



February 12, 2019

Ms. Kari Parsons
Project Manager/Planner II
Planning and Community Development
El Paso County
2880 International Circle, Suite 110
Colorado Springs, CO 80910

Submitted electronically via: www.epcdevreview.com

RE: Letter of Intent for Palmer-Williams Creek Site Development Plan (EA Number 17-46)

Dear Ms. Kari Parsons:

Palmer Solar LLC and Colorado Springs Utilities (with JSI Construction LLC as its authorized representative) are pleased to submit the Letter of Intent and its associated application materials for the Palmer Solar Project and Williams Creek Substation. The two groups (jointly referred to within as "Applicant") received approval from the El Paso County Board of County Commissioners for a Wind/Solar Energy Overlay on January 22, 2019 for the area proposed in this Site Development Plan. Furthermore, Applicant has submitted all materials necessary for the El Paso County 1041 Permit, which provides a mechanism for reviewing and permitting Areas and Activities of State Interest in the jurisdiction. The 1041 Permit is under review and Applicant understands it is a necessary condition for Site Development Plan approval.


To date, Applicant has coordinated with, and received approvals from, over a dozen local, state, and federal agencies on the proposed solar project and substation. The documents and designs in the Site Development Plan application reflect a careful balance of site characteristics, renewable energy technology, local conditions, and considerations raised by stakeholders throughout the permitting process. The final design is consistent with relevant plans in El Paso County and supports cross-departmental goals for responsible development and renewable energy.

The Palmer Solar Project is a 60 megawatt (MW) photovoltaic, solar energy generation facility that requires a project substation and the Williams Creek Substation for its interconnection. The proposed development is located on land in unincorporated El Paso County, Colorado on land under a Wind/Solar Energy Overlay (WSEO). The size of the WSEO is 711 acres whereby the limits of development are contained within, abiding by recently approved zoning standards set by El Paso County.

The Applicant appreciates El Paso County's review of the Site Development Plan and looks forward to continued collaboration on the proposed development.

Sincerely,

Stuart Coles



Project Planner
Palmer Solar LLC and JSI Construction LLC (subsidiaries of juwi Inc.)
1710 29th Street, Suite 1068
Boulder, CO 80301
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Phone: 720.245.2922

1. Owner/Applicant

The co-applicants for the Site Development Plan are Palmer Solar LLC and Colorado Springs Utilities (with JSI Construction Group LLC as its authorized representative). Palmer Solar LLC and JSI Construction Group LLC are wholly owned subsidiaries of juwi Inc. and any documentation referencing juwi also pertains to JSI Construction Group LLC and Palmer Solar LLC. Palmer Solar LLC will be owner of Palmer Solar Project (and all Project components up to point of interconnection at the Williams Creek Substation, including 230-kV interconnection line) and Colorado Springs Utilities will be owner of Williams Creek Substation.

Co-applicants:

1. Palmer Solar LLC

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Boulder, CO 80301
Attention: Jay Sonnenberg, General Counsel
Contact: Stuart Coles, Project Planner
Phone: 720.245.2922
Email: scoles@juwiamericas.com

2. Colorado Springs Utilities

121 South Tejon Street, Third Floor
P.O. Box 1103, Mail Code 930
Colorado Springs, CO 80947
Attn: John Romero, Warren Seese
Phone: 719.668.8390
Email: wseese@csu.org

2. Site location, size, and zoning

The Project is located approximately 4 miles from Fountain, Colorado on land located in unincorporated El Paso County. The WSEO acreage is approximately 711 acres on the following parcels: There are approximately 467 acres within fenced areas of the project (solar project and substations). The base zoning for the property is RR-5; a Wind/Solar Energy Overlay was approved by the El Paso County Board of County Commissioners on January 22, 2019.

3. Request and Justification

Request: Applicant requests approval of Site Development Plan for Palmer Solar Project and Williams Creek Substation.

Justification: Applicant requests approval of the Site Development Plan for Palmer Solar Project and Williams Creek Substation to fulfill its contractual obligations to deliver 60 MW of solar energy onto the Colorado Springs Utilities (CSU) grid. In 2018, Palmer Solar LLC and Colorado Springs Utilities entered into a Power Purchase Agreement whereby CSU agrees to buy at least 20 years of power generated from the Palmer Solar Project. Colorado Springs Utilities is the electrical provider for a significant portion of the population of El Paso County and plays a pivotal role in its economy and its way of life.

