

July 9, 2024

Rachid Rabbaa, Project Manager
Office of Development Assistance
City of Aurora
15151 E. Alameda Parkway
Aurora, CO 80012

RE: Letter of Introduction, Colorado's Power Pathway (#1708633, DA-2384-00)

Dear Rachid Rabbaa,

Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy (Xcel Energy), is seeking approval of a Conditional Use Permit Application and Site Plan for a Minor Utility use (Application) from the City of Aurora to construct and operate a portion of Colorado's Power Pathway (Pathway) located in Aurora. Pathway is a \$1.7 billion investment to improve the state's electric grid and enable future renewable energy development around the state. Pathway will increase electric reliability, boost the regional economy, and create jobs during construction. Pathway includes the installation of approximately 550 miles of new 345-kilovolt (kV) double-circuit transmission line; four new electric substations; and expansion, equipment additions or equipment upgrades at four existing electric substations.

Pathway will be constructed in five segments with each new or expanded electric substation serving 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)

In March 2021, Xcel Energy filed a Certificate of Public Convenience and Necessity (CPCN) Application with the Colorado Public Utilities Commission (CPUC) describing the purpose, need, and public benefits of constructing Pathway. In February 2022, the CPUC provided verbal approval, and in June 2022, it provided written approval of the CPCN for Segments 1–5, based on a determination that Pathway is in the public interest. The 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. While the CPUC determines the need for Pathway, it does not determine the location of the components; the location and land use permissions will be granted through easement negotiations with landowners and land use permits in the applicable jurisdictions where Pathway components will be located. Preferred transmission line routes and substation sites for Pathway have been selected after completion of routing and siting studies, coordination with permitting entities, and conducting public outreach.

Pathway land use permitting is occurring concurrently with Arapahoe, El Paso, Elbert, Lincoln and Pueblo counties for the portions of Segment 5 that occur in those jurisdictions. Coordination is ongoing with additional jurisdictions for other segments as described in Section 2 of the Application.

This Letter of Introduction and the Application provide information about Pathway in Aurora, including specific information required by the Site Plan Manual (Table 1) and the approval criteria for approval of a Conditional Use Permit required by Section 5.4.3.A.3 of the Aurora Unified Development Ordinance (UDO; Table 2) and, with additional detail about Pathway as a whole provided in Section 2 of the Application. The applicant has uploaded this Application onto Aurora's Development Application Review website.

Table 1: Compliance with Letter of Introduction Requirements per Section 2 of the Aurora Site Plan Manual

Requirement*	Description
Description of the type of land use proposed	Minor utility; approximately 1 mile of new 345-kV double-circuit electric transmission line.
Location of the project	Approximately 1 mile through Aurora jurisdiction, parallel to and north of East Quincy Avenue within land zoned as Parks and Open Space (POS). See the Vicinity Map in Attachment B of the Application.
Size of the project in acres	Pathway transmission line facilities in Aurora are approximately 1 mile long (length) and includes a 150-foot right-of-way (ROW; width). The total size of Pathway facilities in Aurora is approximately 18 acres.
Intensity of development	During operation, the transmission line represents a passive use and will not be staffed. Transmission line operations will not require on-site staff and will be monitored remotely. Visits from personnel will be limited to emergencies or maintenance and inspection activities. The intensity of the development will be similar to other transmission lines located in proximity and on the south side of East Quincy Avenue.
Outline of justification and mitigation for each proposed adjustment of the city code. Analysis of the adjustment criteria requirements in Section 146-5.4.4.	Xcel Energy is requesting a waiver of the submittal of GIS and CAD files for addressing purposes as an Administrative Adjustment in accordance with Section 146-5.4.4.F of the UDO. The transmission line will not require an address since it is an unstaffed linear facility. Regarding the criteria for approval in Section 146-5.4.4.F.3(a-g) of the UDO, none of the criteria directly apply to the request for waiver of the submittal of GIS and CAD files for addressing purposes, therefore Pathway would not be inconsistent with the criteria for approval.

