

**Interwest Energy Alliance • The Nature Conservancy •  
Western Resource Advocates**

May 14, 2007

Shane Gutierrez  
Xcel Energy  
1099 18th St. – 22nd Floor  
Denver, CO 80201

**Re: Xcel Energy's Implementation of SB 100**

Dear Mr. Gutierrez:

We are writing to express our interests and concerns as Xcel moves forward in implementing SB 100 that was recently passed into law in Colorado. The process of designating energy resource zones and developing transmission plans to link those zones to the power grid offers both exciting opportunities as well as challenges.

SB 100 offers all of us in Colorado an incredible opportunity to increase our use of renewable energy sources. Reliance on clean sources of energy, such as wind and solar power, will help move Colorado to a more sustainable energy policy that has many environmental benefits. From the preliminary identification of energy resource zones, we are encouraged that high potential wind and solar areas in eastern and southern Colorado are being recognized for their energy potential and connection to the grid system.

Our major concern is that Xcel Energy must incorporate information regarding wildlife and sensitive ecological areas into its planning process in order to lessen environmental impacts. This type of scientific data should be identified and collected early on in the process so that impacts from transmission corridor proposals can be fully analyzed, disclosed and mitigated in an open, transparent process with the public and interested stakeholders. Analyzing these concerns at the very beginning of the process will yield the best chances for different interests to come together in agreement on best possible routes for new transmission and appropriate areas for development within the identified resource zones. Delaying this type of analysis and public discussion to later stages of planning will frustrate opportunities for stakeholder input and buy-in on best siting and location options. Ultimately, we are concerned that this may lead to otherwise avoidable delays for new transmission targeted for renewable energy projects.

We are pleased to be able to work with Xcel in this process. We've enclosed the Central Shortgrass Prairie Ecoregional Assessment and Partnership Initiative, created by The Nature Conservancy and the Shortgrass Prairie Partnership 2006. This research provides scientific data on important wildlife habitat and species locations in eastern Colorado. We ask that you

incorporate this information – contained in GIS format – into different layered maps so that highly sensitive ecological and wildlife areas can be avoided and overall impacts to natural resources can be lessened and mitigated. The GIS data contains species-specific information for wildlife and plant communities and also can be displayed in conservation priority areas that have high biological diversity.

In addition to this information, we encourage Xcel to begin collecting data regarding wildlife and sensitive lands (public and private) from the Colorado Division of Wildlife and other sources. Successful implementation of SB 100 will also be facilitated by early outreach to and discussions with state and federal wildlife agencies, conservation/sportsmen groups, county commissioners and private landowners.

Thanks for your consideration and please contact any of us if you have questions. Our organizations are filing this comment letter jointly, and our groups may also be sending comments on the overall SB 100 implementation issues separately. We look forward to working with Xcel as we move forward to identifying high-potential areas for renewable energy in Colorado and developing appropriate transmission plans to bring these clean energy resources on line.

Sincerely,

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