Land Development Code 5-3.4 Use By Special Review - Approval Criteria

1. The following criteria shall be used to assist in determining that the proposed Use by Special is appropriate:

a) Recognize the limitations of existing and planned infrastructure, by thoroughly examining the availability and capability of water, sewer, drainage, and transportation systems to serve present and future land uses.

The Project planned land use does not require any changes to existing or required planned infrastructure expansion due to the nature of the Project. The Project is generating electricity to supply to CORE's existing electrical transmission system. The Site for the Project already includes necessary infrastructure to connect the Project to CORE's electrical transmission system. No new electrical transmission infrastructure is required by CORE to utilize the electricity produced by the Project.

The Project also does not require the use of water for equipment operations and no water source currently exists on the site (no water well or city water service line). No new water well is planned for the project. Instead, the Project will install a dedicated Fire Water Tank for the fire water supply system and dedicated Potable Water Storage Tank for potable water supply to the Controls Trailer for employee needs.

The fire water system is comprised of a dedicated Fire Water Pump Skid and underground fire water supply loop with hydrants across the site to support firefighting capabilities. The dedicated Fire Water Tank will have a capacity of 165,000 gallons, significantly exceeding the NFPA 850 requirements. This ensures a reliable and continuous supply of water for firefighting. After a fire event, the Fire Water Tank will be refilled by water trucked to the site. The source of the water will be from a local supplier who is permitted to supply water for this service.

The Potable Water Tank will store the required potable water volume to meet the demands and needs of employees, including for bathroom facilities and hand washing in the Controls Trailer. Pumps will be used to ensure adequate pressure and flow for potable water supply to Controls Trailer. The Potable Water Tank will be located next to the Controls Trailer. The Project will have two (2) bathrooms installed in the Controls Trailer for employee use, and these bathrooms will discharge to a septic system (onsite water treatment system). The septic system will include a septic tank and leach field, sized in accordance with Arapahoe County Health Department and IPC requirements. The use of a Potable Water Storage Tank is compliant with Chapter 6 of the International Plumbing Code (IPC) for potable water sources. The code allows the use of a potable cistern for the source of potable water to supply water to plumbing fixtures, as specified in Section P-602.3 Individual Water Supply. In this case, the Potable Water Storage Tank serves as the potable cistern. Potable water will be supplied by local supplier permitted for this service.

The potable water system and onsite septic system is planned for the limited personnel needed to operate the Project. The facility is expected to operate with two (2) employees per 12-hour shift with two shifts per day. Based on 40-hour work weeks with rotating shift teams, this would support up to 12 full-time, highly skilled operational positions. The Project will have increased traffic during construction but once the Project is operating, traffic generated by Project Operators is very minimal. Please refer to Traffic Study Waiver Memo in Appendix B2 for expected vehicle quantities. In general, the Project will have two operators per 12-hour shift. There will be periodic deliveries but not of significance to impact existing or future traffic patterns.

The Project will require internet service to ensure the facility can communicate outside the facility, this includes phone service and network communications. Due to the critical nature of network and plant controls, the Project will most likely use a satellite-based internet provider if a local high-speed fiber optic internet provider is not able to bring fiber to the Site. There is existing fiber optic to the Brick Center Substation but due to the critical nature and security requirements for the substation operations by CORE, the Project will not be able to use this existing fiber service. This is typical of electrical utility industry.

Overall, the Project will not rely on existing infrastructure that would create any limitations to how the Project will be constructed or operated. Since the Project will install its own necessary utilities, the Project does not need existing infrastructure related to providing water, sewer, drainage, or transportation systems, there is no impact on existing or future Land Uses by the surrounding properties and community in general.

The Project will have no negative impacts or required expansion of infrastructure as noted above. The Project does not need or require any existing infrastructure or expansion of infrastructure in order to be constructed or to operate.

b) Assure compatibility between the proposed development, surrounding land uses, and the natural environment.

The Project is located in Unincorporated Arapahoe County in an agricultural area that includes current zoning uses allowed within approved Special Use and the Arapahoe County Comprehensive Plan. The elevation of the site is approximately 5,775 feet above sea level. The Project will be located within property owned by CORE, on land currently zoned A-1. Canyon Peak Power Station will be co-located with the existing Brick Center Substation, which maximizes CORE's existing infrastructure, optimizes available utility land, and minimizes the construction footprint of the Project. The gas pipeline will be installed within the County Road 129 utility ROW. No change in zoning is required for the Project. The Project is not located within in a floodplain or geological sensitive area.

The gas pipeline will cross three drainageways. The pipeline is not anticipated to significantly impact the quantity or quality of surface water or impact the meandering characteristics and limits of streambeds as impacts to waters of the United States (WOTUS) will be avoided using either boring or horizontal directional drilling (HDD) installations. Additionally, appropriate control measures will be implemented to ensure minimal impacts to surface water quality. A construction stormwater management plan will be developed for the pipeline in accordance with Colorado

Department of Public Health and Environment's Colorado Discharge Permitting System Permit (COR400000) and Arapahoe County's Grading, Erosion and Sediment Control Manual. To mitigate the impacts of these crossings, the Project will implement specific erosion and sediment control measures, such as installing Reinforced Rock Berms and Sediment Control Logs, to prevent soil disturbance and sediment runoff. Additionally, the use of Erosion Control Blankets and regular inspections will ensure that these crossings do not adversely affect the drainage systems or the surrounding environment.

Land uses along County Road 129 from Belleview Avenue to East Iliff Trail are largely agricultural zoned with residences located sporadically. Large tracts appear to be used for ranching and dryland farming. There are numerous properties that have reviewed through the Use By Special Review process facilities located within these agricultural zoned areas. These include large solar facilities installed on properties in the vicinity of the Project, the Arapahoe County Eastern Service Center located north of the Project site, and Kiowa Creak Sporting Club, located east of the Project Site.

Properties immediately adjacent to the Project are similarly zoned and have large solar facilities installed for renewable energy generation or have minimally agricultural use of the land.

There are no local land-use plans specifically adopted for the Project area located in CORE's property. The Project complies with the intended implementation for A-1 Zone District from the Arapahoe County Land Development Code for A-1 zoning, for land use categories "Rural Area Uses" as designated in the Land Use Plan element of the Comprehensive Plan. From the Arapahoe County Comprehensive Plan, for Non-Residential Land Uses, the Project is considered a primary use under Public Facilities (power energy facilities) with siting determined through the County's land use review process. Under Rural Area Uses, Special Review allow public facilities on a case-by-case basis.

The Project also addresses goals and policies from the Comprehensive Plan in relation to Local and Regional Public Facilities and Utilities Facilities. The Project supports local utility needs and growth of the region. The Project's land use is compatible with surrounding land uses and does not have negative impacts regarding water usage, regional water aquifer, stormwater drainage, sensitive areas related to cultural resources, floodplains, wildlife habitats, geological hazards, and the environment. The Project is a critical piece of CORE's planned portfolio and will meet near-term reliability needs and help CORE integrate high levels of weather-dependent renewable generation. The Project strengthens CORE's local electrical utility services and its ability to serve its cooperative members.

c) Allow for the efficient and adequate provision of public services. Applicable public services include, but are not limited to, police, fire, school, park, and libraries.

Canyon Peak Power will not require expansion of local government services provided in the immediate area. The Project will not have a significant adverse effect on the capability of local government to provide services and will not exceed the capacity of service delivery systems. This includes no adverse impacts on or increased capacity or demand for roads, schools, water and

wastewater treatment, water supply, infrastructure, housing, or law enforcement to accommodate development. The Project only expects local government services to include emergency response services such as emergency medical services during and after construction. This may include the Sheriff in cases of theft or vandalism. During power plant operations, emergency services are expected to be required in case of emergencies such as injury, but this will be limited as only two operators are required to run the Canyon Peak Power Station. The Project may require fire response services, but this would be limited to small brush fires. No firefighting is needed or required for the power plant equipment.

Due to the type of power plant operations and limited operators required; the Project does not foresee any negative impacts to the current services provided by Bennett-Watkins Fire Rescue. The Project has incorporated the suggested design requirements from Bennett-Watkins Fire Rescue, including adequate site access, turn radius for emergency vehicles, and required fire hydrants.

The Plant will continue to engage with local fire, police, and the Arapahoe County Office of Emergency Management prior to construction and operations. This will ensure that the expected level of resources needed in case of emergency will be available. Please see Appendix B18 for Emergency Response Plan.

Traffic after construction and during normal operations will not impact the current County traffic loads; therefore, operation of the Project will not impact the existing transportation network in Arapahoe County. The limited number of operators for the power plant will also not adversely impact local traffic. This includes deliveries for Plant operations. Please see Appendix B2 for traffic impact waiver.

d) Enhance convenience for the present and future residents of Arapahoe County by ensuring that appropriate supporting activities, such as employment, housing, leisure-time, and retail centers are in close proximity to one another.

The Project will provide reliability to CORE's service territory within the Town of Bennett and throughout Arapahoe County. Additionally, the Project will facilitate a transition to more renewable energy consumption by local businesses, residents, and public facilities. The Project will not degrade any sector of local economy.

According to Arapahoe County comprehensive master plan, residential and mixed-use developments are expanding rapidly, making the town ripe for further investment. The Project will support the local economy and positively contribute to its future growth.

The Project will provide a major benefit to Arapahoe County's economy through the jobs that are created during construction and the increased revenues to local businesses that provide goods and services to the Project as well as its contractors and employees. This includes goods and services used by employees and contractors over the course of the development and construction of the Project. The Project has already employed local surveyor and geotechnical testing services to support the development of this application.

Following construction, the Project area for the associated natural gas lateral will be restored to pre-existing conditions. No existing activities, recreational or agricultural, are currently practiced in the Project area, therefore, no negative impacts are expected.

This Project will not place undue financial burden on the existing or future residents of Arapahoe County. Public funding for the Project is not required and will be financed by the Applicant or affiliated entity. The Project will result in increased tax revenues for Arapahoe County. This Project will not negatively impact the existing tax burden or fee structure for government services or for government services applicable to Arapahoe County residents and property owners. Nevertheless, the additional infrastructure created by this Project will result in increased tax revenues for Arapahoe County.

This project will increase availability and reliability of electrical service provided by CORE. This is a direct benefit to the cooperative members including residential, commercial, and industrial developments within Arapahoe County. This project will also provide firm pricing of electric power when renewable power is unavailable to CORE. Rather than having to import power at high market prices during periods of increased demand, CORE will have Canyon Peak available to maintain reliable and cost-effective power to its cooperative members.

e) Ensure that public health and safety is adequately protected against natural and man-made hazards which include, but are not limited to, traffic noise, water pollution, airport hazards, and flooding.

Canyon Peak Power has determined the project is not subject to significant risk from natural hazards. This includes geological or flood-based hazards. As discussed in the Environmental Impact Analysis in Appendix B9 and Appendix B10, the Project site and Pipeline route are not located in areas where earthquakes occur, or faults are located, are not located in floodplains or located in fire prone areas.

Also, the Geotechnical Investigative report in Appendix B16 provides guidance on best practices for design and construction methods to reduce any risk or hazards associated with subsurface conditions, including expansive soils. The use of deep foundations (drilled piers) for the large equipment, such as the CTGs, reduces any affect that expansive soil conditions would have on the Project.

The Project will not significantly degrade the environment. Although the Canyon Peak Power Station will consume natural gas to generate electricity, the Project will employ state of the art combustion technologies and supplemental equipment that reduce environmental impacts from operations, specifically NOx, VOCs, and other pollutants.

The Project will also employ best management practices while including a SWPPP and GESC to minimize any impacts during construction and operations. The Project will install erosion and sediment control measures during construction and permanent measures prior to operation.

Following construction, disturbed areas will be restored to pre-construction contours as closely as practicable. Construction debris and organic refuse unsuitable for distribution over the ROW will be disposed of at appropriate facilities in compliance with applicable regulations. Permanent

erosion and sediment control measures will be installed as appropriate, and the Project area will be revegetated using approved seed mix.

A detailed environmental impact analysis is provided in Section 2.12 and in Appendix B9 and B10.

The Project is expected to cause minor nuisances, such as increased traffic, dust, and noise, during construction but will not create any major sources of noise, dust, glare, fumes, vibration, or odors.

Dust suppression techniques, such as watering, will be implemented during construction. The key to dust control is through watering roads and site construction areas. Impacts from the use of heavy equipment will be minimized to the extent possible. All construction will occur during the day, no nighttime construction is expected.

Construction nuisances will be temporary and limited in duration. It is expected that there will be no significant increase in ambient air pollutant concentrations. Any potential impacts from construction equipment, exhaust for diesel or gas fueled, will be minimized by federal design standards imposed at the time of manufacture that comply with EPA. Fuel purchased will comply with regulations established by federal and state air pollution control regulations.

The Project will not impact access to nearby residences during construction. Temporary safety fences will be erected along the construction ROW in areas where construction activities will occur near public road or near residences. Following construction, areas will be restored to pre-construction conditions, where noted on design drawings.

Once the Project is in operation, no increases to glare, dust, fumes, vibration, or odors is expected. Equipment purchased for the Plant will include provisions for noise attenuation to the greatest extent possible and specifications to meet specific CRS industrial noise limits. The Project has a preliminary noise study that can be found in Appendix B17. Although the Project will be held to C.R.S. industrial zone noise levels, the preliminary noise study indicates operational db(A)'s that are nearer the range of the daytime residential standard at the two nearest properties located approximately 0.2 miles east and west of the respective fence lines. Additionally, the Project will pursue baffles and other noise mitigation to maximize sound attenuation. Given the low anticipated capacity factors for the power facility (10-20% of the year) the Project does not anticipate noise to be a significant nuisance.

f) Provide for accessibility within the proposed development, and between the development and existing adjacent uses. Adequate on-site interior traffic circulation, public transit, pedestrian avenues, parking and thoroughfare connections are all factors to be examined when determining the accessibility of a site.

The Project land use is in compliance with Arapahoe County's Development Standards and Comprehensive Plan. The land is currently owned by CORE and used for public electric utility purposes. No additional infrastructure or changes to area properties is required that would affect existing land uses such as natural, agricultural, recreational, range or industrial resources. There will be no need to change any existing land uses or infrastructure related to traffic. The Project

will not cause any degradation in any existing or future uses or resources or traffic infrastructure in the area around the proposed project.

g) Minimize disruption to existing physiographic features, including vegetation, streams, lakes, soil types and other relevant topographical elements.

The Project land use is in compliance with Arapahoe County's Development Standards and Comprehensive Plan. The land is currently owned by CORE and used for public electric utility purposes. No additional infrastructure or changes to area properties is required that would affect existing land uses such as natural, agricultural, recreational, range or industrial resources. There will be no need to change any existing land uses. The Project will not cause any degradation in resources in the area around the proposed project. This includes vegetation, streams, lakes, soils and other relevant topographical elements. The Project will restore land not part of project generally to original topographic elements, where possible, once construction has been completed, in order to minimize disruption to existing physiographic features.

As noted above regarding land use, the Project will not have a negative impact or create issues with the surrounding area and adjacent properties, this includes any notable physiographic features nearby.

h) Ensure that the amenities provided adequately enhance the quality of life in the area, by creating a comfortable and aesthetically enjoyable environment through conventions such as, the preservation of mountain views, the creation of landscaped open areas, and the establishment of recreational activities.

The primary land use in this area is production of agriculture, including livestock grazing and dryland farming. The areas and properties around the project site also have large solar facilities installed, providing a local source of renewable power for the community. These solar facilities benefit from the proximity of the existing Brick Center Substation to interconnect to CORE's electrical grid. Owners of the properties where these solar facilities are installed have benefited financially either through land leasing or sales.

The natural gas pipeline portion of the Project will have a negligible impact on the underlying land value and will require no new easements along the installation route.

This project will increase availability and reliability of electrical service provided by CORE. This is a direct benefit to the cooperative members including residential, commercial, and industrial developments within Arapahoe County. This project will also provide firm pricing of electric power when renewable power is unavailable to CORE. Rather than having to import power at high market prices during periods of increased demand, CORE will have Canyon Peak available to maintain reliable and cost-effective power to its cooperative members.

The biggest enhancement to the quality of life in the area is how the Project affords CORE the ability to supply electricity to their members from renewable sources. Although the project is adding equipment and structures to the Project Site, they are necessary to ensure the continued increase of renewable sources of electricity for the area. The Project seeks to minimize any

nuisances to the local area and residents but the Project is also using existing land already in use for electrical utility service but improving CORE's accessibility to renewable energy.

i) Enhance the useable open spaces in Arapahoe County, and provide sufficient unobstructed open space and recreational area to accommodate a project's residents and employees.

For the immediate Project area, there are no hiking or biking trails located on the site or nearby, this includes possible fishing areas. The Kiowa Creek Sporting Club is located roughly 0.5 miles to the northeast of this Project area but is not accessed or impacted by the Project area. The Project area is flat and not used for any recreational activities. See Section 2.11 for further expansion on this subject.

The Project location does not currently provide any recreational opportunities, therefore there will not be any negative recreational impacts. This Project will not unduly degrade the quality or quantity of recreational opportunities and experiences such as fishing, hiking or biking. Conversely, this Project will support recreational opportunities and experience as it enables these types of locations to transition to lower emission power sources while enhancing power supply reliability.

This Project is not expected to have a direct impact on recreational activities such as fishing, hiking or biking, nor does it currently provide recreational opportunities that would be impacted.

Canyon Peak Power

1041 & Use By Special Review Application
Arapahoe County, Colorado

April 30, 2025 - Resubmittal

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Acronyms + Abbreviations

Applicant	Canyon Peak Power LLC
CORE	CORE Electric Cooperative
Power Plant	156 MW (net output) natural gas-fired power generaton facility
Pipeline	10-inch natural gas pipeline
AQCR	air quality control region
ASME	American Society of Mechanical Engineers
ATWS	additional temporary workspace
BMPs	Best Management Practices
BOP	Balance of Plant
BWFD	Bennet-Watkins Fire District
CAA	Clean Air Act
CCR	Code of Colorado Regulations
CDNR	Colorado Department of Natural Resources
CDWR	Colorado Division of Water Resources
CDPHE	Colorado Department of Public Health and Environment
CEMS	Continuous Emissions Monitoring System
CFR	Code of Federal Regulations
CIG	Colorado Interstate Gas
CM	construction control measure
CO	carbon monoxide
CPW	Colorado Parks and Wildlife
CWI	Certified Weld Inspector
DLE	Dry Low Emission
ECD	erosion control device
EPA	U.S. Environmental Protection Agency
FEMA	Federal Emergency Management Agency
GE	General Electric
GESC	Grading, Erosion, and Sediment Control
GHG	greenhouse gas
GW	Gigawatts (1,000 megawatts)
HAP	hazardous air pollutant
HPH	High Priority Habitat
LDAR	leak detection and repair
MP	milepost
MW	Megawatts (1,000 kilowatts)
NAAs	nonattainment areas
NAAQS	National Ambient Air Quality Standards
NFPA	National Fire Protection Association

NHPA	National Historic Preservation Act
NOx	nitrogen oxide
NO2	nitrogen dioxide
NRCS	Natural Resources Conservation Service
O3	ozone
Pb	lead
PEM	palustrine emergent
PHMSA	Pipeline and Hazardous Materials Safety Administration
PM	respirable particulate matter
PM2.5	particulate matter sized 2.5 microns or smaller
PM10	particulate matter sized 10 microns or smaller
RC	Radio Control
ROW	right-of-way
SCADA	supervisory control and data acquisition
SIP	State Implementation Plan
SO2	sulfur dioxide
SPRP	Spill Prevention and Response Procedures
UDP	Unanticipated Discoveries Plan
USACE	U.S. Army Corps of Engineers
USGS	U.S. Geological Survey
USR	Use by Special Review
VOC	volatile organic compounds
WSS	Web Soil Survey

Executive Summary

April 30, 2025
Ms. Molly Orkild-Lawson, RLA, AICP
Principal Planner
Public Works and Development
Planning Division
6924 S. Lima Street
Centennial, CO 80112

Subject: 1041 & Use By Special Review Application Resubmittal – Canyon Peak Power Project

Dear Ms. Molly Orkild-Lawson,

This letter is being submitted as part of the 1041 and Use By Special Review (USR) application resubmittal for the Canyon Peak Power Station.

The 1041 and USR application has been coordinated and resubmitted by Canyon Peak Power LLC with preparation assistance provided by Holland & Hart LLP, Stanley Consultants, Inc, and PSI, LLC. The application has been prepared in accordance with Arapahoe County requirements, as described in Arapahoe County's Land Development Code, Development Application Manual, and the Regulations Governing Areas and Activities of State Interest in Arapahoe County (1041 Regulations).

Canyon Peak Power LLC is preparing to install a natural gas simple-cycle combustion turbine power generation facility, comprised of six General Electric LM2500XPRESS power generation units with a cumulative generating capacity of 156 MW (net output). The Project will be located on property owned by CORE Electric Cooperative, Inc at 5050 S County Rd 129, Bennett, CO 80102. The land will be leased to Canyon Peak Power LLC and the project is being constructed exclusively to serve CORE's cooperative members and residents. The facility will be interconnected to CORE's 115 kV transmission lines located at the existing Brick Center substation located on the property. The Project also includes the installation of approximately 3.9-miles of a 10-inch natural gas supply pipeline to provide natural gas fuel to the site. The Project will support CORE's transition away from previous power providers to more renewable based power sources for their cooperative.

Sincerely,

Thomas Flexon
Vice President
Canyon Peak Power LLC

Introduction

This application for Use by Special Review (USR) with 1041 components permit is submitted in accordance with the Arapahoe County's Land Development Code (LDC), Development Application Manual (DAM), and the Regulations Governing Areas and Activities of State Interest in Arapahoe County (1041 Regulations) and pursuant to *Sections 29-20-108, 24-65.1-101 et seq*. and other applicable sections of the Colorado Revised Statutes[1].

Section 5-3.4 in the *Land Development Code (LDC)*, dated February 27, 2024

Section 2-4 in the *Development Application Manual (DAM)*, dated August 154, 2019

Regulations Governing Areas and Activities of State Interest in Arapahoe County (1041 Regulations), readopted and amended December 12, 2006

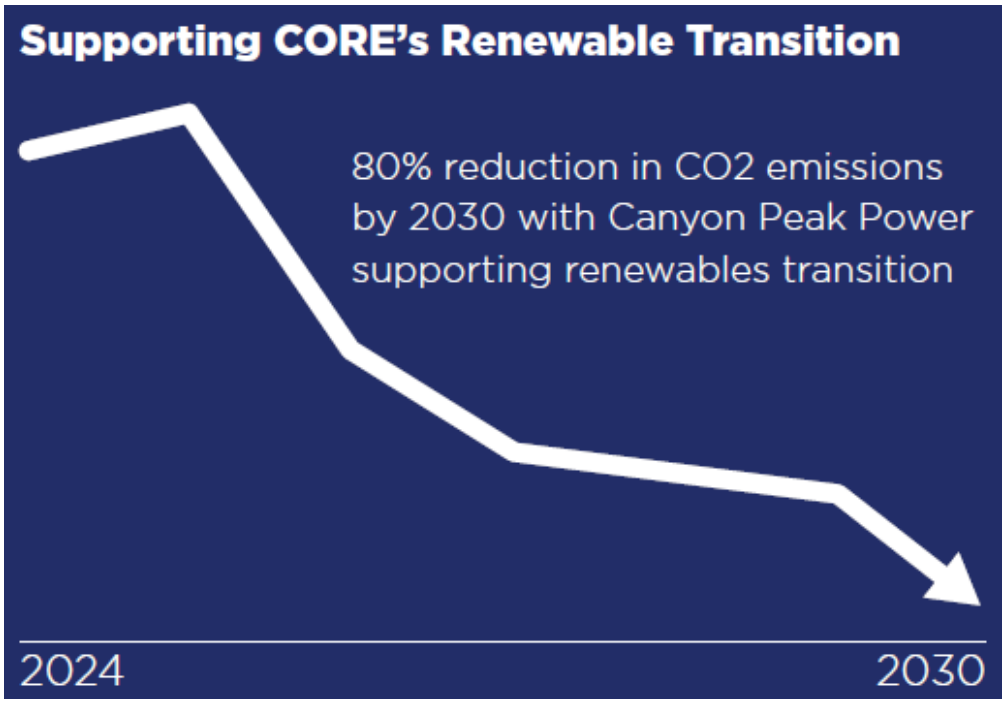
This application is Arapahoe County Case No. UASI25-001.

Project Background & Description

The Canyon Peak Power Station (the "Project") is a planned installation of a greenfield[2] natural gas-fired peaking power generation facility at the existing Brick Center Substation. The Brick Center Substation is located on a 20-acre site at 5050 S County Rd 129, Bennett, CO 80102, 1 mile south of the intersection of County Road 129 and County Road 30. The entire property and substation are owned by CORE Electric Cooperative ("CORE"). The Project also includes the installation of approximately 3.9-miles of a 10-inch natural gas supply line (the "Pipeline") to provide natural gas to the Project site from Colorado Interstate Gas ("CIG").

The Project is being developed by Canyon Peak Power LLC ("Canyon Peak") an affiliate of Kindle Energy LLC. The power generation facility is comprised of six General Electric ("GE") LM2500XPRESS power generation units with a cumulative generating capacity of 156 MW (net). The Project will be located on property owned by CORE leased to Canyon Peak and will exclusively serve CORE's members. The Project will be interconnected to CORE's existing 115 kV transmission system via the Brick Center Substation located on the property. Canyon Peak Power is a key piece of CORE's planned portfolio and will meet near-term reliability needs and help CORE integrate high levels of weather-dependent renewable generation.

