



SENATE BILL 07-100 REPORT:

**DESIGNATION OF ENERGY RESOURCE ZONES
AND
TRANSMISSION EXPANSION PLAN**

PREPARED
BY
BLACK HILLS CORPORATION
TRANSMISSION PLANNING

October 30, 2009

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1. Introduction

1.1. Colorado Senate Bill 07-100

On March 27, 2007, Colorado Senate Bill 07-100 (SB-100) became effective. The purpose of the bill is to ensure that Colorado utilities “continually evaluate the adequacy of electric transmission facilities throughout the state” and “promptly and efficiently improve such infrastructure as required to meet the state’s existing and future energy needs.”

The bill specifically requires each Colorado electric utility that is subject to rate regulation by the Colorado Public Utilities Commission (Commission) to perform the following on or before October 31 of each odd-numbered year:

- (a) Designate Energy Resource Zones;
- (b) Develop plans for the construction or expansion of transmission facilities necessary to deliver electric power consistent with the timing of the development of beneficial energy resources located in or near such zones.
- (c) Consider how transmission can be provided to encourage local ownership of renewable facilities, whether through renewable energy cooperatives as provided in 7-56-210, C.R.S., or otherwise; and
- (d) Submit proposed plans, designations, and applications for Certificates of Public Convenience and Necessity to the Commission for simultaneous review.

The requirement for a Certificate of Public Convenience and Necessity (CPCN) for a particular transmission project is at the discretion of the Commission.

1.2. Black Hills History

On July 14, 2008, Black Hills Corporation acquired the Colorado electric utility assets and operations of Aquila, Inc. With the expiration of a power purchase agreement with Public Service Company of Colorado (PSCo) on December 31, 2011, Black Hills Colorado Electric (Black Hills) will lose approximately 75% of its electric capacity, and the associated energy. In early 2009, the Commission granted approval for Black Hills to build two LMS 100 natural gas-fired generators. On June 8, 2009, Black Hills filed an application for Certificate of Convenience and Necessity (CPCN) to construct these two generators. Black Hills issued a Request for Proposals (RFP) on March 25, 2009 to meet the remaining resource requirements. The bidding process was active while the study work for this Report was being performed. For that reason, results of the RFP were not incorporated into this 2009 SB-100 study process. On October 1, 2009, Black Hills filed Notice with the Commission that it had executed a twenty year power purchase agreement with the least-cost bidder in the RFP process.

1.3. Stakeholder Participation

All interested parties were encouraged to participate in the 2009 SB-100 study process. An open stakeholder SB-100 Kick-off Meeting was held on April 22, 2009 in Pueblo, Colorado to inform stakeholders of the proposed study plan and to provide an opportunity for suggestions and feedback on the study process. The Kick-off Meeting was attended by neighboring utilities, resource developers and Commission staff. Meeting notices were distributed via email and posted on the Black Hills OASIS page at <http://www.oatioasis.com/bhct/index.html>. All presentations were posed on the Black Hills OASIS as well as a SB-100 webpage established on the Black Hills Corporation website at <http://www.blackhillscorp.com/transmission.htm>.

Black Hills's SB-100 progress and assumptions were also presented at two Colorado Coordinated Planning Group (CCPG) meetings. These meetings were well attended by neighboring utilities, resource advocates, Commission staff and other stakeholders. These presentations afforded the opportunity for stakeholders to provide input and to ask questions. Beyond general questions clarifying the scope of Black Hills's study, no stakeholders submitted comments requesting that Black Hills revise its SB-100 scope and assumptions.

2. Designation of Energy Resource Zones

2.1. Zone Identification Assumptions

An Energy Resource Zone (ERZ), as defined in Colo. Rev. Stat. § 40-2-126(1), is “a geographic area in which transmission constraints hinder the delivery of electricity to Colorado consumers, the development of new electric generation facilities to serve Colorado consumers, or both. SB-100 requires utilities to identify ERZs and to “develop plans for the construction and expansion of transmission facilities necessary to deliver electric power from resources in or near such zones”.

