA execution.
- The Transmission Provider is currently experiencing continued increases to material lead times which could impact the schedule milestones. The schedule milestones are based upon material lead times known at this time.
- Availability of line outages to interconnect new facilities to the transmission system.

7.0 Summary of Provisional Interconnection Service Analysis

The total estimated cost of the PSCo transmission system improvements required for PI-2023-2 to qualify for Provisional Interconnection Service would be $7.145 million.

The initial maximum permissible output of PI-2023-2 Generating Facility is 10 MW. The maximum permissible output of the Generating Facility in the PLGIA would be reviewed quarterly and updated if there are changes to system conditions compared to the system conditions previously used to determine the maximum permissible output.

Security: PI-2023-2 is a request for NRIS. For NRIS requests, security shall estimate the risk associated with the Network Upgrades and the Interconnection Facilities and is assumed to be a minimum of $25 million.

Note that Provisional Interconnection Service in and of itself does not convey transmission service.

8.0 Contingent Facilities

The portions of Colorado Power Pathway outlined in Section 4.0 are assumed to be completed prior to this GIR COD. Any capacity or lack thereof is based on these segments being completed. In the event these facilities are delayed, not constructed, reconfigured, redesigned, or otherwise changed from the manner and timing currently modeled for this study, the ability to provide Provisional Interconnection Service would need to be re-evaluated.

The Contingent Facilities identified for PI-2023-2 are:

1) Huckleberry – Boone 230 kV Line #1 – ISD 2026 (TSGT)
2) Flying Horse 115 kV Series Reactor – ISD 2024 (CSU)
3) West Station – Hogback 115 kV Line #1 – ISD TBD (BHE)

Additional Contingent Facilities identified for PI-2023-2 include the TPIF and Station Network Upgrades identified in Table 7 and Table 8, respectively.

Tables C-1 through C-3, included in Appendix C, summarize the worst-case branch overloads when an unbuilt facility is excluded from the Study Case.

9.0 Conceptual POI One-Line Diagram of PI-2023-2

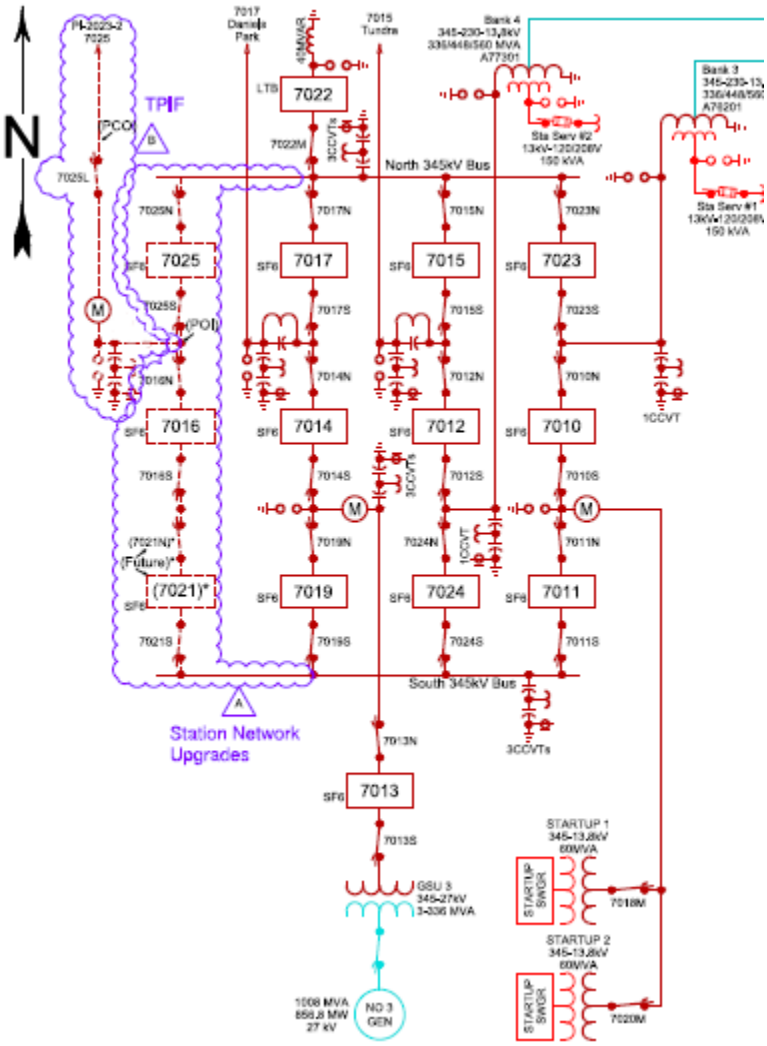

Figure 2 – Preliminary One-Line of PI-2023-2 at the Comanche 345 kV substation

10.0 Appendices

Appendix A: Transient Stability Plots (Discharge)	PI-2023-2_Transient Stability Plots.pdf
Appendix B: Transient Stability Plots (Grid Charging)	PI-2023-2_GC_Transient Stability Plots.pdf
Appendix C: Contingent Facility Results	PI-2023-2_Contingent Facilities.pdf