Requirement*	Description				
List of the names, addresses, and phone numbers of the property owner and any project consultants	<p>The names and addresses of the surface owners within the Pathway ROW in Aurora as available in the Aurora Assessor's database are shown in Attachment E of the Application. Xcel Energy is currently negotiating with the potentially affected landowners for necessary land rights along the proposed transmission line route. These negotiations include securing an option for a permanent non-exclusive easement for the 150-foot-wide ROW of the transmission line as well as permanent and temporary easements required for access and TCAs during and after construction. Once land surveying, final engineering design, and permitting have been completed, Xcel Energy will exercise the options and record the final easements. The easements for each phase of Pathway will be secured and recorded prior to construction starting on that phase.</p> <table border="0"> <tr> <td data-bbox="448 667 927 930"> Applicant: Jennifer Chester Sr. Manager, Siting and Land Rights Xcel Energy 1800 Larimer Street, Suite 400 Denver, CO 80202 303-285-6533 </td><td data-bbox="927 667 1422 930"> Surveyors: Corey Herring Project Manager LW Survey 12345 W. Alameda Pkwy, Ste 205 Lakewood, CO 80202 303-515-3337 </td></tr> <tr> <td data-bbox="448 951 927 1213"> Engineer: Josh Peterson, P.E. Principal Transmission Engineer Xcel Energy 1800 Larimer Street, Suite 500 Denver, CO 80202 303-571-6559 </td><td data-bbox="927 951 1422 1213"> Consultant: Stephanie Phippen Project Manager Tetra Tech, Inc. 390 Union Blvd, Suite 400 Lakewood, CO 80228 303-980-3515 </td></tr> </table>	Applicant: Jennifer Chester Sr. Manager, Siting and Land Rights Xcel Energy 1800 Larimer Street, Suite 400 Denver, CO 80202 303-285-6533	Surveyors: Corey Herring Project Manager LW Survey 12345 W. Alameda Pkwy, Ste 205 Lakewood, CO 80202 303-515-3337	Engineer: Josh Peterson, P.E. Principal Transmission Engineer Xcel Energy 1800 Larimer Street, Suite 500 Denver, CO 80202 303-571-6559	Consultant: Stephanie Phippen Project Manager Tetra Tech, Inc. 390 Union Blvd, Suite 400 Lakewood, CO 80228 303-980-3515
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A justification for how the site plan conforms to the site plan criteria in Section 146-405(F) in the City Code	Pathway compliance with the site plan criteria in Section 146-405(F) is addressed in Section 6, Site Plan Criteria for Approval, of the Application.				

*Requirements for the Letter of Introduction per Section 2 of the Aurora Site Plan Manual (Aurora 2024).

Table 2: Compliance with Conditional Use Permit Approval Criteria per Section 5.4.3.A.3 of the Aurora Unified Development Ordinance

UDO Citation*	Criteria	Pathway Compliance
5.4.3.A.3.a	<p>a. The application complies with the applicable standards in this UDO, other adopted Aurora regulations (including but not limited to any use-specific standards for the proposed conditional use in Section 146-3.3), any approved Master Plan that includes the property, and any conditions specifically applied to development of the property by the Planning and Zoning Commission or City Council in a prior decision affecting the property;</p>	<p>Pathway is located within the municipal boundaries of Aurora for approximately 1 mile within the Parks and Open Space (POS) zone district (Aurora 2023a). The proposed use is classified as a Minor Utility by the UDO, which includes above-ground electric transmission lines of public utilities (146-6.2.U). A Minor Utility may be permitted in the POS zone district through the conditional use process (Permitted Use Table, Table 3.2-1 in Section 146-3.2 of the UDO). Minor Utilities do not have use-specific standards per the Permitted Use Table, Table 3.2-1 in Section 146-3.2 of the UDO.</p> <p>Existing Master Plans on the properties include the Aurora Bicycle and Pedestrian Master Plan (Aurora 2012) and the Seam Interceptor Master Plan, previously referred to as the Senac Creek Interceptor Project (Aurora 2023b). Xcel Energy has reviewed the Aurora Bicycle and Pedestrian Master Plan for information regarding future regional trail corridors through the Pronghorn Natural Area (Natural Area) and identified a proposed trail within the Natural Area. (See map on page 41 of Aurora Bicycle and Pedestrian Master Plan.) The proposed trail appears to be aligned in a north to southeast direction, which assumes a perpendicular crossing. Pathway will not prohibit the construction and use of the future trail in this area.</p> <p>Pathway adheres to the Seam Interceptor Master Plan (Aurora 2023b). This is a water pipeline project that Pathway will have to cross. Interference with the water pipeline location and function is not expected nor is an interference with the water facility. The Seam Interceptor Master Plan includes layout of existing and future planned facilities associated with the water treatment facilities. Pathway will be located at the property boundary with East Quincy Avenue ROW. A future trail is planned in this area. The proposed trail appears to be aligned in a west to east direction, which assumes parallel orientation with Pathway. Pathway will not prohibit the construction and use of the future trail. It is unknown whether construction schedules will overlap between trail construction and Pathway</p>

