

1041 Documents Related to 5.201 (Items 1-11)

For

Williams Creek Generating Station

Williams Creek Generating Station
El Paso County 1041 Application

Applicant: Colorado Spring Utilities

Colorado Springs Utilities
It's how we're all connected

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Article 2: Permit Application and Procedures

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(10) Applicants seeking a permit for the site selection and construction of a power plant shall submit, in addition to those requirements set forth above, a map locating and describing resource areas to be utilized as sources of energy……..…… 14

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Chapter 5, Article 2: Permit Applications and Procedure
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Please update vicinity map; the map provided does not depict uses and road names in the immediate area of the site area.

(1) Vicinity map showing the proposed site and the surrounding area. The Project area to be shown shall be defined as follows:

(a) If a power plant is proposed, the area within fifty (50) miles radius from the site.

See Attachment D, Vicinity Map.

(b) If new transmission lines or pipelines are proposed, provide a map showing all existing transmission lines and pipelines for a distance of two (2) miles radius beyond any reasonable alternative studied.

See Attachment DD, Existing Transmission and Piping and Alternatives Maps.

(c) For upgrades of existing transmission lines or gas pipelines, a map showing all existing transmission lines and pipelines within one (1) mile on either side of the proposed alignment.

update map

The project does not propose to upgrade any existing transmission lines or gas pipelines. Service to the site will come from a new off-site natural gas pipeline, which is not included as part of this application.

(d) For all other major facilities of a public utility, the area within ten (10) miles radius of the site if another major facility is proposed.

Depict new gas line on map and discuss so a new 1041 is not required; inlcude that language in this 1041 request in the exhibit B (diameter point of origin, and miles, hoops stress) and summary. Are no new power poles and lines being proposed? substation expansion?

There is no other major facility being proposed.

(2) Type of facility - specify where applicable:

(a) The voltages and lengths of transmission lines.

Not applicable. No new 230kV transmission lines will be constructed, and no off-site transmission is proposed.

(b) Type of poles used, with graphic depictions.

Transmission structures for the project include steel monopoles. The typical structure is a self-supporting steel monopole; no guyed structures are proposed. The design uses no more than five distinct structure framing types across the work, which keeps the visual character of the line consistent along its length, and structures are fabricated from tapered tubular steel with equipment and bus supports built from AISC standard-shape steel products. Structure foundations are selected during design development from the alternatives appropriate to the loading and the subsurface conditions, with a limited number of standardized designs applied across the structure types to maintain consistency. Where station lighting requires independent poles, those are standard off-the-shelf light poles rather than engineered structures.

The structure count is modest because the work modifies and extends an existing line rather than establishing a new corridor. South of the Williams Creek Substation, the scope of onsite

height? voltage?

improvements includes modifications to two existing structures and the installation of five new deadend structures. On the north side of the substation, the scope of work includes adding one new deadend structure to serve future purposes. These counts represent the current design basis; any change to the assumed line length, structure count, or framing types will be reviewed for cost and schedule implications as the design advances.

Each circuit is designed with one-half inch extra-high-strength steel shield wire, and conductor installation uses 1272 kcmil 45/7 strand ACSR "Bittern" conductor with its associated hardware and assemblies. Transmission structures are grounded as part of the electrical scope. Structure design addresses insulation, blowout and right-of-way, structure loading, foundations, and clearances to ground, objects, and structures. Design is carried out in PLS-CADD, with plan and profile drawings and phasing diagrams produced in that software and remaining drawings in AutoCAD. Detailed structure deliverables developed as design advances include a structure layout drawing showing the relative locations, orientations, and quantities of all structures; load and design drawings for the tapered tubular steel structures; structure detail drawings for equipment and bus supports with anchor details; and foundation drawings showing design intent, with supplier-prepared reinforcing shop drawings reviewed by the engineer of record.

(See Attachment EE, Transmission Pole Typical Detail)

(c) Power source and generating capacity.

The WCGS will be a natural-gas-fired, simple-cycle facility composed of ten aeroderivative PE6000 combustion turbine generator units. The A-1 Technical Specification establishes an approximate nominal dispatchable capacity of 400 MW gross and requires the ten units to satisfy the applicable facility net-power guarantee. Each unit will use pipeline-quality natural gas and will include emissions-control systems designed to meet the applicable air-permit and performance requirements. Electricity will be generated at a nominal 13.8 kV and stepped up to a nominal 230 kV for delivery through the project electrical interconnection.

