



COLORADO'S POWER PATHWAY

ARAPAHOE COUNTY 1041 REGULATIONS

**SITE SELECTION AND CONSTRUCTION
OF MAJOR FACILITIES OF A PUBLIC
UTILITY PERMIT APPLICATION**

CASE NUMBER ASI25-001

REVISED MARCH 2026

Arapahoe County 1041 Regulations – Submittal Requirements

Information	Location in this Permit Application	Arapahoe County Guidelines and Regulations for Areas and Activities of State Interest Code Citation
Project Narrative		
1. Application Fee	Section 2.1	III(C)(1)
2. Information Describing the Applicant	Section 2.2; Section 2.6; Notarized Letter of Authorization (ASI25-001_LE25-003-Authorization); Xcel Energy's 2024 Annual Report (ASI25-001-Annual Report); Project Cost Estimate, Project Cost Forecast, and the Colorado's Power Pathway Summary Schedule from the Colorado Public Utilities Commission Certificate of Public Convenience and Necessity Application (ASI25-001-CostSchedulefromCPCN)	III(C)(2)
3. Information Describing the Project	Section 1; Section 2.3; Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study); Pre-submittal Meeting Notes (Q24-096-Presub Notes); Vicinity Map (ASI25-001_LE25-003-Vicinity Map); Plans, Representative Photographs, and Simulations (ASI25-001_LE25-003-Photosim); Drainage Study (ASI25-001_LE25-003-Drainage Study); Grading, Erosion, & Sediment Control Report (ASI25-001_LE25-003-GESC Report); Grading, Erosion, & Sediment Control Plan (ASI25-001_LE25-003-GESC Plans); Grading, Erosion, & Sediment Control Plan Permit Application (ASI25-001_LE25-003-GESC Permit Application); Approved Traffic Impact Study Waiver (ASI25-001_LE25-003-Traffic Waiver APR); Helicopter Working Rules and Reporting Requirements (ASI25-001_LE25-003-Helicopter Work Rules Reporting)	III(C)(3)
4. Property Rights, Permits and Other Approvals	Section 2.4; Section 1.3; Section 2.17	III(C)(4)
5. Regional Water Quality Management Plan	Section 2.5; Letters of Service from Water Providers (ASI25-001_LE25-003-Will Serve-Water)	III(C)(5)
6. Financial Feasibility of the Project	Section 2.6; Xcel Energy's 2024 Annual Report (ASI25-001-Annual Report); Project Cost Estimate, Project Cost Forecast, and the Colorado's Power Pathway Summary Schedule from the Colorado Public Utilities	III(C)(6)

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Information	Location in this Permit Application	Arapahoe County Guidelines and Regulations for Areas and Activities of State Interest Code Citation
	Commission Certificate of Public Convenience and Necessity Application (ASI25-001-CostSchedulefromCPCN)	
7. Land Use	Section 2.7; Pathway Consistency with the Arapahoe County Comprehensive Plan (ASI25-001_LE25-003-Consistency with Comp Plan); Plans, Representative Photographs, and Simulations (ASI25-001_LE25-003-Photosim)	III(C)(7)
8. Local Government Services	Section 2.8; Section 2.3.a.6; Section 2.15; Section 2.17	III(C)(8)
9. Financial Burden on County Residents	Section 2.9; Project Cost Estimate, Project Cost Forecast, and the Colorado's Power Pathway Summary Schedule from the Colorado Public Utilities Commission Certificate of Public Convenience and Necessity Application (ASI25-001-CostSchedulefromCPCN)	III(C)(9)
10. Local Economy	Section 2.10	III(C)(10)
11. Recreational Opportunities	Section 2.11; Vicinity Map (ASI25-001_LE25-003-Vicinity Map); Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study); Recreational Uses Map (ASI25-001-Recreational Uses Map)	III(C)(11)
12. Environmental Impact Analysis a) Air Quality b) Visual Quality c) Surface Water Quality d) Groundwater Quality and Quantity e) Wetlands and Riparian Areas f) Terrestrial and Aquatic Animals and Habitat g) Terrestrial and Aquatic Plant Life h) Soils, Geologic Conditions and Natural Hazards	Section 2.12; Section 2.3.a.6; Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study); Plans, Representative Photographs, and Simulations (ASI25-001_LE25-003-Photosim); Grading, Erosion, & Sediment Control Report (ASI25-001_LE25-003-GESC Report); Grading, Erosion, & Sediment Control Plan (ASI25-001_LE25-003-GESC Plans); Grading, Erosion, & Sediment Control Plan Permit Application (ASI25-001_LE25-003-GESC Permit Application); Water Resources Map (ASI25-001-Water Resources Map); Noxious Weed Control Measures (ASI25-001_Noxious Weed Control Measures); Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report (ASI25-001-Survey Report)	III(C)(12)
13. Nuisances	Section 2.13; Noise and EMF Study (ASI25-001-Noise and EMF Study)	III(C)(13)