UDO Citation*	Criteria	Pathway Compliance
		<p>construction. Xcel Energy will coordinate with the landowners to reduce conflict or other interruption of construction progress.</p> <p>Pathway is not aware of conditions of approval applied to the property by the Planning and Zoning Commission or City Council in prior decisions affecting the property.</p>
5.4.3.A.3.b	b. The application is consistent with the Comprehensive Plan.	<p>Pathway is consistent with the Aurora Comprehensive Plan, titled Aurora Places: Planning Tomorrow's City (Comprehensive Plan; Aurora 2018). An analysis of Pathway's consistence with the Comprehensive Plan is provided as Attachment H. A summary of Pathway consistency with Chapter 4: Placetypes, Chapter 5: Connecting Places, and Chapter 6: Goals, Policies, and Practices of the Comprehensive Plan are described in the subsequent text.</p> <p>Chapter 4: Placetypes</p> <p>Pathway is located in an area defined in the Comprehensive Plan as an urban greenspace (Aurora 2018). This includes the Pronghorn Natural Area (Natural Area) which is located in the POS zone district. The Urban Green Space Placetype is largely defined by three land uses: parks, trails, and open space (Aurora 2018). These, however, are not the only land uses to occur or that are allowed in this Placetype.</p> <p>Pathway is a low intensity use and is compatible with the surrounding land uses. During operation and after construction, the transmission line represents a passive use and will not be staffed. Transmission line operations will not require on-site staff and will be monitored remotely. Visits from personnel will be limited to emergencies or maintenance and inspection activities.</p> <p>Where feasible, Pathway will be collocated with an existing transmission line corridor along East Quincy Avenue to reduce impacts. Pathway is not expected to change the land use of the Natural Area because it is being located adjacent to an existing transmission line and a road. Aside from the transmission pole foundation footprint, areas under and around Pathway can continue in their current land use. The transmission line will be located parallel to the East Quincy Avenue ROW. Pathway will mitigate impacts to roads due to construction and related</p>

UDO Citation*	Criteria	Pathway Compliance
		<p>transportation routing using BMPs and traffic control during construction, and through post-construction restoration efforts.</p> <p>Temporary impacts to land uses are expected to be minor. Disturbed areas surrounding new transmission poles will be revegetated following construction. Construction and operation of the transmission line will not interfere with continued use of the surrounding areas. Disturbed areas will be returned to pre-construction conditions in a reasonable manner or reseeded according to landowner requests and Aurora requirements. Discussions of impacts and mitigation to various resources related to the greenspace placetype are included in the Impacts Analysis (Section 9 of the CUP and Site Plan Application Narrative) as follows: Public Outdoor Recreation Facilities (9.11); Visual Quality, Noise, Vibration, and Odor (9.14); Biological Resources (9.3); and Water Resources (9.13).</p> <p>Chapter 5: Connecting Places</p> <p>Chapter 5 of the Comprehensive Plan describes the policies and goals of connecting places in Aurora. The Comprehensive Plan states that “cost effective, efficient and reliable utilities are essential to all activity in Aurora” (Aurora 2018). Pathway will ensure safe, reliable, and economical electric service to the public, boost the regional economy, and create jobs during its construction.</p> <p>Chapter 5 also discusses transportation and mobility planning including the Southeast Area Transportation Study (SEATS), which includes future plans for East Quincy Avenue. SEATS plans to establish Quincy Avenue as a six-lane major arterial as far east of Monaghan Road. During the pre-application meeting, Aurora provided information regarding an Intergovernmental Agreement between Aurora and Arapahoe County about East Quincy Avenue that identifies Quincy Avenue as a six-lane arterial with a final ROW width of 144 feet. Xcel Energy proposes the future ROW for Pathway to lie directly adjacent to the north side of the Quincy Avenue ROW.</p> <p>The Aurora Bicycle and Pedestrian Master Plan (Aurora 2012) is also referenced in Chapter 5. Xcel Energy has reviewed the Aurora Bicycle and Pedestrian Master Plan for information regarding future regional trail corridors through the Natural</p>