1 The Proposed Project is designated as a "Major Electrical, Natural Gas, and Petroleum Derivatives Facility of a Private Company" under the USR Standards of the Arapahoe County Land Development Code (Section 5-3.4.B.) and "Major Facilities of a Public Utility" under the Arapahoe County 1041 Regulations.
2 Greenfield is a term that is used to indicate a construction project that takes places on an undeveloped site.



The Project originated with CORE transitioning to more renewable based power generation for their source of electrical power. Renewable based power generation, such as solar or wind, is an intermittent resource, subject to both weather conditions and power demands placed on the grid. Intermittent resources are complemented by alternative resources that provide reliability and stability to the grid. Natural gas-fired peaking power plants are flexible and reliable, and an ideal solution for Colorado's evolving energy grid. A peaking power plant, known for having fast start capabilities, only runs when energy demand is high and additional power resources are required by the grid. It acts as a safety net when intermittent renewable energy sources — solar and wind, for example — cannot fully meet power grid electricity needs, and ensures grid stability as more renewables energy resources are integrated into the system.

The proposed combustion turbines can provide power very quickly as each can be online within 10 minutes or less. Although the design is for a net output of 156 MW, the plant can operate at lower loads based on the amount of power required to support CORE's electrical demand. It is expected that the entire Plant will operate less than 10-20% annually. The role of the Project will be to enable CORE's transition to more renewable based power while utilizing state of the art, fast-response natural gas-fired combustion turbines to support the reliability of their service territory. This Project, combined with CORE's transition to more renewable energy resources, will help reduce the environmental profile of CORE's current supply portfolio, support the energy demand growth of CORE, and help provide stable pricing for cooperative members.

The Project is expected to be operational by the 2nd quarter of 2026. Construction is expected to be started in early 3rd quarter of 2025. This is dependent on receiving all necessary permits and approvals.

Construction activities at the Site will disturb approximately 8 acres, generally on the east side of the Site. Approximately 5 acres will be used as a temporary laydown area for equipment storage, construction employee parking, and construction trailers. The footprint of the new equipment is approximately 7 acres. Temporary equipment, such as cranes, and materials needed for construction activities (i.e., fuels, sealants, lubricating oils, paints) will also be located in the temporary laydown and fabrication areas. The location of all these areas is presented on the USR Site Plan provided in Appendix B19.

All construction associated with the scope of work included in this application will occur in Arapahoe County. The site is zoned A-1 (Agricultural), and the proposed use for the Canyon Peak Power Project is "Major Electrical, Natural Gas, and Petroleum Derivatives Facility of a Private Company", which requires Use By Special Review (USR) with application of certain 1041 Regulation components and standards (under which the proposed use is classified as "Major Facilities of a Public Utility"). The Project will be constructed on property (Parcel # 2067-00-0-04-001) owned by CORE. The parcel is identified in the legal description provided in Appendix A6.

1. Application Submittal Requirements

1041 Section C

1.a -c Application Fee

Canyon Peak Power LLC is prepared to make an initial deposit of $10,000 to Arapahoe County with the understanding that a formal invoice will be sent for fee payment. Per the County's Requirements Checklist, Canyon Peak understands that staff will track hours worked on this project and will bill accordingly.

2. Information Describing the Applicant

The project applicant is Canyon Peak Power LLC (Canyon Peak), an affiliate of Kindle Energy LLC (Kindle Energy). Kindle Energy invests, operates and manages power generation assets in North America. Kindle Energy currently manages and operates 8.7 gigawatts (GW) of generation facilities located in the Midwest that are capable of powering approximately 6.9 million homes. Kindle Energy also has approximately 2 GW of projects currently in construction and development. The primary contact for the Project is Mr. Thomas Flexon. He can be contacted as follows:

2.a Project Applicant

Thomas Flexon
c/o Kindle Energy LLC
500 Alexander Park Drive
Suite 300
Princeton, NJ 08540
Telephone: (609) 250-7227

Email: thomas.flexon@kindle-energy.com

Project Property Owner

CORE Electric Cooperative, owns the property upon which the Canyon Peak Power Station will be constructed. CORE owns and maintains the existing Brick Center Substation. CORE provides electric power to more than 375,000 residents along Colorado's Front Range. Our nearly 5,000-square-mile service area includes portions of 11 counties to the east, west and south of Denver. CORE will receive all electricity generated by the Canyon Peak Power Station.

Brooks Kaufman
Lands and Rights of Way Manager
5496 N US Hwy 85
Sedalia, CO 80135
Telephone: (720) 733-5493
Email: BKaufman@core.coop

2.b Applicant Agents

Applicant Agents – Legal Services

Holland & Hart LLP is providing legal services to Canyon Peak in connection with the application. Holland & Hart has experience in environmental and natural resources law, complex permitting processes, real estate and land use matters, and with federal, state, and local regulators. They assist with all stages of project development and operations. They provide help at all stages of project development and operation in environmental and natural resource matters and complex permit approval processes.

Jordan Bunch
Partner

Holland & Hart LLP
1800 Broadway
Suite 300
Boulder, CO 80302
Telephone: (303) 473-4828
Email: JJBunch@hollandhart.com

Or

Abby Briggerman
Partner

Holland & Hart LLP
555 17th Street

Suite 3200
Denver, CO 80202
Telephone: (202)-365-1385
Email: ACBriggerman@hollandhart.com

Applicant Agents – Stanley Consultants, Inc - Engineering Services

Stanley Consultants, Inc., is providing engineering services in support of the application for the Canyon Peak Power Station. Stanley Consultants brings over 107 years of experience in power generation plants, transmission lines, distribution systems, and substations. Stanley will be the engineer of record for the Canyon Peak Power Station. Stanley brings vast experience with gas-fired combustion turbine power generation projects utilizing GE's state of the art LM2500XPRESS Combustion Turbine Generators. Most recently with the new six (6) unit power plant in operation for Colorado Springs Utilities and the six (6) unit Mountain Peak Power Plant currently under construction in Weld County.

Michael Reed, PE, PMP
Senior Project Manager

Stanley Consultants, Inc.
8000 South Chester Street, Suite 400
Centennial, CO 80112
Telephone: (303) 925-8346
Email: reedmichael@stanleygroup.com

Applicant Agents – PIS, Inc - Gas Pipeline Engineering Services

PSI, Inc., authorized to do business in Colorado providing gas pipeline engineering services in support of application for the Canyon Peak Power natural gas pipeline. PSI has been providing engineering, inspection services, and operational support for facilities and pipelines across commercial, industrial, municipal, oil and gas, renewable energy, and utility industries for over 30 years. PSI provides project management, engineering and design, drafting, construction management, operations and maintenance, and corrosion and integrity support for pipeline projects.

Matthew J. Herrera, PE
Principal Engineer / Project Manager

PSI, Inc
4311 Sara Road
Rio Rancho, NM 87124
Telephone: (505) 999-1995
Email: mherrera@psi-llc.com

Applicant Agents – Ramboll, Inc - Environmental Consulting Services

Ramboll, Inc., authorized to do business in Colorado is providing environmental consulting services in support of application for the Canyon Peak Power project. Ramboll is providing services to support the air permit application with the State of Colorado and the Environmental Inspection Assessment for the Canyon Peak Power project.

Eric Hodek
Principal

Ramboll
1999 Broadway
Suite 2225
Denver, CO 80202
Telephone: (303) 382-5460
Email: ehodek@ramboll.com

Applicant Agents – SWCA - Environmental Consulting Services

SWCA Environmental Consultants, authorized to do business in Colorado and provides environmental planning and permitting, cultural resource management, biological and ecological services, water resources management, air quality planning, and sustainability consulting since 1913. SWCA is providing services to support Environmental Inspection Assessment for the gas pipeline portion of the Canyon Peak Power project.

Clint Hinebaugh
Natural Resources Consultant

SWCA Environmental Consultants
295 Interlocken Boulevard
Suite 300
Broomfield, CO 80021
Telephone: (303) 487-1183
Email: chinebaugh@swca.com

2.c Letter of Authorization

Appendix A5 contains notarized letter authorizing Canyon Peak Power LLC to prepare and process the Application on behalf of CORE, as landowner of the Property.

2.d Documentation of the Applicant's Financial and Technical Capability to Develop and Operate the Project

Canyon Peak Power is a wholly owned subsidiary of Kindle Energy LLC. Kindle is a wholly owned portfolio company of Blackstone Inc., one of the world's leading investment firms. Blackstone seeks to create positive economic impact and long-term value for its investors, the companies it invests in, and the communities in which it works. Founded in 1985 and publicly listed since 2007, Blackstone is a leading global alternative asset manager with over $1 Trillion of total assets under management.

Kindle Energy's leadership team has deep experience developing, managing, and operating assets both internationally and domestically. On average, Kindle Energy's leadership has over 25 years of individual experience in the power generation industry. Members of the Kindle Energy team have led and are leading the full development efforts of over 6.6 GW in projects. Currently, Kindle Energy overseeing the construction of two facilities that it developed, contracted, and financed: Magnolia Power Generating Station and Mountain Peak Power Station. These projects represent almost 900 MW of greenfield development and over $1 Billion of total investment with expected commercial operation in 2025.

Kindle Energy has deep experience in managing and optimizing power generation facilities. In total, Kindle Energy employees have managed more than 130 generating facilities totaling over 65 GW of generating capacity. Kindle Energy currently manages two generation portfolios comprising an aggregate of 8.7 GW: the Lightstone Generation portfolio located within Ohio and Indiana (5.3 GW) and the Pelican portfolio located in Louisiana and Texas.

Please refer to Sections 2.a regarding the background of Applicant and their extensive experience with developing and operating power plants across the United States. Refer to Section 2.b for backgrounds on the Applicant's Agent and their extensive backgrounds in developing projects of similar nature. Refer to Section 6 for more financial information. The Applicant and Applicant Agents have an existing project very similar to Canyon Peak Power, the Mountain Peak Power Plant, currently in construction in Weld County. The Mountain Peak Power Plant uses the same technology and equipment to generate power for an existing electric cooperative in Weld County. Similarly with CORE, the Mountain Peak Power Plant project is allowing a Colorado electrical cooperative the ability to increase their renewable power generation capabilities while also increasing their power reliability.

3. Information Describing the Project

3.a Canyon Peak Power Station Detailed Plans and Specifications of the Project

Canyon Peak Power Station is comprised of power generation units outfitted with selective catalytic reduction (SCR) and oxidation catalysts to control nitrogen oxide (NOx) and carbon monoxide (CO) emissions. The Project also includes the construction of a control room building

with employee parking; a storm water detention pond; drive aisles to allow for 360-degree access around the property; a fire suppression loop; and other auxiliary equipment.

Canyon Peak Power Station will produce power utilizing combustion turbine generators (CTGs) LM2500XPRESS units supplied by GE. Each CTG uses a dry low NOx emission oxidation combustion system to reduce NOx emissions production during natural gas combustion. In addition to the dry low NOx combustion technology, each CTG unit will be equipped with a SCR system that will further reduce NOx emissions from the flue gas prior to exiting the CTG stack. The SCR utilizes 19% aqueous ammonia as the reagent in the catalytic conversion of NOx emissions to nitrogen and oxygen. The 19% aqueous ammonia is supplied by an on-site 20,000-gallon ammonia storage and forwarding system with containment and truck unloading pad. The LM2500XPRESS is GE's state of the art aeroderivative-based combustion turbine generator which is designed with considerations for both efficiency and emissions. Additionally, the LM2500XPRESS also provides fast-start capabilities and the ability for multiple daily starts and stops. GE has developed this CTG package to complement power grids that are experiencing increased renewable energy utilization – a growing trend in Colorado.

The Project will require certain Balance of Plant (BOP) equipment to support plant operations and emergencies. A skidded compressed air system is required to provide compressed air for plant operations and consists primarily of an air compressor skid with dryer and storage tank.

For fire protection, an underground fire water loop will encircle the plant and have fire hydrants spaced according to National Fire Protection Association (NFPA) requirements. To supply the fire water system, a 165,000-gallon fire water storage tank will be installed and connected to a fire pump skid that provides pressurized fire water to an underground fire water loop. Canyon Peak has engaged the local fire department (Bennett-Watkins Fire Rescue) about developing the fire protection system at the site.

The Project will connect to CORE's existing 115 kV transmission system on the site with no additional electrical transmission infrastructure required outside of the site boundaries. Each CTG produces power at 13.8 kV which is fed to a Generator Step-Up (GSU) transformer that converts the power to 115 kV. This 115 kV power is then connected to CORE's existing Brick Center Substation which supplies CORE's 115 kV transmission system. The connection to 115 kV transmission system will occur on the north side of the existing Brick Center Substation with new high voltage disconnects and circuit breakers. Each CTG will have a separate GSU and separate connection to the 115 kV service. This will allow the facility to serve a range of loading to CORE's electrical grid based on varying power demands.

The Project will plan to operate under a minor stationary air permit application submitted to the CDPHE. This submission request to the CDPHE is for a permit to construct the six (6) new natural gas fired turbines and the accompanying Air Pollution Emission Notice (APEN) and APCD Form 102 in accordance with the 5 Code of Colorado Regulations (CCR) 1001-5, Regulation No. 3 (Colo. Reg. 3), Part B, Section II. The permit is seeking to obtain a minor source air permit via establishment of enforceable limits to permit emissions of NOx and VOC. Please see the Environmental Impact Assessment section of this application and Appendix B9 and Appendix B10 for further information on the air permit.

Combustion Turbine Generator

Each LM2500XPRESS CTG package is considered a unit. Each unit will consist of three main modules: (i) The Turbine Module, (ii) the Generator Module, and (iii) the Control House Module. The LM2500XPRESS CTG is a two-shaft aeroderivative design with the combustion turbine separate from the power turbine. This mechanically decoupled design allows the power turbine to operate at a continuous speed allowing for startup to full load in less than 10 minutes. The main deck of the generator module contains the generator, generator ventilation, generator lube oil system and switchgear. The turbines will utilize pipeline quality natural gas.

Exhaust Stack

Each unit is equipped with an 80-foot exhaust stack. Each exhaust stack includes a SCR to control NOx and a Catalytic-Oxidation (CatOx). The SCR utilizes 19% aqueous ammonia injection to reduce NOx emissions. An Ammonia Storage and Forwarding system will store and supply ammonia to the SCRs at each CTG exhaust stack.

The exhaust stack height is determined by the air permit operational requirements and EPA monitoring requirements. The exhaust stack height is also designed to provide maximum mitigation of emissions and noise impacts from the Project. The exhaust stack height is based on a combination of the SCR section, baffling section for engine exhaust noise attenuation, and minimum duct lengths prior to the EPA mandated testing ports. The SCR Catalyst sections are designed to ensure adequate flow and mixing of the exhaust gas to meet emissions limits mandated by air permit. Changing the configuration of the SCR would affect the operational characteristics and efficiency of the SCR, to the detriment of emissions reduction efforts. The exhaust duct section that houses baffling for noise attenuation would also be affected by changes in configuration, such that the ability to reduce engine noise would be very limited. Lastly, the EPA has stringent requirements on where test ports are to be located to verify emissions are being met via periodic testing with sampling equipment.

Each exhaust stack will be equipped with a 40 CFR Part 60 / 75 continuous emissions monitoring system (“CEMS”) providing monitoring of CO emissions, NOx emissions, and fuel flow. The extractive sampling system will also include an O2 analyzer for diluent and reporting purposes. Each CEMS will be in a prefabricated climate-controlled enclosure with a sample handling system, analyzers, calibration gases and a data acquisition and handling system.

Fire Water System

The fire water system includes a 165,000-gallon fire water storage tank connected to a fire pump skid that provides pressurized fire water to an underground fire water loop. The fire pump skid will contain an electric fire pump, a jockey pump to maintain fire loop pressure, and a backup diesel fire pump. The Fire Pump Skid also contain a small diesel fuel tank for the backup diesel fire pump, sized to National Fire Protection Association (NFPA) requirements. The Fire Water Storage Tank will include a connection to provide service water for the site, such as dust suppression needs. This service water connection will be located above the 160,000-gallon level of the Fire Water Storage tank so this volume is preserved for fire water supply. Please see Appendix B12 for the Fire Water System Basis of Design for further background. Canyon Peak has engaged

Bennett-Watkins Fire District to coordinate the fire system, please see this application Section 20 regarding evidence of agencies to serve the Project for more information.

Controls Trailer

Power plant operations will be monitored and controlled from the Controls Trailer, which is located centrally on the power plant site. The Controls Trailer will house plant operators in a control room to monitor the Plant site and operations. The Controls Trailer will be secured and include operator offices, conference room, break room, bathrooms, and critical network and control system hardware and infrastructure for power plant operations. The Controls Trailer is a permanent structure and will require a building permit with Arapahoe County. See Appendix B11 for preliminary layout.

Potable Water & Septic System

The Controls Trailer will have potable water and bathroom facilities for operators. An onsite septic system will be installed at the site to support the bathrooms and employee hand washing.

The source for potable water will be a dedicated Potable Water Tank located at the Controls Trailer. The Potable Water tank will be periodically filled by a qualified and permitted potable water supplier. The use of a Potable Water Storage Tank is compliant with Chapter 6 of the International Plumbing Code (IPC) for potable water sources. The code allows the use of a potable cistern for the source of potable water to supply water to plumbing fixtures, as specified in Section P-602.3 Individual Water Supply. In this case, the Potable Water Storage Tank serves as the potable cistern.

The Potable Water Tank will store the required potable water volume to meet the demands and needs of employees, for bathroom facilities and hand washing in the Controls Trailer. Tentative size for Portable Water Tank is roughly 450 gallons for 5-day supply with a 180 gallon 2-day intermediate tank located inside the Controls Trailer. Pumps will be used to ensure adequate pressure and flow for potable water supply to Controls Trailer. The Project will have two (2) bathrooms installed in the Controls Trailer for employee use, and these bathrooms will discharge to a septic system (onsite water treatment system). The septic system will include a septic tank and leach field, sized in accordance with Arapahoe County Health Department and IPC requirements.

General Basis of Design for the Potable Water system is as follows:

- Basis of Design
  - Population Served – 2 employees each for 12-hour shifts, staffed around the clock
  - Demand – 2 employees at 22.5 gallons per day (gpd)/employee per shift
    - 2 employees per shift at 22.5 gallons each employee per shift x 2 shifts = 90 gpd
  - Storage – 7-day storage with weekly replenishment via truck tanker – 630 gallons
  - Storage Breakdown:
    - External – 5-day storage – 450 gallons (heated to prevent freezing)

  - Internal – 2-day storage – 180 gallons
  - This split allows for up to 2 days float for a water tanker to service the facility
- Flow Rate
  - Fixtures include lavatory mixing valve, water closet with tank, urinal flushometer, and drinking fountain.
  - Water Supply Fixture Units (WSFU) – 8.15
  - Flow Rate – 12.95 gallons per day (gpd) from International Plumbing Code Appendix E, Section E103
  - Pumping Rate – 2 times flow rate or 25.9 gpm
- Hot Water Supply
  - On demand tankless water heater with tempering controls for safe hot water supply
- Pressure Tank
  - Bladder Size – 209 gallons
  - Acceptance Factor – 0.9
  - Cut-In Pressure – 40 psi
  - Cut-Out Pressure – 60 psi
  - Basis of Design – Amtrol Well-X-Trol WX-452C (full acceptance)
  - Working Pressure – 125 psig
- Residual
  - Manual chlorine residual testing and augmentation using sodium or calcium hypochlorite may be necessary

General Basis of Design for the Septic System is as follows:

- Input Parameters
  - Operations building with one bathroom.
  - Daily WW Flow – 15 GPD/capita per 12-hour shift (per Table 3 Office Buildings)
  - 2 employees per shift, 2 shifts
  - Design Flow – 90 GPD
- Design Parameters
  - Soil type - 4 (assumed per Table 10). Field soil characterization is currently being obtained.
  - Percolation Rate – 80 min/inch (assumed per Table 3). Field percolation rates are currently being obtained.
  - Treatment Level - 1 (per Table 4)
  - Long Term Acceptance Rate (LATR) – 0.2 gal/sq ft (assumed per Table 10)
  - Size Adjustment Factor – 1.2 (per Table 12, bed treatment area, gravity application)

- Type of Media – Rock
- Size Adjustment Factor – 1.0 (per Table 13)

» Septic System Design

- Tank Size - 400 gal (minimum size)
- Soil Treatment Area – 540 sq ft

Power Delivery

Finally, the Project will feature the installation of six (6), oil-filled power transformers, each with a rating of 28.8/38.4/48 MVA, primary winding of 115 kV and secondary winding at 13.8 kV, at 60 Hz. The purpose of the transformers is to supply power from generators on the CTGs to CORE's existing 115 kV Brick Center Substation, and then to CORE's 115 kV transmission system.

Please see Appendix A13 for more information on the combustion turbine generator equipment required for power generation at the Plant.

Natural Gas Pipeline

The Project will be fueled by natural gas. The natural gas pipeline lateral will be approximately 3.9 miles long running north of the project on the east side of County Road 129 within the road right-of-way and connecting the Project to Colorado Interstate Gas ("CIG") pipeline. Canyon Peak has entered to into a permanent easement agreement with a landowner to utilize approximately one-half acre to tap into CIG's pipeline for regulated natural gas. The one-half acre serves as the natural gas interconnection point and will be utilized for CIG's gas meter yard and other small footprint infrastructure. Please see Appendix A9 for details of the letter agreement between Canyon Peak and the landowner.

The gas meter yard is not a part of the proposed Project scope and will be a separate project managed by CIG. The gas meter yard will be located in a fenced area to secure the gas yard. The gas yard will include piping, instrumentation, and equipment required to tap into CIG's existing natural gas delivery pipeline to monitor and condition the natural gas for supply to Canyon Peak Power, LLC. The Project will connect to the gas yard at the gas yard fence line. From this connection, the Project's natural gas line will be then routed to the Project Site along the proposed route as shown in Appendix B19 gas line design drawings.

Canyon Peak has established a pipeline easement with property owner where CIG's gas yard and the Project's gas line will best installed, the easement was provided to Arapahoe County's Planning Division on February 14, 2025. The easement was officially recorded with the County on January 9, 2025. Please see Appendix A14 for this easement.

No other infrastructure or utilities from adjacent properties or the surrounding areas, except those herein listed for natural gas, will be required for operation of the power facility.

Detailed Maps and Plans

Please see designs for Canyon Peak Power Station and the associated natural gas pipeline lateral included in Appendix B19. The Plans include location and design of Project improvements, the natural gas pipeline, topographical features, and vicinity land uses.

The Selective Catalytic Reduction (SCR) system is a key component of the emission reduction strategy for the Project. The SCR system works by injecting a reagent, in this instance 19% aqueous ammonia, into a catalyst system in the exhaust stream. This reagent reacts with nitrogen oxides (NOx) in the presence of a catalyst, converting them into nitrogen and water vapor, thereby significantly reducing emissions. The SCR also includes a separate catalyst system that reduces CO and Volatile Organic Compound (VOC) emissions.

The facility is hydrogen capable but has no plans to consumer hydrogen for the foreseeable future.

3.b Descriptions of Alternatives to the Project that were considered by Applicant.

Alternative 1 - No Action Alternative

Under the No Action Alternative, Canyon Peak Power would not construct the proposed Project. If the proposed facilities were not constructed, based on the growth of demand within CORE's service territory, as well as its separation from its current power supplier, CORE would be unable to satisfy its supply and electric reliability needs. Moreover, due to the increase in the amount of renewable generation within CORE's electric supply portfolio, a critical attribute of the Project is being dispatchable, meaning it can turn on and off quickly, based on the real time needs of the power grid. Therefore, the No-Action Alternative was not considered a feasible alternative to the proposed Project. Alternative locations that were considered and ultimately dismissed are described below.

Alternative 2 – Different Location within CORE's Service Territory

Alternative 2 is located to the southern portion of CORE's service territory at the Kiowa Substation. Alternative 2 features similar infrastructure as the Project location and was further distance to the natural gas interstate pipeline. However, Alternative 2 did not have sufficient land that would be suitable for the power facility. In addition, the envisioned route for the natural gas lateral was overwhelmingly infeasible at Alternative 2 due to a more populated surrounding area.

Due to concerns with ample site acreage and a complicated natural gas interconnection strategy, Alternative 2 was dismissed from further consideration.

Alternative 3 – Out of State Location

Alternative 3 is located outside of Colorado. Alternative 3 features similar availability of land as the Project location but does not have the electrical transmission infrastructure to delivery power into CORE's service territory. Furthermore, given the higher elevation of Alternative 3, there would be an associated reduction in the amount of power supply available to CORE. In summary,

Alternative 3 would have no way of achieving timeline, cost, and deliverability requirements requested by CORE.

Alternative 4 – Brick Center Substation – Selected Project Location

Canyon Peak Power carefully selected Alternative 4 based on key characteristics that optimize efficiency and feasibility of the Project. Alternative 4 allows for the effective use of available utility land by utilizing excess acreage already owned by CORE thus eliminating the need for additional land acquisition. Additionally, Alternative 4 maximizes existing infrastructure, as CORE's electrical transmission system is readily available at the site, improving overall project economics. Finally, the site provides the most favorable access to natural gas interconnection minimizing the extent of pipeline installation required for fuel. These factors collectively ensure that the selected location supports a cost effective and strategically sound development of the Project.

Alternative 4 is the location presented throughout this Application. Alternative locations that were considered and ultimately dismissed are described previously.

3.c Schedules for designing, permitting, construction, and operating the project, including the estimated life of the project.

Design, permitting, construction, commissioning, and startup for the Project is scheduled for completion by September 1, 2026. Construction will start on both the power plant and natural gas pipeline once all required permits are approved and received. Construction will be scheduled to minimize impacts to the community and environment within the Project area to the maximum extent possible.

The power plant portion of the Project will be constructed per the general schedule milestones provided below:

- Site mobilization and ground preparation - July 2025
- Earthwork – August 2025
- Foundation work – September 2025
- Installation completed – April 2026
- Performance testing – May 2026
- Plant Operational – June 2026

The gas line portion of the Project is currently planning construction to start in September 2025 and completing in December 2025.