2.2. Colorado-wide ERZ Identification

On November 24, 2008, PSCo filed with the Commission an information report which identified five ERZs within Colorado. Three of the ERZs identified by PSCo are located to the south of the Black Hills system. Specifically, the resources in PSCo's defined Zones 3, 4 and 5 are geographically closest to the Black Hills system. In its informational report, PSCo further identified higher priority transmission projects which would facilitate the delivery of resources within Zones 3, 4 and 5 to PSCo customers. Two of these projects, San Luis Valley-Comanche and Lamar-Front Range, would terminate at a point of interconnection between the PSCo and Black Hills transmission systems, namely Comanche substation.

Black Hills anticipates that these facilities will be under the jurisdiction of PSCo's FERC-approved Open Access Transmission Tariff (OATT). OATT provides transmission rights on a transparent, non-discriminatory, just and reasonable basis. As such, Black Hills believes it would be a least-cost, reasonable and prudent decision to procure firm

transmission service utilizing PSCo transmission OATT facilities to deliver beneficial energy resources from PSCo ERZ Zones to the PSCo points of interconnection with the Black Hills system as opposed to building redundant facilities to achieve a similar purpose.

2.3. Black Hills System ERZ Identification

Black Hills identified two ERZs within its service territory.

- 1) ERZ A: The Pueblo Chemical Depot (PCD) is a 23,000 acre site owned by the US Army. A portion of the facility is leased through 2016 by the Pueblo Depot Activity Reuse Authority which sublets property for commercial use. Potential development of a 200 MW solar generation project on PCD property has been recently reported. The project would require 2,000 acres, a small fraction of the total PCD area. Black Hills evaluated the transmission needs required to facilitate delivery of 200 MW from this ERZ to Black Hills system load. In addition, Black Hills determined the maximum MW injection that could be accommodated without any system upgrades.
- 2) ERZ B: As noted above, Black Hills filed with the Commission on June 8, 2009 an application for a CPCN to build two LMS-100 generating units. (Docket No. 09-0415E.) The application stated that the plant site is to be located north-northwest of the Pueblo Memorial Airport. As depicted in Exhibit 3 of the application, the proposed generation site is near the existing three-way switch tap point commonly referred to as Airport Tap. To be consistent with Commission Decision C09-0184 in Docket No. 08A-346E, Black Hills evaluated the transmission needs required to facilitate delivery of 152 MW from this ERZ to Black Hills system load.

