

COLORADO'S POWER PATHWAY

LETTER OF INTENT

El Paso County Site Selection and Construction of Major Facilities of a Public Utility

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LIST OF ACRONYMS AND ABBREVIATIONS

1041 permit	Permit to locate and construct major facilities of a public utility
APEN	Air Pollutant Emissions Notice
Application	1041 Permit Application
BMP	Best Management Practice
CCR	Code of Colorado Regulations
CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CFR	Code of Federal Regulations
CPCN	Certificate of Public Convenience and Necessity
CPUC	Colorado Public Utilities Commission
CRS	Colorado Revised Statutes
FAA	Federal Aviation Administration
kV	Kilovolt
Pathway	Colorado's Power Pathway
ROW	Right-of-Way
SWMP	Stormwater Management Plan
TCA	Temporary Construction Area
WOTUS	Waters of the U.S.
Xcel Energy	Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy

LETTER OF INTENT

(1) INTRODUCTION AND BACKGROUND INFORMATION REGARDING COLORADO'S POWER PATHWAY

Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy (Xcel Energy), proposes to construct, maintain, and operate Colorado's Power Pathway (Pathway) in eastern Colorado.

Pathway is a \$1.7 billion investment proposed by Xcel Energy to improve the state's electric grid and enable future renewable energy development around the state. Pathway will ensure safe, reliable, and economical electric service to the public, boost the regional economy, and create jobs during its construction. Pathway includes:

- Installation of approximately 550 miles of new 345-kilovolt (kV) double-circuit transmission line in 12 counties;
- Construction of four new electric substations (Canal Crossing, Goose Creek, May Valley and Sandstone); and
- Expansion, equipment additions, or equipment upgrades at four existing electric substations (Fort St. Vrain, Pawnee, Harvest Mile, and Tundra).

Pathway will be constructed in five segments (Figure 1). The Colorado Public Utilities Commission (CPUC) did not approve construction of the May Valley – Longhorn Extension (Extension) in the January 2024 Phase II Decision regarding Xcel Energy's Electric Resource Plan and Clean Energy Plan. Xcel Energy may bring a proposal to construct the Extension and Longhorn Substation forward again in the future but has paused its further development as part of Pathway.

Each new or expanded electric substation will serve as an endpoint for the transmission line segments:

- Fort St. Vrain – Canal Crossing (Segment 1)
- Canal Crossing – Goose Creek (Segment 2)
- Goose Creek – May Valley (Segment 3)
- May Valley – Sandstone – Tundra (Segment 4)
- Sandstone – Harvest Mile (Segment 5)

The estimated length of each transmission line segment and location of each substation is outlined in Table 1.