Preliminary engineering design and long-lead equipment procurements for the Project are already in progress due to delivery of these procurements are over a year out. The manufacturing industry continues to see large constraints in fabrication capabilities furthered by the continuance of supply chain issues with materials of construction and parts suppliers. This is specifically an issue with electrical based equipment such as large electrical transformers and higher voltage switchgear

and components. Preliminary work includes surveying the Project site and the natural gas pipeline route, geotechnical investigations of the Project site, along with a noise study for the Project.

The Project design life is for 25 years and is expected to provide electricity to CORE over the course of its design life. Due to the expected limited yearly operation of the Plant, with proper Operations and Maintenance (O&M) program, the plant life will likely be able to extend beyond the design life, although that is subject to future conversations and regulatory regimes. Periodic maintenance of equipment and inspections of the CTG and associated auxiliary systems will ensure the Project will be maintained with the ability to operate for an extended period of time.

The natural gas pipeline portion of the project is to transport natural gas via a 10-inch-diameter lateral. Currently, no infrastructure exists to transport the natural gas to the site. The natural gas lateral describe herein is anticipated to provide natural gas to the Canyon Peak Power Station over its 25-year design life. The pipeline can be maintained indefinitely utilizing a robust Operations and Maintenance (O&M) program, modern inspection techniques, and cathodic protection (for the pipeline). For example, pigging operations can clean the pipe and identify damaged sections that may need to be replaced, should the need for the pipeline exceed the anticipated duration of production.

The workforce for the Project is expected to peak at approximately 160 to 200 workers split during construction of the proposed Pipeline and Plant.

3.d The need for the project, including existing/proposed facilities that perform the same or related function; and population projections of growth trends that form the basis of demand projections justifying the project.

CORE's service territory encompasses 5,000 square miles of land, including fast-growing areas between Denver and Colorado Springs. CORE's historical load growth (2015-2024) has averaged 1.6%, driven by steady meter growth of about 2.2% over the same period. Current load is roughly two-thirds residential, and CORE expects organic population growth to continue in the areas near the Denver and Colorado Springs load centers. This organic population growth will bring with it both small and large commercial loads to provide services for these growing communities. In addition to normal population growth, CORE is receiving interest from new industries to the area, including small and mid-size data centers. One established data center operator has recently announced construction of a small data center in CORE's service territory, which is expected to add new power demand to the CORE system, contributing to an average annual energy sales growth of approximately 4% through 2030. CORE is in conversation with several other similar potential loads, with meaningful additions to take place over the next decade.

CORE's peak load growth has slowed in the last few years to an average of 1.8% over 2019-2024 from its prior trend, which averaged 3.7% from 2015-2019. This is at least partially due to changes in CORE's rate structures which encourage members to shift consumption to off-peak periods. The addition of high-load factor data centers is expected to continue to improve the overall system load factor, which has averaged just below 50% for much of the last decade.

CORE's supply portfolio is transitioning from a heavy reliance on fossil fuels for the bulk of its members' energy needs to a largely renewable portfolio with firming capacity provided by high-efficiency, rapid-response natural gas units supplemented by battery energy storage systems which will be accomplished this decade. CORE will exit its long-term supply agreement with Public Service Company of Colorado at the end of 2025 and has entered into PPAs with renewable projects, battery facilities, regional market participants, and natural gas generators to meet its members' needs. CORE currently supplies roughly half of its members' energy needs from its minority ownership in the Comanche 3 coal generator in Pueblo, CO. The plant has a committed retirement date no later than January 1, 2031. CORE expects to reduce the share of its members' energy needs supplied by the plant between 2026 and 2030, as outlined in CORE's Clean Energy Plan1. This CEP outlines a path to achieve an 80% reduction in greenhouse gas emissions associated with our power supply from a 2005 baseline by 2030. More specifically, CORE expects to reduce CO2 emissions from approximately 1,970,000 short tons in 2023 to 377,000 short tons in 2030. CORE was recently announced as a finalist for award of grant funding under the New ERA program, which will support CORE's transition zero-emissions resources as a major energy source.

Canyon Peak is a key piece of CORE's planned portfolio, meeting near term reliability needs as the cooperative transitions from existing supply arrangements, helping to integrate high levels of weather-dependent renewable generation for CORE's members, and contributing to regional reliability. By 2030, CORE's contracted renewable resources are expected to generate at least 85% of the energy consumed by members. CORE's intentions are to rapidly decarbonize as the cooperative relies progressively less on coal-powered resources. Canyon Peak will be primarily used as a peaking resource to meet energy needs on the hottest and coldest days of the year, and during those periods when weather-dependent generation is not available. The publicly disclosed CEP includes near-term renewable generation which have been contracted to come online in 2026-2027 timeframe. In the interim, CORE will use thermal assets and contracted firm purchases from regional market participants to meet their members' energy needs.

3.e Description of all conservation techniques to be used in the construction and operation of the project.

Both the power plant and natural gas pipeline will be designed using engineering best practices and safety in engineering and best available conservation techniques for construction means and methods. This conforms to industry standards, national codes, and Federal, State and Local regulations. The Project's primary objective during construction and operations is to implement conservation techniques to minimize ecological footprints, contribute to environmental protection, and sustainable techniques as described in detail further below. The

Project is also focused on safety and compliance to Federal, State, and Local regulations while minimizing disruptions to the local community.

Construction techniques of the project are intended to employ following conservation in construction:

- Habitat – minimize destruction of natural habitats and areas, this includes reclaiming or restoring habitats or areas to preconstruction conditions when construction is finished
- Soil Erosion and Degradation – Employ best management practices to ensure no soil erosion or degradation occurs during construction activities such as excavation, grading, and clearing of land.
- Air Pollution – Employ technology and best practices to reduce generation of emissions from heavy machinery, diesel-powered vehicles, and construction materials such as cement.
    - For vehicles or machinery, this includes methods to reduce fuel consumption and emissions, such as reducing idling, improving driving efficiency to reduce aggressive acceleration, conducting regular maintenance, use of diesel particular filters, and ensuring catalytic converters are working properly.
    - For particulates, this includes dust suppression methods and use of road materials that generate low dust when driven on by vehicles or machinery
- Energy Usage –
    - Prioritize local sourcing of materials, consumables, and labor to reduce transportation distances and associated emissions and fuel usage.
    - Using electric tools in lieu of gas-powered or compressed-air powered tools.
- New Equipment – newer equipment and machinery are more efficient than older equipment, can improve fuel efficiency and reduce emissions.
- Water – implement water-savings means and methods to reduce usage during construction. This includes ensuring no leaking containers and no spillage when transferring or filling water trucks or similar.

Key components of the Power Plant and Pipeline installation process include:

Planning and Design: Before installation, detailed surveys, geotechnical investigations, and environmental assessments are conducted. For the pipeline, this helps to determine the optimal route, address land use concerns, and identify potential environmental impacts. The design phase includes selecting the appropriate materials, pipeline diameter, and pressure specifications based on the intended capacity and geography. For the power facility, this helps with equipment layout,

grading and drainage design of the site, equipment foundation designs and construction, overall constructability, and site access for operators and equipment maintenance.

- Permitting and Regulatory Compliance:
  - The installation must comply with local, state, and federal regulations, including obtaining necessary permits. This ensures adherence to safety standards and minimizes environmental disruption. For the pipeline, this includes agencies such as the Federal Energy Regulatory Commission (FERC) and the Pipeline Hazardous Material Safety Administration (PHMSA) oversee pipeline construction and operation. For the power facility, this includes the CDPHE, EPA, NFPA, and Arapahoe County.
- Construction and Installation:
  - Pipeline installation involves trenching/boring, welding, coating, and testing to ensure structural integrity and leak prevention. Heavy machinery and specialized equipment are employed for excavation and pipeline laying while welding and joining methods ensure strong, secure connections between segments. A final inspection and restoration of the site complete the installation.
  - Plant installation includes site clearing and grubbing, civil site work to grade the site, excavations for foundations and underground utilities (electrical and process piping), concrete work for foundations. Work requires heavy machinery and large cranes to place equipment around the site. The work requires the use of multiple different craft labor to perform civil, structural, mechanical, and electrical installation and construction activities. Each system or component is inspected and tested prior to burying or connecting to other equipment or systems. This includes the use of third-party testing services such as geotechnical to verify compaction of backfill, concrete testing and CWI inspectors for any welding or non-destructive testing required.
- Safety Measures:
  - Rigorous safety protocols are followed throughout the installation to protect workers, local communities, and the environment. These measures include monitoring for gas leaks, mitigating fire hazards, monitoring excavation or trenching, and ensuring proper worker safety gear and training. Continuous inspections are conducted to identify and address potential risks.
- Environmental Impact and Mitigation:
  - Environmental impact assessments are required to minimize harm to ecosystems, wildlife, and natural resources. Strategies for mitigating damage include erosion control, habitat restoration, and careful management of soil and water quality.
- Testing and Commissioning:
  - Upon completion, the pipeline undergoes thorough testing, including pressure testing and leak detection, to verify its integrity and operational readiness. Once all safety standards are met, the pipeline is commissioned and prepared for service.
  - For the power facility, testing occurs during the course of construction to verify equipment, components, or systems meet all required operational requirements. For piping, as will the Pipeline, pressure testing and leak detection are performed as part of the testing and commissioning. Given the complexity of the Plant and associated

equipment, a thorough startup and commissioning process occurs where specialist in this type of work coordinates with the construction contractor and vendor representatives to ensure equipment functions safely and as required. This work includes electrical and performance testing to ensure the Plant operates as designed and conforms to operational permits and regulations.

- Ongoing Maintenance and Monitoring:
  - After installation, the pipeline requires regular maintenance, including inspection, cleaning, and monitoring for signs of wear or potential issues. Advanced technology, such as In-Line Inspection Pigs (ILI), is used for ongoing monitoring, assuring the pipeline's long-term reliability and safety.
  - For the power plant, operators will monitor the daily operation of the facility. This includes coordinating power generation and unit dispatch when requested by CORE to ensure sufficient power needs are met for CORE's grid. The operators also perform daily duties such as inspections and coordinating any schedule preventative maintenance of the equipment. The power plant will sit idle when not in operation, the CTG units will not be operating in any manner unless the operator initiates the startup of a CTG unit. From there, the control system automates and monitors the process of unit ramp up and power generation. With the power facility only planned to operate 10-20% of the year, maintenance of the CTG units will occur infrequently due to the fact that maintenance intervals are predicated by the number of hours in operation. This also includes any deliveries of consumables required for power plant operations, such as lubricants and ammonia.

Natural Gas Pipeline

The following provides an overview of the installation process for natural gas pipelines, outlining key procedures, safety measures, environmental considerations, and regulatory compliance necessary to complete pipeline projects successfully. The primary objective is to ensure the safe, efficient, and environmentally responsible installation of pipelines that meet industry standards and regulations.

Construction and Installation of Natural Gas Pipelines

The construction and installation of natural gas pipelines are highly technical and complex processes that demand precision, coordination, and adherence to safety protocols. From site preparation to the final welding and testing of the pipeline, each phase of the construction is executed with meticulous attention to detail, ensuring the pipeline is installed correctly and safely and minimizing risks during installation and future operations.

Site Preparation and Excavation

"Call Before You Dig": The Project will provide proper notification to 811 to ensure 1) prevention of accidental damage to underground utility lines, 2) public safety and protection, 3) avoidance of service disruptions, and 4) avoidance of costly repairs. This service is particularly important in the pipeline installation process as it ensures that the pipeline is not accidentally damaged during excavation, which would have unintended impacts on the Project.

Route Clearing: The pipeline route is first cleared of trees, vegetation, and other obstacles. This may require tree removal, brush clearing, and the removal of rocks or other natural obstructions. Environmental considerations like soil preservation and erosion control are factored into the clearing process to minimize ecological disruption. For instance, measures such as using erosion control blankets and silt fences prevent soil erosion during the clearing process.

Trenching: Once the route is cleared, heavy excavation equipment (e.g., bulldozers, backhoes, trenchers) dig the trench where the pipeline will be laid. All pipelines will be buried at a minimum depth of cover of 48 inches to the top of the pipe or equivalent means to protect the pipeline from outside force damage. For the several road, driveway, and creek crossings, the depth of the pipe will likely be deeper than 48 inches. The minimum buried depth between the top of the pipeline and road or creek beds will be determined in the HDD design. All trenches will be wide enough to accommodate the pipeline sections and space for welding and inspection.

Trench Support and Safety: In areas where the trench may be unstable or deep, trench supports (such as shoring or trench boxes) are used to prevent collapse and ensure worker safety. These precautions are especially important when working near populated areas or in challenging geographies like wetland zones, steep slopes, or rocky terrains. Regular safety briefings and personal protective equipment (PPE) further enhance worker safety.

Pipeline Welding and Joining

Pipeline Section Assembly: Typically, 40 feet long, steel pipeline sections are delivered to the construction site and stacked along the trench. The sections are then aligned and prepared for welding.

Welding Process: The pipeline segments are joined using a process called manual or automatic welding. First, the pipe ends are beveled to ensure a proper fit and aligned precisely before welding. Welding is performed in several stages, including the root pass (the initial weld), fill passes (subsequent layers), and the final cap pass. Each weld is carefully inspected for quality and strength.

Inspection and Testing of Welds: After welding, non-destructive testing (NDT) methods such as ultrasonic testing, X-ray, or magnetic particle inspection are used to check the quality of the welds. Any defects identified during inspection are repaired before proceeding.

Coating: Once welded, the pipeline is coated with a protective layer to prevent corrosion. This is typically done using a combination of fusion-bonded epoxy (FBE) or polyethylene coatings, followed by an outer layer of polymeric material for additional protection. In some cases, a cathodic protection system is also installed to further reduce the risk of corrosion by using electrical currents to counteract the corrosive forces in the environment.

Pipe Lowering and Installation

Lowering the Pipeline into the Trench: After welding and coating, the completed pipeline sections are carefully lowered into the trench. This is done using specialized machinery, such as side

booms or cranes, which gently lower the pipe into place. The sections are laid in the trench and positioned to maintain proper alignment along the entire length of the route.

Backfilling the Trench: The trench is backfilled with the excavated soil once the pipeline is in position. In many cases, layers of sand or padding are placed around the pipeline to protect it from external damage caused by sharp objects or rocks in the soil. The backfilling process is completed in stages to ensure the pipeline remains properly aligned and supported.

Hydrostatic Testing and Pressure Testing

Pressure Testing: Before the pipeline is put into service, it undergoes a rigorous testing process known as hydrostatic testing. This test involves filling the pipeline with water, which is then pressurized to levels above its normal operating pressure to ensure it can safely withstand high-pressure conditions. The pressure is monitored over time to check for potential leaks or weaknesses.

Leak Detection: During hydrostatic testing, leaks or pipeline weaknesses will become apparent, and repairs can be made before the pipeline is fully operational. This process is critical to ensuring the long-term safety and integrity of the pipeline.

Post-Test Dehydration: After testing, the water used in the test is removed, and the pipeline is dried and prepared for gas service. This may involve purging the pipeline with air or another gas to remove moisture that could cause corrosion once the pipeline is in service.

Installation of Ancillary Equipment

Valves and Metering: Besides the pipeline itself, various ancillary components are installed along the pipeline route to support its function. These include:

Valves: Valves are strategically placed along the pipeline to control gas flow, isolate sections for maintenance, and respond to emergencies.

Metering Stations: Metering stations are installed at key points along the pipeline to monitor gas flow, pressure, and volume.

Pig Launchers and Receivers: Pipeline inspection gauges (PIGs) are used for internal pipeline cleaning and maintenance. PIG launchers and receivers are installed at each end of the pipeline to allow for the insertion and retrieval of PIGs.

Final Inspection and Commissioning

Final Inspection: Before the pipeline is officially commissioned, it undergoes a final inspection. This includes checking that all welding, coatings, and pressure tests have been completed successfully and ensuring that safety and regulatory standards are met.

Commissioning: Once all inspections and tests are complete, the pipeline is ready for commissioning. The pipeline is gradually introduced to the natural gas supply at a controlled

pressure, and additional safety checks are performed to ensure it operates as intended. This phase also includes the final connection to the gas distribution network.

Restoration of the Site

Revegetation and Environmental Restoration: After the pipeline is installed and tested, efforts are made to restore the construction site to its original condition, as environmental regulations require. This may involve planting vegetation to prevent soil erosion, repairing wetlands or habitats disturbed during construction, and restoring areas of the right-of-way affected by the Project.

No wetlands will be impacted by the project. An upland seed mix has been provided in SWCAs Environmental Impact Analysis (EIA). No wetlands will be impacted by the project and therefore, no wetland-specific seed mix or restoration is required.

Ongoing Monitoring: Once the pipeline is in operation, it will be continuously monitored for gas leaks, pressure changes, and signs of wear. Remote monitoring systems and on-site inspections are part of the ongoing safety measures to ensure the pipeline operates safely and efficiently throughout its lifespan.

Trenching and Excavation

Trenching and excavation are critical steps in constructing a natural gas pipeline. They involve digging a trench along a planned pipeline route to bury the pipeline safely and ensure minimal environmental impact. The process typically begins with site preparation, clearing vegetation, and leveling the ground. Next, trenching equipment like excavators or trenchers creates a trench designed based on the required pipeline depth, width, and soil type. Safety measures are essential during excavation to prevent hazards such as cave-ins, managed by trench shoring, sloping, or benching methods.

After trenching, the pipeline sections are carefully lowered into the trench, often welded together, and seams are coated above ground before being lowered as a continuous segment. The pipeline is then inspected for corrosion resistance. Once placed, the trench is backfilled with the excavated soil, and the surface is restored as close to its original condition as possible to minimize environmental disruption.

Strict regulatory standards and safety protocols are followed throughout the process to ensure the pipeline's integrity and the workforce's safety.

Pipeline Crossings

When trenching and excavation for a natural gas pipeline are needed on crossroads, driveways, or other hard surfaces, special methods are employed to minimize disruption and ensure safety.

Horizontal Directional Drilling (HDD): This trenchless method is often preferred for busy roads and driveways. A drill creates a tunnel beneath the surface through which the pipeline is pulled. HDD avoids open trenches, minimizing traffic disruptions and reducing the risk of surface damage.

Open-Cut Trenching: For roads with lower traffic or shorter crossings, open-cut trenching may be used. This involves cutting through the road surface to create an open trench for the pipeline. Traffic may be temporarily rerouted or controlled with signs and barriers, and steel plates are often placed over the trench during non-working hours to maintain vehicle access.

Boring or Auger Boring: This technique is similar to HDD but generally used for shorter crossings. A borehole is drilled beneath the road surface to make a path for the pipeline. This method is often faster than HDD for short distances and requires less complex machinery.

Road Restoration: Road surfaces are fully restored after the pipeline is placed. This includes refilling the trench with compacted material and laying fresh pavement or concrete to match the original surface. Any temporary access routes or safety barriers are removed to ensure smooth traffic flow.

Canyon Peak Power Station

The following provides and overview of the construction, installation, and operation of the Canyon Peak Power Station. The primary objectives are to ensure a safe, environmental compliant, locally responsible, and reliable Plant to support CORE's electricity demands. The power plant will be designed using engineering best practices and safety in engineering and construction means and methods conforming to industry standards, national codes, and Federal, State, and Local regulations.

Some methods of construction are similar to those described above for the natural gas line except trenching is limited or not used. Due to the nature of the site and type of construction performed, trenching is not needed.

Site Preparation & Mobilization

Before construction can begin in earnest, once approvals and permits have been issued, the Project will mobilize a small team to begin site preparations. These site preparations include performing a preconstruction survey to mark property boundary lines and includes contacting the 811 service to mark any underground utilities. "Call Before You Dig": Proper notification to 811 is crucial because it helps prevent accidental damage to underground utility lines, protects public safety, prevents service disruptions, and avoids costly repairs.

Site preparation also includes installing all required BMPs according to the SWPPP and Stormwater Construction Permit from CDPHE. This would include installing silt fencing, erosion control measures, and construction fencing, where needed to protect areas of the site from any construction activities.

Once BMPs and erosion control measures are installed and inspected, the site will be prepared for receiving of earthmoving equipment, construction trailers, and establishing construction parking and laydown areas. Refer to the Site Plan drawings for preliminary locations. The Site BMPs and erosion control measures will be maintained over the course of construction and in accordance with Stormwater Construction Permit.

Site Clearing & Grubbing

After site preparation, construction of the site can begin in earnest. Initial phases of construction involve a lot of earthwork and grading. Before grading can occur though, the area of construction will be cleared of debris and spoils, which are unsuitable for reuse. The preliminary soils geotechnical report indicates that the soil is suitable for backfilling of foundation and other areas of the site. Spoils and soils will be stockpiled or removed from the site depending on reusability.

Site Grading, Excavation, & Foundations

After the site has been prepared, grading will begin. Initial stages of grading will comply with Arapahoe County Grading Permit to establish necessary drainage design features, such as swales, culverts, and the detention pond. The aim here is to establish the overall grading of the site that is in conformance with the Grading Permit from Arapahoe County.

As major equipment locations are graded per design, site excavations will begin at the same time to begin work on all underground utilities and prepare the site for foundation work. Excavations will not be trench type, rather large areas will be cleared to allow installation of underground utilities and other components will be done in open areas, removing the use of trenches during construction. This is a much safer approach to construction. The phasing of excavations and foundation work will most likely follow a north to south approach, where construction will focus on areas and the proceed to the next area. This ensure site access is maintained during construction and allows for safer movement of equipment and manpower.

Installation of deep foundations will start after site grading and excavations. For the Project, equipment requiring deep foundations is established by a geotechnical investigation. See Appendix B16 for preliminary geotechnical investigation. The geotechnical engineer analyses the soil type and depth of bedrock for various borings at the site to establish criteria for what type of foundation can be used depending on the loads expected. Particularly loads that will require deep foundations. For the Project, the use of drilled piers is expected to be required for the CTG and Exhaust Stack foundations. This is due to the loading and rotational energy of the equipment. The drilled piers ensure no heaving or settlement of the pile caps or slab foundations will occur after construction is completed and the Plant is in operations. Any movement of the foundations for the larger equipment can cause damage or unbalanced operation of the machinery. The use of drilled piers is typical in this type of construction in Colorado due to the expansive soils found throughout the Front Range.

All other foundations will be slab type. These foundations will be installed below frost depth and use rebar to reinforce. For the GSU foundations, as described elsewhere in this application, secondary containment will be designed into the foundation per NFPA requirements to capture oil and firefighting water.

Underground Utilities, Backfilling, and Foundations

As areas of the site are excavated and prepared for foundations, underground utilities such as buried piping and cable ductwork or conduit is installed. This allows for the construction contractor to focus on one area of the site and allows for an open construction area. Also, utility installation

during foundation preparation work allows for stub-ups to be installed, whereas piping or electrical cables can be installed within the foundations and stub-up to their locations where they connect to the equipment. This approach allows for a more open site once construction is completed and provides more accessibility to operators and maintenance personnel once the Plant is in operation.

Before piping utilities are backfilled and covered, hydrostatic leak testing can be performed, same as described above for the natural gas pipeline. Once utilities are installed and leaked tested, and foundation formwork is in place for the large foundations, backfilling of the area can begin. This includes compaction and grading per design requirements. Construction contractor will use geotechnical engineering to test compaction of the backfill soils to confirm it is compliant with structural design requirements.

Once backfilling is complete, foundations in the area of work can be poured and finished. The construction contractor will use concrete pumping trucks to allow reach and precise pouring of the concrete. Geotechnical engineer will be onsite collecting samples of concrete for break tests and performing various quality testing of the concrete prior to pouring. The foundations for the plant are critical part of the overall project success and future operation of the Plant. Concrete quality is imperative to the Plant's longevity and to ensure proper operation of the CTGs.

Equipment Deliveries & Placement

The Project is installing large equipment that is precision engineered and fabricated. The construction schedule is aligned with the delivery schedule of certain equipment, such as the CTGs, Exhaust Stack, and GSUs. Construction schedule is planned and performed such that foundations are ready for equipment to be placed once the equipment arrives onsite. The Project does not intend to store these pieces of equipment as unnecessary movements and storage can damage the equipment and create issues with future performance. The construction contractor will employ large capacity cranes that can transfer equipment from transports directly to their final locations. To ensure the Project can support these crane operations and equipment deliveries, the site has been laid out to allow access for both the cranes and delivery transports.

Some of the equipment will arrive on over-sized transports. The Project will coordinate with transport companies to ensure proper approvals and permits are obtained from the State and County prior to delivery occurring.

Final Testing, Startup & Commissioning

Once construction contractor has all the equipment installed and all piping and cabling terminated, the Project will go through a rigorous startup and commissioning process. This process ensures all piping, cabling, and equipment are thoroughly tested prior to equipment being placed into service. Due to the complex nature of some of the equipment, such as the CTGs, representatives from the vendors will be onsite assisting with startup and commissioning activities to ensure they meet critical functions and operating requirements. This includes verifying the control system for the Plant provides the necessary monitoring and control functions to operate the facility. The startup and commissioning process is documented to ensure quality control and quality assurance.

The Project will be engaging the Bennett-Watkins Fire Rescue over the course of construction and especially during this startup and commissioning phase. The Project will be providing documentation of testing and notifying when witness testing is required by Bennett-Watkins. This includes testing of the fire pump skid, fire hydrants, and fire alarm panel in the Controls Trailer.

Final Testing

Once startup and commissioning is completed, the Plant go through a detailed performance and compliance testing. This testing includes operational testing to verify the equipment is operating to the performance guarantees provided by the equipment vendors. This includes emissions testing as well. CDPHE will be engaged during this process with test results provided prior to approval of operating air permit.