Has what capacity now and what will it be expanded to?

(d) The functions and sizes of substations.

No new substation is proposed for the project. The power plant connects to the transmission system through the existing Springs Utilities Williams Creek Substation, which will be expanded to accept the new generation. That distinction matters for this application: the land use question is not the siting of a new facility but the intensification of an existing one already committed to the use. The existing substation and its relationship to the development footprint are shown on the Preliminary Construction Drawings (Attachment GG), which also depicts the switchyard, the tie points for high-voltage electrical connection, switchyard fiber, contractor switchyard input and output, and grounding connections to the utility substation, together with the permanent fence that ties into the existing substation fence.

The substation's function is to serve as the point of interconnection between the power plant and the Utilities transmission system. The expansion provides the additional bays and terminal equipment needed to accept the station's output, to reconfigure existing transmission passing through the station, and to supply station and site service. In physical terms, the expansion adds equipment and structures to bring two 230 kV lines into the station on its north side, adds two legs on the east side, and reconfigures the existing transmission to the south so that it terminates in one of the new bays. The existing two bays at the station are adapted as part of

that work. Separately from the transmission interconnection, a distribution source is run from the existing distribution lines south of the substation to serve the new facilities.

The substation alterations include both removals and installations. Removals comprise shield wire removal and relocation, jumper removal to create room for the new circuit breakers, and the removal of insulator support structures together with their foundations. Installations comprise 230 kV circuit breakers, jumpers and bus, new line protection relay panels, 230 kV combination current and potential transformer units with their foundations and support structures, equipment grounding and platforms, conduit to the new equipment, and the associated control and power cable. Springs Utilities furnishes the circuit breakers, relay panels, distribution transformers, combination units, and the network, protection, and control equipment; Kiewit and its subcontractor perform the design and installation. A ground grid connection will be established from the existing substation to the Power Plant Contractor's ground grid, with ground grid testing being performed. A climate-controlled communication room is proposed to be located at the existing substation to house the rack, cabinet, and networking and fiber infrastructure that Utilities furnishes and integrates.

Site electrical distribution will be handled separately from the substation and is located within the development footprint shown on the associated Site Plan. An electrical E-House, or Power Distribution Center, distributes power to the site auxiliary loads and contains switchgear, motor control centers, dry-type step-down transformers, an uninterruptible power supply, panels, and HVAC, with outdoor transformers placed adjacent at the required clearances. The Power Distribution Center appears in elevation on the provided Elevation Views between the raw water tank and the control building. Normal, emergency, and uninterruptible supplies are designed to meet process load requirements, with emergency loads made redundant through either a standby diesel generator with an automatic transfer switch or an upstream breaker in the power plant providing emergency power. A new ground grid is to be designed, and conduit and duct bank carry distribution feeders from the transformer to the site facilities.

verify these corridors for water, are cited on the maps so that it is clear they are permitted with this 1041

(e) The diameters and lengths of pipelines.

The pipelines associated with the project fall into three categories, and the information available differs by each category.

The raw water supply is the one pipeline having an already established diameter and length. The project installs a twenty-inch HDPE lateral running approximately one-half (1/2) mile from the existing Williams Creek Pump Station, north and then west, to the project's raw water supply tank. That lateral draws from the existing sixty-six (66”) inch diameter Southern Delivery System pipeline through a metered vault arrangement, with isolation valving and flow metering provided on both the sixty-six (66”) inch main and the twenty-inch lateral. Within the site, yard piping carries raw water to the storage tank and a second run serving the pump house, with level control valving at the tank. Valving will be arranged to prevent backflow of mixed tank water into the Southern Delivery System, and an overflow line back to that system will be provided for risk mitigation. Yard piping also runs from this system to the Power Plant Contractor's water treatment and generating units, and instrumentation and control wiring will be extended to the Williams Creek Pump Station. The raw water tie point, the tank, and the pump house are shown in Attachments D, GG, and HH.

add titles to the nomenclature so its clear what attachments you are referring to please

See Attachment DD, Existing Transmission and Piping and Alternatives Maps.

elevations may be,missing the details described above

? which party? is there a purchase agreement solidified?

Natural gas lateral transmission pipeline is provided to site by a 3rd party to an offsite meter station, which shall undergo custody transfer to the onsite natural gas meter station. This gas supply shall be routed onsite to a designated tie-in point to the Power Plant, a gas supply to the buildings, and a gas supply tie-in to the ZLD system for building heat and the auxiliary boiler. The gas lateral transmission line is completed by others up to the site property boundary. The natural gas tie point is identified in the Civil Site Plan.