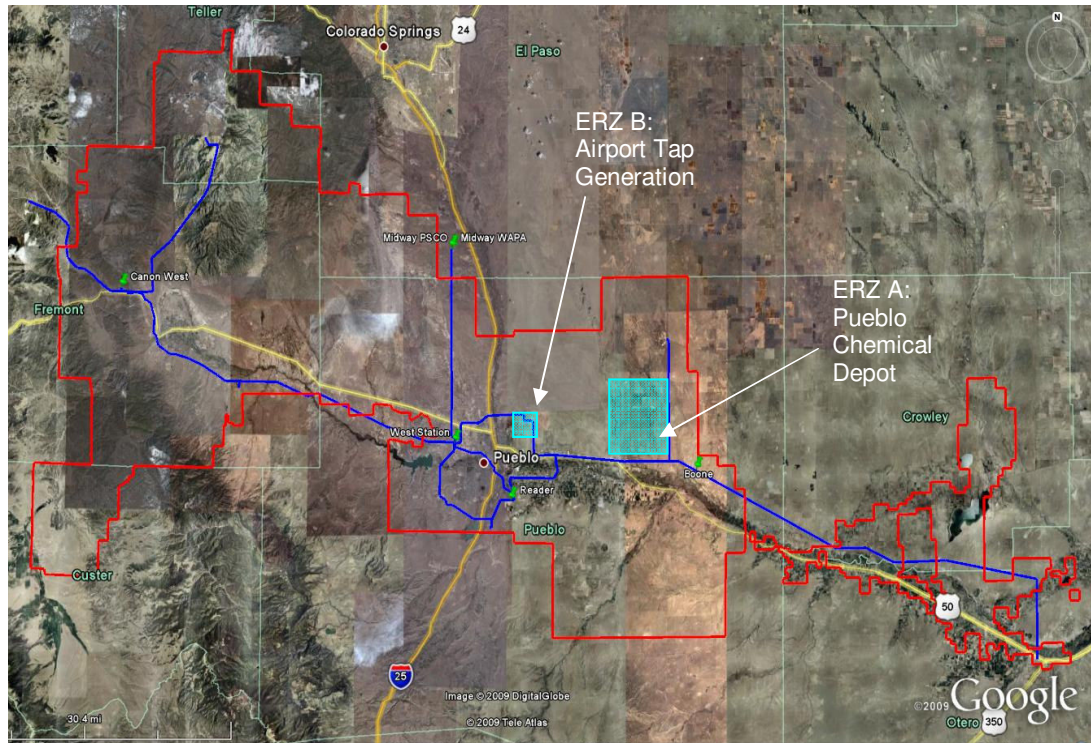


Figure 1: Black Hills Energy ERZ Designation

3. Transmission System Evaluation

3.1. Study Methodology

The transmission system was evaluated under 2015 peak summer load levels to identify any significant adverse impact to the reliability and operating characteristics of the Western Electricity Coordinating Council (WECC) bulk transmission system and, more specifically the Black Hills and surrounding transmission system. Steady state voltage and thermal analyses examined system performance without additional projects in order to establish a baseline for comparison. Performance was re-evaluated with resource injections modeled and compared to the baseline performance to determine the impact of the injections on area transmission reliability. Upgrades to the transmission system were identified for each resource scenario and tested for adequacy. The final upgrades required to accommodate each resource alternative in 2015 were modeled in the 2027 time frame to determine the long-term adequacy of the identified transmission additions.

The criteria described below are consistent with the WECC TPL – (001 thru 004) – WECC – 1 – CR – System Performance Criteria and Colorado Coordinated Planning Group’s Voltage Coordination Guide.

3.1.1. Voltage Criteria

Table 1 identifies the voltage criteria used in or around the primary study area for the assessment. Pre-existing voltage violations outside the localized study area were ignored during the evaluation.

Table 1: Steady State Voltage Criteria

Voltage Class	Acceptable Voltage Range	
	Pre-Contingency (Normal Conditions)	Post-Contingency (Emergency Conditions)
69 kV and above	0.95 to 1.05 per unit	0.90 to 1.10 per unit

3.1.2. Thermal Criteria

WECC member utilities, including Black Hills, follow a planning philosophy whereby normal thermal ratings shall not be violated under system intact conditions, and the applicable emergency rating shall not be exceeded under contingency conditions.

3.2. Study Area

The Black Hills transmission system follows the Arkansas River Valley from the Royal Gorge west of Canon City to La Junta. The system consists of approximately 194 miles of 115 kV transmission lines. The major load centers on the system are at Canon City to the west, Rocky Ford to the east, and Pueblo in the center. Points of interconnection to the neighboring utilities are shown in Table 3.

Table 2: Black Hills Transmission System Interconnection Points

Interconnection Name	Interconnecting Utility ¹
Midway (PSCo)	PSCo
Midway (WAPA)	WAPA, CSU, Tri-State
Boone	PSCo, Tri-State
Reader	PSCo
Cañon West	WAPA, PSCo
West Station	Tri-State

3.3. Study Case Development

3.3.1. 2015 Study Case

The 2015 heavy summer time frame was chosen for the near-term analysis for several reasons. The summer demand levels have historically been the most critical of the seasonal load patterns in the study area. The 2015 summer case was also chosen

¹ CSU means Colorado Springs Utilities; WAPA means Western Area Power Administration and Tri-State means Tri-State Generation and Transmission Association, Inc.

because it fell into a "gap" between existing study work performed by Black Hills and the CCPG. Additionally, PSCo had recently compiled a 2015 heavy summer case as part of its SB-100 study process. The case originated as a WECC-approved base case. The PSCo case was used as the starting point for the 2015 analysis. Updates to the case loads, resources, and topography were solicited from neighboring systems and applied to the model. Black Hills loads were served by existing Black Hills generation and with generic resources located at the proposed PSCo/Tri-State Calumet 230 kV substation.