UDO Citation*	Criteria	Pathway Compliance
		<p>Area and identified a proposed trail within it. (See map on page 41 of Aurora Bicycle and Pedestrian Master Plan; Aurora 2012.) The proposed trail appears to be aligned in a north to southeast direction, assumes a perpendicular crossing of Pathway. Pathway will not prohibit the construction and use of the future trail.</p> <p>Chapter 6: Goals, Policies, and Practices</p> <p>Chapter 6 discusses the seven principles and their underlying goals for future planning in Aurora. Per the Comprehensive Plan (Aurora 2018), there are several goals that encourage access to utilities. Attachment H addresses each of the principles and underlying goals in detail.</p>
5.4.3.A.3.c	c. The size, scale, height, density, multi-modal traffic impacts, and hours of operation of the proposed use are compatible with existing and planned uses in the surrounding area.	<p>The size, scale, height, and density are compatible with the existing and planned uses in the surrounding area, which include an existing roadway, existing open space/natural area, an existing transmission line, future water pipeline/treatment facility, and future trail.</p> <p>Surrounding uses include the Natural Area in the POS zone district. The proposed use is classified as a Minor Utility by the Aurora Unified Development Ordinance, which includes above-ground electric transmission lines of public utilities (146-6.2.U). The Minor Utility may be permitted in the POS zone district by the conditional use process.</p> <p>Pathway is a low intensity use and is compatible with the surrounding land uses including recreational open space and trails. The transmission line represents a passive use and will not be staffed. Transmission line operations will not require on-site staff and will be monitored remotely. Visits from personnel will be limited to emergencies or maintenance and inspection activities.</p> <p>Where feasible, Pathway will be collocated with an existing transmission line corridor along the south side of East Quincy Avenue to reduce impacts. Pathway is not expected to change the land use of the Natural Area because it is being located adjacent to an existing transmission line and road. Aside from the transmission pole foundation footprint, areas under and around Pathway can continue in their current land use.</p>

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		<p>The transmission line will be located parallel to the East Quincy Avenue ROW. Pathway will mitigate impacts to roads due to construction and related transportation routing using BMPs and traffic control during construction, and through post-construction restoration efforts.</p> <p>Temporary impacts to land uses are expected to be minor. Disturbed areas surrounding new transmission poles will be revegetated following construction. Construction and operation of the transmission line will not interfere with continued use of the surrounding areas. Disturbed areas will be returned to pre-construction conditions in a reasonable manner or reseeded according to landowner requests and Aurora requirements.</p> <p>Traffic impacts are expected to be minimal and temporary in nature. 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 electric transmission facilities will not be staffed as it is monitored remotely.</p>
5.4.3.A.3.d	d. The proposed use will not change the predominant character of the surrounding area;	<p>The visual landscape along the route features existing transmission lines, roadways, and industrial elements, and Pathway will result in an incremental increase in transmission poles in the viewshed. Visual resources are discussed in Section 9.14 of the CUP and Site Plan Application Narrative.</p> <p>Pathway is a low intensity use and is compatible with the surrounding land uses. The transmission line represents a passive use and will not be staffed. Transmission line operations will not require on-site staff and will be monitored remotely. Visits from personnel will be limited to emergencies or maintenance and inspection activities.</p> <p>Where feasible, Pathway will be collocated with an existing transmission line corridor along East Quincy Avenue to reduce impacts. Pathway is not expected to change the land use of the Natural Area because it is being located adjacent to an existing transmission line and a road. Aside from the transmission pole foundation footprint, areas under and around Pathway can continue in their current land use.</p>
5.4.3.A.3.e	e. The City's existing infrastructure and public improvements, including but not	No new or upgraded public services or facilities are anticipated to be needed to serve Pathway in Aurora. Pathway creates no additional demand for