On-site process piping will be of various sizes and will run within corridors inside the project boundaries. Pipe sizes and routing are not explicitly developed or provided at this stage of the permit submittal; they are established as the design advances through the thirty and sixty percent submittals. System design and material selection for that piping follow ASME B31.1 Power Piping, with deviations permitted only on owner approval. Systems operating at elevated temperature or pressure, and systems conveying flammable, toxic, or corrosive chemicals, are subject to enhanced isolation requirements for servicing and maintenance.

For completeness, the stormwater conveyance system analyzed in the Preliminary Drainage Report uses storm sewer pipe at a minimum of eighteen (18”) inches in diameter, sized to carry the five-year minor storm without surcharging at velocities between three and twelve feet per second, with culverts at roadway crossings likewise eighteen inches or larger.

(f) The capacities of the storage tanks and types of petroleum derivative to be stored.

Please add and label all storage tanks & corridors optional locations to Map drawings pdf

See Attachment FF, Hazardous Materials.

not provided

(g) Corridor locations and dimensions.

The corridors associated with the Project (pipeline corridors for raw water and natural gas, and electrical corridors for transmission and distribution) lie within the project boundaries and are depicted on the Civil Site Plan. Corridor dimensions for on-site process piping and distribution are not explicitly developed or provided at this stage of the permit submittal and will be established as design advances. The raw water corridor follows the twenty-inch HDPE lateral described above, running approximately one-half mile from the existing Williams Creek pump station north and then west to the raw water supply tank.

The site is crossed by a number of existing easements and licenses of record, and the new corridors are laid out in relation to them. The Attachment D, 1041 Map, shows the Civil Site Plan depicts a two hundred twenty-five foot Public Service Company easement recorded at Book 2023, Page 398, and a one hundred foot Mountain View Electric Association easement recorded at Book 2629, Page 435. Three Mountain View Electric Association licenses are shown, at Reception Numbers 222124624 identified as the older license, 22300244 identified as the newer, and 219154070, together with a Palmer Solar easement at Reception Number 21953978 and a further easement at Reception Number 223900020. Where the design runs adjacent to existing overhead power, a thirty-foot offset is maintained, and the same thirty-foot offset governs at the potential overhead line relocation shown on the drawing. A one hundred foot dimension and a two hundred twenty-five foot dimension are annotated across the easement corridors at the northern edge of the development. The drawing carries the standard qualification that the utility locations depicted are approximate, have been compiled from

existing records, and require field verification, with no guarantee made as to their accuracy or completeness.

Corridor rights are being secured in parallel with design. The transmission line design proceeds on the assumption that adequate right-of-way exists along the preliminary route. Temporary construction easement requirements for the work are determined by the contractor, which provides the supporting legal descriptions and exhibits. Road improvements running from Birdsall Road and Lower Fountain Heights to the WCGS will require easement agreements and approvals from the affected property owners, coordinated by Springs Utilities. Best available records are used to evaluate potential utility conflicts and crossings, supplemented by subsurface utility engineering at Quality Level A, where utilities are precisely located horizontally and vertically by actual exposure, and Quality Level B, where existence and approximate horizontal position are determined by surface geophysical methods.

All corridor geometry is referenced to a documented datum recorded on the Civil Site Plan. Project coordinates are modified Colorado State Plane Central Zone NAD 83 (2011) coordinates, modified from state plane by a combined elevation and scale factor of 1.00286801 at a point of origin of North 290,781.192, East 3,246,761.474. That point of origin is the center quarter corner of Section 26, Township 16 South, Range 65 West of the 6th Principal Meridian, monumented by a No. 6 rebar. The generating station site itself lies within the northeast quarter of that section.

(a) Service area.

See Attachment II, Electric Service Area Map.

(3) Resource area (e.g., source of power being generated or transmitted, source of petroleum derivative being transported).

The proposed natural gas-fired power plant will receive natural gas service via the planned Rocky Mountain Express Pipeline (not a part of this application).

The EDARP file No. FERC251 . Federal Law and the exemption from 1041 provides for the approval of the FERC line not the connecting gas lines, those require 1041 so please include locations here and a sentence so we can include them in the approval.

(4) Projected development schedule.

(a) Specify timetable for planning (e.g., federa… local zoning, etc.).