Significant changes to the Black Hills transmission system from the 2009 existing configuration included the addition of 69 kV capacitor banks at Rocky Ford, modeling the existing 115 kV capacitor bank at West Canon, the proposed Black Hills and Tri-State LaJunta Tie project and a proposed second Boone 230:115 kV transformer. A 115 kV line was also added between the Airport Tap 115 kV bus and the West Station 115 kV bus as identified in Black Hills 2009 Rule 3206 filing. Significant neighboring system updates include the PSCo/Tri-State San Luis Valley-Calumet-Comanche transmission project and a second 115 kV circuit between Comanche and Reader.

3.3.2. 2027 Study Case

The 2027 time frame was used to analyze identified transmission upgrades and assess their effectiveness on system reliability into the future. The 2027 case was created by updating the 2015 case with anticipated Black Hills loads and dispatching additional generic resources at Calumet to serve the higher load requirements.

3.3.3. Resource Scenarios

Resource injection alternatives to the base line case were evaluated to identify impacts to the existing transmission system.

Resource Scenario 1: The first resource scenario consists of a 200 MW resource injection in ERZ A. Per Black Hills' 2008 Resource Plan filed with the Commission on August 5, 2008 in Docket No. 08A-346E, Black Hills anticipates the need to acquire a total of 8 MW of solar resources between 2012 and 2025. Based upon this resource plan, the resources in this scenario were dispatched against Pawnee, as this represents a worst-case export dispatch. Black Hills also evaluated the amount of resource injection from ERZ A which could be delivered without requiring Black Hills transmission upgrades.

Resource Scenario 2: The second resource scenario consists of a 152 MW resource injection in ERZ B dispatched against the generic resources modeled at Calumet. The resource scenario was dispatched against Calumet as these generic resources were modeled to balance the Black Hills load following the expiration of the PPA with PSCo on December 31, 2011.

Resource Scenario 3: The third resource scenario evaluates the first and second resource scenarios simultaneously.

3.4. Transmission Planning Standards

The 2009 SB-100 study was performed for both the 2015 and 2027 time frames with the following assumptions:

- All existing and planned facilities and the effects of control devices and protections systems were accurately represented in the system model.
- Projected firm transfers were represented per load and resource updates from each utility.
- Existing and planned reactive power resources were modeled to ensure adequate system performance.
- Known planned outages related to maintenance or otherwise were simulated for the system facilities deemed to be the most critical by the transmission planner. No known planned outages were identified for the time periods contemplated in this study.

Each scenario described in Section 3.3 was evaluated to meet the requirements of all applicable NERC and WECC reliability standards and criteria.

3.5. Evaluation of the Black Hills Transmission System

A number of thermal overloads on the Black Hills transmission system were common to all of the resource scenarios including the baseline. These common system issues and the associated solutions are listed below. Sections 3.5.1 through 3.5.7 list the reliability criteria violations unique to each evaluated resource scenario.

- The Portland-West Station and West Canñn-Canñn City 115 kV lines are the primary transmission paths into the Canñn City-area load center. Various post-contingent overloads confirmed the need for an additional circuit into the Portland/Canñn City 115 kV area to maintain system reliability. The existing Portland-West Station line is limited by the thermal rating of a current transformer (CT). The CT should be replaced to increase the rating of the line to 122 MVA from 80 MVA.
- The Hyde Park-Pueblo 115 kV line exceeded thermal limits following the N-1 loss of the Greenhorn (formerly South Pueblo)-Reader 115 kV line, along with several N-1-1 outages. It is recommended that the Hyde Park-Pueblo 115 kV line be rebuilt.
- The Greenhorn-Reader 115 kV line reached thermal limits following the N-1 loss of the Pueblo-Reader 115 kV line, along with several N-1-1 outages. It is recommended that the Greenhorn-Reader 115 kV line be rebuilt.

In addition to the common thermal limit issues described above, each evaluated resource scenario exhibited reliability criteria violations unique to that scenario.

