

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

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 TO CALUMET TO 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
TO SECOND SET OF DISCOVERY REQUESTS BY
WESTERN RESOURCE ADVOCATES**

Tri-State Generation and Transmission Association, Inc. ("Tri-State" or "TSGT"), pursuant to Rule 1405 of the Rules of Practice and Procedure of the Colorado Public Utilities Commission, hereby responds to the Second Set of Discovery Requests propounded by Western Resource Advocates ("WRA") as follows:

WRA 2-1 Relating to the proposed transmission corridors, please identify and provide the following data in digital GIS format, (including 20 miles to either side of the proposed routes, where possible), and all other documents in the possession, custody or control of the Company:

- a. Proposed power line right-of-way width, and center line alignment;
- b. Proposed power line location and elevation data;
- c. Existing utility corridors (power lines, gas pipelines, etc.);
- d. Existing utility structures including elevation data, if available (substations, power lines, gas pipelines, etc.);
- e. Digital elevation data (LIDAR, if available, or 10m or finer DEM);
- f. Parcel data with ownership information (public, private, federal, etc.);
- g. Existing land use and cover (forest, agriculture, conservation designations, zoning, etc.);
- h. Federal public lands by agency (USFS, NPS, BLM, etc.);
- i. Other public lands held by counties, cities, state, or other jurisdictions;
- j. Vegetation type if available;
- k. Public roads and highways (include designated scenic routes, if

Sponsor: Robert Wolaver

WRA 2-3 For each of the transmission lines running north from the area of the San Luis Valley, please identify and provide all documents in the possession, custody and control of the Company with the following information:

- i. Its start and end point;
- j. Its rated capacity, and, if different, its actual capacity; and
- k. Its current available capacity (both contractual and, if available, power flow).

RESPONSE TO WRA 2-3 (i) through (k): Based on a telephone conversation with WRA counsel on July 15, 2009, it is Tri-State's understanding that Request No. WRA 2-3(i)-(k) may be treated as an interrogatory rather than a request for production of documents. With that understanding, and with the further understanding that the phrase "the transmission lines running north from the area of the San Luis Valley", as used in the Request, refers to those transmission lines which extend north from the San Luis Valley Substation, Tri-State responds as follows:

There are three transmission line running north from the San Luis Valley Substation: (1) the Poncha – San Luis Valley 230 kV line, jointly owned by Tri-State and PSCo; (2) the Poncha – San Luis Valley 115 kV line, owned by PSCo; and (3) the Poncha – San Luis Valley 69 kV line, owned by PSCo. With regard to Tri-State's Poncha – San Luis Valley 230 kV line:

- i. The line connects the Poncha and San Luis Valley substations.
- j. The rated thermal capacity of the transmission line is 1688 amps. The actual thermal capacity is limited by a current transformer at San Luis Valley to 500 amps;
- k. The available thermal capacity is 500 amps. The line is jointly owned with PSCo and Tri-State owns 50% of the line and capacity.

Since Tri-State does not own the Poncha – San Luis Valley 115 kV line or the Poncha – San Luis Valley 69 kV line, both of which are owned by PSCo. Tri-State refers WRA to PSCo's response to the parallel request contained in WRA's Second Set of Discovery Requests to Public Service Company of Colorado.

Sponsor: Andrew R. Leoni

WRA 2-4 Please identify and provide all studies, analyses, white papers, records of company discussions, and other documents that discuss the possibility of upgrading the lines running north from the area of the San Luis Valley as an alternate and/or complement to the proposed line from the San Luis Valley substation to Calumet.

RESPONSE TO WRA 2-4: See documents produced in response to Trinchera Ranch Request No. TR 1-1 and Exhibit No. MJM-2 attached to the Direct Testimony of Tri-State witness Mark J. Murray.

Sponsor: Andrew R. Leoni