Site Finishing

While final testing is occurring, the construction contractor will be working on site finishing of the area. This includes removing all construction equipment and materials, returning the site to pre-existing conditions where identified in design documents. This will include reseeding areas, placing signage, completing security fencing and security gate installations. The contractor will also place the site laydown and construction parking back to original conditions.

Included in Site Finishing is site restoration of areas that were used temporarily for construction or covered work such as buried pipelines. This includes reclaiming land to prior existing conditions by soil remediation or replacement, revegetating with native species, ensuring erosion control measures are in place, and restoring or installing drainage systems.

4. Property Rights, Permits, and Other Approvals

The Project has completed numerous reports and assessments as part of the 1041/USR application. These reports and assessments were prepared by consultants listed as Applicant Agents and are included as appendices to this application. Please refer to these appendices, as noted below, as they address in more detail the following application questions.

4.a A list and copies of all other Federal, State, and local permits and approvals that have been or will be required for the project, together with any proposal for coordinating these approvals with the County permitting process.

Please refer to Appendix B13 for complete list of required permits for the construction of the Project.

The Project has been engaging the following entities for developing required permits and approvals:

- Arapahoe County
- Colorado Department of Public Health and Environment (CDPHE)

- Bennett-Watkins Fire Rescue

With the peaking power plant portion of the Project situated in the Denver Metro North Front Range (DMNFR), emission sources from the Project requires a minor stationary air permit with the CDPHE. Please refer to Appendix B9 for expanded description of this process and detailed modeling analysis submittals to CDPHE. The minor stationary air permit is required prior to construction starting for the peaking power plant.

The existing site where Brick Center Substation is located has an existing drainage easement along the south and southwest portion of the site. The site includes drainage swales installed during the substation construction along the east side of the substation and south of the substation to maintain existing site drainage flows. The site also exists in the Kiowa Creek drainage basin.

The Project has completed a Phase III Drainage Report (see Appendix B1) and Grading, Erosion, and Sedimentary Control (GESC) Report (see Appendix B5) that details the existing conditions for the whole site and design features, including Best Management Practices (BMPs) to ensure the overall site drainage improvements comply with State and Arapahoe County drainage requirements. The Project will coordinate with Arapahoe County regarding vacating the existing Drainage Easement and replace with new Drainage Easement as part of overall permitting and approval process. The Project will also be engaging with SEMSWA for drainage basin fee due to development in the watershed.

The pipeline portion of the Project will be installed in the existing Arapahoe County Road 129 ROW. It is anticipated that there will be a total temporary ROW of 60 feet, which will be used during the construction of the pipeline. Additional temporary workspace will be acquired as needed for constructability, as well as for equipment access to the pipeline ROW during construction. It is not anticipated that there will be any above-ground appurtenance (block valves, pig traps, etc.) locations between the pipeline inlet and outlet. The pipeline will cross County roads and dry creek beds and some private property roads access points.

The County roads crossed are County Road 129, E. Harvard Avenue, and County Road 30 (E. Quincy Avenue/Airline Road). Refer to Appendix B19 for projected route of pipeline. All major roads and creek crossings will require Horizontal Directional Drilling (HDD) methods to be utilized to ensure that disturbance of the crossed entities will not occur. Small private roads are expected to be open cut. The Project will provide preconstruction and post-construction profiles of the ROW to Arapahoe County in accordance with permit requirements. The Project will be required to obtain Arapahoe County Street Cut/Right of Way permit prior to starting any work.

The Project has entered into an easement agreement with a property owner (see Appendix A14). The agreement covers a permanent easement of approximately one-half acre and a temporary easement of approximately 0.1 acres. The easement agreement allows for installation of gas meter yard along with the pigging station and other related infrastructure on contemplated area of the property. Please see revised USR Plan Set for layout of gas meter yard area and where Project pipeline connects. CIG is responsible for design and layout of piping and equipment located within gas meter yard and is not part of this Project application.

4.b Copies of all official federal and State consultation correspondence prepared for the project; a description of all mitigation required by Federal, State, and local authorities; and copies of any draft or final environmental assessments or impact statement required for the project.

The Project has been in contact with the Colorado Department of Public Health & Environmental (CDPHE) regarding the air permit application, please refer to Appendix B9 under Appendix E for current air permit application.

The Project has also been in contact with the Bennett-Watkins Fire Rescue (Bennett-Watkins) regarding the fire water system for the Project. Bennett-Watkins and Applicant held a meeting on April 21, 2025 to go over the Fire Water System Basis of Design. Bennett-Watkins only concern was the flow capacity of the Fire Water Pump and storage capacity of Fire Water Storage Tank.

Bennett-Watkins uses the International Fire Code (IFC) for fire water supply determination. The IFC uses building construction type and building square footage to determine the required fire water flow. For this Project, the Controls Trailer is the largest building used to determine fire water flow per IFC. The Controls Trailer type of construction is V-B and has a square footage of 1,873 sq feet. From Appendix B of the IFC, based on 0 – 3,600 square footage for Type V-B construction, the minimum fire water flow is 1,500 gpm for a duration of 2 hours. The minimum fire water storage then becomes 180,000 gallons. Which is 1,500 gpm x 2 hours x 60 mins/hr = 180,000 gallons

The Applicant's current Fire Water Pump is sized for 1,000 gpm and the Fire Water Storage Tank is 165,000 gallons. This is based on National Fire Protection Association (NFPA) requirements for power plants. Since Bennett-Watkins use the IFC and only recognizes NFPA standards when IFC allows, Bennet-Watkins requirements was to size the Fire Water Pump at 1,500 gpm and provide fire water of 180,000 gallons to meet 2-hour flow duration.

Bennett-Watkins FD did not have any other comments on the overall fire water system, which includes an underground fire water supply loop and hydrants. This includes the use of preinstalled fire suppression on the CTGs and use of Clean Agent fire suppression in the Controls Trailer network room. Bennett-Watkins and the Applicant agreed to further discussions on what size the Fire Water Pump should be as the IFC allows for a reduction in minimum flow requirements if the Controls Trailer included full fire suppression for the whole building. Following the conclusion of the call with Bennett-Watkins, Bennett-Watkins informed the Applicant that they would communicate to Arapahoe County that day (April 21, 2025) that they did not see any issues with the Applicant's fire water system that would not allow this portion of the 1041/USR application to finish the review and referral portion of the application process. The size of the Fire Water Pump would be considered a condition of approval.

The Applicant followed up with Bennett-Watkins on April 26, 2025 that the Fire Water Pump and Fire Water Storage Tank would be changed to comply with IFC requirements of 1,500 gpm and minimum fire water storage of 180,000 gallons. Based on the discussions with Bennett-Watkins described above, this implies that there are no outstanding issues regarding Bennett-Watkins application review.

The Applicant has conveyed the requirement of a "Will Serve" letter to Bennett-Watkins and sent subsequent communications requesting Bennett-Watkins follow up with Arapahoe County so this portion of Applicant's 1041/USR application can be closed out.

The Applicant has learned from discussions with Arapahoe County on April 28, 2025 that Bennett-Watkins did not follow up with Arapahoe County after the April 21, 2025 meeting. Applicant has made repeated requests to Bennett-Watkins to please communicate with Arapahoe County specifically regarding the Will Serve letter requirement.

Please see Appendix B12 for correspondences to date with Bennett-Watkins and Arapahoe County regarding this topic.

4.c Description of the water to be used by the project and alternatives, including the source, amount, the quality of such water, the applicant's right to use the water, including adjudicated decrees, applications for decrees, proposed points of diversion, and the existing uses of the water. If an augmentation plan has been filed in court, the applicant must submit a copy of that plan.

The Project will use water obtained from a permitted commercial water supplier local to the project area. During construction, the Project will require water for hydrostatic testing of the natural gas pipeline and the process piping installed at power facility site. Water will also be utilized for dust control during construction activities. The Project will have water delivered to the site and stored in large portable water storage tank similar to frac water trailers (roughly 21,000 gallons each). At this stage of the Project, the amount of water required is unknown and Project conditions will determine needs.

The source for potable water will be a dedicated Potable Water Tank located at the Controls Trailer. The Potable Water tank will be periodically filled by a qualified and permitted potable water supplier. The use of a Potable Water Storage Tank is compliant with Chapter 6 of the International Plumbing Code (IPC) for potable water sources. The code allows the use of a potable cistern for the source of potable water to supply water to plumbing fixtures, as specified in Section P-602.3 Individual Water Supply. In this case, the Potable Water Storage Tank serves as the potable cistern.

The Potable Water Tank will store the required potable water volume to meet the demands and needs of employees, including for bathroom facilities and hand washing in the Controls Trailer. Pumps will be used to ensure adequate pressure and flow for potable water supply to Controls Trailer. The Project will have two (2) bathrooms installed in the Controls Trailer for employee use, and these bathrooms will discharge to a septic system (onsite water treatment system). The septic system will include a septic tank and leach field, sized in accordance with Arapahoe County Health Department and IPC requirements.

No adjudicated decrees or augmentation plans are needed.

5. Regional Water Quality Management Plan

The Project site is located within the South Platte River Watershed, with no streams, lakes, or surface water features within or near the area and subject to the South Platte Basin Implementation Plan. Runoff from the site flows into roadside ditches and ultimately to Kiowa Creek, with a detention pond designed to handle up to the 100-year, 1-hour storm, in compliance with Arapahoe County and CDPHE stormwater requirements. The site is not within a floodplain, and best management practices, including a SWMP and GESC, will minimize impacts during construction and operation. The absence of mapped surface water and water management measures will minimize impacts to surface water quality or quantity.

6. Financial Feasibility of the Project

Canyon Peak Power is a wholly owned subsidiary of Kindle Energy LLC ("Kindle"). Kindle is a wholly owned portfolio company of Blackstone Inc., one of the world's leading investment firms. Blackstone seeks to create positive economic impact and long-term value for its investors, the companies it invests in, and the communities in which it works. Founded in 1985 and publicly listed since 2007, Blackstone is a leading global alternative asset manager with over $1 Trillion of total assets under management.

6.a The estimated construction costs and period of construction for each development component.

The total construction costs for the Project are estimated to be approximately $300 million. Of that total, the power generation associated equipment for the Project is estimated to cost more than $210 million, of which more than 95% has been already purchased. The balance of the estimated construction costs includes installation, interconnection, and labor costs. While timing of the construction period is dependent upon a variety of factors, including the grant of the USR/1041 permit, weather, and other variables, Kindle intends that the Project be complete and in-service by the second quarter of 2026 in order to fulfill the power needs of CORE and its members.

6.b Revenues and operating expenses for the Project.

Canyon Peak Power has executed a 25-year offtake agreement with CORE Electric Cooperative in which CORE has agreed to purchase all energy generated by, and all capacity associated with the Project in excess of the energy required for the operation of the Project. CORE is an AA- rated retail electric cooperative utility that recovers the cost of its electric utility service from its retail ratepayers through retail rates. As such, the Project will have revenues in excess of the $35 million annually, covering operating and debt servicing costs. Operating costs at the facility will range between $3 to $4 million per year. Nearly half of the operating costs are associated with labor while the balance is mostly consumables. The largest operational expense, the natural gas needed to run the facility and produce power, will be provided and purchased by CORE.

6.c The amount of any proposed debt and the method and estimated cost of debt service.

The construction of the Project will be financed with 70% to 80% debt. The balance of construction costs will be financed by sponsor equity. Kindle has funding in place to finance the purchase of equipment for the Project, which, as noted in Section 6.a., comprises more than two-thirds of the total upfront estimated construction costs. The Project has secured a $145,600,000 loan facility for the purchase of this equipment. This existing equipment loan will be retired upon the permanent private placement financing. The lenders of the private placement financing have conditioned this additional funding on receipt of a USR/1041 permit from the County. Issuance of the USR/1041 permit will thereby facilitate securing the remainder of Project financing. Annualized cost of debt will range between 6%-8% depending on market rates. Please see Appendix B14 for Financial Support letters that have been provided by Sumitomo Mitsui Banking Corporation ("SMBC") and First Citizens Bank expressing interest in financing the Project based on the strength of financial projections for the Project, Kindle's past performance as borrower of these lenders, and Kindle's demonstrated ability to deliver successful comparable projects.

6.d Details of any contract or agreement for revenues or services in connection with the project.

As discussed in Section 6.b, Canyon Peak Power has executed a 25-year offtake agreement with CORE Electric Cooperative in which CORE has agreed to purchase all energy generated by, and all capacity associated with the Project in excess of the energy required for the operation of the Project. The contract was executed by Canyon Peak Power and CORE on November 21, 2024, and the 25-year term commences the earlier of (a) the latest commercial operation date; and (b) the date on which all six generating units comprising the Project have been installed, commissioned, and tested.

6.e Description of the persons or entity(ies) who will pay for or use the project and/or services produced by the development and those who will benefit from any and all revenues generated by it.

CORE, an AA- rated entity, will pay for 100% of the facility output under a long-term power purchase agreement. The beneficiary of the facility is CORE along with its electric cooperative members. The Applicant (Canyon Peak Power) provides a service at an agreed upon cost to CORE. The consumer of electricity is the beneficiary.

As of year-end 2023, CORE currently serves the following cooperative members:

CORE Electric Cooperative Customers (2023)	
Residential Electric Customers	161,800
Commercial Electric Customers	13,914
Industrial Electric Customers	11
Total Retail Electric Customers	**175,725**

Source: EIA

6.f Cost of all mitigation measures proposed for the project.

The cost of all mitigation measures proposed for the Project will be approximately $40-$50 million, which is included in the overall construction costs described in 6.a. This includes the emissions controls like the SCR, exhaust stack, and baffles for sound attenuation, among other items.

6.g Detailed description as to how the project will be financed to show that the applicant has the ability to finance the project.

Kindle plans to raise non-recourse project financing for the Project. The Project will be funded through a combination of long-term debt and sponsor equity, ensuring financial sustainability and alignment with market standards for similar large-scale energy projects.

The Project is currently funded by $34,200,000 in sponsor equity from Blackstone. Blackstone is the largest private equity firm in the world with over $1 trillion in assets.

As discussed above, Kindle has already secured a $145,600,000 loan facility for the purchase of equipment. This financing will be retired and replaced with the permanent private placement financing, which is expected to close in Q4 2026. In discussions with potential lenders of the private placement financing, those lenders have conditioned the additional funding on receipt of a USR/1041 permit from the County. See the two Financial Support Letters issued by SMBC and First Citizens Bank in Appendix B14.

Kindle intends to secure competitive long-term debt from institutional investors or a syndicate of commercial banks, depending on market conditions and project requirements. Potential debt instruments include a structured project finance facility from a diverse lender base or a U.S. private placement ("USPP"). The financing strategy will target optimal debt sizing based on maximum leverage constraints and a minimum debt service coverage ratio.

Kindle Energy has a proven track record in project finance, successfully executing complex, large-scale financings for power generation assets, including both combined-cycle and simple-cycle gas turbine projects. These projects include:

- Magnolia Power (Iberville Parish, Louisiana): Achieved financial close in July 2022, securing a $490MM Term Loan and a $90MM Revolver, with total project investment reaching $780MM. The financing was supported by a syndicate of six banks, and equity was provided by Blackstone funds.

- Mountain Peak Power (Weld County, Colorado): Secured financing through a $285MM 30-year fixed-rate U.S. private placement ("USPP") and a $35MM revolver, with financial close completed on October 24, 2024. Equity was also funded by Blackstone.

This recent experience in structuring, negotiating, and executing non-recourse financing demonstrates Kindle Energy’s ability to secure competitive capital while optimizing financial

structures tailored to project-specific needs. Kindle Energy's expertise ensures the successful execution of financing for the Project, leveraging strong relationships with lenders and institutional investors.

7. Land Use

7.a Description of existing land uses within and adjacent to the Project Impact Area.

The Project is located in Unincorporated Arapahoe County in the A-1 (Agricultural) zone district. No change in zoning is required for the Project. The Project will be located within property owned by CORE. Canyon Peak Power Station will be co-located with the existing Brick Center Substation, which maximizes CORE's existing infrastructure, optimizes available utility land, and minimizes the construction footprint of the Project. The gas pipeline will be installed within the County Road 129 utility ROW. The Project is not located within in a floodplain or geological sensitive area.

Land uses along County Road 129 from Belleview Avenue to East Iliff Trail are largely agricultural with residences located sporadically. Large tracts appear to be used for ranching and dryland farming. There are numerous properties that have non-residential improvements, including utility and other facilities, located within vicinity of the Project. These include large solar facilities installed on properties in the vicinity of the Project, the Arapahoe County Eastern Service Center located north of the Project site, and Kiowa Creak Sporting Club, located east of the Project site.

Properties immediately adjacent to the Project are also zoned A-1 and have large solar facilities installed for renewable energy generation or have minimally agricultural use of the land.

7.b Description of provisions from local land use plans that are applicable to the project and an assessment of whether the Project will comply with those provisions.

There are no local land-use plans specifically adopted for the Project site that include CORE's property. The Project complies with the intent of the A-1 Zone District under the Arapahoe County Land Development Code, and with the applicable land use category "Rural Area Uses" as designated in the Land Use Plan element of the Arapahoe County Comprehensive Plan. Under the Comprehensive Plan, for Non-Residential Land Uses, the Project is considered a primary use under Public Facilities (power energy facilities) with siting determined through the County's 1041/USR review process. This process allows public facilities to be sited on a case-by-case basis as approved by the Board of County Commissioners of the County.

The Project also furthers various goals and policies from the Comprehensive Plan in relation to Local and Regional Public Facilities and Utilities Facilities. The Project supports local utility needs and growth of the region. The Project's land use is compatible with surrounding land uses and does not have negative impacts regarding water usage, regional water aquifer, stormwater drainage, sensitive areas related to cultural resources, floodplains, wildlife habitats, geological

hazards, and the environment. The Project is a critical piece of CORE's planned portfolio and will meet near-term reliability needs and help CORE integrate high levels of weather-dependent renewable generation. The Project strengthens CORE's local electrical utility services and its ability to serve its cooperative members.

7.c Description of impact and net effect that the project would have on land-use patterns.

Following Project construction completion there will be no additional impacts on current land use patterns in the vicinity of the Project. The existing land use of the Project site serves the public under public facilities as defined in the Comprehensive Plan (power substations, Utility Lines). This site was strategically selected to maximize utilization of CORE's existing infrastructure on the property and to optimize available utility land while minimizing the construction footprint. Properties near and adjacent to the Project property have already been approved for solar facilities (Power Energy Facilities). The Project is consistent with improvements of the public facilities available to the public without changing any current land uses or requiring zoning changes.

8. Local Government Services.

8.a Description of existing capacity of and demand for local government services including roads, schools, water and wastewater treatment, water supply, emergency services, transportation, infrastructure, housing law enforcement, and other services necessary to accommodate development.

Canyon Peak Power Station does not require expansion of local government services other than those already provided in the immediate area. The Project will not increase capacity or demand for roads, schools, water and wastewater treatment, water supply, transportation, infrastructure, or housing law enforcement to accommodate development. Canyon Peak does expect emergency services such as emergency medical services during and after construction. This includes the Sheriff in cases of theft or vandalism. During power plant operations, emergency services are expected to be required in case of emergencies such as injury. The Project may require fire response services, but this would be limited to small brush fires. No firefighting is needed or required for the Plant process equipment.

The Project will require a Potable Water supply, but this will not be a local government service. The Project will contract with a local permitted water supply source. Please see Section 3.a and 4.c for background on Potable Water source.

8.b Description of the impact and net effect of the project on the demand for local government services and the capability of local governments to provide services.

As noted above, the Project only expects local government services to include emergency response services. The Project has engaged Bennett-Watkins Fire Rescue regarding the Project's equipment and operations once construction is completed. This includes familiarity with power plant access and expected instances where Bennett-Watkins Fire Rescue services would be needed. Due to the type of power plant operations and limited operators required; the Project does not foresee any negative impacts to the current services provided by Bennett-Watkins Fire Rescue. The Project has incorporated design requirements of Bennett-Watkins Fire Rescue, including adequate site access, turn radius for emergency vehicles, and required fire hydrants. The Project will continue to proactively engage Benett-Watkins Fire Rescue to ensure any needs are met with overall Project design, which ultimately ensures an emergency response plan conforms with their expectations.

9. Financial Burden on County Residents.

9.a Description of the existing tax burden and fee structure for government services including but not limited to assessed valuation, mill levy, rates for water and wastewater treatment, and costs of water supply.

CORE is a non-profit co-operative and therefore does not pay ad velorum property taxes on its property. The natural gas pipeline will be located in County ROW. Canyon Peak Power is responsible under its lease, easements, and other agreements to pay permitting and processing fees for Project permits. The Project does not require water or sanitary sewer service. The Project will not rely on any government services; therefore, a description of the existing tax burden and fee structure is not applicable.

10. Local Economy

10.a Description of the local economy including but not limited to revenues generated by the different economic sectors, and the value or productivity of different lands.

The Town of Bennett and Arapahoe County have a diverse and evolving economy, serving as a commercial and service hub along the eastern Interstate 70 corridor. The local retail sector is anchored by national chains and complemented by hundreds of local businesses. Retail and service activities thrive due to its strategic location near major transportation routes, which also supports a labor pool of 1.7 million workers within a 50-mile radius. Industrial growth is driven by proximity to the Colorado Air and Space Port and Denver International Airport, with planned employment centers along I-70 focusing on warehousing, manufacturing, logistics, and ancillary services like hotels and restaurants. The Project will provide reliability to CORE's service territory

within the Town of Bennett and throughout Arapahoe County. Additionally, the Project will facilitate a transition to more renewable energy consumption by local businesses, residents, and public facilities.

According to County Comprehensive Plan, residential and mixed-use developments are expanding rapidly, making the area ripe for further investment. The Project will support the local economy and positively contribute to its future growth.

The local economy is bolstered by strategic investments in infrastructure, including transportation networks and renewable water resources, as outlined in the Town of Bennett's comprehensive master plan. The town's comprehensive economic development strategy aims to attract diverse commercial and industrial investments. Canyon Peak represents the success of the town's comprehensive economic development strategy to attract diverse investment. The combination of thriving retail, industrial, agricultural, and residential sectors positions Bennett as a balanced and resilient community prepared for continued growth. The Project will support the town's economic development strategy by supporting renewable energy growth, providing reliability to the regional power grid, and adding to the tax base of Arapahoe County.

The Project coincides with the local economy's economic growth or comprehensive master plans and aligns well with the existing plans for future economic and industrial growth through strategic investment.

The primary land use in this area is production of agriculture, including livestock grazing and dryland farming. The areas and properties around the project site also have large solar facilities installed, providing a local source of renewable power for the community. These solar facilities benefit from the proximity of the existing Brick Center Substation to interconnect to CORE's electrical grid. Owners of the properties where these solar facilities are installed have benefited financially either through land leasing or sales.

The natural gas pipeline portion of the Project will have a negligible impact on the underlying land value as it will be installed in the existing County road ROW and will require no new easements along the installation route.

The pipeline is not being placed outside of the County ROW except for the location where it ties into the gas meter yard. The gas meter yard will be owned by CIG. The gas meter yard will be placed in an easement owned by Canyon Peak. The easement was recorded with the county on January 9, 2025.

This project will increase availability and reliability of electrical service provided by CORE. This is a direct benefit to the cooperative members including residential, commercial, and industrial developments within Arapahoe County. This project will also provide firm pricing of electric power when renewable power is unavailable to CORE. Rather than having to import power at high market prices during periods of increased demand, CORE will have Canyon Peak available to maintain reliable and cost-effective power to its cooperative members.

10.b Description of impacts and net effect of the project on the local economy and opportunities for economic diversification, including the number and types of jobs created.

Canyon Peak Power Station will increase the property tax revenue on the project property. In addition to providing tax revenues to Arapahoe County, the Project will provide a major benefit to Arapahoe County's economy through the jobs that are created during construction and the increased revenues to local businesses that provide goods and services to the Project as well as its contractors and employees. This includes goods and services used by employees and contractors over the course of the development and construction of the Project. The Project has already employed local surveyor and geotechnical testing services in furtherance of this application.

The Project estimates that an average of 100 workers will be employed over the approximate 10 to 12-month construction period. At its peak, the Project will employ approximately 140 craft workers with competitive compensation. The general contractor for the Project will hire local as much as possible, and the Project expects most of the construction labor will be residents of Colorado. The ultimate number of construction personnel will be determined by the Project's general contractor prior to construction. The Applicant will select a qualified general contractor for the Project with extensive experience in power plant construction across the U.S. providing capabilities in concrete, structural, equipment installation, piping, electrical, instrumentation, and commissioning.

The Project will select a qualified pipeline construction contractor. The Applicant has engaged PSI Inc. for engineering and design and will undertake a competitive bid process to select the most qualified contractor among a strong list of candidates.

Certain tasks associated with the power plant and pipeline construction will be performed by subcontractors that are based locally to the extent feasible. These tasks and subcontractors will not be determined until the project approaches the start of construction. Wherever possible, the Applicant and its contractor(s) will purchase materials locally.

Following completion of construction, the Applicant will operate the Project with 2 employees per 12-hour shift, with 2 shifts a day, which based on 40 hour work weeks with rotating shift teams would equate to up to 12 full-time, highly skilled operation jobs. On average, these jobs will compare favorably to the median income with Arapahoe County. It is reasonable to assume operational staff will reside in the Denver Metro area, providing the local economy with stable sources of income for the next 25 years. Where operators choose to reside, however, is not within Canyon Peak's control.

The Project helps unlock the highest and best use of the land it will reside since it is co-located on existing utility land with CORE's Brick Center Substation. The Project will complement the current industrial activities at the site by way of utilizing existing electrical equipment. The roughly 20-acre site, which is zoned as A-1 Agricultural, was selected to maximize utilization of CORE's existing infrastructure, optimize available utility land, and minimize the construction footprint. The facility will not affect local water resources.

