

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

PROCEEDING NO. 23A-0585E

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IN THE MATTER OF THE APPLICATION OF TRI-STATE GENERATION AND  
TRANSMISSION ASSOCIATION, INC. FOR APPROVAL OF ITS 2023 ELECTRIC  
RESOURCE PLAN

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SUPPLEMENTAL DIRECT TESTIMONY AND ATTACHMENTS OF  
LISA K. TIFFIN  
ON BEHALF OF  
TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.

**NOTICE OF CONFIDENTIALITY**

A portion of this document has been filed under seal.

- Pages 6, 8, 9

April 22, 2024

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## ATTACHMENTS

Revised LKT-1	Revised ERP Report
Revised LKT-1 (Redline)	Revised ERP Report (Redline)

1 I. **INTRODUCTION, QUALIFICATIONS, PURPOSE OF TESTIMONY AND**  
2 **RECOMMENDATIONS**

3 **Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

4 A: My name is Lisa K. Tiffin. My business address is 1100 West 116<sup>th</sup> Avenue,  
5 Westminster, CO 80234.

6 **Q: BY WHOM ARE YOU EMPLOYED AND IN WHAT CAPACITY?**

7 A: I am employed by Tri-State Generation and Transmission Association, Inc. (“Tri-  
8 State”) as Senior Vice President, Energy Management.

9 **Q: ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS DOCKET?**

10 A: I am testifying on behalf of Tri-State.

11 **Q: HAVE YOU PREVIOUSLY FILED DIRECT TESTIMONY IN THIS**  
12 **PROCEEDING?**

13 A: Yes. I submitted Direct Testimony on December 1, 2023, in support of Tri-State’s  
14 2023 Electric Resource Plan (“ERP”) Phase I application in this proceeding. That  
15 testimony includes my background and experience in the electric utility industry  
16 and my Statement of Qualifications.

17 **Q: WHAT IS THE PURPOSE OF YOUR SUPPLEMENTAL DIRECT TESTIMONY IN**  
18 **THIS PROCEEDING?**

19 A: The purpose of my Supplemental Direct Testimony is to provide an update on the  
20 status of Tri-State’s Empowering Rural America (“New ERA”) funding request and  
21 its implications for the 2023 ERP Phase I. Subsequent to Tri-State filing its ERP  
22 Phase I and supporting testimony on December 1, 2023, Tri-State agreed to a  
23 modification of the procedural schedule in this proceeding given timing

1 considerations related to the status of Tri-State request for U.S. Department of  
2 Agriculture (“USDA”) New ERA funding. The revised schedule approved by  
3 Decision No. R24-0138-I on March 5, 2024 accommodated a Supplemental Direct  
4 Testimony filing deadline by Tri-State on April 22, 2024.

5 Additionally, my testimony addresses a future change to Tri-State load and  
6 its implications for Phase II of the 2023 ERP associated with LaPlata Electric  
7 Association’s notice that it will withdraw from Tri-State.

8 **Q: PLEASE IDENTIFY THE OTHER WITNESSES WHO ARE PROVIDING**  
9 **SUPPLEMENTAL DIRECT TESTIMONY ON BEHALF OF TRI-STATE.**

10 A: Tri-State’s witnesses that have also filed Supplemental Direct Testimony in this  
11 proceeding are as follows:

- 12 ○ Ms. Susan Hunter, Vice President, Energy Resources. Ms. Hunter’s  
13 testimony addresses updates to certain Phase II documents necessary for  
14 New ERA program alignment.
- 15 ○ Ms. Jessica Lien, Senior Manager, Financial Planning & Analysis. Ms.  
16 Lien’s testimony addresses financial updates for the IRA Scenario.
- 17 ○ Mr. Chris Pink, Senior Vice President Operations. Mr. Pink’s testimony  
18 provides an update on the siting study for the natural gas combined cycle  
19 plant with carbon capture and storage (“NGCC” and “CCS”).

20 **Q. ARE YOU SPONSORING ANY ATTACHMENTS AS PART OF YOUR**  
21 **SUPPLEMENTAL DIRECT TESTIMONY?**

22 A. Yes, as part of my Supplemental Direct Testimony, I am sponsoring the following  
23 attachments:

- 1 • **Revised LKT-1:** Revised ERP Report.

2 Tri-State is providing two versions of the report, for ease of review, one  
3 identifies the redline changes and the other is an updated, clean version of the  
4 revised ERP Report filed December 1, 2023.

5 **II. TRI-STATE'S PREFERRED PLAN UPDATE**

6 **Q: WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

7 A: The purpose of this section of my Supplemental Direct Testimony is to provide an  
8 update regarding the status of Tri-State's New ERA funding request and Tri-State's  
9 preferred plan.

10 **Q: HAS TRI-STATE RECEIVED A NOTICE TO PROCEED TO SUBMIT AN**  
11 **APPLICATION FOR NEW ERA FUNDING?**

12 A: Yes. On March 1, 2024, Tri-State received a notice to proceed in submitting an  
13 application for New ERA funding from USDA.

14 **Q: IS TRI-STATE MODIFYING ITS PREFERRED PLAN (IRA SCENARIO) FILED**  
15 **DECEMBER 1, 2023 AS A RESULT OF THE NOTICE TO PROCEED?**

16 A: No. Tri-State is not modifying its preferred plan, and is not making any changes  
17 to resource retirements or procurements during the Resource Acquisition Period.