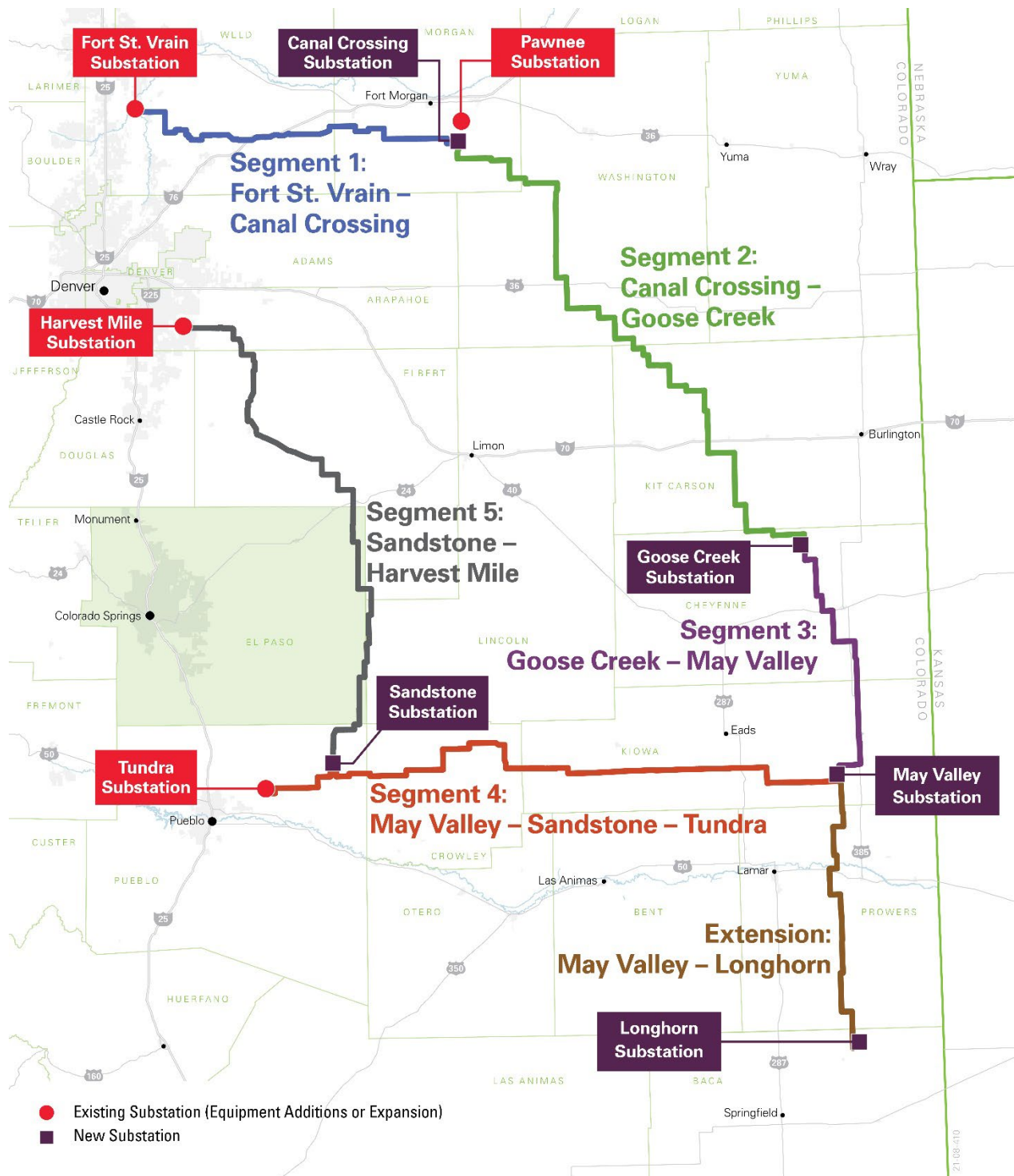


Figure 1: Colorado's Power Pathway

Table 1: Colorado's Power Pathway by County

County	Segment (Estimated Miles of Transmission)							Substation
	1	2	3	4	5*	Ext. **	Total	
Baca	-	-	-	-	-	2	2	New Longhorn
Cheyenne	-	9	35	-	-	-	44	New Goose Creek
Crowley	-	-	-	41	-	-	41	-
Kiowa	-	-	22	64	-	6	92	New May Valley
Kit Carson	-	62	-	-	-	-	62	-
Lincoln	-	-	-	-	4	-	4	-
Morgan	27	21	-	-	-	-	48	New Canal Crossing, Pawnee Equipment Additions
Prowers	-	-	-	-	-	51	51	-
Washington	-	53	-	-	-	-	53	-
Weld	47	-	-	-	-	-	47	Fort St. Vrain Equipment Additions
El Paso	-	-	-	-	45	-	45	-
Elbert	-	-	-	-	50	-	50	-
Arapahoe*	-	-	-	-	18	-	18	Harvest Mile Equipment Additions
Pueblo	-	-	-	25	9	-	34	Tundra Expansion, New Sandstone
Total	74	145	57	130	126	59	591	

*The mileage for Pathway facilities in Aurora (1 mile) is included in Arapahoe County total.

** The CPUC did not approve construction of the Extension Segment in the January 2024 Phase II Decision regarding Xcel Energy's Electric Resource Plan and Clean Energy Plan. Xcel Energy may bring a proposal to construct the Extension and Longhorn Substation forward again in the future but has paused its further development as part of Pathway.

Pathway is a backbone transmission system that serves Colorado; as such, this 1041 permit application (Application) does not address project-specific details that apply for developments or direct utility service projects.

The Eastern Plains region of Colorado is one of the nation's best areas for wind and solar energy generation, but it does not currently have a network transmission system that can integrate these new generation resources into the state's interconnected grid system, which is needed to meet Colorado's clean energy goals. Pathway will support Xcel Energy's Clean Energy Plan (Xcel Energy 2021) that is estimated to deliver as much as an 85 percent reduction in carbon dioxide emissions by 2030 and add approximately 6,500 megawatts of new wind, solar, and other resources. Pathway will help to meet the state's growing electricity needs, improve safety, reliability, and affordability, and enable the transition to clean energy. Pathway will allow developers of

energy generation projects to interconnect energy resources located in the areas of the state that are underserved by backbone transmission lines and allow Xcel Energy to deliver energy to electric customers.

In March 2021, Xcel Energy filed a Certificate of Public Convenience and Necessity (CPCN) application with the CPUC describing the purpose, need, and public benefits of constructing Pathway. In February 2022, the CPUC provided verbal approval, and in June 2022, CPUC provided written approval of the CPCN for Segments 1 through 5 based on a determination that Pathway is in the public interest. While the CPUC determines a public need for Pathway, it does not approve the location of specific project facilities. The location and land use approvals will be determined through easement negotiations with landowners and the land use approval process in the applicable jurisdictions where the Pathway facilities will be located.

(2) ESTIMATED PATHWAY SCHEDULE

The estimated approval, construction, and in-service schedule for Pathway facilities is shown in Figure 2. Many variables factor into the schedule for projects of this magnitude. The construction schedule is contingent on acquiring all necessary land rights and permits.

Pathway will be constructed and brought in-service in phases. The estimated construction timeline for each segment and related substation, and anticipated in-service dates are shown in Figure 2 and Table 2.

Transmission line Segment 5 and associated new substations and substation expansions or equipment additions will be completed in 2027, provided required approvals are obtained.

Table 2: Estimated Individual Segment and Substation Construction and In-Service Dates

Segment & Substation	Construction	In-Service Year
Segment 1 & Fort St. Vrain Substation Equipment Additions	Spring 2024–Spring 2026	Spring 2026
Segment 2 & New Canal Crossing & Goose Creek substations & Pawnee Substation Equipment Additions	Spring 2023–Spring 2025	Spring 2025
Segment 3 & New May Valley Substation	Spring 2023–Spring 2025	Spring 2025
Segment 4, Tundra Substation Expansion & New Sandstone Substation	Spring 2025–Spring 2027	Spring 2027
Segment 5, Harvest Mile Substation Equipment Additions	Spring 2025–Spring 2027	Spring 2027