3.5.1. 2015 Baseline Case Results

The 2015 baseline case exhibited thermal overloads on several Black Hills transmission system elements:

- Line segments on one of three parallel 115 kV paths between Reader and West Station became overloaded following line outage combinations on each of the other two paths. The first of the three paths consists of the Reader-Greenhorn-Burnt Mill-West Station segments. The second path consists of the Reader-Pueblo-Hyde Park-West Station segments. The remaining path consists of the Reader-Airport Memorial-Airport Park-Airport Tap-West Station line segments.
 - On the first path, the Greenhorn-Burnt Mill-West Station 115 kV line conductor thermal limits were exceeded.
 - On the second path, the conductor thermal limits were exceeded on the Hyde Park-West Station 115 kV line.
 - On the third path, the Airport Memorial-Airport Park 115 kV conductor thermal limit was exceeded. This line acts as a bottleneck for south-to-north flows from Reader and Boone.
- Rebuilding these lines with a larger conductor would mitigate these overloads and accommodate increased south-to-north power flows from Reader to West Station.
- The Boone-DOT Tap 115 kV line exceeded thermal limits following the N-1-1 loss of both Comanche-Reader 115 kV circuits. Rebuilding this line with a larger conductor would mitigate these overloads.

Additionally, the Airport Park-Airport Tap 115 kV line reached 100% of its thermal limit for a single N-1-1 outage combination of the Greenhorn-Reader and Pueblo-Reader 115 kV lines.

3.5.2. 2015 Resource Scenario 1 Results

The 2015 Resource Scenario 1 case differed from the baseline case in that a 200 MW plant was modeled on-line at the PDA 115 kV bus in ERZ A. The new resource injection caused several 115 kV lines to exceed thermal limits following various outage combinations:

- Line segments on one of three parallel 115 kV paths between Reader and West Station became overloaded following line outages on each of the other two paths. Rebuilding the Hyde Park-West Station and Greenhorn-Burnt Mill-West Station 115 kV line segments with larger conductor would mitigate the line overloads and allow for increased south-to-north power flows from Reader to West Station.
- All 115 kV line segments from Boone to Airport Tap exceeded thermal limits as a result of inadequate outlet capacity from the PDA resource injection following several outage combinations. The line segments included Boone-DOT Tap-Nyberg-Airport Memorial-Airport Park-Airport Tap. In order to mitigate these overloads, the Boone-Airport Tap line segments were modeled with larger conductor, and the addition of a second circuit from DOT Tap-Nyberg was included. Additionally, an

existing Airport Tap-Nyberg 115 kV line, which is currently not in service, was modeled with larger conductor and put into service to provide an additional generation outlet path for the resource at PDA.

- The PDA-DOT Tap 115 kV line became overloaded for all scenarios where the PDA resource injection was modeled. The existing radial line is the only transmission path from the Point of Interconnection to the networked Black Hills transmission system. Currently the thermal capacity of the line is inadequate to accommodate the full resource injection at PDA.

All overloads encountered in the 2015 Scenario 1 evaluation met or exceeded the Baseline case overloads.

The maximum ERZ A injection limit of the existing Black Hills transmission system was further evaluated. The existing Black Hills transmission system can accommodate a maximum of 10 MW of resource injection at PDA without significant impacts to the system. The addition of a second Airport Tap-West Station 115 kV circuit, as discussed in Section 3.5.3 below, increases the allowable ERZ A injection to 135 MW.

3.5.3. 2015 Resource Scenario 2 Results

The 2015 Resource Scenario 2 case differed from the baseline case in that a 152 MW plant was modeled on-line and interconnected at the Airport Tap 115 kV bus. The additional generation caused several 115 kV lines to exceed thermal limits following various outage combinations. Most of the overloads that occurred in the Baseline case also occurred in the Scenario 2 case, although the additional generation reduced these overloads. Several new post-contingent overloads were identified as a result of inadequate transmission outlet capacity for the added Airport Tap generation. The overloads occurred on the Airport Tap-Airport Park, Airport Tap-Overton, and Overton-Northridge 115 kV lines. All Scenario 2 overloads were mitigated by adding a second Airport Tap-West Station 115 kV circuit.