Due to the nature of the both the future power plant and natural gas pipeline, is it expected that the use of local goods and services will be needed to support future plant operations and maintenance.

Following the construction and installation of natural gas pipeline, this portion of the Project will be restored to pre-existing conditions. Any ongoing activities will continue and not degrade from the pipeline installation. No such existing activities occur on the site for the future Canyon Peak Power Station, so construction of the facility will not impact any existing economic activity or opportunities.

For additional project benefits, please refer to SWCA's Technical Memorandum in Appendix B20 with the subject "Canyon Peak Benefit Cost Analysis / SWCA Project No. 94828" which further evaluates the Project.

11. Recreational Opportunities

11.a Description of present and potential recreational uses, including the number of recreational visitor days for different recreational uses and the revenue generated by types of recreational uses.

Canyon Peak Power will provide reliability and firming capacity to support CORE and Colorado's transition to renewable energy resources. CORE plans to reduce CO2 emissions from approximately 1,850,000 short tons in 2023 to approximately 377,000 short tons in 2030. All public recreational uses within Arapahoe County that receive power from CORE will benefit from increased renewable energy consumption and additional grid reliability. Arapahoe County's Parks and Recreation District, now known as Trails Park and Recreation District ("TPRD"), provides county residents and visitors with trails, parks, and open spaces which are located roughly 17 miles to the west of the Project. Furthermore, no fisheries or recreational waters will be crossed and / or impacted by the Project. The Town of Bennett Parks and Recreation Department manages several parks, including Trupp Park, Brothers Four Park, and Centennial Park for a variety of recreational activities. The Town of Bennett, as well as its parks, are located approximately 10 miles north of the Project along the I-70 corridor. Due to the distance of these parks and recreational spaces from the Project, as well as the Projects mitigation efforts, there will be no adverse impact on these recreational resources.

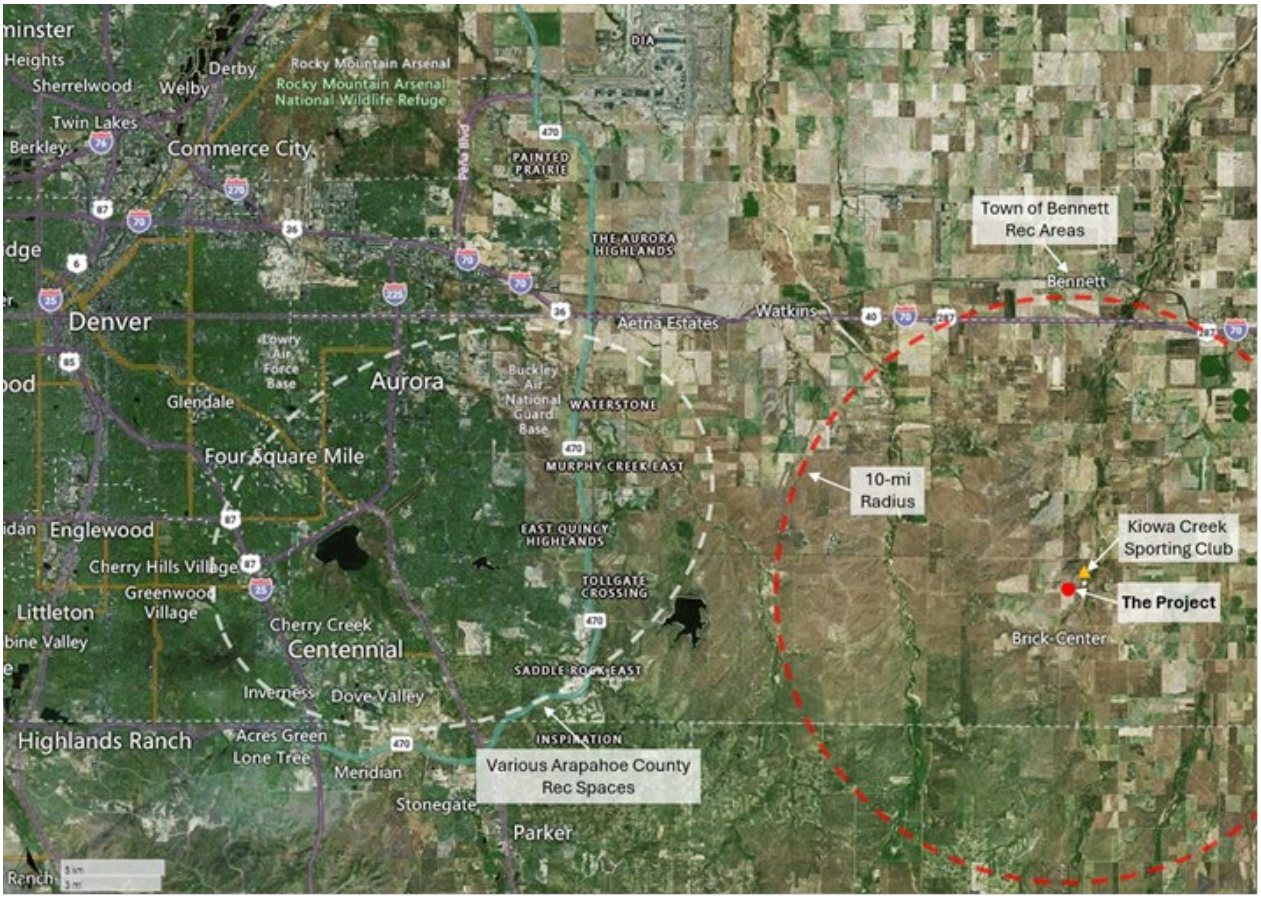
For the immediate Project area, there are no hiking or biking trails located on the site or nearby, this includes possible fishing areas. The Kiowa Creek Sporting Club is located roughly 0.5 miles to the northeast of this Project area but is not accessed or impacted by the Project area. The Project area is flat and not used for any recreational activities.

This Project is not expected to have a direct impact on recreational activities such as fishing, hiking or biking, nor does it currently provide recreational opportunities that would be impacted.

11.b Map depicting the location of recreational uses such as fishery stream segments, access points to recreational resources, and hiking and biking trails.

This Project is not expected to have a direct impact on recreational activities such as fishing, hiking or biking, nor does it provide recreational opportunities.

A map depicting the location of the Canyon Peak Power in relation to Arapahoe County and the Town of Bennett's recreational facilities is provided below.



11.c Description of the impacts and net effect of the project on present and potential recreational opportunities and revenues to the local economy derived from those uses.

All necessary road crossings associated with the construction of the Project's natural gas lateral pipeline will be crossed via boring or HDD methods, at a minimum depth of 48 inches to mitigate any potential disturbances to traffic. Therefore, access to the recreational facilities in Arapahoe County and the Town of Bennett will not be impacted during construction or operation.

It is reasonable to assume, activities associated with the TPRD and Town of Bennett's recreational spaces, including transportation, are unlikely to extend into the active construction areas; therefore, there should be no impact on the recreational spaces.

The only known recreational activity near the Project area is the Kiowa Creek Sporting Club. There are no expected impacts to the activities associated with the Kiowa Creek Sporting Club.

12. Environmental Impact Analysis.

Please refer to Appendix B9 and Appendix B10 for complete Environmental Impact Analysis performed by Ramboll and SWCA.

Description of the existing natural environment and an analysis of the impact of the project to the natural environment. Descriptions in this section shall be limited to the impact area and shall include an analysis of existing conditions supported with data, and a projection of the impacts of the project in comparison to existing conditions. The analysis shall include a description of how the applicant will comply with the applicable Approval Criteria in Section V.

For responses to this section please see above.

12.a Air Quality

i. Description of the airsheds to be affected by the project, including the seasonal pattern of air circulation and microclimates.

The project is situated in the DMNFR, an area that struggles with ozone pollution. Current ozone levels are already above acceptable limits.

ii. Map and description of the ambient air quality and State air quality standards of the airsheds to be affected by the project, including particulate matter and aerosols, oxides, hydrocarbons, oxidants and other chemicals, temperature effects and atmospheric interactions.

For a map and description of the ambient air quality and State air quality standards of the airshed to be affected, please refer to Appendix B9, 3.1, Air Quality.

iii. Descriptions of the impacts and net effect that the project would have on air quality during both construction.

In accordance with the minor source review permit (see Ramboll EIA, Appendix E), the Project will implement various emission controls and mitigation measures to reduce environmental impacts, including Dry Low Emission (DLE) technology, selective catalytic reduction (SCR), and catalytic oxidation (CatOx) systems on combustion turbines to limit NOx, VOCs, and other pollutants. Additionally, the project will monitor emissions, control construction dust, and use BMPs like equipment maintenance, low-sulfur fuel, and minimizing engine idling to mitigate air

quality impacts. For a complete analysis f the impacts and net effect, please refer to Appendix B9, 3.1, Air Quality.

12.b Visual Quality

i. Map and description of ground cover and vegetation, forest canopies, waterfalls and streams or other natural features.

The visual quality assessment found that the project area consists of open high plains and herbaceous vegetation, with no tree canopy, streams, lakes, or parks nearby. For a map and detailed description, please refer to Appendix B9, 3.2, Visual Quality

ii. Description of viewsheds, scenic vistas, unique landscapes or land formations.

The flat landscape lacks scenic vistas. A site visit confirmed these conditions.

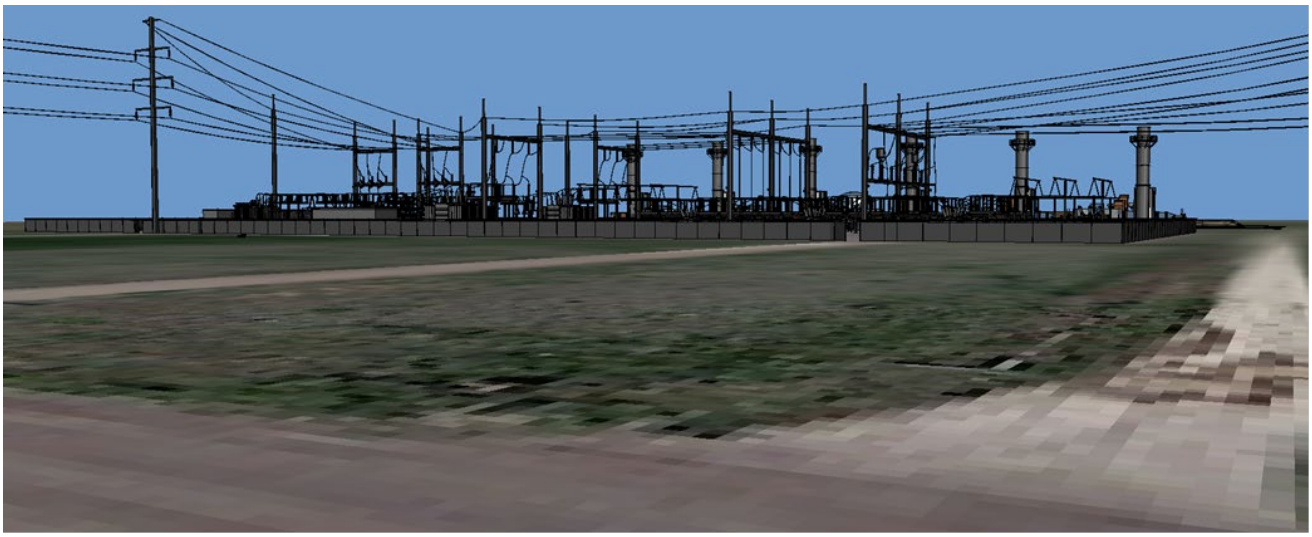
iii. Map and description of buildings, structure design and materials to be used for the project. Include elevations of proposed buildings and other structures.

The facility's turbine stacks, under 80 feet tall, will blend into the existing landscape with the adjacent Brick Center Substation and solar arrays. For a map and detailed descriptions, please refer to Appendix B9, 3.2, Visual Quality

iv. Descriptions of the impacts and net effect that the project would have on visual quality.

The project is situated away from residential areas, minimizing visibility and impacts on communities.

For reference, see following renderings of the Project looking east from County Road 129 and then west towards County Road 129.



12.c Surface Water Quality

i. Map and description of all surface waters, including applicable State water quality standards, to be affected by the project.

The project site is located within the South Platte River Watershed, with no streams, lakes, or surface water features within or near the area. Runoff from the site flows into roadside ditches and ultimately to Kiowa Creek, with a detention pond designed to handle up to the 100-year, 1-hour storm, in compliance with Arapahoe County and CDPHE stormwater requirements. For a map of all surface waters, please refer to Appendix B9, 3.3, Surface Water Quality

ii. Descriptions of the immediate and long-term impact and net effects that the project would have on the quantity and quality of surface water under both average and worst-case conditions.

The site is not within a floodplain, and best management practices, including a SWMP and GESC, will minimize impacts during construction and operation. The absence of mapped surface water and water management measures will minimize impacts to surface water quality or quantity.

iii. Descriptions of the immediate and long-term impacts and net effects that the project would have on the meandering characteristics and limits of the streambed under both average and worst-case conditions.

The site is not within a floodplain, and best management practices, including a SWMP and GESC, will minimize impacts during construction and operation. The absence of mapped surface water and water management measures will minimize impacts to surface water quality or quantity.

12.d Groundwater Quality and Quantity

i. Map and description of all groundwater, including any and all aquifers that are affected by the proposed project. At a minimum, the description should include:

a) Seasonal water levels in each subdivision of the aquifer affected by the project.

b) Artesian pressure in aquifers.

c) Groundwater flow directions and levels.

d) Existing aquifer recharge rates and areas and the methodology used to calculate recharge to the aquifer from any recharge sources.

e) For aquifers to be used as part of a water storage system, methodology and results of tests used to determine the ability of aquifer to impound groundwater and aquifer storage capacity.

f) Seepage losses expected at any subsurface dam and at stream-aquifer interfaces and methodology used to calculate seepage losses in the affected streams, including description and location of measuring devices.

g) Existing groundwater quality and classification.

h) Location of all water wells and their uses.

The proposed project is located away from mapped alluvial aquifers, with the nearest being about 0.3 miles east, and there are no groundwater wells within the Project area. For a map and detailed descriptions, please refer to Appendix B9, 3.4, Groundwater Quality and Quantity.

ii. Description of the impacts and net effect of the project on groundwater.

The facility will not require groundwater resources or wells, and trenching will be above any groundwater according to nearby wells. Best practices will be implemented to prevent contamination and spills. Therefore, the project is expected to have no impact on groundwater quality or quantity.

12.e Wetlands and Riparian Areas

i. Map and description of all floodplains, wetlands, and riparian areas to be affected by the project, including a description of each type of wetlands, species composition, and biomass.

For the project area, not including the pipeline route, topographic data indicates only an eight-foot elevation change, and the soil types present are not hydric, meaning they cannot support wetlands. A site visit in confirmed the absence of wetland plants or hydrologic features. Therefore, the project will not impact wetlands or riparian areas. For a map and detailed description of the project area, please refer to Appendix B9, 3.5, Wetland and Riparian Areas. For maps and descriptions regarding the pipeline route, please refer to Appendix B10.

ii. Description of the source of water interacting with the surface systems to create each wetland (i.e., side-slope runoff, over-bank flooding, groundwater seepage, etc.).

The project area does not support wetlands. For wetland information pertaining to the pipeline route, please refer to Appendix B10.

iii. Description of the impacts and net effect that the project would have on the floodplains, wetlands and riparian areas.

The project area does not support wetlands or riparian areas. For wetland and riparian areas information pertaining to the pipeline route, from Appendix B10, impacts to aquatic features will be avoided using either boring or horizontal directional drilling (HDD) methods to install the pipeline underneath the features,

12.f Terrestrial and Aquatic Animals and Habitats

i. Map and description of terrestrial and aquatic animals including the status and relative importance of game and non-game wildlife, livestock and other animals; a description of stream flows and lake levels needed to protect the aquatic environment; description of threatened or endangered animal species and their habitat.

Monarch butterfly was observed during the site visit, but no suitable habitat for it or other threatened species was found. The project area consists of heavily degraded shortgrass prairie with mainly non-native grasses. For a map and detailed listing of species, please refer to Appendix B9, 3.6, Terrestrial and Aquatic Animals and Habitats.

ii. Map and description of critical wildlife habitat and livestock range to be affected by the project including migration routes, calving areas, summer and winter range, and spawning beds.

The plants, animals, and habitats evaluation found that while seven federally listed species could potentially occur, no critical habitats are present. For a map and detailed listing of species, please refer to Appendix B9, 3.6, Terrestrial and Aquatic Animals and Habitats.

iii. Description of the impacts and net effect that the project would have on terrestrial and aquatic animals, habitat and food chain.

To protect Monarchs, construction personnel should be trained, and work should be scheduled outside the migratory bird breeding season (March to August), with halts in activities if nesting birds are discovered.

12.g Terrestrial and Aquatic Plant Life

i. Map and description of terrestrial and aquatic plant life including the type and density, and threatened or endangered plant species and habitat.

It is CPP's environmental consultant opinion that the Project area does not support federal or state T&E species or their associated habitat. The shortgrass prairie identified within the Project area is heavily degraded and is expected to be impacted by the proposed project. For maps, please refer to Appendix B9, 3.7, Terrestrial and Aquatic Plant Life.

ii. Descriptions of the impacts and net effect that the project would have on terrestrial and aquatic plant life.

To mitigate impacts to the existing vegetation, Ramboll recommends using native seed mixes to stabilize the ground and provide habitat for the Project area following construction.

12.h Soils, Geologic Conditions and Natural Hazards

i. Map and description of soil, geologic conditions, and natural hazards including but not limited to soil types, drainage areas, slopes, avalanche areas, debris fans, mud flows, rock slide areas, faults and fissures, seismic history, and wildfire hazard areas.

The Project area consists of Quaternary alluvium with soils identified as silt loams. A geotechnical study revealed moderate swell potential in the soils, with bedrock encountered at up to 41 feet. For detailed soil descriptions and a map, please refer to Appendix B9, 3.8, Soils, Geologic Conditions, and Natural Hazards.

ii. Descriptions of the risks to the project from natural hazards.

Wildfire risk is low. For detailed discussion of natural hazards, please refer to Appendix B9, 3.8, Soils, Geologic Conditions, and Natural Hazards.

iii. Descriptions of the impact and net effect of the project on soil and geologic conditions in the area, and their effects on streambed meander limits and aquifer recharge areas.

Construction will involve grading and installation of various structures, potentially causing short-term impacts to soil quality and increased erosion risk due to vegetation removal. To mitigate these effects, a GESC plan will be implemented. Wildfire risk is low, and the includes fire suppression systems.

13. Nuisances

13.a Descriptions and maps showing the range of noise, glare, dust, fumes, vibration, and odor levels caused by the project, along with indication of their significance.

During Construction, the Project is expected to cause minor nuisances, such as increased traffic, dust, and noise, during construction. Other than these minor and temporary construction impacts, the Project will not create permanent noise, dust, glare, fumes, vibrations, odors, or other impacts.

The Project stacks serve an important role in mitigating potential noise impacts to surrounding properties.

Dust suppression techniques, such as watering, will be implemented during construction. The key to dust control is through watering roads and site construction areas. Noise impacts from the use of construction equipment will be minimized to the extent possible and will be within the permissible Colorado Revised Statutes (CRS) noise levels for construction activities. Construction projects are subject to the maximum permissible noise levels specified for industrial zones for the period within which construction is to be completed.

Construction nuisances will be temporary and limited in duration. It is expected that there will be no significant increase in ambient air pollutant concentrations. Any potential impacts from construction equipment, exhaust for diesel or gas fueled, will be minimized by federal design standards imposed at the time of manufacture that comply with EPA. Fuel purchased will comply with regulations established by federal and state air pollution control regulations.

The Project will not impact access to nearby residences during construction. Temporary safety fences will be erected along the construction ROW in areas where construction activities will occur near public road or near residences. Following construction, areas will be restored to pre-construction conditions, with reseeding of native grass and as noted on design drawings.

Once the Power Plant is operating only minimal increases to glare, dust, fumes, vibration or odors are expected. Equipment purchased for the Plant will include provisions for noise attenuation to the greatest extent possible and specifications to meet specific CRS Industrial noise limits. The Project has a preliminary noise study that can be found in Appendix B17. Although the Project will be held to C.R.S. industrial zone noise levels, 80 db(A) from 7:00 am to 7:00 pm,75 db(A) 7:00 pm to 7:00 am. The preliminary noise study indicates operational sound levels at the Canyon Peak Power Project property boundary is estimated to be approximately 72 dB(A) or less. The two nearest properties, located approximately 1/4 mile east or west of the respective centerlines of the gas turbine units, the sound levels will be approximately 53 dB(A.). The Project will pursue baffles and other noise mitigation to maximize sound attenuation. Given the low anticipated capacity factors for the power facility (operating no more than 10-20% of the year) the Project does not anticipate noise to be a nuisance.

14. Areas of Paleontological, Historic or Archaeological Importance

14.a Map and description of all sites of paleontological, historic or archaeological interest.

There are two archaeological sites within one mile, the closest being a historic structure (Site No. 5AH.173) that was demolished prior to 1978 just south of the Project area, and a burial/open camp prehistoric site (Site No. 5AH.120) within 0.5 miles. 5AH.120 was recorded as containing human remains. This Project area may be eligible for listing in the National Register of Historic Places (NRHP). No previous surveys have included the proposed Project area. There is an

unrecorded residence (built in 1927) located across a vacant field east of the proposed project, however the viewshed has been blocked by the solar array fields established in 2024.

14.b Description of the impacts and net effect of the project on sites of paleontological, historic or archaeological interest.

No recorded paleontological or archaeological sites were found within the Project area. However, two sites are located nearby: a demolished historic structure and a prehistoric burial site with human remains. While the Project area may be eligible for the National Register of Historic Places, it hasn't been previously surveyed. Recent ground disturbance from construction activities showed no artifacts. Due to the nearby burial site, an inadvertent discovery clause and archaeological monitoring during construction are recommended and will be a Condition of Approval by the County.

For further details on this section please see Appendix B9 and Appendix B10.

15. Hazardous Materials Description

15.a Description of all hazardous, toxic, and explosive substances to be used, stored, transported, disturbed or produced in connection with the project, including the type and amount of such substances, their location, and the practices and procedures to be implemented to avoid accidental release and exposure, and any foreseeable impacts to the environment of such substances.

The Project will have hazardous materials required for construction and operation of the future Plant. There materials include the following:

- Gasoline – Required for construction vehicles.
- Diesel Fuel – Required for construction vehicles and Emergency Diesel Fire Pump
- Natural Gas – Required for Plant operation.
- Lubricants – Required for construction vehicle maintenance and Plant maintenance.
- Hydraulic Oil – Required for construction vehicle maintenance and Plant maintenance.
- Mineral Oil – Oil-Filled Transformers for Plant operation – for Generator Step-Up (GSU) Transformers
- 19% Aqueous Ammonia– Required for Plant operation.

The Project will implement a Spill Prevention, Control and Countermeasure (SPCC) Plan that will prescribe how hazardous materials are to be handled, storage, and transported during construction and Plant operations.

The facility will use aqueous ammonia (with a concentration of 19% or less by weight) in the Selective Catalytic Reduction (SCR) system to further reduce nitrogen oxide (NOx) emissions.

The SCR system uses aqueous ammonia as the reagent to catalytically convert NOx emissions into nitrogen and oxygen. The 19% aqueous ammonia is regulated under the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) as outlined in Title 29 of the Code of Federal Regulations (CFR) 1910.1200, the U.S. Department of Transportation (DOT) Hazardous Materials Regulations in Title 49 CFR, and is subject to Tier II reporting in accordance with the Emergency Planning and Community Right to Know Act (EPCRA) of 1986, Sections 311 and 312. However, concentrations of 19% aqueous ammonia are not subject to Risk Management Plan (RMP) requirements under Section 112(r) of the Clean Air Act (CAA) of 1970, EPCRA Sections 302 for Extremely Hazardous Substances (EHS), or Resource Conservation and Recovery Act (RCRA) Listed Hazardous Waste codes.

The Project will implement effective containment measures into the design to mitigate the effects of this hazardous material in the event of a leak or spill. The aqueous ammonia storage tank (20,000 gallons), the Truck Transfer Unit (TTU), and the ammonia forwarding pump skid are all situated within an ammonia containment volume that is at least 110% of the tank's volume. This containment is constructed below grade, leveraging the density of ammonia, which is greater than air, causing any released vapor to settle within the containment area rather than disperse. This design is critical for multiple safety and environmental reasons. In the event of a leak or spill, the below-grade containment ensures that ammonia remains confined to a controlled area, preventing its spread to other parts of the facility or the surrounding environment. By limiting dispersion, this design reduces the risk of contamination and mitigates potential hazards. Additionally, since ammonia is highly flammable, the containment provides an extra layer of protection by preventing the spread of vapors, thereby reducing the risk of ignition. This setup also enhances emergency response efforts by localizing any release within a designated, controlled area, facilitating safer and more efficient mitigation measures.

Construction

During construction, minor refueling and lubrication of equipment may occur with the Project work areas with minor volumes of these fluids available. All fuel will be stored in secondary containment and protected from the environment and weather. Spill kits will be available if need to respond to a clean-up incident.

Canyon Peak Power Station

The Canyon Peak Power Station will not have any buried oil storage tanks. However, the project's aggregate aboveground oil storage capacity will exceed 1,320 gallons in containers with storage capacity equal to or greater than 55 gallons and oil-filled equipment. Some hazardous materials will be contained within equipment and no spare storage is necessary. The equipment is the permanent container. An example of this is mineral oil that is required oil-filled transformers.

- Diesel Fuel - One (1) 150-gallon ULSD tank for operation of the backup emergency diesel fire water pump. This diesel fuel tank will be located within the Fire Water Pump Skid to provide fuel for the emergency diesel fire water pump. The Fire Pump Skid is an enclosure that includes secondary containment.

