BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

Docket No. 09A-324E

IN THE MATTER OF THE APPLICATION OF TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC. (A) FOR A CERTIFICATE OF) PUBLIC CONVENIENCE AND NECESSITY FOR THE SAN LUIS VALLEY-CALUMET-COMANCHE TRANSMISSION PROJECT, (B) FOR SPECIFIC FINDINGS WITH RESPECT TO EMF AND NOISE, AND (C) FOR APPROVAL OF OWNERSHIP INTEREST TRANSFER AS NEEDED WHEN PROJECT IS COMPLETED.

AND

Docket No. 09A-325E

IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO (A) FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR THE SAN LUIS VALLEY-CALUMET-COMANCHE TRANSMISSION PROJECT; (B) FOR SPECIFIC FINDINGS WITH RESPECT TO EMF AND NOISE, AND (C) FOR APPROVAL OF OWNERSHIP INTEREST TRANSFER AS NEEDED WHEN PROJECT IS COMPLETED.

RESPONSE OF TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC. TO FOURTH SET OF INTERROGATORIES OF BLANCA RANCH HOLDINGS, LLC AND TRINCHERA RANCH HOLDINGS, LLC

Tri-State Generation and Transmission Association, Inc. ("Tri-State"), pursuant to Rule 1405 of the Rules of Practice and Procedure of the Colorado Public Utilities Commission, hereby responds to the Fourth Set of Interrogatories of Blanca Ranch Holdings, LLC and Trinchera Ranch Holdings, LLC (collectively "Trinchera Ranch" or "TR") to Tri-State Generation and Transmission Association, Inc.[1] as follows:

RESPONSES

TRINCHERA RANCH 7-1: Regarding Tri-State's response to Data Request Trinchera Ranch 4-7(b)(ii):

a. Please identify the voltage thresholds in kV and the typical amount of load shed at the 10, 20 and 30 second setpoints of the load shedding program.

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[1] Trinchera Ranch's Fourth Set of Interrogatories to Tri-State is the seventh set of discovery requests submitted by Trinchera Ranch to Tri-State. Accordingly, for purposes of differentiating Tri-State's answers to these requests from its answers to earlier discovery requests, Tri-State's present answers will refer to, for example, "Trinchera Ranch 7-1" and "Response to Trinchera Ranch 7-1".

JRD-3

b. Please identify the date and time of each event since 2003 where the load shedding program shed load, the approximate amount of load during that event and whether the shedding of load successfully prevented voltage collapse in the San Luis Valley.

RESPONSE TO TRINCHERA RANCH 7-1: Tri-State objects to this Request to the extent it refers to a "load shedding program" as Tri-State has not have an undervoltage load shedding program in the San Luis Valley. Without waiving the foregoing objection, Tri-State responds:

a. There is only one voltage level: 107 kV. There is no "typical" amount of load shed as reduced voltage is a function of load magnitude.

b. Per TSGT 001206, on May 7, 2003 starting at 11:10, approximately 20.5 MW of Tri-State member load was shed due to depressed voltage (99 kV) following the outage of the San Luis Valley 230 kV source. It is probable the removal of load mitigated further voltage decay and voltage collapse.

Sponsor: Andrew R. Leoni

TRINCHERA RANCH 7-2: Please identify whether Tri-State, since January of 1998, has performed, or had performed on its behalf, any transient or dynamic (i.e., small-signal) stability analysis of the export capability of the San Luis Valley other than that presented starting at page 28 (Attachment E) of Attachment TR2-7.A14 that was provided as part of Tri-State's response to Data Requests Trinchera Ranch 2-5 and 2-7. If Tri-State has not performed, or has not had performed on its behalf, such analysis, please explain in detail why not. If Tri-State has performed such analysis, please provide a complete copy, in electronic form only, of any correspondence, reports or other documentation associated with the analysis in Tri-State's possession, custody or control.

RESPONSE TO TRINCHERA RANCH 7-2: Tri-State objects to this Request as it was Public Service Company of Colorado ("PSCo") that produced the document referenced in the Request. Without waiving the foregoing objection, Tri-State is not aware of any transient or dynamic stability analyses it has performed, or had performed on its behalf, since January, 1998 with respect to the "export capability of the San Luis Valley." Tri-State has not had a need to perform transient or dynamic stability analyses of the "export capability of the San Luis Valley." Tri-State will conduct such studies as part of the FERC LGIP procedures in the event new generation is proposed to be interconnected in the San Luis Valley.

Sponsor: Andrew R. Leoni

TRINCHERA RANCH 7-3: Please explain in detail why Tri-State does not currently utilize emergency line ratings in addition normal ratings for its transmission circuits and transmission level transformers.

RESPONSE TO TRINCHERA RANCH 7-3: Tri-State does utilize emergency line ratings in addition to normal line ratings for its transmission circuits and transmission level transformers. Normal ratings are typically used in planning studies.