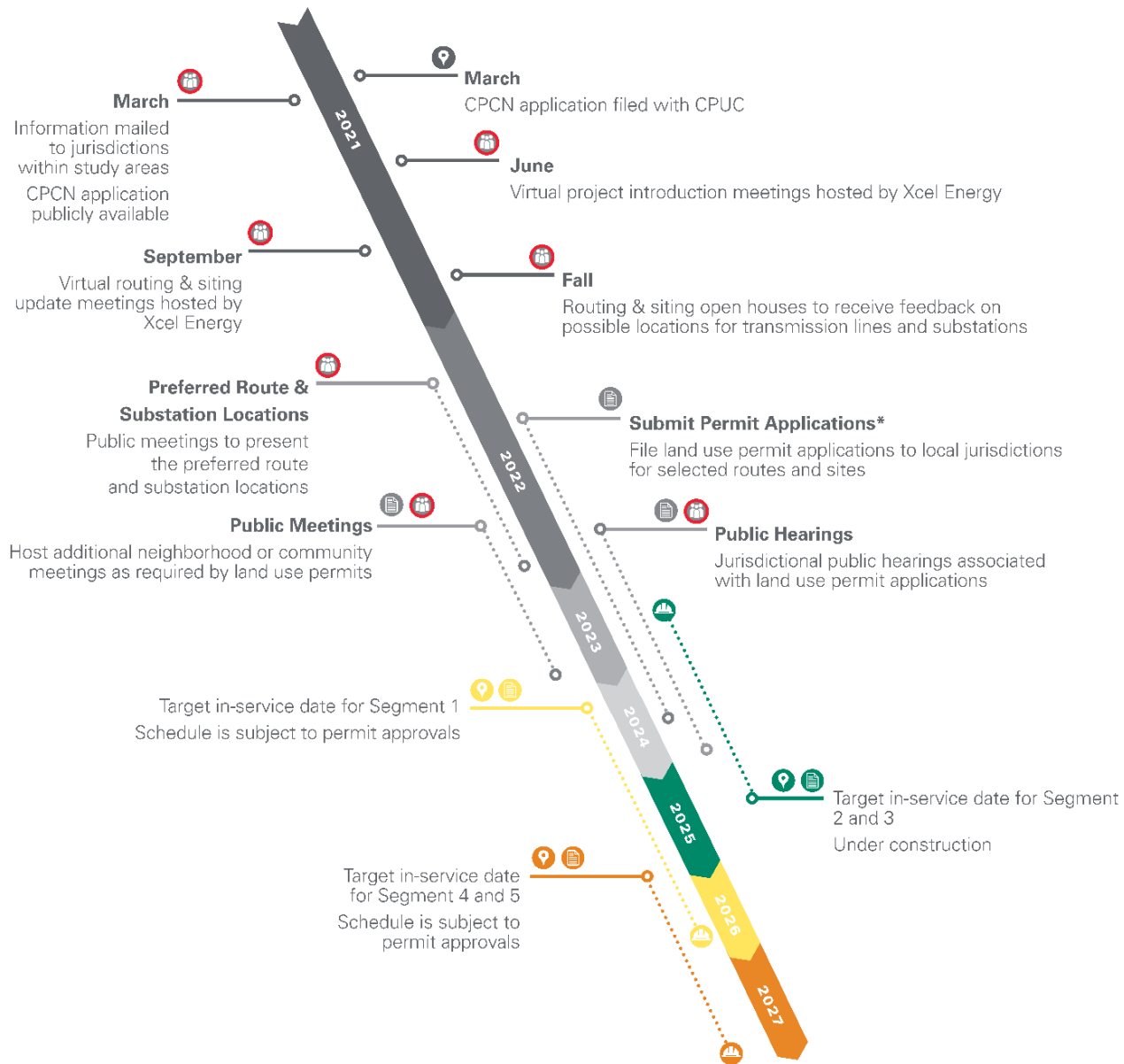


Figure 2: Estimated Pathway Schedule

(3) PATHWAY ACTIVITIES PRIOR TO SUBMITTAL OF APPLICATION

(a) *Public Outreach*

Public outreach efforts were conducted to receive public and stakeholder feedback and input on transmission line route and substation site selection (see Transmission Line Routing & Substation Siting Studies in Section 3(b) of this Letter of Intent).

- In June 2021, three virtual introductory meetings were held for the public to discuss Pathway's benefits to communities and the process to be used to identify the locations of the proposed transmission lines and new substations. These meetings were held virtually due to restrictions on large gatherings due to COVID-19.
- In June through September 2021, Pathway representatives met with jurisdictions within Pathway's Study Areas to discuss Pathway and receive feedback. Pathway representatives met with El Paso County representatives on June 23, 2021.
- In September 2021, two virtual routing and siting meetings were held for the public to learn about the progress made on Pathway, including the development of focus areas for identification of transmission line links and substation sites. These meetings were held virtually due to restrictions on large gatherings due to COVID-19.
- In October and November 2021, 15 in-person public open houses were held to gather public feedback on the preliminary transmission links. Two public open houses were held in Calhan and Ellicott on November 8 and 9, 2021.
- In January through March 2022, 15 in-person open houses were held to present the preferred route for Segments 1, 2, 3, 4, and the Extension and to present additional preliminary transmission links for Segment 5. A public open house was held in Yoder on March 3, 2022.
- In May 2022, four in-person open houses were held to gather additional public feedback on the preliminary transmission links and preferred route for Segment 5.
- In August 2022, two in-person open houses were held in the Eastern Review Area, an area further east from the Segment 5 preliminary transmission links and partial preferred route, to gather feedback from landowners in that area about potential additional route options.

(b) *Transmission Line Routing & Substation Siting Studies*

Routing a new transmission line and siting a substation require a comprehensive review and analysis of factors and criteria including, but not limited to, electric system planning, engineering, environmental and cultural resources, land use, regulatory requirements, land rights, stakeholder input, and public and worker safety. As shown in Figure 3, the five-step routing and siting process assesses constraints and opportunities between segment endpoints to ultimately identify the preferred route location for the transmission line and the preferred locations for new substation sites. The process is described in detail in the routing and siting studies for each segment of Pathway. The Routing and Siting Study for Segment 5 is attached to this Application as Attachment C. The other routing and siting studies are not provided because they do not involve transmission lines or substations within El Paso County.