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Information	Location in this Permit Application	Arapahoe County Guidelines and Regulations for Areas and Activities of State Interest Code Citation
14. Areas of Paleontological, Historic or Archaeological Importance	Section 2.14; Addendum to Routing and Siting Study for Segment 5 5 (ASI25-001_LE25-003-Routing and Siting Study)	III(C)(14)
15. Hazardous Materials Description	Section 2.15	III(C)(15)
16. Balance Between Benefits and Losses	Section 2.16	III(C)(16)
17. Monitoring and Mitigation Plan	Section 2.17; Section 2.12; Addendum to Routing and Siting Study for Segment 5 5 (ASI25-001_LE25-003-Routing and Siting Study); Noise and EMF Study (ASI25-001-Noise and EMF Study); Noxious Weed Control Measures (ASI25-001_Noxious Weed Control Measures); Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report (ASI25-001-Survey Report)	III(C)(17)
18. Transportation Impacts	Section 2.18; Section 2.3.a.6; Approved Traffic Impact Study Waiver (ASI25-001_LE25-003-Traffic Waiver APR)	III(C)(18)
19. Benefit/Cost Analysis	Section 2.19	III(C)(19)
20. Engineering Studies. Submittal of Drainage Study, GESC – Grading, Erosion, & Sediment Control Report/Plan and Traffic Study	Section 2.20; Drainage Study (ASI25-001_LE25-003-Drainage Study); Grading, Erosion, & Sediment Control Report (ASI25-001_LE25-003-GESC Report); Grading, Erosion, & Sediment Control Plan (ASI25-001_LE25-003-GESC Plans); Grading, Erosion, & Sediment Control Plan Permit Application (ASI25-001_LE25-003-GESC Permit Application); Approved Traffic Impact Study Waiver (ASI25-001_LE25-003-Traffic Waiver APR)	III(C)(20)
21. Referrals to Outside Agencies and Response to Referral Comments	Section 2.21	III(C)(21)
22. Additional Submittal Requirements Applicable to Major Facilities of a Public Utility	Section 3; Vicinity Map (ASI25-001_LE25-003-Vicinity Map); Legal Description/Ownership Information (ASI25-001_LE25-003-Legal Desc); Pathway Consistency with the Arapahoe County Comprehensive Plan (ASI25-001_LE25-003-Consistency with Comp Plan); Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study)	III(E)(E)
23. General Approval Criteria	Section 4; Section 2.2;	V