Site analysis started in April 2026. Permitting process with El Paso County and CDPHE started summer 2026. Geotechnical investigation, natural resource surveys, and cultural resource surveys were completed in third and fourth quarters of 2026. Land Use Approvals, to include the El Paso County 1041 and Development Plan, and the Certificate of designation (or waiver concurrence letter) are anticipated to be approved prior to January 2028.

Issuance of the Colorado Department of Public Health and Environment (CDPHE) Air Pollution Control Division (APCD) Construction Permit is anticipated to be in January 2028. Final issuance of the APCD Construction Permit includes APCD Environmental Justice review and concurrence, compliance review of state and federal regulatory requirements including the EPA Acid Rain Permit, New Source Review Prevention of Significant Deterioration, National Ambient

Air Quality Standards, and Air Quality Control Commission Regulations.

Construction related permits (e.g., land development permit, construction stormwater, dewatering permits, dredge and fill permits, installation permits, and building permits) are anticipated to be obtained prior to the end of December 2027.

(b) Estimate beginning and completion of construction and beginning of operation of facility.

Site construction is anticipated to start in Fall of 2027. Power Plant construction team is planned to mobilize in April of 2028 and completion of project is projected to occur during either the 2nd or 3rd quarter of 2030. Operations will commence in the summer 2030.

(5) Hazards and emergency procedures:

this may be a draft copy that was uploaded; has applicant worked with OEM and Fire district? Please verify

(a) Describe hazards, if any, of fire, explosion and other dangers to the health, safety and welfare of employees and the general public.

See Attachment AA, Emergency Response Plan, and Attachment BB, Evacuation Plan.

Construction safety will be governed by a written, site-specific plan issued before work begins. A Site Specific Health and Safety Plan will be prepared covering each package of the Project, Job safety briefings and training are conducted, and the contractor is responsible for ensuring that its own staff, its subcontractors, and its subconsultants understand the safety requirements applicable to their work. Hazard identification is not left to the field: a Risk Management Plan managed throughout the project design progression and levels identifies project risks and develops the mitigation for them, so that the principal hazards are engineered out or planned for before crews mobilize.

The hazards themselves are those characteristic of heavy industrial construction on a site with expansive soils and adjacent live electrical infrastructure. Excavation presents the most immediate physical danger, and excavation sidewalls are sloped, benched, or otherwise supported to maintain stable conditions in conformance with OSHA standards at 29 CFR 1926.650-652, Subpart P; the claystone underlying much of the site is anticipated to require track-mounted equipment with slow production, which lengthens the period during which open excavations exist. Deep excavation is concentrated in the process water basins, the stormwater detention basins, and the structural foundations. Work adjacent to and within an energized substation presents electrical hazards, and electrical construction is performed in accordance with the NEC, the NESC, and applicable local and state codes, with lockout and tagout procedures established before energization. A lockout/tagout program is applied to systems requiring isolation for servicing, with enhanced isolation requirements for systems at elevated temperature or pressure and for systems conveying flammable, toxic, or corrosive chemicals. Entry into tanks, vaults, and process vessels is controlled through confined space entry permits established during pre-commissioning and readiness, with permit-required and non-permit-required spaces identified by signage installed throughout the facility.

Chemical hazards arise principally during commissioning, when sulfuric acid, caustic, antifoam, antiscalant, and sodium hypochlorite are first introduced to the ZLD and water treatment systems. Chemical handling safeguards are established as part of pre-commissioning, dosing

skids are calibrated under controlled conditions before process chemicals are run at rate, and safety showers are provided at the ZLD building, in the maintenance shop, and at two tie points in the power plant, with a handwashing station in the shop. Spill response supplies and personal protective equipment are maintained readily available and strategically located on site through completion.

Fire and explosion risk is managed through both design and construction controls. A fire safety code analysis is performed for the ZLD system, the control room, and the raw water areas. A fire loop compliant with applicable fire codes and Fire Marshal requirements is installed around the control building and the ZLD facility building, with hydrants and fire department connections provided as the applicable codes require. Occupied spaces receive interior sprinkler protection per the current Pikes Peak Regional Building Department Fire and Building Codes, and communication rooms receive dry fire suppression appropriate to the equipment they house. Fire water is supplied from the pump house by an electric fire pump rated 2,500 gallons per minute with a jockey pump, backed by a diesel-driven emergency fire pump of the same rating driven by a 350-horsepower engine, drawing on the 6.5 million gallon raw water storage shown on the Plot Plan and the Elevation Views. Gas release is a hazard specific to the tie-in work, which is confined to connections between flange points furnished by the Power Plant Contractor and the Gas Contractor; gas leak alarms form part of the permanent site alarm system.