- 19% Aqueous Ammonia - One (1) 20,000-gallon 19% aqueous ammonia storage tank (AST). The aqueous ammonia storage tank will be in the northeast portion of the Project area and situated within a concrete secondary containment foundation that is designed with low points to contain any leaks or accidental release during truck unloading. This AST will also employ monitoring systems to alarm and notify operators of any release of aqueous ammonia.
- Generator Step-Up Transformers – Six (6) GSU Transformers rated for 115 mV/13.8 mV, 48/38.4/28.8 MVA, 60 hz, each containing roughly 5,284 gallons of mineral oil. The transformers are located west of the CTGs and take power from the CTG generators from each unit and step it up to 115 mV for feed to Brick Center Substation. Each GSU will be installed on a foundation that includes secondary containment sized according to National Fire Protection Association (NFPA) requirements.

Other secondary containment for equipment will consist of the following:

- Combustion turbine generators are housed in enclosures that are designed to provide secondary containment for any oils or lubricants that are used in the machines.

15.b Location of storage areas designated for equipment, fuel, lubricants, chemical and waste storage with an explanation of spill containment measures.

The Plant will have only one location for storage of hazardous fluids. A storage shed with secondary containment for approximately 550 gallons of lubricating oils required for equipment maintenance will be needed. The shed will be located by the Controls Trailer on the east side of the Plant.

16. Balance Between Benefits and Losses

16.a Description of foreseeable benefits of natural, agricultural, recreational, range or industrial resources within the County and opportunities to develop those resources in the future.

The Project will benefit the County as a whole by allowing CORE to produce electricity through increased use of renewable power sources. The Project provides CORE and their cooperative members with reliable electricity and not subject to fluctuating electricity prices when renewable power is not available. CORE's ability to continual add more renewable sources of power in the future will also accrue with the Project in operation. The Project only requires the use of natural gas to operate and generate electricity. No water or other resources are needed for the operation of the Plant. No water well will be required so the Plant operations will not affect the existing area aquifers. Please see Sections 3.a and 4.c for Potable Water Source.

The Project does not impair or otherwise negatively impact the natural, agricultural, recreational, range, or industrial resources in the County. The Project is co-located with the substation to avoid

the development of additional land. This benefits the natural, agricultural, and range resources in the County. The Project will benefit agricultural and industrial uses in the County by supporting reliable power supply for their current and future operations.

The power plant will be located at a site where no current agricultural activities are occurring or will occur in the future. CORE is the owner of the property and does not participate in agricultural activities.

The natural gas lateral portion of the Project will be installed in the ROW of County Road 129. The road ROW does not allow for any agricultural activities currently or in the future. The Property at address 2150 S County Road 129 where the Pipeline will be connected to CIG's existing gas transmission line, is zoned agricultural, the property owner has indicated it will not negatively affect any activities occurring on the property. Please refer to Appendix A14 the letter agreement with the property owner.

Although construction activities may increase traffic in the vicinity of the Project, there is no indication that the Project will degrade the quality or quantity of agricultural activities.

The Project does not expect to interfere with existing cultural resources, including historical structures and sites, agricultural resources, the rural lifestyle and the opportunity for solitude in the natural environment. Any nuisances created by the Project are expected to be temporary in nature from construction activities. The Pipeline will be buried underground and reclaimed to existing conditions. The power plant will have structures lower in height than the existing power transmission towers and lines at the Brick Center Substation and surrounding properties.

16.b Description of foreseeable losses of natural, agricultural, recreational, range or industrial resources within the County and loss of opportunities to develop those resources in the future.

The proposed land use for the Project is consistent with the County's Comprehensive Plan and all applicable standards in the County's Land Development Code, Development Manual, and 1041 Regulations. The co-location of the Project with the substation and alignment of the natural gas pipeline in the County ROW prevent impacts to County resources. The Project will not affect the rights of the County or private property owners to develop these resources in the future. The land is currently owned by CORE and used for public electric utility purposes. No additional infrastructure or changes to area properties is required that would affect existing land uses such as natural, agricultural, recreational, range or industrial resources. There will be no need to change any existing land uses. The Project will not cause any degradation in any existing or future uses or resources in the area around the proposed project.

17. Monitoring and Mitigation Plan

17.a Description of all mitigation measures for the Project.

The following are mitigation measures that will be implemented by Canyon Peak to address potential impacts associated with construction and operation of the Project:

- The movement of crews and equipment will be limited to the Project workspace, which was designed to be the minimum area necessary to safely and efficiently construct the Project. Only designated access routes will be used to access the Project workspace.
- Wetlands and riparian areas will be avoided to the extent feasible. Temporary erosion control measures will be installed and maintained to protect off-site areas from increased sedimentation. Protection in these areas will include the use of construction control measures as outlined in the Project's SWMP and GESC Report.
- Construction activities will be performed by methods that will prevent spillage of solid matter, contaminants, debris, and other possible pollutants and wastes into surface waters and groundwater.
- Impacts to sensitive plant species and their habitat will be temporary in nature during construction activities and will be allowed to revert to previous conditions following reseeding and restoration. Any species-specific mitigation measures will be designed on an as-needed and case-by-case basis.
- Construction will be scheduled to minimize impacts on sensitive wildlife species within the Project area to the maximum extent possible. All construction personnel will be instructed on the protection of cultural resources and the Project's Inadvertent Discovery Clause with reference to relevant laws and penalties, and the need to cease work in the location if such resources are discovered during ground disturbing activities.
- During construction, soils will be disturbed on the Project site. The project will employ water trucks to suppress dust as necessary during construction. In addition, water or county-approved methods may also be employed to suppress dust associated with construction traffic on unpaved roads and employee parking.
- Although certain heavy equipment will be required, noise and odors will be minimal. The noise generated from construction equipment will be intermittent and should not reach levels greater than those that would be considered a nuisance to adjacent properties. Potential impacts associated with exhaust emissions from construction equipment and vehicle engines will be minimized by avoidance of idling and federal design standards imposed at the time of manufacture of the vehicles that comply with EPA mobile and non-road emission regulations. Should there be any landowner concerns during construction activities, the Project will work with the landowners to address their concerns.
- Emissions produced during operation of the combustion turbines will be controlled by the latest exhaust system technology including dry low emission (DLE) oxidation combustion system and a Selective Catalytic Reduction (SCR) system to reduce nitrogen oxide (NOx) emissions produced during natural gas combustion. Each unit will also be equipped with a Catalytic Oxidation (CatOx) system to control Carbon Monoxide (CO) and Volatile

Organic Compound (VOC) emissions. In addition to the DLE, SCR and CatOx emission controls, each unit is equipped with an 80-foot exhaust stack and will use continuous emissions monitoring system (CEMS) for emissions monitoring and compliance. The 80-foot height of the stack in a power plant is necessary to accommodate multiple critical components. At a minimum, the stack must extend beyond the SCR system. Above this, a silencer with internal baffles is incorporated to mitigate turbine-generated noise before exhaust gases are released. Additionally, an open section is maintained above the silencer to allow proper dispersion before reaching the EPA-designated sampling ports, ensuring accurate emissions testing and compliance with regulatory standards.

- Due to the short-term nature of Project's construction activities and the proposed mitigation measures discussed above, any effects of these impacts will be minimal. Once the plant starts commercial operations, any nuisances from the site will decrease significantly.

17.a.i Describe how and when mitigation will be implemented and financed.

Mitigation measures and strategies will be implemented as appropriate prior to, during, and immediately after construction. These measures will be adequately funded as part of the overall Project cost. Impacts to local resources because of the Project shall be addressed immediately upon identification or notification.

Mitigation measures for the Project will include structural, operational, and environmental controls to minimize impacts on local resources. The installation of the Selective Catalytic Reduction (SCR) system will significantly reduce nitrogen oxide (NOx) emissions, ensuring compliance with air quality standards. Additionally, the 80-foot stack itself serves as a mitigation measure by dampening noise, promoting proper dispersion of exhaust gases, and reducing ground-level pollutant concentrations. To further ensure regulatory compliance, a Continuous Emissions Monitoring System (CEMS) will be installed to provide real-time tracking of key pollutants, allowing for immediate corrective action if emissions approach permitted limits. To address noise concerns, the stack will be equipped with a silencer incorporating internal baffles to attenuate turbine-generated sound before release. Dust suppression strategies, such as water spraying and wind barriers, will be employed during construction to limit airborne particulates. Further, real-time monitoring and rapid response protocols will be in place to address any unforeseen environmental impacts, ensuring that mitigation efforts remain effective throughout the Project's lifecycle.

These will be financed through partners identified in Appendix B14 (First Citizens and SMBC) as well as the project sponsor, Blackstone Inc.

17.a.ii Describe impacts that are unavoidable that cannot be mitigated.

The impacts from the project are addressed in Section 17.a.i and Canyon Peak is proactively addressing these impacts. By way of example, emissions will be monitored via CEMS and mitigated with the SCR systems. Additionally, noise levels are substantially reduced by deploying a silencer in the exhaust stack. Dust will be mitigated by using the suppression strategies mentioned above. There are no other material impacts, therefore Canyon Peak does not believe there to be any impacts that cannot be reasonably mitigated.

17.b Description of methodology used to measure impacts of the project and effectiveness of proposed mitigation measures.

The previously mentioned mitigation measures and Best Management Practices (BMPs) have been utilized by the Applicant on previous projects similar in design and scope with positive results. These measures are specific to active monitoring and are designed to minimize known impacts, to the extent practicable.

17.c Description, location, and intervals of proposed monitoring to ensure that mitigation will be effective.

All mitigation techniques and BMPs for the Project will be monitored during and after construction activities by field personnel. A GESC report and other plans such as Environmental Impact Analyses (EIA), Emergency Response Plan, and Monitoring and Mitigation Plan have been prepared in accordance with state and local jurisdictional requirements. For more information on this, please refer to Appendix B18. The Project will conduct regular monitoring and tests throughout the life of the Project such as monitoring of air emissions via a continuous emissions monitoring system (CEMS) to ensure compliance with all federal, state, and local regulations and permit conditions.

18. Transportation Impacts

The Project has prepared a Traffic Impact Study Waiver request see Appendix B2 that is submitted with this application. Appendix B2 includes a memo on the expected traffic volumes and types of traffic during construction and operation of the Project.

Traffic after construction and during normal pipeline and power plant operations will not impact the current County traffic loads; therefore, operation of the Project will not impact the existing transportation network in Arapahoe County. The Applicant will notify residents located within 500 feet of the Project by mail two weeks prior to the commencement of construction related traffic along County Line Road.

The Applicant will sign a County Agreement to fix any County Roads that may be damaged during construction.

18.a Describe what impacts the proposal will have upon transportation patterns in the area intended to be served or affected by the Proposed Project

through the submittal of a traffic impact analysis. The traffic impact analysis should include but not be limited to the following:

18.a.i Identify the transportation facilities required to support existing and future land uses.

No additional public transportation facilities will be required to support the existing or future land uses.

18.a.ii Furnish the traffic model data verifying consistency with the regional transportation plan, the Colorado Department of Transportation (CDOT) Statewide Transportation Improvement Program (STIP) and the regional Transportation Improvement Program (TIP).

No proposed improvements are anticipated along the County Road 129 in vicinity of the site in either the State STIP or the Denver Regional Council of Governments (DRCOG) TIP plans. The 2050 Metro Vision Regional Transportation Plan shows County Road 129 as a Rural Road for Street Typology. This road is not shown in the Metro Vision Road Network 2050 system either.

18.a.iii Provide the existing and proposed traffic volume impacts to the adjacent road system, including local roads.

The existing traffic volumes is 216 vehicles per day per the Tuesday, October 15th, 2024, counts collected as part of the waiver application. By 2045, assuming 2% growth, the total traffic volume will grow to 329 vehicles per day with the background traffic together with the site generated traffic as shown in the table below. Altogether, the site will add 8 additional trips to the adjacent road system.

Period	Existing Volumes	2045 Background Growth Volumes (Assuming 2% growth)	Site Generated Volumes	Total 2045 Traffic Volumes (Background + Site)
AM Peak	20	30	4	34
PM Peak	22	33	4	37
Daily	216	321	8	329

18.a.iv Provide the existing and future Level of Service (LOS) and capacity before and after the Proposed Project is completed.

Operations will not be a concern at this location as the existing plant also generates limited traffic at the existing accesses. The through volumes along CR-129 are limited as well with relatively low volumes expected in the 2045 future year generated by only the site and the existing low-density agricultural land-uses nearby. As a result, traffic for the access in the AM and PM peak hours for existing and 2045 condition is expected to be limited and the intersection would operate well within an LOS A range.

18.a.v All transportation access information as required by the CDOT State Highway Access Code, 1998 revisions or the most current edition thereof.

The 2040 Arapahoe County Transportation Master Plan identifies CR-129 as a Collector/Secondary Rural Road. The State Highway Access code would identify this street as a type R-B Rural Highway. The requirement for auxiliary lanes along R-B streets requires a left turn deceleration lane when entering left turning vehicles are greater than 10 vehicles per hour (vph) and a right turn deceleration lane with right turning vph are great than 25. Neither of these criteria are met and as a result no auxiliary lanes are recommended for the site access. The nearest access is at Airline Rd, over 4,700 ft to the north. The proposed accesses will meet necessary access spacing requirements

19. Benefit/Cost Analysis

19.a Submittal of a benefit/cost analysis of the Proposed Project and identify the distribution of the burden of the cost for the proposed improvements, including cost to adjacent state or local jurisdiction.

The Canyon Peak Power Project is expected to deliver substantial economic benefits to Arapahoe County. During construction, the project will support an average of 110 workers, peaking at 140, with total labor expenditures reaching $33 million. Once operational, the Project will provide 12 full-time jobs, contributing approximately $1.2 million annually in labor income. Additionally, the Project will generate a significant tax revenue boost, including an estimated $725,000 in sales tax, alongside property and income tax contributions. Local businesses will also benefit, as some construction materials and equipment will be sourced locally, and annual operational expenditures of $2.8 million will support the regional economy. With total estimated expenditures in excess of $300 million, the Project enhances infrastructure investment while creating jobs and generating lasting economic growth for the county. As noted in Section 6, the Applicant is only providing a service to CORE. The Applicant has no control over CORE's use or costs of this service to their members. CORE is responsible for developing their own pricing and rate structures.

Please see Appendix B20 for the complete benefit costs analysis of the proposed Project.

20. Engineering Studies

20.a Phase III Drainage Study.

The site location is within the Kiowa Creek Basin. Kiowa Creek is located east of the proposed development. According to the Kiowa Creek Master Plan, Kiowa Creek is a perennial stream with ephemeral tributary drainage channels. Per the Kiowa Creek Master Plan, the development is not within the 100-year Future Floodplain limits.

The existing site directs runoff to the southeast towards the detention facility. The existing site has a detention facility located east of the existing substation yard. Currently, all runoff produced from the developed areas of the site are directed into the (Extended Detention Basin (EDB).

The existing site has graded swales to lead to the existing detention facility. The existing site has one culvert under an access road on the northwest corner of the site. The conveyance on the west side of the site will be integrated into the proposed design. The east side of the site is being developed, and new drainage conveyance will be developed.

The development will use an Extended Detention Basin (EDB) for the storage and water quality requirements. The proposed detention facility is located east of the proposed substation. An extended detention basin (EDB) with water quality and sediment removal structures will use to manage additional runoff produced.

The detention facility will release the detention volumes at the southeast corner of the site, into the existing drainage channel. This is the same location as the existing outfall of the site. Riprap will be used for energy dissipation. The runoff will then follow existing drainage patterns towards Kiowa Creek. Due to release rates being below historic conditions, downstream capacity is not a concern. The detention facility will be located within the proposed drainage easement, allowing for maintenance of the facility.

Please see Appendix B1 for Phase III Drainage Study.

20.b GESC – Grading, Erosion, & Sediment Control Report.

The GESC report for the Canyon Peak Power Project ensures compliance with local regulations and standards by detailing comprehensive erosion and sediment control measures. To control soil disturbance, the report specifies the use of Reinforced Rock Berms, Sediment Control Logs, Silt Fence, and Erosion Control Blankets, with a requirement to seed and mulch all disturbed areas within 14 days after the construction of the Power Station. To prevent erosion, initial measures include Reinforced Rock Berms, a temporary sediment basin, Construction Fence, and Vehicle Tracking Control. Interim measures involve Sediment Control Logs, Erosion Control Blankets, and the Retention Basin. Final measures focus on seeding, mulching, and the reinstallation of Erosion Control Blankets. For managing sediment runoff, the report outlines the use of Reinforced Rock Berms, Sediment Control Logs, Silt Fence, and the existing Detention Basin as a temporary sediment basin, with a Retention Basin for drainage. All control measures

are maintained until vegetation is established, and water is used for dust control to prevent the escape of water and sediment from the site.

Please see Appendix B5 for GESC Report.

20.c Traffic Study

The Project has prepared a Traffic Impact Study Waiver request, which is included in Appendix B2 and submitted with the application. Appendix B2 contains a memo detailing the expected traffic volumes and types during both the construction and operational phases of the Project. The study concludes that no additional public transportation facilities are required, and no proposed improvements are anticipated along County Road 129 near the site. The existing traffic volume is 216 vehicles per day, and by 2045, it is expected to increase to 329 vehicles per day, with the site generating 8 additional trips. The intersection is projected to maintain an LOS A rating during both the AM and PM peak hours. Furthermore, no auxiliary lanes are recommended for site access, as the criteria for their installation are not met.

Please see Section 18 for more on Transportation Impacts and waiver request in Appendix B2.

21. Process for Referrals to Outside Agencies and Response to Referral Comments

21.a Identification of Referral Agencies

The Arapahoe County Planning Division will identify and determine which outside referral agencies may be affected by the proposed development. These agencies may include, but are not limited to, homeowner's associations, local, regional, state, and federal governmental entities, and service providers. The Planning Division will compile a list of these agencies to receive referral packets.

21.b Review of Referral Packets

The Arapahoe County Planning Division will review the referral packets to ensure they contain sufficient information. This review will include, but is not limited to, verifying that the packets include 1041 permit information relevant to each referral agency.

21.c Preparation and Mailing of Referral Packets

The Applicant acknowledges that they will be responsible for preparing the referral packets and addressing the envelopes. However, the Arapahoe County Planning Division will handle the mailing of these packets to the identified referral agencies.

21.d Response Timeline

It is understood that referral entities will have 30 days to respond to the referral packets. If a referral entity does not provide a response within this 30-day timeframe, it will be assumed that the entity does not have any objections to the 1041 Application.

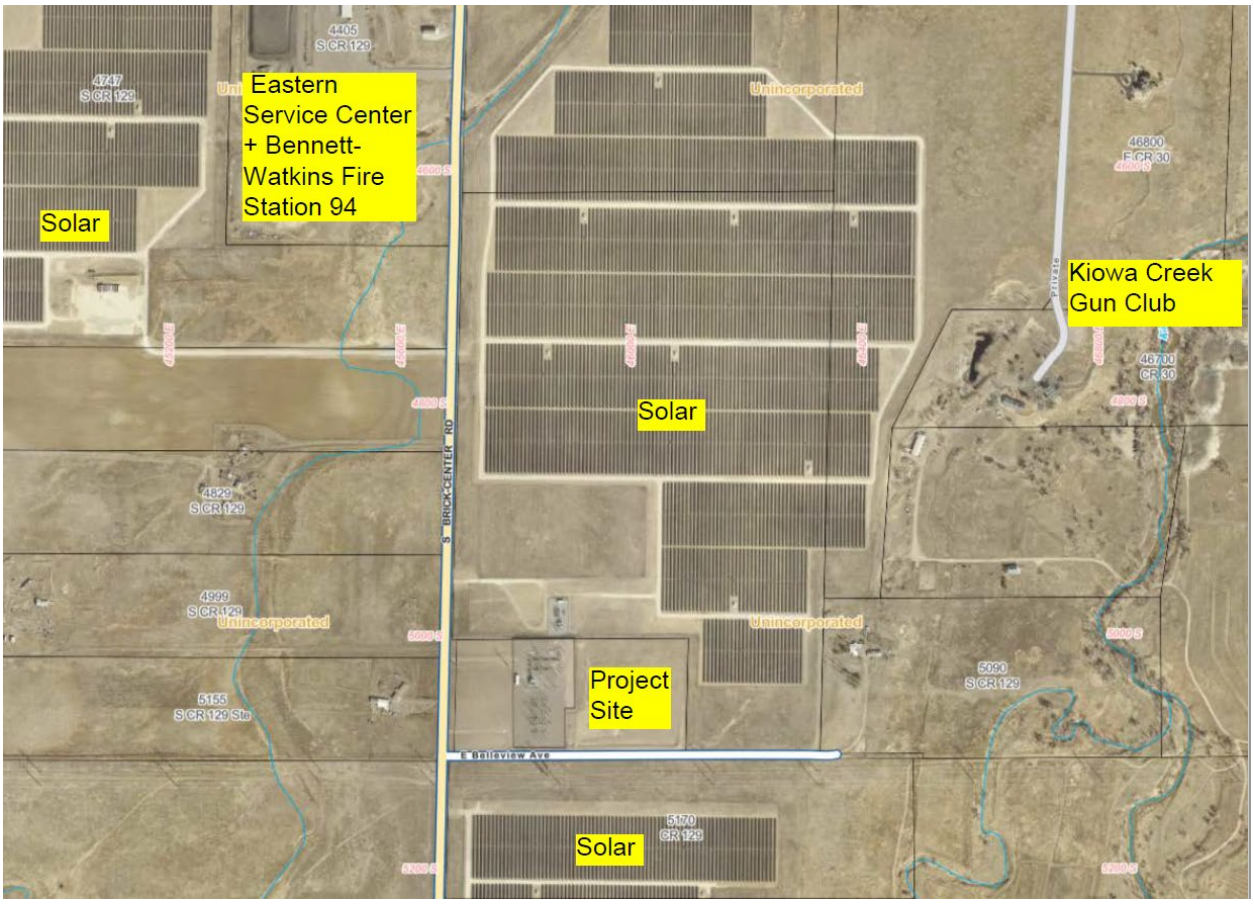
21.e Response to Referral Comments

The Applicant is aware that they will be responsible for responding to all comments received from the referral entities. These responses will be included as part of the application to ensure that all concerns and feedback are addressed comprehensively. By following these steps, the applicant will ensure that all relevant parties are informed and that their feedback is considered in the development process.

Section III.E Additional Submittal Requirements Applicable to Major Facilities of a Public Utility

1. Map and description of areas around the proposed major facilities of a public utility.

The Project will be located in a rural part of unincorporated Arapahoe County where CORE's Brick Center Substation currently exists. There are residential properties near the site but a very sparce and are located on large sections of land with limited agricultural or dry farming activity. The closest residential property west from the Project Site is roughly 750 feet, while the closed residential property to the east is roughly 760 feet. Distances are measured to edge of residential properties, not residences. There are three different large solar facilities located to the north, south, and west of the Project site. Just north of the Project site is the Arapahoe County Eastern Service Center and Bennett-Watkins Fire Department Station No. 94. The Kiowa Creek Gun Club is located to the northeast of the site and Kiowa Creek runs north/south to the east of the site.



2. Potential likelihood of nearby activities that may disrupt utility services.

There are no known activities near the Project area that would affect the operation or disrupt power generation from the facility. The Plant site contains all components and equipment necessary for Plant operations. The supply of natural gas to the Plant will be buried and not subject to any activities in the area that would disrupt supply.

3. Description of how facilities will affect existing community patterns.

The Project will be located on an existing site already used for electrical utility services. The Plant requires minimal employees to operate and will not create any issues with traffic or current transportation activities. No access to public or private properties will be impaired by the Plant operation.

4. Description of applicable adopted comprehensive plans and whether facilities comply with those provisions.

Under the County Comprehensive Plan, the Project is classified as Public Facilities (power energy facilities) with siting and other Project elements reviewed and approved through the County's land use review process. Under Tier 3 and Rural Area Uses, Use by Special Review allows for public facilities like the Project to be approved on a case-by-case basis by the Board of County Commissioners of the County.

The Project also addresses goals and policies from the Comprehensive Plan in relation to Local and Regional Public Facilities and Utilities Facilities. Whereas the Project supports local utility needs and growth of the region. The Project's land use is not incompatible with surrounding land uses and does not have negative impacts regarding local resources. Water usage will be managed sustainably, the Project will have a dedicated Fire Water Storage tank and separate Potable Water Storage Tank. The Fire Water Tank will supply the underground fire water system and hydrants. The dedicated Potable Water Storage Tank will supply potable water to employees in the Controls Trailer. The Potable Water Tank will be periodically refilled by a local permitted water supplier. The Controls Trailer provide restrooms and sinks for employees, which will drain to the septic system, which consists of a septic tank and a leach field sized per Arapahoe County regulations, will adequately handle wastewater. Stormwater drainage systems, discussed in section 4.a, will be implemented to prevent adverse environmental impacts. Additionally, the Project is designed to avoid sensitive areas related to cultural resources, floodplains, wildlife habitats, and geological hazards, minimizing disruption to these vital ecosystems. Environmental safeguards are in place to protect the surrounding natural and cultural landscape. Moreover, the Project does strengthen electrical utilities services particularly for increased renewable power expansion and ability of CORE to operate a highly reliably electrical grid.

5. Projections/forecasts of need for electricity or natural gas and the basis for the projections and forecasts.

Canyon Peak Power is being developed to meet the needs CORE's current and forecasted energy needs and requirements. CORE spends considerable effort to ensure they are providing reliable power to their cooperative members. Appendix A12 contains CORE's current Clean Energy Plan, which includes forecasts for future electricity needs. The following are project load forecasts from this Plan, please refer to Plan for further information.