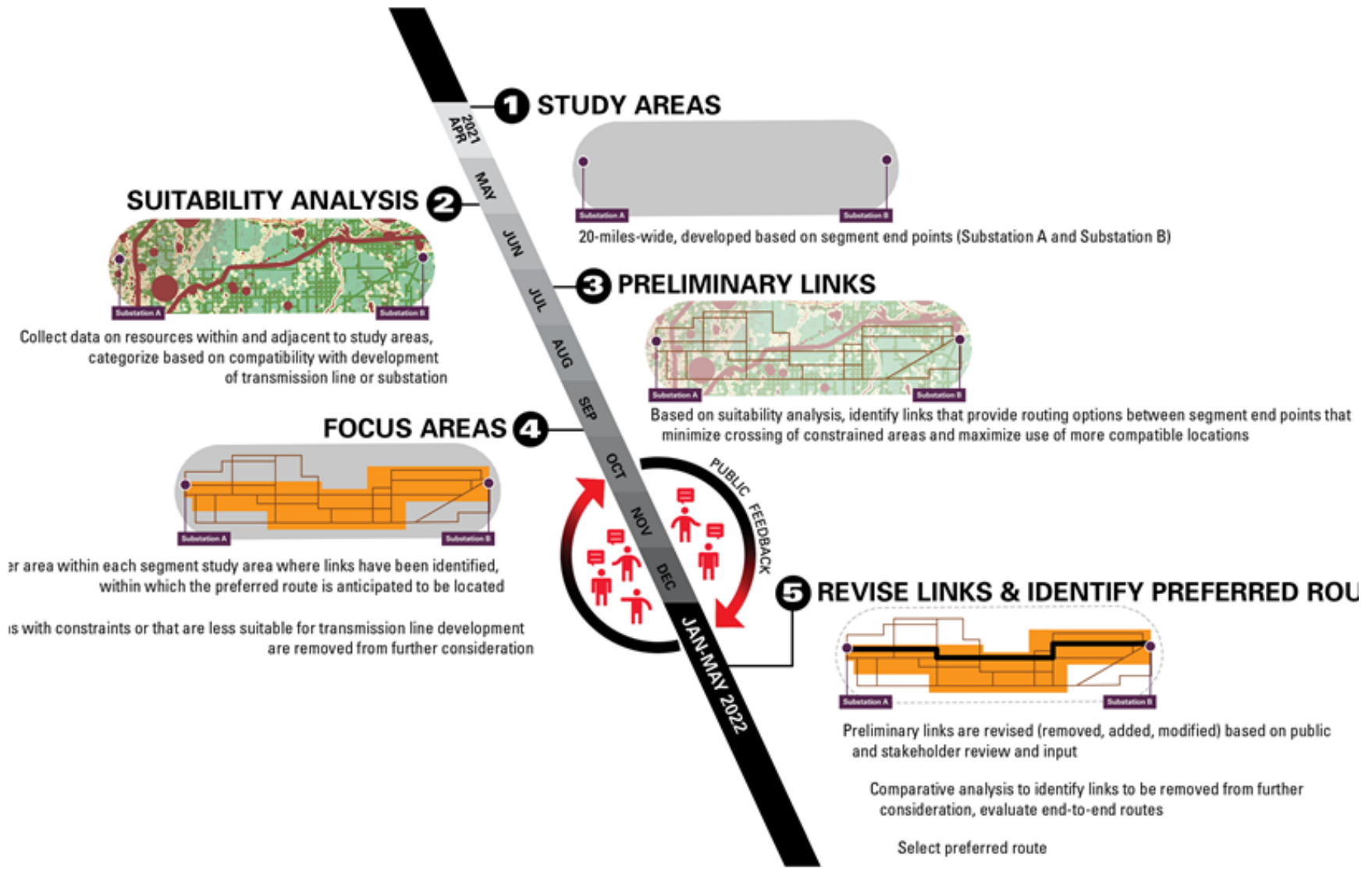


Figure 3: Pathway Routing and Siting Study Process

(4) REGULATORY FRAMEWORK

Federal, state, and local permits and approvals may be required prior to Pathway construction. The regulatory requirements identified by Xcel Energy are described in Table 3 on the following page. Table 3 is intended as an illustrative description of the permits and approvals that may be required for Pathway.

Outreach was conducted with each jurisdiction crossed by Pathway to solicit feedback and discuss potential permits that may be required.

Multiple Colorado statutory provisions and local government land use plans and controls apply to Pathway, including approval of a CPCN from the CPUC; notice, consultation, and permit approvals from counties and municipalities, and notice to owners of a mineral estate associated with the substation sites.

All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and maintained during construction as required and may include but are not limited to major land use permits, right-of-way (ROW) permits, road use agreements, access permits, oversize/overweight permits, grading permits, and stormwater permits.

Xcel Energy anticipates avoiding impacts to jurisdictional waters of the U.S. (WOTUS) in El Paso County and therefore does not anticipate that Pathway facilities in the county will require a Nationwide Permit 57 or other U.S. Army Corps of Engineers permitting under the Federal Clean Water Act, Section 404.

Table 3: Land Use Permit Requirements and Applicability to Pathway

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Federal Aviation Administration (FAA)	Structures occurring in Navigable Airspace	FAA Form 7460-1, Notice of Proposed Construction or Alteration	Objects affecting navigable airspace	Title 14 Code of Federal Regulations (CFR) Part 77	To be submitted following final design
CPUC	All	CPCN	Need for new electrical facility in Colorado	Colorado Revised Statutes (CRS) 40-5-101, CRS et seq., and Rule 1303 4 Code of Colorado Regulations (CCR) 723-1 and Rules 3002, 3102, and 3206, 4 CCR 723-3	Proceeding No. 21A-0096E, Approved June 2, 2022
	All	Notification of Intention to Submit Permit Application for Major Electrical Facilities	Filing permit application for location, construction, or improvement of major electrical or natural gas facilities	CRS 29-20-108	In addition to other notifications, Xcel Energy met with El Paso County on June 23, 2021; February 8, 2022; and August 24, 2023, about Pathway.
	All	Government and State Notice Requirements, Mineral Owners	Public hearing by a local government on an application for development	CRS 24-65.5-103	Pursuant to the statute CRS 24-65.5-103, the Pathway transmission line is exempt from the statutory mineral estate owner mailing notification requirements.