18 **Q: HAVE ANY ANALYTICAL RESULTS FOR THE PREFERRED PLAN (IRA**  
19 **SCENARIO) CHANGED AS A RESULT OF THE NOTICE TO PROCEED?**

20 A: Yes. [REDACTED]  
21 [REDACTED]  
22 [REDACTED]. Tri-State has therefore updated the  
23 financial analysis results for the preferred plan, as described in the Supplemental

1 Direct Testimony of Jessica L. Lien. Tri-State has provided revised financial  
2 results for the preferred plan, the IRA Scenario, in Tables 8, 37, 38, and 111 in  
3 **Revised LKT-1**, the updated ERP Report.

4 **Q: DID TRI-STATE MAKE ANY OTHER UPDATES TO THE ERP REPORT?**

5 A: Yes. Tri-State made minor corrections to the loads and resources (“L&R”), in  
6 Tables 1 and 2 and Figures 1 and 2 of the ERP Report, to align with the updated  
7 L&R submitted in Proceeding No. 24M-0033E on April 1, 2024. Tri-State also  
8 corrected the inadvertent omission of four tables<sup>1</sup> that identify each scenarios’  
9 *Total Financial Under EWE Sensitivity* results.

10 **III. NOTICE OF LOAD CHANGE**

11 **Q: WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

12 A: The purpose of this section of my Direct Testimony is to provide an update  
13 regarding a forthcoming change to Tri-State’s load as a result of a Member  
14 providing notice that it will withdraw from Tri-State.

15 **Q: HAS THE COMMISSION REQUESTED THAT TRI-STATE PROVIDE NOTICE**  
16 **OF MATERIAL CHANGES TO THE LOAD FORECAST PRIOR TO PHASE II OF**  
17 **THE 2023 ERP?**

18 A: Yes. On page 21, lines 2-12, the Direct Testimony of Lisa Lynn describes the  
19 Commission requirement stated in Decision No. C23-0437 and Tri-State’s  
20 proposed approach.

21 **Q: IS A NEW MATERIAL LOAD CHANGE ANTICIPATED PRIOR TO PHASE II OF**

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<sup>1</sup> Table 19, Table 59, Table 80, and Table 100.

1 **TRI-STATE 2023 ERP?**

2 A: Yes. On March 25, 2024, La Plata Electric Association, Inc. (“LPEA”) located in  
3 southwest Colorado, with office locations in Durango and Pagosa Springs,  
4 provided notice to Tri-State that it will exit our system on April 1, 2026. LPEA  
5 represented [REDACTED] of Tri-State’s system energy in 2023, with a Member peak load  
6 of approximately [REDACTED]

7 **Q: IS LPEA’S LOAD INCLUDED IN THE LOAD FORECAST TRI-STATE USED**  
8 **FOR THE 2023 ERP PHASE I MODELING?**

9 A: In part. [REDACTED]  
10 [REDACTED], not all of LPEA’s load was reflected in the load  
11 forecasted used to project Tri-State resource needs in the expansion plan.

12 **Q: HOW ARE TRI-STATE’S ASSUMPTIONS CHANGING REGARDING LOAD TO**  
13 **BE SERVED THROUGH PARTIAL REQUIREMENTS?**

14 A: In Tri-State’s 2023 ERP Phase I modeling, [REDACTED] Partial Requirements  
15 load was assumed as not being served by Tri-State. On August 24, 2023, the  
16 Federal Energy Regulatory Commission (FERC) accepted Tri-State’s withdrawal  
17 of the tariff associated with Partial Requirements,<sup>2</sup> subsequent to Tri-State  
18 beginning Phase I modeling for this proceeding. Tri-State is working with its  
19 Members to evaluate potential replacement program options, subject to future  
20 FERC approval.

21 **Q: DOES THESE LOAD CHANGES RESULT IN THE NEED TO MODIFY TRI-**

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<sup>2</sup> Docket No. ER23-2303-000.

1           **STATE’S PREFERRED PLAN?**

2    A:    No. Given the unprecedented opportunity represented by USDA New ERA funding  
3           to advance Tri-State’s clean energy transition, and emissions reductions  
4           requirements leading to and including 2030, along with the consideration I noted  
5           regarding [REDACTED], Tri-State does not intend to modify its  
6           Phase I resource plan.

7    **Q:    WILL THESE CHANGES IN LOAD BE REFLECTED IN 2023 ERP PHASE II**  
8           **MODELING?**

9    A:    Yes. Tri-State will update its load forecast, partial requirements assumptions, and  
10           other modeling inputs based on best available information, in preparation for  
11           Phase II portfolio modeling.

12   **IV.   CONCLUSION**

13   **Q:    WHAT RECOMMENDATIONS ARE YOU MAKING IN YOUR SUPPLEMENTAL**  
14           **DIRECT TESTIMONY?**

15   A:    I continue to recommend that the Colorado Public Utilities Commission  
16           (“Commission”) approve Tri-State’s Phase I 2023 ERP, including the Inflation  
17           Reduction Act Scenario (“IRA Scenario”) as Tri-State’s preferred plan and the  
18           following items Tri-State has proposed for Phase II of the 2023 ERP:

- 19           • Phase II timeline;
- 20           • Phase II RFPs;
- 21           • Bid evaluation criteria and bid policy;
- 22           • Independent Evaluator (“IE”) Statement of Work;
- 23           • Model power purchase agreements (“PPAs”) and Term Sheets;

- 1           • Phase II Implementation Report components;
- 2           • 45-Day Report content; and
- 3           • RAP Action Plan.

4   **Q:   DOES THIS CONCLUDE YOUR SUPPLEMENTAL DIRECT TESTIMONY?**

5   **A:   Yes.**