Through the permitting process for the Wind/Solar Energy Overlay and El Paso County 1041, the Palmer Solar Project and Williams Creek Substation have demonstrated consistency and compatibility with the El Paso County Master Plan and Land Development Code as well as other relevant planning documents, such as the Parks and Trails Plan and Drainage Criteria Manual. The application package for the Site Development is intended to build off recent zoning and permitting approvals and demonstrate conformity to applicable regulations, including Section 5.3 and 5.9 of the Land Development Code.

4. Existing and proposed facilities, structures, roads, etc.

Existing infrastructure within the Project area

The land within the Project area is in a rangeland use condition; land practices on the Woodmoor Water and Sanitation District no. 1 and City of Colorado Springs properties have historically been for cattle grazing. Accordingly, there is limited infrastructure within the Project area.

As depicted in the Site Development Plan, there is overlap with some cattle fencing. Additionally, there is a small distribution electric line owned by Mountain View Electric that will be relocated to allow for development of the propose design. There is a high-voltage electrical line owned by Colorado Springs Utilities that runs east-west at the Project site (arrays straddle this line on the eastern portion of the site). Other transmission lines running north-south are in close proximity, but outside the project boundary. There are a few unnamed, private maintenance roads on the Woodmoor Water and Sanitation District no. 1 property that will be removed and is authorized in the lease agreement between Applicant and landowner. Finally, some fencing will be relocated.

Proposed infrastructure within the Project area

The Project is bifurcated into two principal array areas (Birdsall Road Site and Squirrel Creek Site). Access to the facility is identified at two separate locations; one from the west coming from Birdsall Road and one from the east coming from Squirrel Creek Road. All infrastructure and construction operations will be limited to boundary of the WSEO setbacks. The principal feature of the project will be ground-mounted, photovoltaic panels that are set directly into the ground and track the sun across the sky from east to west. Power generated from the facilities follows underground circuits to power stations (which include inverters, transformers, and other infrastructure) that allow for electricity to be converted into the appropriate current. Circuits from the Birdsall Road and Squirrel Creek array areas combine at the Palmer Solar Project substation where a step-up transformer and a short 230-kV transmission line brings power to the Williams Creek Substation. The point at which the 230-kV transmission line connects to the Williams Creek Substation is the point of interconnection.

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In response to neighbor feedback regarding the project, additional drainage features are proposed in order to mitigate and address existing drainage issues in the area. Preexisting surface flows on the west side of the Project have resulted in periodic flooding for residences in the area surrounding Moonshadow Lane. Applicant proposes a series of best management practices for construction and operations to help the status quo of this neighborhood. While these features go beyond what is required in the Drainage Criteria Manual, Applicant has proposed the responsible design to demonstrate its commitment to El Paso County communities.

The following components are proposed within the Project area.

- Approximately 3,630 rows of photovoltaic panels
- Security fencing: 38,245 LF for solar site, 740 LF for Palmer Substation, 3,233 LF for Williams Creek Substation
- 2 access points
- 2 weather (MET) stations
- 21 Power Stations (inverter and transformer)
- 5360 feet of distribution line between Birdsall Road site to Palmer Solar Substation
- 1,680 feet of 230-kV line between Palmer Substation and Williams Creek Substation
- 1 project-side substation (owned by Palmer Solar LLC)
- 1 utility-side substation (owned by Colorado Springs Utilities)
- 8 temporary parking/staging areas

Through the El Paso County permitting process, other stipulations and design requirements have been placed on the project. For example, the project includes a comprehensive Noxious Weed Plan and Reseeding Plan. Additionally, the Project incorporates design recommendations from wildlife agencies and other governmental entities. Please see the detailed LOI in the WSEO Application and the 1041 Application for further information on the Project. The figures presented above, and the documents included in the application, reflect the final design at the time of Site Development Plan application.

5. Deferral and Waiver Requests and Justification

Deferral

- CDPHE permits: The Project requires an Air Pollutant Emissions Notice (APEN) and Stormwater Permit. Applicant requests deferment of this permit and will be provided prior to Site Development Plan approval.