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Colorado Department of Public Health and Environment (CDPHE)	All	Construction General Stormwater Permit and Stormwater Management Plan (SWMP)	Construction sites that disturb one acre or greater	5 CCR 1002-61	To be obtained prior to construction
	All	Land Development Air Pollution Emissions Notice (APEN)	Construction disturbance greater than 25 contiguous acres and land development activities longer than 6 months	5 CCR 1001-14	To be obtained prior to construction
Colorado Department of Transportation (CDOT)	Components crossing state and federal roadways	Access and Crossing Permits	Crossings of state roadway	2 CCR 601-1	To be obtained prior to construction
Colorado State Historic Preservation Office	To be determined following final design and pre-construction surveys	Determination of Compliance with Historical, Prehistorical, and Archaeological Resources	Potential impacts to historic, prehistoric and/or archaeological resource	CRS 24-80-401-411, CRS 24-80-1301-1305, 8 CCR 1504-7	Pathway will coordinate with the State Historic Preservation Office on any applicable requirements for cultural resources review.
Burlington Northern Santa Fe Railroad	Components crossing railroads	Access and Crossing Permits	Crossings of railroad	49 CFR 200.1 et. Seq., CRS 32-12-123, CRS 37-95-108	To be obtained prior to construction.

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Concurrent County Land Use Permits					
Arapahoe County	Segment 5; Harvest Mile Substation Equipment Additions	1041 Permit and Location and Extent Permit	Proposed development of an activity of state interest (major facility of a public utility) in Arapahoe County	Regulations Governing Areas and Activities of State Interest in Arapahoe County	Anticipated submittal in second quarter of 2024
Crowley County	Segment 4	Use by Special Review	Development of public utility and public service structures, including transmission lines in Crowley County	Crowley County Planning and Zoning Manual, Section 2	Use by Special Review Permit approved in Resolution Number 2023-8591 on April 24, 2023.
Elbert County	Segment 5	1041 Permit, Use by Special Review	Proposed development of an activity of state interest (major facility of a public utility) in Elbert County	Guidelines and Regulations for Areas and Activities of State Interest Elbert County	Anticipated submittal in second quarter of 2024
Pueblo County	Segment 4, 5; Tundra Substation equipment additions, and new Sandstone Substation	1041 Permit	Proposed development of an activity of state interest (major facility of a public utility) in Pueblo County	Pueblo County Code, Title 17, Division 2: Areas and Activities of State and Local Interest	Anticipated submittal in second quarter of 2024

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Weld County	Segment 1; Fort St. Vrain Expansion	1041 Permit, Use by Special Review, Site Development Plan	Proposed development of an activity of state interest (major facility of a public utility) and change to an existing approved Use by Special Review permit in Weld County	Weld County Charter and County Code Chapter 21 Areas and Activities of State Interest; Weld County Charter and County Code Article 2, Division 5 Special Review Permits for Major Facilities of a Public Utility or Public Agency; Weld County Charter and County Code Article 2, Division 3 Site Plan Review and Minor Amendment to a Use by Special Review Procedural Guide	1041 permit issued on April 3, 2024. Use by Special Review permit issued on February 20, 2024. Site Plan Review conditionally approved on November 14, 2023.
City of Aurora	Segment 5	Conditional Use Permit and Site Plan	Proposed development of a conditional use in City of Aurora	Aurora Unified Development Ordinance, Article 146 Zoning and Subdivision Procedures, Section 5 Specific Procedures	Submitted April 2024
Lincoln County	Segment 5	Use by Special Review	Proposed new land use or development	Lincoln County Zoning Resolution, Article 3 Use by Special Review Procedures	Anticipated submittal in second quarter of 2024

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
County and City Land Use Permits Filed in Summer 2022					
Morgan County	Segment 1, 2; Canal Creek Substation, equipment additions at Pawnee Substation	1041 Permit	Proposed development of an activity of state interest (major facility of a public utility) in Morgan County	Guidelines and Regulations for Areas and Activities of State Interest	1041 Permit issued on November 16, 2022.
Kit Carson County	Segment 2	Land Use Change Permit	Any proposed change in land use in unincorporated Kit Carson County	Kit Carson County Code, Article 2	Land Use Change Permit issued on September 21, 2022
Washington County	Segment 2	Use by Special Review and 1041 Permit	Proposed development of transmission line in Washington County	Application for Use by Special Review, Washington County	Use by Special Review Permit was issued on November 21, 2022; 1041 Permit was issued on December 13, 2022.
Cheyenne County	Segment 2, 3; Goose Creek Substation	Conditional Use Permit and 1041 Permit	Proposed development of a conditional use in Cheyenne County	Cheyenne County Comprehensive Plan and Zoning Ordinance	Conditional Use Permit was issued on September 30, 2022. 1041 Permit was issued on September 30, 2022.

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Kiowa County	Segments 3, 4; New May Valley Substation	1041 Permit	Proposed development of an activity of state interest (major facility of a public utility) in Kiowa County	Guidelines and Regulations for Areas and Activities of State Interest County of Kiowa	1041 Permit was issued on November 22, 2022.
Other County and City Land Use Permits Considered					
Town of Platteville	Segment 1	Not applicable	Town confirmed that the only permit approval required was from CDOT	Platteville Municipal Code, Chapters 15-18	Not applicable

(5) DESCRIPTION OF FACILITY IN EL PASO COUNTY

Xcel Energy is submitting this Application for a permit to locate and construct major facilities of a public utility (1041 permit) pursuant to Appendix B - Guidelines and Regulations for Areas and Activities of State Interest of the El Paso County Colorado Land Development Code (El Paso County §1041 Regulations; El Paso County 2024). The Application addresses each section in the El Paso County §1041 Regulations, as noted in the headings and tables throughout the Application.

