



1041 Documents Related to 5.202 Review Criteria

For

Williams Creek Generating Station

Application Submittal Requirements of El Paso County Guidelines and Regulations for Areas and Activities of State Interest Article 5.202

5.202 Review Criteria

A permit to conduct site selection and construction of a major facility of a public utility shall be approved if the Permit Authority, or in the case of an Administratively Approved Permit, the Director finds the application complies with the following criteria and the relevant criteria at Section 2.405. If the Permit Authority finds the application does not comply, the application shall be denied or may be approved with conditions..

5.202(1) All reasonable alternatives to the proposed action, including use of existing rights-of-way and joint use of rights-of-way wherever uses are compatible, have been adequately assessed and the proposed action represents the best interests of the people of this County and presents the best utilization of resources in the impact area.:

No existing rights-of-way or easements will be negative impacted by the project. Siting and construction of the WCGS on land already owned by the City of Colorado Springs, which also includes existing utility infrastructure and utility-grade solar arrays, ensure that the project will not have a negative impact on the vast majority of residents of El Paso County. The size and location of the property also allow for any potential impacts to residents or landowners in this rural and largely undeveloped area of the County to be mitigated. The WCGS will be located at least two (2) miles from the nearest County residence and all traffic related impacts will be limited to short term construction activities. The response provide to Section 2.303(5)(d) (p. 12 of the 1041 Documents Related to 2.303 Items attachment to this application) provides a detailed accounting of Utilities' evaluation of viable alternatives to the project.

5.202(2) A satisfactory program to mitigate and minimize adverse impacts has been presented.

Extensive analysis has been provide in the response documents and the attachments to this application to ensure that all potential adverse impacts

have been considered and methods of mitigation have been provided in each of those reports. Additional analysis will be provided at the Site Development Plan stage of development and as the project continues to obtain applicable federal and state permits.

5.202(3) *Reserved*

No response required.

5.202(4) *Electric transmission lines and pipelines shall be located so as to discourage traffic congestion, incompatible uses, and expansion of the demand for government services beyond the reasonable capacity of the community or region, and to avoid unreasonable or burdensome expenditure of public resources..*

No new transmission lines or pipelines are being proposed with the WCGS project, except a short onsite transmission tie in to the existing onsite substation. No new or expanded government services will be required during the construction and operation of the plant.

5.202(2) *Major facilities of a public utility shall be administered so as to minimize disruption of the service provided by the utility and preserve desirable existing community patterns.*

One of the primary purpose of the WCGS project is to ensure that electrical service to the community served by Colorado Springs Utilities is not disrupted. The closure of the Ray D. Nixon (Nixon) coal-fired power plant by December 31, 2032 (originally Dec. 31, 2029), will reduce capacity on Springs Utilities' system by over 200 MW. Closure of the plant is at the direction of the State of Colorado due to regulated 80% reduction in emissions by 2032. In addition, between now and the Nixon Power Plant closure date, load growth is still expected to grow by at least 12.5%, which doesn't include potential large load customers. The need for the WCGS at a generating capacity of 400MW is to cover the loss of capacity with closure of the Nixon Power Plant (208 MW), to account for future anticipated growth, and to bridge less-reliable renewable energy resources

while still providing reliable electric service 99% of the time as expected by customers.