Risk for wildland fire is minimal due to non-combustible buffers such as roads and gravel base around the process areas. Additional transmission lines will not add much risk above the numerous lines that already exist in the area and additional roads will create additional fire breaks.

Hazards to the general public are limited by the site's isolation and by controlled access, but they are managed rather than assumed away. Control measures are provided, installed, inspected, and maintained to prevent pollutant releases, erosion and sedimentation, fugitive dust, and the tracking of pollutants off site, and existing vegetation is preserved to the maximum extent practicable. Haul and construction traffic is routed over the paving improvements and access roads constructed outside the power block, including the proposed roadway extension shown on the Civil Site Plan, with construction parking, laydown yards, trailers, temporary power, construction water, and construction internet established within the site so that construction activity is contained. A perimeter fence encloses the entire facility, encapsulating the water, gas, and wastewater infrastructure, the detention pond, and the power block components, and ties into the existing Williams Creek Substation fence with non-conductive final connection panels; that fence line is shown on the Civil Site Plan in Attachment D, 1041 Map . Fencing is phased to suit the construction sequence and is complete for the power plant first fire date. Access is controlled through automated entry and exit gates at the 24/7 manned guard shack with card readers, manual lockable gates for emergency access and other purposes, card reader access at the control building, all communication rooms, the guard shack, and the ZLD building, and security cameras covering the guard shack, control building, ZLD area, and perimeter fencing. The guard shack and its parking are located at the main site entrance as shown on the Civil Site Plan.

Emergency notification is provided through a site alarm system comprising PA speakers, strobes, and paging stations, covering fire alarms, gas leak alarms, and general evacuation

alarms. The scope and standards for both the alarm system and the hazard signage are developed jointly with the owner's safety and health team before construction pricing is finalized, so that the systems in place during construction align with those the operating facility will use. The authorities having jurisdiction over these arrangements include OSHA, the National Fire Protection Association, the Hanover Fire Protection District, the Pikes Peak Regional Building Department, the Colorado Department of Public Health and Environment, the Environmental Protection Agency, El Paso County, and the City of Fountain.

The transition from construction to operation is itself treated as a safety-critical phase. Commissioning safety plans are developed as part of construction handover, and commissioning proceeds in stages that introduce energy and fluids progressively. Pre-commissioning verifies that mechanical, electrical, and structural installation is complete before power or untreated water is introduced, with equipment alignment, valve orientation, and pressure testing confirmed, instrumentation calibrated, and alarms and interlocks verified at their expected thresholds both from the control system and locally in the field. Functional testing then runs equipment dry, including bump testing motors for correct rotation, before wet runs introduce clean water to flush lines, test system pressure, and check for leaks in tanks, piping, and basins. Plant startup introduces untreated water gradually while adjusting flow rates and pressures toward target capacities, with continuous monitoring and laboratory testing of treated water quality. Operating procedures covering normal operation, startup, shutdown, troubleshooting, and emergency response are provided at turnover, together with familiarization training for plant personnel covering normal operations, maintenance, performance, and emergency response, so that Springs Utilities staff can safely operate and maintain the facility once the contractors demobilize.

Was input obtained from OEM, Fire Marshal and Fire District to verify ERP is attainable? Does Hanover Fire have the equipment? Does the Sheriffs Wildland Fire team?

(b) Describe hazards, if any, of environmental damage and contamination due to solid waste, hazardous waste, petroleum products, hazardous, toxic, and explosive substances or materials used at, or activities taking place at, the proposed facility.

See Attachment AA, Emergency Response Plan.

Neither the construction or operation phase of the WCGS is anticipated to cause environmental damage or contamination due to solid waste, hazardous waste, petroleum products, or hazardous or toxic substances. Explosives will not be utilized during either phase.

During construction all waste, petroleum products, and hazardous or toxic substances will be stored in secondary containment and labeled as applicable. Any accidental releases of hazardous substances or petroleum products will be remediated in accordance with applicable regulations.