Pathway facilities proposed in El Paso County include approximately 45 miles of new 345-kV double-circuit electric transmission line. Proposed activities in El Paso County will also include seeking approval of all temporary construction areas (TCA) associated with construction of the Pathway facilities for the duration needed to complete Pathway construction (including staging/laydown areas, and conductor stringing areas; described in Section 5(c) of this Letter of Intent and shown in Attachment B, Vicinity Map). Pathway will be constructed in segments, with a portion of Segment 5 proposed to be located in El Paso County.

The Application addresses the entire portion of the Pathway transmission line and all TCAs for staging and laydown yards, conductor stringing areas, and concrete batch plants associated with construction of the Pathway facilities for the duration needed to complete Pathway construction within El Paso County (see Attachment B, Vicinity Map). Pathway land use permitting in El Paso County is occurring concurrently with Weld, Elbert, Arapahoe, Lincoln, and Pueblo counties and the City of Aurora for the portions of Segments 4 and 5 that occur in those jurisdictions. Coordination is ongoing with additional jurisdictions for other Segments.

This Application package was prepared per the requirements of the El Paso County §1041 Regulations. The Application also was prepared based on direction provided by El Paso County representatives during the Early Assistance Meeting held on August 24, 2023.

The proposed transmission line route in El Paso County is generally oriented in a north to south direction in the area south of Simla, near the El Paso/Lincoln county line and is co-located along the following existing roads in El Paso County: Oil Well Road, Harrisville Road, Simla Highway, Rush Road, Holtwood Road, S Johnson Road, and Whittemore Road.

The following sections describe the Pathway transmission line facilities within El Paso County subject to this Application.

(a) Transmission Line

The new 345-kV double circuit transmission line will be constructed using steel poles. A single pole will be used for most transmission pole locations; however, two transmission poles will be required in certain locations where the weight of the conductor requires extra structural support. These are typically 'angle locations' where the line changes direction. Each transmission pole will be placed on a concrete foundation. Voltage, conductor sag, pole type, terrain, length of span between transmission poles, and minimum clearances of existing buildings influence the necessary height of transmission pole. The transmission poles will be weathering steel and a brown or rust color. The anticipated physical characteristics of a double-circuit pole are summarized in Table 4, and a representative transmission pole with line is shown in Figure 4.

Table 4: Typical 345-kV Double Circuit Transmission Line Characteristics

Characteristic	Anticipated Design
Typical height	105-140 feet (poles will not exceed 199-foot maximum height)
Right-of-way	150 feet total width, 75 feet on either side of the transmission line corridor centerline
Span length	Typically 950 feet between transmission poles
Material/color	Weathering steel, brown or rust color
Clearance	Maintain all clearances as required by National Electrical Safety Code

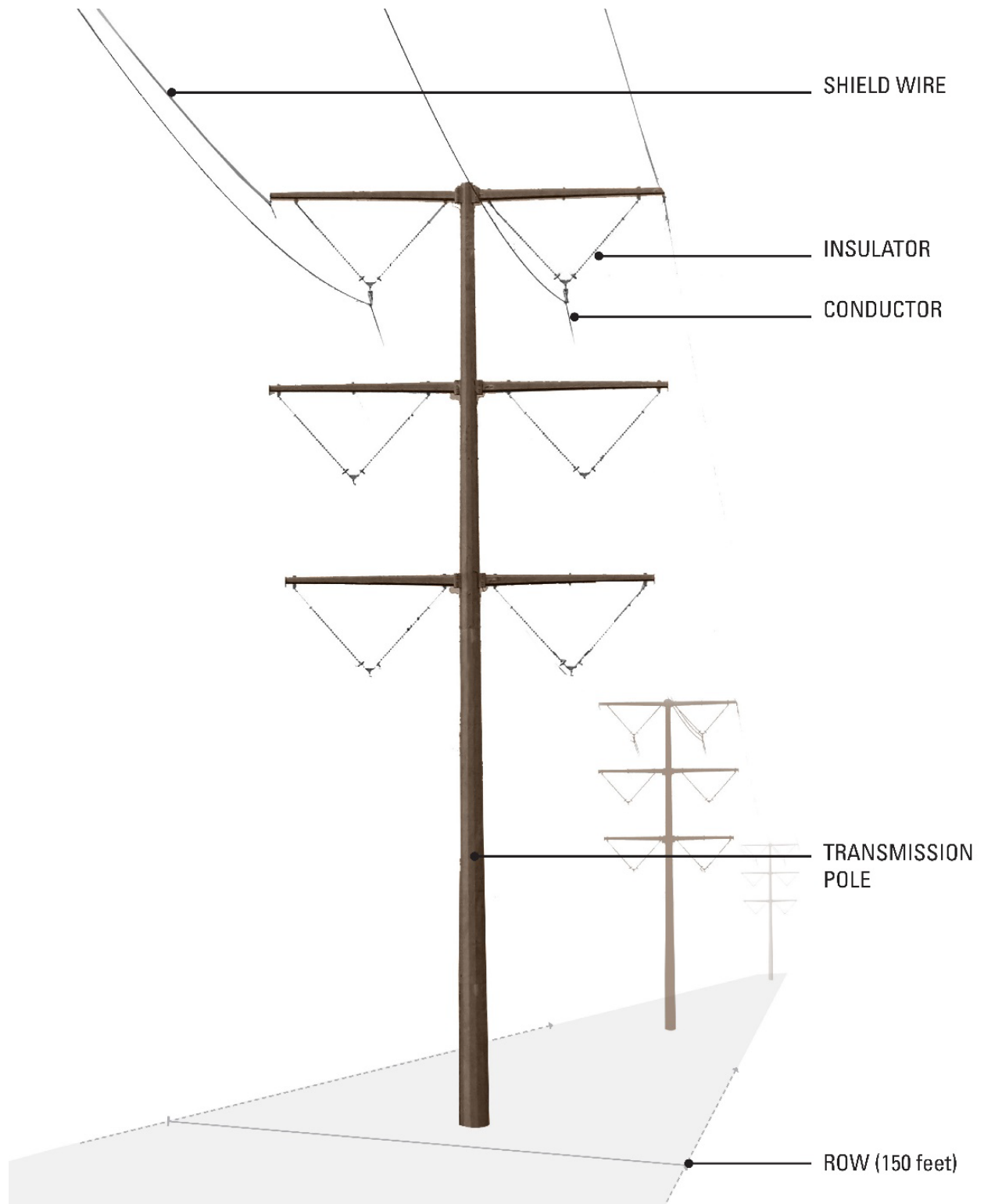


Figure 4: Typical Transmission Pole Configuration (Illustrative)

(b) Transmission Line Access

Construction access roads will allow construction crews and vehicles to access transmission pole locations and TCAs (described below). Traffic controls may be required near TCAs during construction to ensure the safety of crews and the travelling public.