UDO Citation*	Criteria	Pathway Compliance
	limited to its street, trail, and sidewalk systems, have adequate capacity to serve the proposed development, and any burdens on those systems have been mitigated to the degree practicable;	transportation infrastructure, educational facilities, housing, water (other than trucked-in water for construction), wastewater treatment, or public transportation.
5.4.3.A.3.f	f. The application demonstrates that the proposed use will not create significant dislocations of tenants or occupants of the property, or that any impacts are outweighed by other public benefits or progress toward other Comprehensive Plan goals that would be achieved by approval of the application.	<p>Pathway is not located near any residential areas in Aurora and will not relocate any tenants or occupants on the subject property. Construction and operation of Pathway will result in minimal permanent impacts to natural resources or agricultural lands. Lands can continue in current land use with the exception of the footprint of the individual transmission poles.</p> <p>Pathway is anticipated to provide local economic benefits during construction and long-term economic benefits should new generation resources be developed in the area. Pathway will also improve the state's electric reliability, thereby benefiting all consumers in Colorado.</p>
5.4.3.A.3.g	g. The application mitigates any adverse impacts on the surrounding area to the degree practicable.	Mitigation measures planned for Pathway are listed by resource in Table 5 of the CUP and Site Plan Application Narrative. A full description of resources, potential impacts, and mitigation measures are included in Section 9, Impacts Analysis, of the CUP and Site Plan Application Narrative.

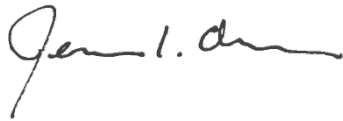
*Conditional Use Permit approval criteria from Section 5.4.3.A.3 of the Aurora Unified Development Ordinance (Aurora 2024).

A portion of Pathway's Segment 5 is proposed to be located in Aurora, within land zoned as Parks and Open Space (POS). The proposed use is classified as a Minor Utility by the UDO, which includes above-ground electric transmission lines of public utilities (Section 146-6.2.U). Pathway facilities proposed in Aurora include approximately 1 mile of new 345-kV double-circuit electric transmission line. Segment 5 enters Aurora from the west, northeast of the Arapahoe County Fairgrounds, and proceeds directly east for approximately 1 mile through Aurora jurisdiction, parallel to and north of East Quincy Avenue. Pathway facilities in Aurora parallel an existing 115-kV transmission line that runs parallel and south of East Quincy Avenue.

Project representatives met with Aurora staff on May 18, 2023, for the Pre-Application Meeting during which Xcel Energy provided information about Pathway and responded to questions from Aurora representatives. Project representatives met with Aurora staff on April 5, 2024, for the Pre-Submittal Meeting during which Aurora representatives provided information on the application submittal process. This Application package was prepared per the requirements of the Aurora UDO (Sections 146-5.3.3, 146-5.4.3.A, and 146-5.4.3.B) and the Site Plan Manual. This Application was also prepared pursuant to guidance and discussion provided during the Pre-Application Meeting attended by representatives of Aurora and Xcel Energy on May 18, 2023. This Letter of Introduction has been revised per the Initial Submission Review Comment 2C requesting Xcel Energy to provide details on how the approval criteria will be satisfied (see Table 2).

We look forward to working with you during the permit process. Please feel free to contact me by telephone at (303) 285-6533 or email at jennifer.l.chester@xcelenergy.com, or contact Xcel Energy's Siting & Land Rights Agent Cory Miller at (303) 571-7759 or cory.r.miller@xcelenergy.com, or contact Xcel Energy's permitting consultant, Stephanie Phippen with Tetra Tech Inc., at (303) 980-3515 or stephanie.phippen@tetrattech.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer I. Chester". The signature is fluid and cursive, with the first name "Jennifer" and last name "Chester" clearly distinguishable.

Jennifer Chester
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