During operations all applicable petroleum products will be identified and managed in accordance with the facility Spill Prevention, Control, and Countermeasure (SPCC) Plan. Industrial wastewater will be processed at the on-site ZLD system, and all ZLD byproducts will be disposed of off-stie. Any byproducts or waste generated from operations will be evaluated to determine applicability of the Colorado Department of Public Health and Environmental (CDPHE) Hazardous Materials and Waste Management regulations and will be managed

accordingly. Any accidental releases of hazardous substances or petroleum products will be remediated in accordance with applicable regulations.

Potential environmental hazards include releases of natural gas, lubricating or hydraulic oil, transformer mineral oil, diesel fuel, aqueous ammonia, water-treatment chemicals, cleaning agents, turbine-wash wastewater, oily drainage and solid or hazardous wastes. Uncontrolled release could affect soil, stormwater or nearby drainage features or create fire, vapor or worker-exposure hazards. The design will reduce these risks through compatible secondary containment, double-walled tanks with interstitial leak detection, controlled sumps and drainage, oil-stop valves and filtration, secured storage, level monitoring and alarms, and automatic fire, gas and ammonia-leak detection. Contractor-controlled spills will be isolated, reported, contained, cleaned up and disposed of in accordance with applicable law. Bulk petroleum products will be addressed in an SPCC Plan, and final chemical inventories, SDSs, inspection requirements and waste-management procedures will be incorporated into facility operating and emergency documentation. (Sources: A-1 Sections III.L-M, IV.B, IV.I, IV.L, VI.B-C and VIII.K; restated EPC agreement Sections 4.29-4.30.) The black-start diesel generator and its fuel system will be addressed explicitly in the fuel inventory, spill-prevention measures and fire/emergency planning. Exhibit E establishes contractor safety and emergency-planning requirements, while Attachment A-12 extends safety planning to commissioning.

Was input obtained from OEM, Fire Marshal and Fire District to verify ERP is attainable? Does Hanover Fire have the equipment? Does the Sheriffs Wildland Fire team?

(c) Describe emergency procedures to be used in the event of fire, explosion or other event which may endanger the public health, safety and welfare.

See Attachment AA, Emergency Response Plan, and Attachment BB, Evacuation Plan, for detailed procedures associated with emergency events.

The facility emergency-response program will address fire, explosion, natural-gas release, ammonia or chemical release, petroleum spill, electrical event, severe weather and other conditions that could endanger employees or the public. Automatic fire, gas and ammonia detectors will provide local audible and visual alarms and transmit identifiable alarm points to the plant control system. Upon discovery of an emergency, personnel will stop work or place equipment in a safe condition, isolate the affected system when it is safe to do so, notify the control room and emergency coordinator, initiate evacuation or shelter procedures as appropriate, account for personnel, contact 911 and the responding fire district when required, and implement trained fire or spill-response measures without exposing personnel to unacceptable risk. Releases will be contained, reported, cleaned up and documented in accordance with applicable law. The final Facility Emergency Response/Operations Plan will establish alarm protocols, shutdown and isolation steps, evacuation routes and assembly areas, notification responsibilities, response-equipment locations, training and drill requirements, and coordination with local emergency agencies.

(6) <u>The applicant shall supply an analysis of non-structural alternatives to the Project, such as conservation of energy use, no development or management (different scheduling, conservation programs, facility design, land trades etc.), if applicable.</u>

Not applicable.

(7) <u>The applicant shall supply an analysis of structural alternatives to the Project, such as alternate locations and routes, alternative types of facilities, use of existing rights-of-way, and joint use of rights-of-way with other utilities and upgrading of existing facilities.</u>

Three potential sites were identified as locations for the proposed power plant. The Horizon Utility Campus was the first selection since it was already located within Springs Utilities' service territory and was adjacent to other utility infrastructure. Unfortunately, during the Development Plan process the Colorado Springs Airport determined the only acceptable mitigation effort to ensure the power plant would not interfere with airport operations was to relocate the power plant. The third site ended up interfering with an existing air permit and could not move forward. The Williams Creek location was the second choice and is now the planned construction site for the power plant.

Different types of generation energy such as a Heat Recovery Steam Generators (HRSG) were deemed inefficient for the load demand required, which is particularly important during the peak hours and peak seasons such as hot summer days where air conditioning units are frequently used or peak hours from 5pm to 9pm Monday-Friday. HRSG units are specifically used for base load generation as it takes them several hours to turn on and off and they also consume a substantial amount of energy in doing so. Nuclear energy is being researched now but does not suit the timeframe the community requires for meeting the current and near-term demand.