During construction, temporary impacts to local roads will vary day-by-day as the construction moves along the route. Road closures associated with construction deliveries and normal construction activities are not anticipated. Traffic control measures may be needed during wire pulling activities; Xcel Energy will obtain the necessary permits from El Paso County and from CDOT, as needed, prior to construction. Impacts to school bus routes are not anticipated. Temporary overland access for the transmission line will occur within the acquired Pathway ROW.

Where practicable, existing public roads and private roads will be utilized during Pathway construction, maintenance, and operation. Some private roads may require improvements and some new access roads will need to be constructed to accommodate construction equipment and long-term maintenance of the transmission line.

Where road improvements are needed, Xcel Energy will acquire any necessary grading, stormwater, and erosion control permits and comply with permit requirements. Xcel Energy will acquire permanent or temporary access easements where necessary access routes traverse private property. Some access routes may remain post-construction to maintain access to transmission lines for operation and maintenance activities.

(c) Temporary Construction Areas

TCAs will be used during construction to stage construction equipment and materials including construction trailers, cranes, and transmission poles. Some TCAs may require grading to level out the area for equipment placement and materials storage. TCAs are also necessary when stringing the conductor wire. This Application seeks approval of the TCAs required for Pathway construction for the duration necessary to complete Pathway construction. At the end of each construction phase, all equipment will be removed from the TCAs solely used for that construction phase. No proposed improvements at the TCAs will be permanent, and remaining areas will be restored in a manner generally similar to preconstruction conditions.

Final TCA locations will be identified once construction plans are finalized. Additional details about TCAs are discussed in the following sections. The TCAs will be an approved accessory use for the Pathway transmission line in El Paso County under this Application including use of the TCAs as a concrete batch plant. Final TCA locations identified by Xcel Energy may be reviewed and administratively approved by County staff for a duration sufficient to allow completion of permitted construction.

(1) Staging/Laydown Areas

Staging and laydown areas will be located within the TCAs and will be used for equipment delivery, storage, and assembly. Additional TCAs used for transmission pole laydown and staging may be required for construction. Staging/laydown areas are shown on the Vicinity Map (Attachment B). No staging/laydown areas are currently planned in El Paso County. If staging/laydown yards will be used in El Paso County, Xcel Energy will ensure they are reviewed and administratively approved by County staff.

(2) Conductor Stringing Areas

TCAs will be used for stringing the conductor wire. The locations and use of TCAs for this function are required at specific angles to ensure the conductor wire is pulled in line with the transmission poles, thereby limiting the strain on the poles. In addition, temporary TCAs may be used adjacent to public ROW for temporary guarding/protecting of the roadway during stringing of the new transmission line. These temporary guard sites will be restored following construction, as described above. Conductor stringing areas (pull sites) are shown on the sheet maps included in Attachment B, Vicinity Map. The construction plan does not currently call for the use of helicopters within El Paso County for stringing the conductor wire. If helicopters will be used for stringing the conductor wire, Xcel Energy will provide El Paso County with a comprehensive plan detailing those operations, including any temporary road closure, affected routes, closure durations, and detours and will coordinate with El Paso County authorities to minimize disruption and address community concerns.

(d) Areas for Other Construction Activities

Construction contractors also will use TCAs to store water trucks, traffic control items, and best management practice (BMP) materials for stormwater management and erosion control. Water will be used in concrete production, dust suppression, and compaction activities. Traffic control will be implemented where required for the safety of the construction crews and the traveling public. BMPs will be installed to meet stormwater, grading, and erosion control requirements. Construction contractors will work with the appropriate jurisdictions to obtain and follow all related construction permits.

(e) Construction Process**(1) Pre-Construction**

Construction of the transmission line is expected to occur in steps that generally include the following: pre-construction activities, such as construction access and vegetation clearing, installation of BMPs, equipment mobilization and material delivery, followed by

foundation construction, transmission pole placement and installation, conductor wire stringing and electrical equipment installation, and land restoration.

Construction access road improvements, grading, and setup of TCAs, along with vegetation work, will be conducted prior to construction of the transmission line. Proposed access roads will allow construction crews and vehicles to access transmission pole locations and TCAs.

Vegetation management within the transmission line ROW will be required prior to, or in conjunction with, construction. Trees and tall vegetation growing within or near the Pathway ROW can cause downed lines, power outages, and wildfire. Vegetation management crews will work to prevent these situations from occurring. Vegetation management involves the use of various types of treatment including removing, pruning, and mowing vegetation and the treatment of vegetation with herbicides to ensure safe operations. The extent of this work will vary along the transmission line depending on the level of vegetation encroachment and additional ROW needs.

(2) *Transmission Line Construction*

Once the pre-construction preparation work has been completed, work on the transmission lines will begin. The new transmission pole foundations will consist of concrete reinforced with steel that can range in diameter and depth based upon the subsurface conditions. Construction crews will begin drilling for transmission pole foundations. Reinforced concrete drilled pier foundations typically range from 6 to 9 feet in diameter and are drilled 20 to 40 feet deep. Once construction crews have drilled the hole for the new transmission pole, the foundation is installed, and the hole is backfilled.