3.5.4. 2015 Resource Scenario 3 Results

The 2015 Resource Scenario 3 case is a combination of a 200 MW resource injection at the PDA 115 kV substation and a 152 MW injection at the Airport Tap 115 kV substation.

- All line segments on each of three parallel 115 kV paths between Reader and West Station became overloaded following line outages on each of the other two paths as a result of inadequate Airport Tap generation outlet capacity.
 - A second 115 kV circuit from Airport Tap to West Station mitigated the majority of the overloads.
 - Modeling the Burnt Mill-West Station 115 kV line with larger conductor fixed the remaining overloads.
- The PDA-DOT Tap 115 kV line became overloaded for all scenarios where the PDA resource injection was modeled. The existing line is the single radial transmission path from the Point of Interconnection to the rest of the Black Hills

transmission system. Currently the thermal capacity of the line is inadequate to accommodate the full resource injection at PDA.

- The Boone-DOT Tap-Nyberg-Airport Memorial 115 kV lines exceeded conductor thermal limits following N-1-1 outages due to inadequate PDA generation outlet capacity. Rebuilding these line segments mitigated the associated overloads. The Airport Tap-Nyberg 115 kV line, which is currently not in service, was modeled with larger conductor and put into service to provide an additional generation outlet path for the resource at PDA.

A sensitivity analysis was performed to determine the maximum amount of injection in ERZ A which could be accommodated simultaneously with Resource Scenario 2 injection assumptions and modeling the associated transmission upgrades. The sensitivity analysis showed the allowable ERZ A injection to 135 MW.

3.5.5. 2027 Load Sensitivity

The transmission solutions for each of the Resource Scenarios noted above were analyzed under estimated 2027 Black Hills system loads. This analysis indicated that all of the transmission upgrades were of sufficient capacity in the 2027 time frame to accommodate the resource scenarios and load growth.

3.5.6. Resource Scenario Analysis

The Resource Scenarios which were analyzed resulted in a variety of potential transmission system projects, some common to all scenarios and some unique to a specific scenario. It is also important to consider how projects in one Resource Scenario potentially could simultaneously meet the needs of another Resource Scenario. It is also prudent to evaluate the required upgrades in the context of resource needs and system capabilities.

Black Hills has filed an application for a Certificate of Public Convenience and Necessity with the Commission for the generation resources contemplated in Resource Scenario 2. Black Hills considers this a “beneficial resource” and fully expects this resource to be constructed. The transmission system project associated with Resource Scenario 2 is described in Section 3.5.3 above. Not only does this project facilitate the ERZ B injection, it also facilitates additional resource injections from ERZ A at the PDA 115 kV substation regardless of the injection at ERZ B. The Black Hills transmission system currently can accommodate 10 MW as documented in Section 3.5.2. The Resource Scenario 2 project will result in an ERZ A injection capability of 135 MW, an increase of 125 MW. Black Hills anticipates the need for a total of 8 MW of solar resource by 2025.

Considering these facts, Black Hills has identified the following transmission projects which fulfill the objectives of the reliable delivery of beneficial resources to customer loads:

- Construct a new second 115 kV line between West Station and Portland.
- Terminal equipment upgrades on the existing West Station-Portland 115 kV line.
- Rebuild the Pueblo-Hyde Park 115 kV line.
- Rebuild the Reader-Greenhorn 115 kV line.
- Construct a second Airport Tap-West Station 115 kV line and the associated substation expansion at Airport Tap and West Station.

These projects are described in more detail below.

4. Transmission System Expansion

The following transmission projects have been identified by Black Hills as fulfilling the objectives of the reliable delivery of beneficial resources to customer load.

4.1. Second Portland-West Station 115 kV Circuit

This project consists of a new 15 mile 115 kV transmission line with 795 ACSR conductor. This project has an estimated total cost of \$11.5 million which includes the line cost and associated substation expansions at West Station and Portland.