(8) <u>Detailed description of the need for the proposed development or activity, including but not limited to:</u>

(a) The present population of the area to be served and the total population to be served when the project is operating at full capacity.

With a peak of 1068 MW in the summer of 2026, peak load has grown by 45 MW since the project was first developed. Load is expected to grow at least 131MW on the low end and up to 478 MW on the high end. A population model provided by consultant Logan-Simpson suggests population could grow from about 500k now to 550k by year 2033.

(b) The predominant type of users or communities to be served by the proposal.

See service area Map. Unincorporated and incorporated areas have service

Municipal utility rate payers (Residences, Colorado Springs Airport, local military bases, businesses, etc.).

How many users are estimated?

The percentage of the design capacity at which the current system is now operating.

This requirement detail is not directly applicable to the project; however, Utilities' electric system currently has an 8% excess capacity margin and the Southwest Power Pool (SPP) will require a 16% reserve margin in the summer and 32% in the winter.

(d) If the proposal is for construction of a new facility and the capacity of that facility exceeds a ten-year projected increase in demand, a detailed explanation of the excess service capacity and the cost of the excess capacity.

The capacity of the proposed units is in line with the expected demands as noted in the Exhibit 2026 EIRP Table 3-1 (see Attachment O).

(e) The relationship of the proposal to the applicant's long-range planning and capital improvement programs.

The assumption of the proposed generation units are foundational to the 2026 Electric Integrated Resource Plan, which studies electric generation needs through 2045 and was unanimously endorsed by City Council. Without these units, significant, urgent, and costly projects would need to be initiated immediately, and long-range plans would have to be updated.

(f) A description of the user needs and user patterns to be fulfilled by the proposed Project.

User needs vary with the type of rate payer served by Utilities electric service infrastructure. Increased need for electric service continues across the country due to the growing demand for EV charging stations and overall increase in household consumption. This growth pattern appears to be continuing and is a driving factor justifying the community benefit of this project.

(g) A description of the relationship of the Project to other existing and planned utility facilities of a similar nature, other communication or energy generation and transmission facilities, local government capital improvement programs and special district expansion programs.

The WCGS is located approximately 3.5 miles east of the existing Front Range Power Plant and Ray Nixon Coal Power Plant. The Ray Nixon Power Plant is scheduled to shut down in December of 2032. There are no other existing power plants located in the area. As mentioned above, there are a number of solar arrays and an associated substation located in the immediate vicinity of the proposed project.

(9) <u>Environmental impact analysis.</u>

(a) Land use:

i. Specify how the proposed development will utilize existing easements or rights-of-way for any associated distribution or collector networks.

All electrical connections needed to bring the proposed WCGS online will be located on the same parcel of land owned by the City of Colorado Springs; therefore, no additional easements or rights-of-way will be required.

(b) Information regarding other utility facilities:

i. A map showing each existing major facility of a public utility within the County of the type proposed for development.

See Attachment JJ, Aeroderivative Generation Map, for the location (Martin Drake Power Plant) of the only other aeroderivative gas unit in El Paso County.

ii. The design capacity of each such facility, the excess capacity of each such facility and the percentage of capacity at which each such facility operates.

The design capacity of the South Plant Aeroderivative Generators (SPAGs) is 25MW each, or 150MW for the plant as a whole. However, due to emissions restrictions, the percentage of capacity at which the facility operates is limited to 40%. As a result, this generation plant has no excess capacity.

iii. Whether present facilities can be upgraded to adequately accommodate a ten-year projected increase in demand for services to be offered by the proposed project.

Upgrading the Nixon Power Plant is not an option as the plant is scheduled to be closed by year 2032. Front Range and other generation sources are not able to cover the "peak loads" efficiently. Base load units take several hours to start up and shut down, resulting in higher operating costs, and create higher emissions. The challenge with the new generation is that the difference between peak load and base load is too significant; therefore, developing a power plant similar to Front Range or Nixon is not financially responsible. Those units manage Utilities' base load demand and run continuously. The demand being targeted by WCGS would cover the peak loads or quickly respond to the renewable resources, which is the draw of these "peaking units" because they can turn on and off quickly, create lower emissions, and use a reliable source of fuel.

(10) Applicants seeking a permit for the site selection and construction of a power plant shall submit, in addition to those requirements set forth above, a map locating and describing resource areas to be utilized as sources of energy.

