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To: Xcel Energy
Attn: Shane Gutierrez, shane.gutierrez@xcelenergy.com
Subject: Designation of energy resource zones under S.B. 07-100

Dear Mr. Gutierrez,

BP Alternative Energy (“BPAE”) is pleased to submit these comments on Xcel Energy’s (“Xcel”) designation of energy resource zones in the state of Colorado as part of the implementation of Senate Bill 07-100.

BPAE believes that all three energy resource zones proposed by Xcel at the April 24 meeting— Zones 1, 2 and 3 – have large areas of potential wind generation, as well as transmission constraints on the generation of wind energy. Accordingly, BPAE urges Xcel to develop transmission plans for all three zones by Oct. 31, 2007, and to include all three zones in Xcel’s next Request for Proposals (RFP) for new generation. . Furthermore, BPAE urges Xcel to consider expanding Zone 1 to incorporate the wind resources from Southeastern Wyoming. This area of the country has a very high wind resource which can benefit the ratepayers of the state of Colorado.

BPAE believes that the long-term plans of Tri-State and/or the Western Area Power Administration to develop transmission capacity in Zones 2 and 3 should not result in exclusion of either zone from Xcel’s designation of energy resource zones by Oct. 31, 2007.

Further, BPAE believes Xcel should not rely entirely on transmission queues as a guide in its designation of energy resource zones. BPAE or its predecessors in interest, Orion Energy LLC and Greenlight, have been developing a number of wind projects in Zones 1, 2 and 3, as shown in the table below, some of which were bid into Public Service of Colorado’s all-source RFP in 2005. For a variety of reasons, not all of these development projects are currently listed in transmission queues.

Zones 1, 2 and 3 all have excellent wind resources that could provide sources of low cost wind generation to the ratepayers of Colorado. Xcel’s development of transmission improvements to every energy resource zone that has substantial productive capacity offers several benefits:

- Encourages wind generation with the lowest cost structure to reach the load centers in Colorado.
- Provides for diversification in production since the wind generation in one zone can balance wind generation from another zone.
- Enables more wind generation in Colorado to be developed more quickly, bringing the benefits of renewable energy to Colorado faster and facilitating compliance with the requirements of the state RPS.
- Transmission improvements throughout eastern Colorado will strengthen the electric system in the state and help create a more robust, reliable and stable grid.

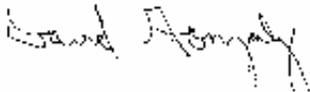
BP&E is actively developing projects in each of these zones, as shown in the following table:

Zone	Total Capacity (MW)	Expected CODs	Fuel
1	Approx. 1,100	2008-2010	Wind
2	Approx. 350	2009-2010	Wind
3	Approx. 400	2009-2010	Wind

As previously discussed, please keep the information in the foregoing table strictly confidential.

We appreciate Xcel's consideration of these comments. If you have any questions, please feel free to contact me at (713) 354-2138. Thank you.

Sincerely,



David Gonzalez, P.E.
Director, Business Development