Table 1: CORE Load Forecast

Year	Energy (GWh)	% Change	System Peak (MW)	% Change	Data Type
2021	2,687	2.7%	649	5.5%	Actual
2022	2,690	0.1%	632	-2.6%	Actual
2023	2,610	-3.0%	628	-0.7%	10 Act/2 Fcast
2024	2,631	0.8%	686	9.2%	Forecast
2025	2,667	1.4%	711	3.6%	Forecast
2026	2,734	2.5%	713	0.3%	Forecast
2027	2,785	1.9%	732	2.7%	Forecast
2028	2,839	1.9%	750	2.5%	Forecast
2029	2,894	2.0%	766	2.2%	Forecast
2030	2,962	2.3%	785	2.4%	Forecast

	2025	2026	2027	2028	2029	2030
Net Retail Load GWh	2,667	2,734	2,785	2,839	2,894	2,962
Growth Rate from prior year	1.4%	2.5%	1.9%	1.9%	1.9%	2.3%

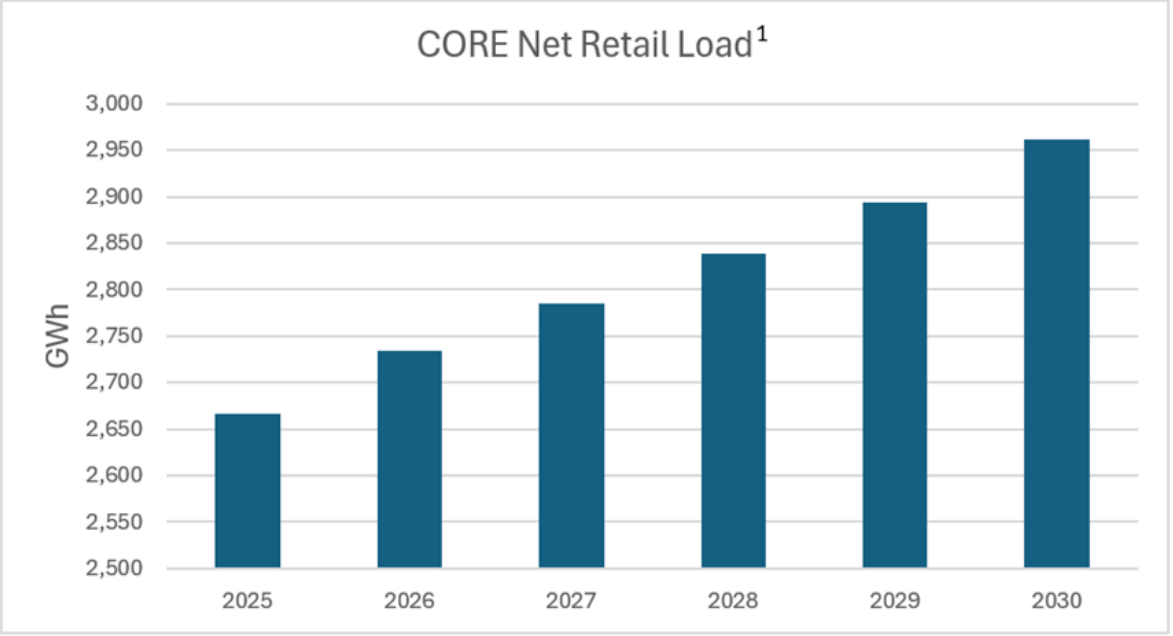


Table 1 and Table 2 show CORE's member loads, or total electricity consumption, will be increasing by approximately 11% between 2024 and 2030. Additionally, Table 1 indicates "System Peak" load growth is increasing by 12.6% from 2024 to 2030. "System Peak" represents the amount of electricity CORE needs to supply energy to its members at the highest demand point in a single year. Table 2 is a graphical representation CORE's member load growth through

2030. The Canyon Peak project is a critical source of electricity generation that CORE needs to meet the service reliability and power demand needs of its members.

6. Expected effect and impact on nearby property owners and on current land uses, compared with alternate locations.

The expected effects and impacts on nearby land property owners is expected to minimal due to the sparsely populated property owners located in area near the Plant. As noted in the Cost/Benefit Analysis, there are two residences within 0.5 miles of the Plant, any effects or impacts from the Plant regarding visual, noise, and property values is expected to be minimal, While the stacks may introduce a visual impact compared to the current landscape, they will be positioned behind transmission towers and wires of equal or greater height, consistent with the existing infrastructure at the Brick Center Substation. All other residences are located outside a 0.5-mile radius, where impacts would not be felt. Although the area surrounding the Plant is flat and lacks vegetation that can affect views, the height of the Plant stacks is lower than the existing transmission towers currently located on and adjacent to the site. Elevation are provided in the USR Plan Set drawings. Please see the EIA report from Ramboll in Appendix B9 for further information on existing landscape and Appendix B19 for elevation views in USR Plan Set.

Regarding current land use, the location of the Plant is ideal as it will sit on existing electrical utility property (substation) and can connect to the existing electrical grid without additional infrastructure required outside of the property. Also, the property is closest of options for supplying natural gas to the Plant. Alternate locations would require additional infrastructure to get power generated from the facility to substations located elsewhere. This also would require additional land development and would require easements from private property owners or otherwise impact private properties. Also, natural gas supply would require a longer pipeline installation distance and would impact residential areas to the accessible of a transmission pipeline from which natural gas supply could be obtained.

7. Provide a Water Supply Plan using an aquifer life assumption of a 100-year supply, non-tributary groundwater classification only, assuming a 50 percent recovery factor to support operations.

The Canyon Peak Power Station does not require any water for operations and no water well will be required for the Project. No existing water aquifers will be affected by the Plant. Any water required for potable uses will be imported to the Plant from permitted sources.

The proposed plant is designed with a robust water system for general firefighting, ensuring the highest level of safety and compliance with industry standards. According to NFPA 850, which provides guidelines for fire protection in electric generating plants, a fire hydrant hose flow rate of at least 500 gallons per minute for a duration of 2 hours is required. The proposed site goes beyond these requirements to provide an even higher level of fire protection. To ensure the

firewater tank is always at full capacity, water can be trucked in and pumped into the tank as needed, providing a reliable and continuous supply of water for firefighting purposes.

The plant will feature a dedicated firewater tank with a capacity (165,000 gallons) that far surpasses the NFPA 850 requirement. This large volume of water ensures that there is an ample supply available to combat any potential fires, even in the event of prolonged incidents. Additionally, the firewater system includes a firewater loop, which is a network of pipes that distribute water throughout the facility. This loop is connected to multiple fire hydrants strategically placed around the plant. The firewater loop ensures that water can be quickly and efficiently delivered to any area of the facility where it is needed. Moreover, the presence of multiple hydrants along the firewater loop provides redundancy and flexibility.

Potable water for employee use will be supplied exclusively within the Controls Trailer, as this serves as their primary work location. The potable water system will consist of a dedicated storage tank positioned at the Controls Trailer, providing a reliable and safe water source. This system is designed to meet the essential daily water needs of employees, including drinking, handwashing, and restroom use, ensuring compliance with health and safety standards.

Additional details on the Potable Water System, including the storage tank and its operation, are provided in Section 4 of this document.

The source for potable water will be a dedicated Potable Water Tank located at the Controls Trailer. The Potable Water tank will be periodically filled by a qualified and permitted potable water supplier. The use of a Potable Water Storage Tank is compliant with Chapter 6 of the International Plumbing Code (IPC) for potable water sources. The code allows the use of a potable cistern for the source of potable water to supply water to plumbing fixtures, as specified in Section P-602.3 Individual Water Supply. In this case, the Potable Water Storage Tank serves as the potable cistern.

The Potable Water Tank will store the required potable water volume to meet the demands and needs of employees, including for bathroom facilities and hand washing in the Controls Trailer. Pumps will be used to ensure adequate pressure and flow for potable water supply to Controls Trailer. The Project will have two (2) bathrooms installed in the Controls Trailer for employee use, and these bathrooms will discharge to a septic system (onsite water treatment system). The septic system will include a septic tank and leach field, sized in accordance with Arapahoe County Health Department and IPC requirements.

Section V. Part A General Approval Criteria

This section identifies how the Project complies with the Approval Criteria outlined in Section V Part A of the Arapahoe County Regulations Governing Areas and Activities of State Interest in Arapahoe County (1041 Regulation). Included in this section are references to appendices or other sections of this 1041 and USR application where more detailed information has been complied that demonstrates compliance with Approval Criteria.

This Approval Criteria section follows responses for Sections III, Part C and E of the 1041 Regulations of this application.

1. Documentation That Applicant Can and Will Obtain All Necessary Property Rights, Permits and Approvals.

Canyon Peak is responsible for obtaining all necessary property rights, permits and approvals for installation of the of the Canyon Peak Power Station and associated 3.9-mile natural gas pipeline. Canyon Peak Power LLC and CORE have agreed to a commercial 25-year land lease agreement executed in January 2025.

A list of all required permits and approvals for the Project is included in Appendix B13 – Permitting Matrix. Canyon Peak's affiliate, Kindle Energy LLC (Kindle Energy), the developer of the Project, has experienced the 1041 and Use By Special Review permitting process and successfully obtained permits for a similar power plant located in Weld County. Given this recent experience, Canyon Peak is prepared to collaborate with State and Local agencies to ensure all necessary property rights, permits, and approvals are obtained as required.

The natural gas pipeline will be routed and installed in County Road 129 ROW, starting from property address 2150 S County Road 129 and routed south to at the power plant address at 5050 S County Rd 129. As noted in previous sections, the Project has entered into a letter easement agreement with property owners at 2150 S County Road 129 to install necessary infrastructure to tap into existing CIG natural gas pipeline and install pipeline to County Road 129 ROW. See Appendix A14 for copy of this letter agreement.

The Project has submitted a minor stationary air permit application with the CDPHE. Please refer to Appendix B9 for expanded description of this process and detailed modeling analysis submittals to CDPHE. The minor stationary air permit is required prior to the commencement of power plant construction.

The Project has also been in contact with the Bennett-Watkins Fire Rescue regarding the fire water system for the Project. On April 21, 2025, the Project met with Benett-Watkins to review the fire water basis of design. From that meeting, Bennett-Warkins was satisfied with most of the planned fire water system including the underground firewater loop and planned fire suppression systems. Bennett-Watkins did take exception to the flow of the Fire Water Pump and size of the Fire Water Storage tank. Bennett-Watkins requested that the size of the pump increase from 1,000 gpm to 1,500 gpm and the fire water supply be available for 2-hour duration in the Fire Water Storage Tank, which would increase planned tank size from 165,000 gallons to 180,000 gallons. Following the meeting, Bennett-Watkins agreed to continue discussions with Applicant on resolving Fire Water Pump and Fire Water Tank sizes, but they would communicate to Arapahoe County that they did not have any other referral comments that would prohibit the application from moving through review process. The size of the Fire Water Pump and Fire Water Tank would be a condition of approval.

Subsequently from the April 21, 2025, meeting, the Applicant sent a communication on April 26, 2025 to Bennett-Watkins that the Fire Water Pump and Fire Water Tank sizes would be changed to meet the requirements set forth by Bennett-Watkins. This would resolve any outstanding comments or requirements by Benett-Watkins for the firewater system.

Bennett-Watkins was made aware on numerous communications that a Will Serve" letter is required by Arapahoe County as part of the 1041 and application. Applicant continues to try to reach out to Bennett-Watkins regarding the Will Serve letter. Please see Appendix B12 for correspondences to date.

As indicated above, the Project team recently went through Weld County's 1041 and Use By Special Review application process. That experience, which was for a facility presently under construction in Weld County, will support the acquisition of property rights, permits, and approvals that are required for this Arapahoe County Project.

2. The Applicant Considers the Relevant Provisions of The Regional Water Quality Plans.

The Project site is located within the South Platte River Watershed, with no streams, lakes, or surface water features within or near the area. Runoff from the site flows into roadside ditches and ultimately to Kiowa Creek, with a detention pond designed to handle up to the 100-year, 1-hour storm, in compliance with Arapahoe County and CDPHE stormwater requirements. The site is not within a floodplain, and best management practices, including a SWPPP and GESC, will minimize impacts during construction and operation. The absence of mapped surface water and water management measures will minimize impacts to surface water quality or quantity.

3. Applicant Has Expertise and Financial Capability to Develop and Operate the Project Consistent with All Requirements and Conditions.

Canyon Peak Power LLC is an affiliate of Kindle Energy. Kindle Energy invests, operates and manages power generation assets in North America. Kindle Energy currently manage and operate 8.7 gigawatts (GW) of generation located in the Midwest that are capable of powering approximately 6.9 million homes. Kindle Energy also has approximately 2 GW of projects currently in construction or late-stage development.

Kindle Energy, as the owner of Canyon Peak Power LLC, has the expertise and financial resources required to develop and operate the Project, see Section 6, Financial Feasibility of the Project, parts a-g. This expertise along with its financial resources available, is consistent with the requirement and conditions needed to develop this Project. Kindle Energy's Mountain Peak Power Station in in Weld County, Colorado is under construction and demonstrates the required execution capabilities. The Mountain Peak Power Station leveraged the knowledge and expertise of Kindle Energy's project teams specifically related, but not limited to, the following fields:

- State and local permitting
- Environmental compliance
- Project financing
- Project management
- Engineering, procurement, and construction
- Technical understanding of electrical infrastructure
- Operations and maintenance
- Power industry fundamentals

Kindle is a wholly owned portfolio company of Blackstone Inc., one of the world's leading investment firms. Blackstone seeks to create positive economic impact and long-term value for its investors, the companies it invests in, and the communities in which it works. Founded in 1985 and publicly listed since 2007, Blackstone is a leading global alternative asset manager with over $1 Trillion of total assets under management.

Kindle Energy's leadership team has deep experience developing, managing, and operating assets both internationally and domestically. On average, Kindle Energy's leadership has over 25 years of individual experience in the power generation industry. Members of the Kindle Energy team have led and are leading the full development efforts of over 6.6 GW in projects. Currently, Kindle Energy overseeing the construction of two facilities that it developed, contracted, and financed: Magnolia Power Generating Station and Mountain Peak Power Station. These projects represent almost 900 MW of greenfield development and over $1 Billion of total investment with expected commercial operation in 2025.

Kindle Energy has deep experience in managing and optimizing power generation facilities. In total, Kindle Energy employees have managed more than 130 generating facilities totaling over 65 GW of generating capacity. Kindle Energy currently manages two generation portfolios comprising an aggregate of 8.7 GW: the Lightstone Generation portfolio located within Ohio and Indiana (5.3 GW) and the Pelican portfolio located in Louisiana and Texas.

Canyon Peak Power is also employing consultants that are providing the legal and technical expertise to develop the Project. The consultants are industry professionals with backgrounds in developing projects that are similar in nature to the Project. This includes assurances that the Project will meet or comply with all national codes, industry standards and Federal, State and Local requirements.

The Applicant and Applicant Agents have an existing project very similar to Canyon Peak Power Station, the Mountain Peak Power Station, currently in construction in Weld County. The Mountain Peak Power Station uses the same technology and equipment to generate power for an existing electric cooperative in Weld County. Similarly with CORE, this other project is enabling a Colorado electrical cooperative to increase their renewable power generation capabilities while also increasing their power grid reliability.

Canyon Peak Power will only employ construction contractors with proven experience and expertise. A pre-qualification effort will be utilized to ensure any construction contractors that bid on work for this Project have necessary experience in performing the work.

4. The Project Is Technically and Financially Feasible.

Canyon Peak Power Station is feasible from both a technical and financial perspective. CORE, as an investment grade entity, has fully contracted this asset for the intended life of the Project. Additionally, Canyon Peak Power and CORE have undertaken technical studies that have determined this electrical interconnection point to be highly viable for the intended use. Furthermore, Canyon Peak Power has performed extensive technical, financial, and regulatory investigative efforts to verify the Project's feasibility. Canyon Peak Power has committed technical, financial and regulatory resources to develop the Project. Canyon Peak Power and CORE agree that this Project meets the needs and purposes for which the Project is being developed, thus substantiating that the Project is technically and financially feasible. Upon receipt of required permits and approvals from federal, state, and local jurisdictions, construction for the Project will commence.

As discussed in Section 2.6 and demonstrated in Appendix B14, Canyon Peak Power has the capability to finance the Project.

5. The Proposed Project Is Not Subject to Significant Risk from Natural Hazards.

Canyon Peak Power has determined the project is not subject to significant risk from natural hazards. This includes geological or flood-based hazards. As discussed in the Environmental Impact Analysis in Appendix B9 and Appendix B10, the Project site and Pipeline route are not located in areas where earthquakes occur, or faults are located, are not located in floodplains or located in fire prone areas.

Also, the Geotechnical Investigative report in Appendix B16 provides guidance on best practices for design and construction methods to reduce any risk or hazards associated with subsurface conditions, including expansive soils. The use of deep foundations (drilled piers) for the large equipment, such as the CTGs, reduces any affect that expansive soil conditions would have on the Project.

6. The Proposed Project Is in General Conformity with The Applicable Comprehensive Plans.

From review of the Arapahoe County Comprehensive Plan, the Project is in Tier 3 which allows Uses by Special Review. In accordance with this guidance provided by the Arapahoe County Comprehensive Plan, Canyon Peak commits to reverting the power plant area back to its agricultural semblance.

Canyon Peak Power complies with the goal to preserve the rural, agricultural character. The power plant development area will revert to its agricultural appearance with the removal of large infrastructure from the site upon cessation of operations. Additionally, Canyon Peak Power

Station does not draw upon local water resources, thereby preserving what is available for existing Arapahoe County agricultural uses. As mentioned throughout this application, co-locating Canyon Peak Power Station with the existing Brick Center substation minimizes impacts to agricultural operations in the immediate areas.

The Canyon Peak Power project aligns with several policies, goals, and strategies outlined in the Arapahoe County Comprehensive Plan, supporting economic development, utility infrastructure, and environmental sustainability. The Project complies with Utility Infrastructure and Energy Goals, particularly Goal PFS 6 (Public Facilities and Services), which states: “Ensure the Adequacy of Electric, Natural Gas, Telephone, Cable and Internet Utilities in Existing and New Development”. Through the Project’s collaboration with CORE Electric Cooperative, the Project supports the County’s commitment to working with utility providers and enhancing local energy reliability by providing firm, dispatchable power. This cooperation with CORE and the natural gas supplier CIG also aligns with Policy PFS 6.1 which highlights the importance of utility company coordination.

Additionally, the Project meets Goal PFS 12 (Public Facilities and Services): “Minimize Impacts of Local and Regional Public Facilities and Utility Facilities” due to its siting at the Brick Center Substation. This location features unique electric infrastructure and minimizes any major utility service buildout.

From an economic development perspective, the Project aligns with two distinct goals and policies, Goal EH 2 and Policy GM 2.1 (Neighborhood Livability), which encourage growth in designated areas and the incorporated town of Bennett. EH 2 states: “Arapahoe County will encourage employment and commercial development in Designated Growth Areas to provide economic opportunities for its residents” and GM 2.1 states: “The County will encourage growth in the Towns of Bennett and Deer Trail.” By creating skilled construction and operation jobs along with substantial investment, the Project contributes significantly to the region’s economic health. The Project supports these objectives by diversifying the local economy and strengthening the energy sector.

Goal PSF 3 is intended to “Reduce Overall Water Consumption in the County.” A unique aspect of the Canyon Peak Power Station is that it is designed to run without water injection. The lack of any water required for operations makes these LM2500XPRESS the optimal choice for power generation equipment.

In terms of environmental and sustainability considerations, the Comprehensive Plan prioritizes energy efficiency and conservation. Policy NCR 6.2 (Natural and Cultural Resources and Environmental Quality): “The County will encourage alternative energy companies to develop facilities and generate energy from alternative sources.” While the Project utilizes natural gas, it facilitates renewable energy integration by providing backup power when renewable sources are insufficient. Canyon Peak Power will allow for CORE to widely adopt renewables while maintaining reliability on their system. Additionally, the Project aligns with Strategy NCR 6.4(a) which encourages energy conservation by providing enhancements to grid stability, optimizing energy use, and reducing Colorado’s carbon footprint.

Regarding land use and compatibility, Policy PFS 12.3 (Public Facilities and Services): requires regional utility facilities to be sited in a manner that ensures safety and land use compatibility, stating: “Arapahoe County will require regional utility facilities to be located in a manner that ensures safety, land use compatibility, and mitigation of potential impacts on surrounding areas”. As mentioned previously, the Project is strategically located and properly designed, meeting this requirement and minimizing impacts on surrounding communities. Overall, the Project is in alignment with Arapahoe County’s goals for economic growth, infrastructure resilience, and environmental stewardship.

As it relates to Economic Health, Goal EH 1 is intended to “Expand the County’s Existing Economic Base.” Arapahoe County states that it will continue to provide opportunities for industrial and commercial development and employment. Canyon Peak Power Station provides a diversified business which offers the following benefits to the County:

- Labor expenditures during construction are estimated at $33 million, benefiting local contractors and workers
- Labor expenses during operations are expected to at least $1.2 million annually
- The project will generate significant tax revenue, with estimated expenditures of $290 million, Arapahoe County is estimated to generate $725,000 in sales tax
- Certain construction materials and equipment will be sourced locally, and annual operational expenditures of approximately $2.8 million will support local businesses

7. The Project Will Not Have a Significant Adverse Effect on The Capability of Local Government to Provide Services and Will Not Exceed the Capacity of Service Delivery Systems.

Canyon Peak Power will not require expansion of local government services provided in the immediate area. The Project will not have a significant adverse effect on the capability of local government to provide services and will not exceed the capacity of service delivery systems. This includes no adverse impacts on or increase capacity or demand for roads, schools, water and wastewater treatment, water supply, transportation, infrastructure, or housing law enforcement to accommodate development. The Project only expects local government services to include emergency response services such as emergency medical services during and after construction. This may include the Sheriff in cases of theft or vandalism. During power plant operations, emergency services are expected to be required in case of emergencies such as injury, but this will be limited as only two operators are required to run the Canyon Peak Power Station. The Project may require fire response services, but this would be limited to small brush fires, and fires on-site (i.e. employee trailer). No firefighting is needed or required for the power plant equipment.

Due to the type of power plant operations and limited operators required; the Project is not projected to create any negative impacts to the current services provided by Bennett-Watkins Fire Rescue. The Project has incorporated the suggested design requirements from Bennett-Watkins

Fire Rescue, including adequate site access, turn radius for emergency vehicles, and required fire hydrants.

The Applicant will continue to engage with local fire, police, and the Arapahoe County Office of Emergency Management prior to construction and operations. This will ensure that the expected level of resources needed in case of emergency will be available. Please see Appendix B18 for Emergency Response Plan.

Traffic after construction and during normal operations will not impact the current County traffic loads; therefore, operation of the Project will not impact the existing transportation network in Arapahoe County. The limited number of operators for the power plant will also not adversely impact local traffic. This includes deliveries for Plant operations. Please see Appendix B2 for traffic impact waiver.

8. The Project Will Not Create an Undue Financial Burden on Existing or Future Residents of the County.

This Project will not place undue financial burden on the existing or future residents of Arapahoe County. Public funding for the Project is not required and will be financed by the Applicant or affiliated entity. The Project will result in increased tax revenues for Arapahoe County. This Project will not negatively impact the existing tax burden or fee structure for government services or for government services applicable to Arapahoe County residents and property owners. Nevertheless, the additional infrastructure created by this Project will result in increased tax revenues for Arapahoe County.

This project will increase availability and reliability of electrical service provided by CORE. This is a direct benefit to the cooperative members including residential, commercial, and industrial developments within Arapahoe County. This project will also provide firm pricing of electric power when renewable power is unavailable to CORE. Rather than having to import power at high market prices during periods of increased demand, CORE will have Canyon Peak available to maintain reliable and cost-effective power to its cooperative members.

9. The Project Will Not Significantly Degrade Any Substantial Sector of The Local Economy.

The Project will provide reliability to CORE's service territory within the Town of Bennett and throughout Arapahoe County and Douglas County. Additionally, the Project will facilitate a transition to more renewable energy consumption by local businesses, residents, and public facilities. The Project will not degrade any sector of local economy.

According to Arapahoe County comprehensive plan, residential and mixed-use developments are expanding rapidly, making the area ripe for further investment. The Project will support the local economy and positively contribute to its future growth.

The Project will provide a major benefit to Arapahoe County's economy through the jobs that are created during construction and the increased revenues to local businesses that provide goods and services to the Project as well as its contractors and employees. This includes goods and services used by employees and contractors over the course of the development and construction of the Project. The Project has already employed local surveyor and geotechnical testing services to support the development of this application.

Following construction, the Project area for the associated natural gas lateral will be restored to pre-existing conditions. No existing activities, recreational or agricultural, are currently practiced in the Project area therefore there will be no negative impacts are to be expected.

10. The Project Will Not Unduly Degrade the Quality or Quantity of Recreational Opportunities and Experience.

For the immediate Project area, there are no hiking or biking trails located on the site or nearby, this includes possible fishing areas. The Kiowa Creek Sporting Club is located roughly 0.5 miles to the northeast of this Project area but is not accessed or impacted by the Project area. The Project area is flat and not used for any recreational activities. See Section C.11 for further expansion on this subject.

The Project location does not currently provide any recreational opportunities, therefore there will not be any negative recreational impacts. This Project will not unduly degrade the quality or quantity of recreational opportunities and experiences such as fishing, hiking or biking. Conversely, this Project will support recreational opportunities and experience as it enables these types of locations to transition to lower emission power sources while enhancing power supply reliability.

11. The Planning, Design and Operation of The Project Will Reflect Principles of Resource Conservation, Energy Efficiency and Recycling or Reuse.