View 9 23 26 updated MAP 9/23/2026 2:57:35 PM Delete

The source of energy will be a planned extension of the Rocky Mountain Express Pipeline (not a part of this application). A final alignment of this line is yet to be determine; therefore, a map depicting its location is not currently available.

we do have a ferc alignment map. See FERC 251

(11) Applicants seeking a permit for the site selection and construction of transmission lines or substations shall submit the following additional documents and information:

(a) Computer modeled electromagnetic field measurement within the proposed transmission line easement for that portion of the transmission line between substations or transition sites; and

Not applicable since no new transmission lines or substations are being proposed with this project.

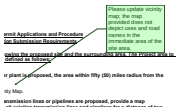
(b) Measures taken to comply with the concept of prudent avoidance with respect to planning, siting, construction and operation of transmission lines, which may be those steps taken to comply with CCR 723-3 Section 3206(9)(b) or similar authority, for projects where other similar authority is applicable.

Not applicable.

You are expanding this...how much are you expanding? new lines are being constructed to tie in...

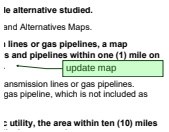
V1_1041 Documents Related to 5.201 (Items 1 - 11).pdf Markup Summary

dsdparsons (23)



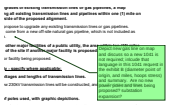
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Page Label: 4
Author: dsdparsons
Date: 11/9/2026 9:53:39 AM
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Please update vicinity map; the map provided does not depict uses and road names in the immediate area of the site area.



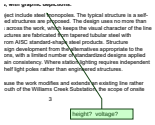
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update map



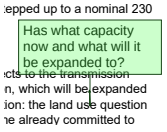
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Depict new gas line on map and discuss so a new 1041 is not required; inlcude that language in this 1041 request in the exhibit B (diameter point of origin, and miles, hoops stress) and summary. Are no new power poles and lines being proposed? substation expansion?



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height? voltage?



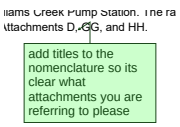
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Has what capacity now and what will it be expanded to?



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Author: dsdparsons
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verify these corridors for water, are cited on the maps so that it is clear they are permitted with this 1041



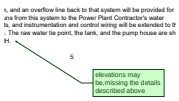
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add titles to the nomenclature so its clear what attachments you are referring to please

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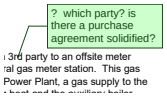


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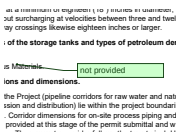
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elevations may be,missing the details described above



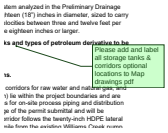
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? which party? is there a purchase agreement solidified?



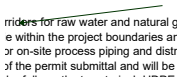
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not provided

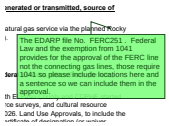


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Please add and label all storage tanks & corridors optional locations to Map drawings pdf

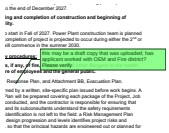


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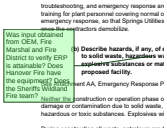
The EDARP file No. FERC251 . Federal Law and the exemption from 1041 provides for the approval of the FERC line not the connecting gas lines, those require 1041 so please include locations here and a sentence so we can include them in the approval.



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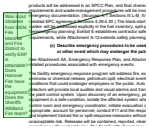
this may be a draft copy that was uploaded; has applicant worked with OEM and Fire district? Please verify

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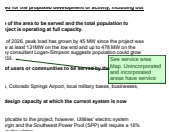
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Was input obtained from OEM, Fire Marshal and Fire District to verify ERP is attainable? Does Hanover Fire have the equipment? Does the Sheriffs Wildland Fire team?



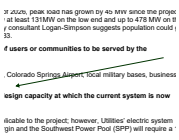
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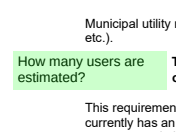


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See service area Map. Unincorporated and incorporated areas have service

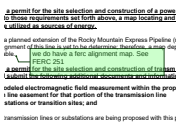


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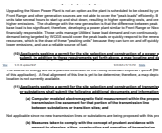
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How many users are estimated?

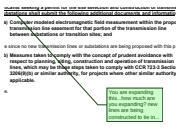


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we do have a ferc alignment map. See FERC 251



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Subject: Planner
Page Label: 15
Author: dsdparsons
Date: 11/9/2026 10:20:14 AM
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You are expanding this...how much are you expanding? new lines are being constructed to tie in...