4.2. Portland-West Station 115 kV Terminal Equipment Upgrades

This project consists of replacing terminal equipment as required at the Portland and West Station substations to increase the existing Portland-West Station 115 kV line rating to the conductor limit of 122 MVA. The estimated cost of this project is \$1.2 million.

4.3. Hyde Park-Pueblo 115 kV Line Rebuild

This projects of rebuilding this 2.5 mile section of line with 795 ACSR conductor. The estimated cost of this project is \$1.5 million.

4.4. Greenhorn-Reader 115 kV Line Rebuild

This project consists of rebuilding this 1.1 mile line with 795 ACSR conductor. The estimated cost of this project is \$0.6 million.

4.5. Airport Tap-West Station #2 115 kV Circuit

This project consists of a second 14-mile Airport Tap -West Station 115 kV line and the required expansion at the Airport Tap and West Station 115 kV substations. This same project was submitted to the Commission in Black Hills Petition for a Declaratory Order (Petition) in Docket No. 09D-735E, requesting a finding that this and other new generation-related transmission and substation projects were in the ordinary course of Black Hills' business and that they do not require CPCNs. As noted in the Petition, Black Hills has proposed to construct this line for future 230 kV operation. The estimated cost of this project, which includes the transmission line, substation and incremental cost of 230 kV construction, is \$9.95 million.

5. Ordinary Course of Business

Black Hills believes that the projects detailed above are in the ordinary course of its business for several reasons. They are located within the Black Hills service territory, and they are contiguous to and will interconnect solely with Black Hills' existing transmission and distribution facilities. They will provide a local load serving function and will improve reliability of service to our Colorado customers. These projects are similar in purpose to previous Black Hills 115 KV projects the Commission has previously determined were in the "ordinary course of business." These transmission projects will provide increased reliability and long-term load serving capability for Black Hills customers. These projects will be part of the Black Hills base transmission infrastructure that is critical to the interconnection and delivery of capacity and energy from Black Hills' self-build generating resources and potential beneficial renewable resources. Moreover, these transmission projects are contiguous to and will interconnect with existing facilities within a city or county in which Black Hills and its predecessors have conducted electric utility operations for more than half a century.

6. Conclusions

Black Hills utilized an open and transparent process in conducting its Colorado Senate Bill 07-100 study. Stakeholders were provided several opportunities for involvement and input into the study process and scope. Through this process, Black Hills believes it has fulfilled the requirements of Colorado Senate Bill 07-100, codified at Colo. Rev. Stat. § 40-2-126.

Designate Energy Resource Zones

Two Energy Resource Zones, pursuant to the definition in Colo. Rev. Stat. § 40-2-126, were identified for inclusion in the 2009 SB-100 study. The first zone, ERZ A, is composed of the Pueblo Chemical Depot (PCD), a 23,000 acre site owned by the US Army located to the east of Pueblo within the Black Hills service territory. The second zone, ERZ B, is the Black Hills self-build generation plant site located north-northwest of the Pueblo Memorial Airport within the Black Hills service territory.

Develop plans for the construction or expansion of transmission facilities necessary to deliver electric power consistent with the timing of the development of beneficial energy resources located in or near such zones.

Black Hills identified the impacts of the various resource scenarios on the Black Hills transmission system and identified projects which ensure reliable delivery of beneficial resources from the designated ERZs to customer loads.

Consider how transmission can be provided to encourage local ownership of renewable facilities, whether through renewable energy cooperatives as provided in 7-56-210, C.R.S., or otherwise.

Black Hills identified ERZ A as a potential development site of renewable solar resources within Black Hills service territory. The proposed transmission projects will facilitate renewable resource development in this zone beyond what can currently be accommodated by the Black Hills transmission system.

Submit proposed plans, designations, and applications for Certificates of Public Convenience and Necessity to the Commission for simultaneous review.

Black Hills believes that the transmission projects it has identified to facilitate the reliable delivery of beneficial resources to customer load are “in the ordinary course of its business” and do not require CPCNs, pursuant to Colo. Rev. Stat. §§ 40-2-126(3) and 40-5-101. The reasons as to why these projects are “in the ordinary course of its business” and should not require CPCNs are detailed in Section 5 of this Report.