Transmission poles will be placed using cranes. Crane installation will involve first hauling the transmission pole pieces to the location and then assembling the transmission poles at the installation locations and setting them with the crane. Once assembled, transmission poles will be transported by truck to installation locations and cranes will lift the transmission poles into place.

Once all the transmission poles are in place, the conductor wire and optical ground wire are strung using a temporary pulley system attached to the insulators. Conductor is pulled from one transmission pole to the next through a pulley system temporarily placed on the transmission pole. After a section of conductor is pulled through a series of transmission poles, the conductor is attached to insulators, which are attached to the transmission pole and the pulleys are removed. Trucks, heavy equipment will be, and helicopters may be, used in this process. As mentioned above, the current construction plan does not include the use of helicopters within El Paso County for stringing the conductor wire. If helicopters will be used for stringing the conductor wire, Xcel Energy will provide El Paso County with

a comprehensive plan detailing those operations and will coordinate with El Paso County authorities to minimize disruption and address community concerns.

Other equipment including bird diverters, spacers, and anti-galloping devices are also installed as needed. TCAs will be located at specific angles to ensure the conductor wire is pulled in line with the transmission poles, remaining in alignment.

(3) Construction Staffing, Vehicles, and Equipment

The first workers, vehicles, and equipment to mobilize for Pathway will conduct investigative fieldwork and prepare work areas for construction. Prior to construction and during the Pathway planning and design stages, soil borings are taken to understand the sub-surface conditions where Pathway facilities will be built. Geotechnical borings are taken using bore drill rigs. Vegetation clearing may be conducted to meet requirements for conductor clearances, minimize potential ignition sources, and to provide access within the ROW. Tree clearing and other vegetation removal is completed with both manual and mechanized equipment and will take place on the identified access route and the area within the easement. Matting is utilized as needed in wet or soft areas to prevent compaction, minimize soil disturbance, and improve site safety.

It is anticipated that one 12-hour shift per day (Monday through Saturday) will be worked during transmission line construction, but additional hours may be required. This will be during daylight hours, early morning to early evening. If additional hours are anticipated for shift work, a 24-hour work permit will be obtained from El Paso County. The maximum number of construction workers on site at any one time at any work area will be approximately 95 total¹. Transmission line construction is expected to be completed in phases over the duration of the construction schedule for each Pathway segment. The transmission line will not have any permanent on-site employees. The expected vehicle trips per day in El Paso County during transmission line construction is summarized in Table 5. The Transportation Memorandum is provided as Attachment I.

Table 5: Daily Vehicle Trips during Transmission Line Construction in El Paso County

Major Construction Tasks	Approximate Construction Duration (Weeks)	Approximate Daily Passenger Car Trips	Approximate Daily Truck trips by Vehicle Type	Approximate Total Daily Roundtrips
Transmission Line Construction				
Foundation Installation (~4 per day)	15 weeks	15	Flatbed trucks 5 Concrete trucks 28	48
Steel Pole Installation (~4 per day)	20 weeks	10	Flatbed and Semi-trucks 25	35

¹ Personnel may not be located or concentrated at same work area on the same day.

Major Construction Tasks	Approximate Construction Duration (Weeks)	Approximate Daily Passenger Car Trips	Approximate Daily Truck trips by Vehicle Type	Approximate Total Daily Roundtrips
Conductor/Optical Ground Wire	24 weeks	5	Semi-trucks 15 Crane 1 Aerial Lifts 2	21

Upon completion, Pathway will be operated and monitored remotely 24 hours a day, 7 days a week, 365 days a year to provide safe and reliable electric service. The transmission line will be inspected regularly (at least annually) to look for the following:

- Non-compatible vegetation and hazards within the ROW.
- Equipment needing repair or replacement.
- ROW encroachments, which can be hazardous to safety and reliable operations.
- Anything that might jeopardize safe, reliable operation of the power line.
- Operations and maintenance staff must visit the ROW for these inspections, but visits typically are minimal, and landowners will be contacted prior to on-site inspections or maintenance. However, in cases of emergency, advanced contact may not be possible.

It is anticipated that an average of 30 trucks per day will be utilized during the construction of the transmission line for crews, spotting materials, framing poles, and erecting poles. Concrete truck deliveries will be made daily when the foundations and piers are being constructed. Multiple deliveries of concrete (up to 28 per day) will be required daily at certain stages of construction. Materials will be delivered to the laydown areas at the onset of construction. An additional 10 to 15 trucks will be needed to deliver steel poles, conductor, anchor bolts, and foundation materials daily to work areas. The impact to local public roads will vary day-by-day as construction moves along the Pathway transmission line route.

A crane, drill rig, concrete truck, boom trucks, trailers, transmission poles, steel casing, and rebar cages are equipment and materials that will be moved into the site for construction. The transmission poles are delivered by truck and assembled at the foundation site and set in place with the use of cranes and other heavy equipment. Trucks, heavy equipment and sometimes helicopters are used to install conductor wire after all transmission poles are erected in an area. The construction plan does not currently call for the use of helicopters within El Paso County for stringing the conductor wire. If helicopters will be used for stringing the conductor wire, Xcel Energy will provide El Paso County with a comprehensive plan detailing those operations, including any temporary road closure, affected routes, closure durations, and detours and will coordinate with El Paso County authorities to minimize disruption and address community concerns.

To mitigate any potential impacts to El Paso County roads, Xcel Energy will negotiate a Development Agreement with El Paso County. Traffic Control Plans will be prepared and followed during construction. A Transportation Memorandum is provided as Attachment I.

REFERENCES

- El Paso County. 2024. El Paso County Land Development Code Appendix B: Guidelines and Regulations for Areas and Activities of State Interest. Revised: May 26, 2015. As provided in El Paso County Colorado Land Development Code. Version August 22, 2024. Available online at:
https://library.municode.com/co/el_paso_county/codes/land_development_code?nodeId=APXBGUREARACSTIN. Accessed September 2024.
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