Waiver:

- Landscaping plan: The Project does not propose additional landscaping requirements beyond what is proposed in the Noxious Weed Plan, Reseeding Plan, and Grading and Erosion Control Plan. The site currently exists in a natural, rangeland condition. No development stipulations have been placed on the project requiring additional landscaping
- Development Impact Mitigation Agreement: Consistent with recommended waiver from Wind/Solar Energy Overlay hearing, Applicant requests continued waiver of the Development Mitigation Agreement for the solar project.

6. Purpose and need for change in zone classification

The site has a Wind and Solar Energy Overlay (approved January 2019) and does not require additional zoning changes.

7. Total number of acres in the requested area

The WSEO encompasses approximately 711 acres. Areas within fenced areas of the project is approximately 467 acres.

8. Total number of residential units and densities for each dwelling unit type

Not applicable

9. The number of industrial or commercial sites proposed

Not applicable

10. Approximate floor area ration of industrial and/or commercial uses

Not applicable.

11. Number of mobile home units and densities

Not applicable.

12. Typical lot sizes – length and width

Not applicable.

13. Type of proposed recreational facilities

Not applicable.

14. If phased construction is proposed, how will it be phased

Construction of the Palmer Solar Project will take place in the same calendar year with completion at time of Site Development Plan application set for end-of-year 2019.

15. Anticipated schedule of development

Milestone	Start	Finish
1. Permit Process and Preparation (WSEO, 1041)	July 2018	February 2019
2. Permit Approvals (Site Plan, Building Permit, Construction)	February 2018	March 2019
3. Pre-construction (surveys, engineering)	November 2017	February 2019
4. Site Improvements, Substation and Project Construction	April 2019	November 2019
4.1 Civil Construction (site grading, roads)	April 2019	September 2019
4.2 Williams Creek Substation construction	April 2019	September 2019
5. Initial Energization	October 2019	
6. Commercial Operation		December 2019
7. Close out of Stormwater Permit	March 2019	July 2020

16. How water and sewer will be served

No permanent water source is required for the Project. Water for construction will be provided by Colorado Springs Utilities and trucked in for on-site use. Portable toilets will be provided during construction at staging areas.

17. Proposed uses, relationship between uses and densities

The solar PV system will be composed of photovoltaic modules that convert the sun's radiant energy into electricity. The modules will be mounted on horizontal single-axis tracking racks that rotate from east to west to track the sun over the course of each day. The modules will be electrically connected in series strings to achieve a system DC design voltage of 1500V DC. Cables from the module strings will be run via cable trays or messenger wire to DC combiner boxes located strategically throughout the field. The DC combiners will connect multiple arrays in parallel, from which point the electricity will be conducted via cables to the inverters, which convert the DC power generated by the modules to grid-synchronized AC power. Step-up transformer(s) will raise the inverter AC output voltage, and the Solar Project output will pass through an AC collection system to a substation and ultimately to the point of interconnection.

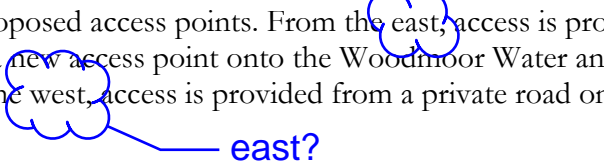
A plant monitoring and control system will maximize energy generation while minimizing the downtime associated with planned and forced outages. The system will also provide for the necessary control and dispatching functionality required by sophisticated utilities and grid operators. The supervisory control and data acquisition ("SCADA") system delivers a high-level overview of plant operations in addition to environmental sensing and real-time electrical data associated with subsystems down to the individual array. More importantly, the system is designed to provide operators with an alert of important events including communications outages, inverter failures, and breaker trips.

18. Areas of required landscaping

No areas within the WSEO require landscaping. The post-construction drainage will provide natural sheet flow conditions. Native vegetation will be reestablished in any construction areas (see Reseeding Plan) and noxious weeds will be managed (see Noxious Weed Plan).

19. Proposed access locations

There are two proposed access points. From the east, access is proposed from El Paso County's Birdsall Road at a new access point onto the Woodmoor Water and Sanitation District no. 1 property. From the west, access is provided from a private road on the City of Colorado Springs property.



20. Approximate acres and percent of land to be set aside as open space

Not applicable. Project abides by WSEO setbacks.

Cloud+ (3)

Subject: Cloud+ contributed to2

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east?

west?