The Project will provide reliability and firming electrical capacity to support CORE and Colorado's transition to renewable energy resources. The Project will also employ state of the art combustion turbine generator technology, which will provide highly efficient power generation. The design of the Project will also employ industry standards for preservation of energy such that no heat or sources of energy are wasted. The project team has a keen focus on maximizing energy efficiency to meet the requirements of CORE and its cooperative members. The Plant will also employ means and methods in design and equipment supply that reduce parasitic loads on power generated by the CTGs. Parasitic loads are defined as electrical demands from equipment that run the plant that reduce the overall output capacity of the Plant. This ensures as much electrical power as possible is transferred to CORE's transmission system. These methods ensure the most efficient (and least wasteful) form of power generation from CTGs.

The Project enables CORE to transition to cleaner energy sources while maintaining power grid reliability. Specifically, Canyon Peak Power Station is designed to be available when renewables cannot meet CORE's electrical demand. Natural gas is cleaner burning than many traditional fuel sources such as coal and is considered a "bridge" fuel between coal and renewable energy sources (e.g., wind and solar resources) that are currently unable to meet demand without supplementing other energy sources. Further, the Project will promote resource conservation by reducing the amount of gasoline or diesel used in transporting oil and water via truck (as compared to the use if the pipeline system is built).

The use of reused or recycled materials is not currently anticipated for construction of the Project; however, the Project has been designed to minimize scrap materials to the maximum extent possible and any scrap materials remaining following construction will be recycled or reused as much as possible.

The facility is being designed for a 25-year operating lifespan but could operate for longer if commercially needed. Decommissioning for the Project may be triggered by events such as catastrophic storm damage or when the facility reaches the end of its operational life. Decommissioning activities involve the dismantling and removal of equipment, structures, and materials of construction. Were possible, resale of equipment will be pursued depending on useful life. Otherwise, equipment and materials will be recycled to the greatest extent possible. The site will be rehabilitated and restored with vegetation to restore the site. For further background on decommissioning of the site, please see Appendix A15 for the Plant Decommissioning Plan.

12. The Project Will Not Significantly Degrade the Environment.

The Project will not significantly degrade the environment. Although the Canyon Peak Power Station will consume natural gas to generate electricity, the Project will employ state of the art combustion technologies (via the LM2500XPRESS units) and supplemental equipment that reduce environmental impacts from operations (via the SCRs), specifically NOx, VOCs, and other pollutants.

The Project will also employ best management practices while including a SWMP and GESC to minimize any impacts during construction and operations. The Project will install erosion and sediment control measures during construction and permanent measures prior to operation.

Following construction, disturbed areas will be restored to pre-construction contours as closely as practicable. Construction debris and organic refuse unsuitable for distribution over the ROW will be disposed of at appropriate facilities in compliance with applicable regulations. Permanent erosion and sediment control measures will be installed as appropriate, and the Project area will be revegetated using approved SEMSWA seed mixes.

12.a Air Quality

In terms of air quality, the project is situated in the DMNFR, an area that struggles with ozone pollution. Current ozone levels are already above acceptable limits. In accordance with the minor source review permit (see Ramboll EIA, Appendix E), the Project will implement various emission

controls and mitigation measures to reduce environmental impacts, including Dry Low Emission (DLE) technology, selective catalytic reduction (SCR), and catalytic oxidation (CatOx) systems on combustion turbines to limit NOx, VOCs, and other pollutants. Additionally, the project will monitor emissions, control construction dust, and use BMPs like equipment maintenance, low-sulfur fuel, and minimizing engine idling to mitigate air quality impacts.

12.b Visual Quality

The visual quality assessment found that the project area consists of open high plains and herbaceous vegetation, with no tree canopy, streams, lakes, or parks nearby. The flat landscape lacks scenic vistas. A site visit confirmed these conditions. The facility's turbines and exhaust stacks, under 80 feet tall, will blend into the existing landscape with the adjacent Brick Center Substation and solar arrays. Additionally, the project is situated away from residential areas, minimizing visibility and impacts on communities.

12.c Surface Water Quality

With respect to surface water quality, the project site is located within the South Platte River Watershed, with no streams, lakes, or surface water features within or near the area. Runoff from the site flows into roadside ditches and ultimately to Kiowa Creek, with a detention pond designed to handle up to the 100-year, 1-hour storm, in compliance with Arapahoe County and CDPHE stormwater requirements. For the project site, the absence of mapped surface water and water management measures will minimize impacts to surface water quality or quantity.

For the pipeline route, two water bodies were observed and mapped during field survey. The gas line is not anticipated to significantly impact the quantity or quality of surface water or impact the meandering characteristics and limits of streambeds, as impacts to surface water features mapped within the Survey Area during the field survey will be avoided using either boring or horizontal directional drilling (HDD).

The project site and pipeline route are not within a floodplain, and best management practices, including a SWMP and GESC, will minimize impacts during construction and operation.

12.d Groundwater Quality and Quantity

The proposed project site is located away from mapped alluvial aquifers, with the nearest being about 0.3 miles east, and there are no groundwater wells within the Project site area. The facility will not require groundwater resources or wells, and trenching will be above any groundwater according to nearby wells.

The Pipeline is located within the Denver Basin aquifer system, which includes four aquifers: the Dawson aquifer, Denver aquifer, Arapahoe aquifer, and Laramie-Fox Hills aquifer. The Impact Area is entirely within the Denver aquifer and Laramie-Fox Hills aquifer. Although the pipeline will cross two water bodies, impacts to aquatic features will be avoided using either boring or horizontal directional drilling (HDD) methods to install the pipeline underneath the features,

Best practices will be implemented to prevent contamination and spills. Therefore, the project is expected to have no impact on groundwater quality or quantity.

12.e Wetlands and Riparian Areas

To assess wetlands, maps and aerial imagery were reviewed to assess wetlands in the project area and found no evidence of wetland or water features. Topographic data indicates only an eight-foot elevation change, and the soil types present are not hydric, meaning they cannot support wetlands. A site visit in confirmed the absence of wetland plants or hydrologic features for the project site, however two water bodies were identified within the pipeline route. All mapped aquatic features will be avoided using either boring or HDD to install the pipeline underneath the features.

Therefore, the project will not impact wetlands or riparian areas.

12.f Terrestrial and Aquatic Animals and Habitats

The plants, animals, and habitats evaluation found that while seven federally listed species could potentially occur, no critical habitats are present. A Monarch butterfly was observed during the site visit, but no suitable habitat for it or other threatened species was found. The project area consists of heavily degraded shortgrass prairie with mainly non-native grasses, and it is not expected to impact federal or state threatened species. To protect Monarchs, construction personnel should be trained, and work should be scheduled outside the migratory bird breeding season (March to August), with halts in activities if nesting birds are discovered.

The pipeline will be buried and located in an existing County Road ROW.. Areas disturbed during construction will be temporary in nature, reseeded with an approved seed mix, and allowed to revert to previous conditions. Therefore, the Pipeline is expected to have minimal impacts to terrestrial and aquatic animal life.

12.g Terrestrial and Aquatic Plant Life

It is CPP's environmental consultant opinion that the Project area does not support federal or state T&E species or their associated habitat. The shortgrass prairie identified within the Project area is heavily degraded and is expected to be impacted by the proposed project. To mitigate impacts to the existing vegetation, Ramboll recommends using native seed mixes to stabilize the ground and provide habitat for the Project area following construction.

The pipeline will be buried and located in an existing County Road ROW. But within the route corridor (Impact Area), contains seven land cover types: Great Plains Cottonwood - Green Ash Floodplain Forest, Northern Great Plains Mixed grass Prairie, Great Plains Shortgrass Prairie, Row & Close Grain Crop Cultural Formation, Introduced & Semi Natural Vegetation. two federally protected plant species are listed with potential to occur in the Impact Area: Ute-ladies' tresses

(Spiranthes diluvialis) and western prairie fringed orchid (Platanthera praeclara). Based on observations from field survey, the Impact Area lacks potentially suitable habitat for these species, and neither species is known to occur in Arapahoe County. Special status plant species are unlikely to occur in the Impact Area and since the pipeline will be buried with cover reverted back to prvious conditions, the pipeline is expected to have minimal impact to terrestrial and aquatic plant life.

12.h Soils, Geologic Conditions and Natural Hazards

The Project site area consists of Quaternary alluvium with soils identified as silt loams. A geotechnical study revealed moderate swell potential in the soils, with bedrock encountered at up to 41 feet. Construction will involve grading and installation of various structures, potentially causing short-term impacts to soil quality and increased erosion risk due to vegetation removal. To mitigate these effects, a GESC plan will be implemented. Wildfire risk is low, and the includes fire suppression systems.

Soils within the pipeline Impact Area have a low corrosion of concrete potential and a moderate to high corrosion. of steel potential. The rate of corrosion of uncoated steel is related to such factors as soil moisture, particle-size distribution, acidity, and electrical conductivity of the soil. None of the soils in the Impact Area have severe corrosion of steel potential. The buried pipeline will have a 14-16 mil Fusion Bond Epoxy (FBE) coating along with a cathodic protection system incorporating anodes and cathodes spaced every 300 feet.

A detailed environmental impact analysis is provided in Section 21 of this document and in Appendix B9 and B10.

13. The Project Will Not Cause a Nuisance.

The Project is expected to cause minors nuisances, such as increased traffic, dust, and noise, during construction but will not create any major sources of noise, dust, glare, fumes, vibration, or odors.

Dust suppression techniques, such as watering, will be implemented during construction. The key to dust control is through watering roads and site construction areas. Impacts from the use of heavy equipment will be minimized to the extent possible. All construction will occur during the day, no nighttime construction is expected.

Construction nuisances will be temporary and limited in duration. It is expected that there will be no significant increase in ambient air pollutant concentrations. Any potential impacts from construction equipment, exhaust for diesel or gas fueled, will be minimized by federal design standards imposed at the time of manufacture that comply with EPA. Fuel purchased will comply with regulations established by federal and state air pollution control regulations.

The Minor Source Permit issued by the Colorado Department of Public Health and Environment (CDPHE) will address air emission controls. Additionally, the Construction Stormwater Permit issued by the CDPHE will address fugitive dust mitigation.

The Project will not impact access to nearby residences during construction. Temporary safety fences will be erected along the construction ROW in areas where construction activities will occur near public road or near residences. Following construction, areas will be restored to pre-construction conditions, where noted on design drawings. An upland seed mix has been included in SWCAs Environmental Impact Analysis (EIA). Since no wetlands will be affected by the project, there is no need for a wetland-specific seed mix or restoration.

Once the Project is in operation, there is no significant increases to glare, dust, fumes, vibration, or odors is expected. Equipment purchased for the Plant will include provisions for noise attenuation to the greatest extent possible and specifications to meet specific CRS industrial noise limits. The Project has a preliminary noise study that can be found in Appendix B17. Although the Project will be held to C.R.S. industrial zone noise levels, the preliminary noise study indicates operational db(A)'s that are nearer the range of the daytime residential standard at the two nearest properties located approximately 0.2 miles east and west of the respective fence lines. Noise levels of 55 db(a) have been predicted by the noise model at edge of Project site near these properties. Additionally, the Project will pursue baffles and other noise mitigation to maximize sound attenuation. Given the low anticipated capacity factors for the power facility (10-20% of the year) the Project does not anticipate noise to be a nuisance.

14. The Project Will Not Significantly Degrade Areas of Paleontological, Historic, or Archaeological Importance.

The Project does not contain any recorded sites within the boundaries of the proposed Project area. There are two archaeological sites within one mile, the closest being a historic structure that was demolished prior to 1978 just south of the Project area, and a burial/open camp prehistoric site within 0.5 miles. The Project will not significantly degrade areas of paleontological, historic, or archaeological importance. Please see Appendix B9 and B10 for analysis of paleontological, historic, or archaeological importance.

With regard to the proposed gas transmission lateral, the pipeline serves to is efficiently transport natural gas from the main pipeline to the Project. The gas transmission lateral has been carefully planned to steer clear of paleontological, historic, or archaeological sites by situating its construction within the existing County Road 120 right-of-way, thereby ensuring these areas will not be significantly impacted by the project.

The Project will implement an inadvertent discovery plan (See Appendix D of Appendix B9), as well as archeological monitoring of earth works during construction. This includes gas line installation.

15. The Project Will Not Result in Unreasonable Risk of Releases of Hazardous Materials.

The Project will implement a Spill Prevention, Control and Countermeasure (SPCC) Plan that will prescribe how hazardous materials are to be handled, storage, and transported during construction and Plant operations. The SPCC will ensure there will not be unreasonable risk of releases of hazardous materials during construction of operation.

The Project will not have any buried tanks containing hazardous materials. All equipment at the Plant that contain hazardous fluids will have secondary containment measures to prevent the release of any material. This includes special enclosures on equipment and pits/sumps in equipment foundations to collect and prevent the release of any hazardous materials.

During operation, the power facility will have a single location for storage of hazardous fluids. A storage shed with secondary containment for lubricating oils required for equipment maintenance. The shed will be located by the Controls Trailer on the east side of the Plant.

The facility will use aqueous ammonia (with a concentration of 19% or less by weight) in the Selective Catalytic Reduction (SCR) system to further reduce nitrogen oxide (NOx) emissions. The SCR system uses aqueous ammonia as the reagent to catalytically convert NOx emissions into nitrogen and oxygen. The 19% aqueous ammonia is regulated under the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (HCS) as outlined in Title 29 of the Code of Federal Regulations (CFR) 1910.1200, the U.S. Department of Transportation (DOT) Hazardous Materials Regulations in Title 49 CFR, and is subject to Tier II reporting in accordance with the Emergency Planning and Community Right to Know Act (EPCRA) of 1986, Sections 311 and 312. However, concentrations of 19% aqueous ammonia are not subject to Risk Management Plan (RMP) requirements under Section 112(r) of the Clean Air Act (CAA) of 1970, EPCRA Sections 302 for Extremely Hazardous Substances (EHS), or Resource Conservation and Recovery Act (RCRA) Listed Hazardous Waste codes.

The Project will implement effective containment measures into the design to mitigate the effects of this hazardous material in the event of a leak or spill. The aqueous ammonia storage tank (20,000 gallons), the Truck Transfer Unit (TTU), and the ammonia forwarding pump skid are all situated within an ammonia containment volume that is at least 110% of the tank's volume. This containment is constructed below grade, leveraging the density of ammonia, which is greater than air, causing any released vapor to settle within the containment area rather than disperse. This design is critical for multiple safety and environmental reasons. In the event of a leak or spill, the below-grade containment ensures that ammonia remains confined to a controlled area, preventing its spread to other parts of the facility or the surrounding environment. By limiting dispersion, this design reduces the risk of contamination and mitigates potential hazards. Additionally, since ammonia is highly flammable, the containment provides an extra layer of protection by preventing the spread of vapors, thereby reducing the risk of ignition. This setup also enhances emergency response efforts by localizing any release within a designated, controlled area, facilitating safer and more efficient mitigation measures.

The potential for releases of hazardous materials during operation of the pipelines will be minimized by constructing the Project in accordance with all applicable federal and state safety regulations for pipelines.

16. The Benefits Accruing to The County and Its Citizens from The Project Outweigh the Losses of Any Resources Within the County, or The Opportunity to Develop Such Resources.

The Project will benefit the County as a whole by allowing CORE to produce electricity through increased use of renewable power sources. The Project provides CORE and their cooperative members with reliable electricity and not subject to fluctuating electricity prices when renewable power is not available. CORE's ability to continual add more renewable sources of power in the future will also accrue with the Project in operation. The Project only requires the use of natural gas to operate and generate electricity. No water or other resources are needed for the operation of the Plant. No water well will be required so the Plant operations will not affect the existing area aquifers. Only water required for the plant is Fire Water and Potable Water, which will be filled from permitted water suppliers. This will protect the aquifer for local residents around and near the site.

The Project does not remove or restrict the ability to develop existing resources within the County. The Project benefits the County and its citizens and poses no risk of losses of any resources within the County, or the opportunity to develop such resources.

17. The Project Is the Best Alternative Available Based on Consideration of Need, Existing Technology, Cost, Impact and Applicable Regulations.

The development of the Project is based on the growth of demand within CORE's service territory, as well as its separation from its current power supplier, CORE would be unable to satisfy its supply and electric reliability needs. Moreover, due to the increase in the amount of renewable generation within CORE's electric supply portfolio, a critical attribute of the Project is being dispatchable, meaning it can turn on and off quickly, based on the real time needs of the power grid.

The Project provides CORE with state-of-the-art low emission, high efficiency combustion turbine generator technology including fast start capabilities to supplement CORE's expansion into more renewable sources of power. The Project allows CORE to separate itself from non-environmentally friendly sources of power, such as coal-fired power generation, which allows further decarbonization of CORE's power generation portfolio. Additionally, CORE will not have to purchase replacement power from the spot market where pricing can be unreliable and expensive. This uncertainty compromises CORE's ability to determine their source of replacement energy, which could include far less efficient power generation.

The Project enables CORE to meet the State of Colorado's Renewable Energy Standard regarding increased percentage of renewable based power generation. The technology used in the Project is allowing the industry to meet this goal faster than anticipated while also using a cleaner source of high-efficient, fast start, low emissions backup power generation to ensure grid stability and reliability. This source of power also facilitates the decommissioning of older, low-efficient sources of power that contribute to air emissions and water consumption.

The Project is being installed on utility property owned by CORE that houses existing electrical infrastructure, making this an ideal location. This location eliminates any additional infrastructure required to transmit electricity to customers. No new power poles or transmission lines are required as the Project can connect directly to CORE's 115 kV transmission system.

18. The Project Will Not Unduly Degrade the Quality or Quantity of Agricultural Activities.

The power plant will be located at a site where no current agricultural activities are occurring or will occur in the future. CORE is the owner of the property and does not participate in agricultural activities.

The natural gas lateral portion of the Project will be installed in the ROW of County Road 129. The road ROW does not allow for any agricultural activities currently or in the future. The Property at address 2150 S County Road 129 where the Pipeline will be connected to CIG's existing gas transmission line. Although this property is zoned agricultural, the property owner has indicated it will not negatively affect any activities occurring on the property. Please refer to Appendix A14 the letter agreement with the property owner.

Although construction activities may increase traffic in the vicinity of the Project, there is no indication that the Project will degrade the quality or quantity of agricultural activities.

19. The Project Will Not Significantly Interfere with the Preservation of Cultural Resources, Including Historical Structures and Sites, Agricultural Resources, The Rural Lifestyle and The Opportunity for Solitude in The Natural Environment.

The Project does not expect to interfere with existing cultural resources, including historical structures and sites, agricultural resources, the rural lifestyle and the opportunity for solitude in the natural environment. Any nuisances created by the Project are expected to be temporary in nature from construction activities. The Pipeline will be buried underground and reclaimed to existing conditions. The power plant will have structures lower than the existing power transmission towers and lines at the Brick Center Substation and surrounding properties.

20. The Project Will Not Cause Significant Degradation of Land Use Patterns in The Area Around the Proposed Project.

The Project site is owned and operated by CORE and already used for public electric utility purposes. Addition of the Project improvements to the site will not cause any degradation in land use patterns in the area around the proposed project.

21. The Applicant Has Complied with All Applicable County Regulations and Has Paid All Applicable Fees.

The Applicant will comply with all applicable regulations and pay all applicable fees as associated with application process and furthering development of the Project.

Section V.C Additional Criteria for Major Facilities of A Public Utility

1. Areas around major facilities of a public utility shall be administered so as to minimize disruption of the service provided by the public utility.

The Project is intended to increase reliability of the services provided by a public utility. As such, the Project will not disrupt the services provided by the public utility. Conversely, the Project will enhance services provided by CORE Electric Cooperative.

2. Areas around major facilities of a public utility shall be administered so as to preserve desirable existing community and rural patterns.

The Project will be constructed on existing public utility land and will not reduce desirability of existing community and rural patterns. The Project will not affect permanent traffic or transportation patterns.

3. Where feasible, major facilities of a public utility shall be located so as to avoid direct conflict with adopted local comprehensive, State and regional master plans.

The Project's location does not conflict with any adopted local comprehensive, State and regional master plans. This includes the Arapahoe County Comprehensive Plan.

4. Where feasible, major facilities of a public utility shall be located so as to minimize dedication of new right-of-way and construction of additional infrastructure (e.g., gas pipelines, roads, and distribution lines.

The Project will not affect future right of ways or construction of additional infrastructure as it will be located within current right of ways. Additionally, the pipeline portion of the Project does not require any new aboveground infrastructure. Since the CTGs of the Project will be located next to the existing Brick Center Substation, no new distribution lines will be required. The Project also does not require the construction of additional permanent infrastructure such as roads, power lines, municipal water, or telecommunications facilities.

Section 4 Water Supply & Septic System

1. Water Supply

The Canyon Peak Power Station does not require water for operations. Only water required by code is potable water and source of fire water. The current site does not have an existing water well. And the Project does not require a water well and does not intend to drill a new water well. The Plant has limited potable water usage, and the fire water tank will be filled from a permitted water source. Water in the Fire Water Tank is only intended for a fire event, so refilling of the tank is not a regular occurrence. Any water required to be replaced in the Fire Water Tank is for general service water needs, which will be very limited.

With the Project's water needs limited, tapping into the existing water aquifers via a new well does not seem necessary. The Project believes water needs for the Plant can be achieved by importing water from locally permitted water suppliers.

The source for potable water will be a dedicated Potable Water Storage Tank located at the Controls Trailer. The Potable Water tank will be periodically filled by a qualified and permitted potable water supplier. The use of a Potable Water Storage Tank is compliant with Chapter 6 of the International Plumbing Code (IPC) for potable water sources. The code allows the use of a potable cistern for the source of potable water to supply water to plumbing fixtures, as specified in Section P-602.3 Individual Water Supply. In this case, the Potable Water Storage Tank serves as the potable cistern.

The Potable Water Tank will store the required potable water volume to meet the demands and needs of employees, including for bathroom facilities and hand washing in the Controls Trailer. Pumps will be used to ensure adequate pressure and flow for potable water supply to Controls Trailer. The Project will have two (2) bathrooms installed in the Controls Trailer for employee use, and these bathrooms will discharge to a septic system (onsite water treatment system). The septic system will include a septic tank and leach field, sized in accordance with Arapahoe County Health Department and IPC requirements.

The Project will use permitted water sources during construction for dust suppression and hydrostatic testing. Water will be transported to the site periodically to meet this need.

The Project will require potable water for operators per IBC requirements, uses include handwashing and sanitary uses (see Septic System). As noted in previous sections, the Project will only require 2 operators per shift. The Project intends to install a potable water tank to supply potable water to the Controls Trailer for handwashing and bathroom facilities. The Project believes that importing potable water from permitted local water suppliers is the best option from an environmental and economic perspective. The potable water tank will be located next to the Controls Trailer. The sizing of the potable water tank will be based on septic system sizing requirements will some additional capacity.

For drinking water, the Plant will employ a bottled water system to ensure employee water supply safety and ensure operators can stay properly hydrated.

The Basis of Design for the Potable Water System is:

- Basis of Design
  - Population Served – 2 employees each for 12-hour shifts, staffed around the clock
  - Demand – 2 employees at 22.5 gallons per day (gpd)/employee per shift – 90 gpd
  - Storage – 7-day storage with weekly replenishment via truck tanker – 630 gallons
  - Storage Breakdown:
    - External – 5-day storage – 450 gallons (heating may be necessary to prevent freezing)
    - Internal – 2-day storage – 180 gallons
    - This split allows for up to 2 days float for a water tanker to service the facility
- Flow Rate
  - Fixtures include lavatory mixing valve, water closet with tank, urinal flushometer, and drinking fountain.
  - Water Supply Fixture Units (WSFU) – 8.15
  - Flow Rate – 12.95 gallons per day (gpd) from International Plumbing Code Appendix E, Section E103
  - Pumping Rate – 2 times flow rate or 25.9 gpm
- Hot Water Supply
  - On demand tankless water heater with tempering controls for safe hot water supply
- Pressure Tank
  - Bladder Size – 209 gallons
  - Acceptance Factor – 0.9
  - Cut-In Pressure – 40 psi

- Cut-Out Pressure – 60 psi
- Basis of Design – Amtrol Well-X-Trol WX-452C (full acceptance)
- Working Pressure – 125 psig

» Residual

- Manual chlorine residual testing and augmentation using sodium or calcium hypochlorite may be necessary

2. Septic System

The Project will use an Onsite Wastewater Treatment System (OWTS) which been preliminarily designed as follows. Arapahoe County On-Ste Wastewater Regulations dated 12/24/2022 (Regulations) was utilized for this preliminary design. All table and calculation references are from these Regulations. This is a preliminary design and is based on preliminary site investigations by a Colorado registered Professional Engineer. However, a final field reconnaissance, and field soil and percolations tests have not been completed. A final design will be accomplished when all field investigations have been finalized.

» Input Parameters

- Operations building with one bathroom.
- Daily WW Flow – 15 GPD/capita per 12-hour shift (per Table 3 Office Buildings)
- 2 employees per shift, 2 shifts
- Design Flow – 90 GPD

» Design Parameters

- Soil type - 4 (assumed per Table 10). Field soil characterization is currently being obtained.
- Percolation Rate – 80 min/inch (assumed per Table 3). Field percolation rates are currently being obtained.
- Treatment Level - 1 (per Table 4)
- Long Term Acceptance Rate (LATR) – 0.2 gal/sq ft (assumed per Table 10)
- Size Adjustment Factor – 1.2 (per Table 12, bed treatment area, gravity application)
- Type of Media – Rock
- Size Adjustment Factor – 1.0 (per Table 13)

» Septic System Design

- Tank Size - 400 gal (minimum size)
- Soil Treatment Area – 540 sq ft

The septic system is located near the Controls Trailer as shown in the Site Plan and complies to all offsets noted in Table 6 in Appendix A (Septic Tank and STA Bed categories) of the Regulations.