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Information	Location in this Permit Application	Arapahoe County Guidelines and Regulations for Areas and Activities of State Interest Code Citation
	Section 2.3; Section 2.4; Section 2.5; Section 2.6; Section 2.7; Section 2.8; Section 2.9; Section 2.10; Section 2.11; Section 2.12; Section 2.13; Section 2.14; Section 2.15; Section 2.16; Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study); Pathway Consistency with the Arapahoe County Comprehensive Plan (ASI25-001_LE25-003-Consistency with Comp Plan); Xcel Energy's 2024 Annual Report (ASI25-001-Annual Report); Project Cost Estimate, Project Cost Forecast, and the Colorado's Power Pathway Summary Schedule from the Colorado Public Utilities Commission Certificate of Public Convenience and Necessity Application (ASI25-001-CostSchedulefromCPCN); Recreational Uses Map (ASI25-001-Recreational Uses Map); Letters of Service from Water Providers (ASI25-001_LE25-003-Will Serve-Water); Noxious Weed Control Measures (ASI25-001_Noxious Weed Control Measures); Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report (ASI25-001-Survey Report)	
24. Additional Criteria Applicable to Major Facilities of a Public Utility	Section 5; Section 2.7; Section 2.8; Section 3.2; Section 3.3; Pathway Consistency with the Arapahoe County Comprehensive Plan (ASI25-001_LE25-003-Consistency with Comp Plan)	V(C)

Arapahoe County 1041 Submittal Checklist Requirements

Information	Location in this Permit Application
Copy of Resubmittal Checklist	Copy of Resubmittal Checklist (ASI25-001-Resubmittal Checklist)
Copy of Pre-submittal Notes	Pre-submittal Meeting Notes (Q24-096-Presub Notes)
Land Development Application Form	Land Development Application Form (ASI25-001-Application)
Letter of Intent	Letter of Intent (ASI25-001-Letter of Intent)
Notarized Letter of Authorization	Notarized Letter of Authorization (ASI25-001_LE25-003-Authorization)
Ownership Information	Legal Description/ Ownership Information (ASI25-001_LE25-003-Legal Desc)
Section III Part C. Application Submittal Requirements	Section 2; Section 1; Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study); Notarized Letter of Authorization (ASI25-001_LE25-003-Authorization); Pre-submittal Meeting Notes (Q24-096-Presub Notes); Vicinity Map (ASI25-001_LE25-003-Vicinity Map); Plans, Representative Photographs, and Simulations (ASI25-001_LE25-003-Photosim); Drainage Study (ASI25-001_LE25-003-Drainage Study); Grading, Erosion, & Sediment Control Report (ASI25-001_LE25-003-GESC Report); Grading, Erosion, & Sediment Control Plan (ASI25-001_LE25-003-GESC Plans); Approved Traffic Impact Study Waiver (ASI25-001_LE25-003-Traffic Waiver APR); Pathway Consistency with the Arapahoe County Comprehensive Plan (ASI25-001_LE25-003-Consistency with Comp Plan); Noise and EMF Study (ASI25-001-Noise and EMF Study)
Section III Part E. Addition Submittal Requirements Applicable to Major Facilities Of A Public Utility	Section 3; Vicinity Map (ASI25-001_LE25-003-Vicinity Map); Legal Description/ Ownership Information (ASI25-001_LE25-003-Legal Desc); Pathway Consistency with the Arapahoe County Comprehensive Plan (ASI25-001_LE25-003-Consistency with Comp Plan); Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study)
Section V Part A. General Approval Criteria (Provide Response to General Approval Criteria)	Section 4; Section 2.2; Section 2.3; Section 2.4; Section 2.5; Section 2.6; Section 2.7; Section 2.8; Section 2.9; Section 2.10; Section 2.11; Section 2.12; Section 2.13; Section 2.14; Section 2.15; Section 2.16; Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study);

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Information	Location in this Permit Application
	Pathway Consistency with the Arapahoe County Comprehensive Plan (ASI25-001_LE25-003-Consistency with Comp Plan); Xcel Energy's 2024 Annual Report (ASI25-001-Annual Report); Letters of Service from Water Providers (ASI25-001_LE25-003-Will Serve-Water); Noxious Weed Control Measures (ASI25-001_Noxious Weed Control Measures); Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report (ASI25-001-Survey Report)
Section V Part C. Additional Criteria Applicable to Major Facilities Of A Public Utility (Provide Response To Additional Approval Criteria)	Section 5; Section 2.7; Section 2.8; Section 3.2; Section 3.3; Pathway Consistency with the Arapahoe County Comprehensive Plan (ASI25-001_LE25-003-Consistency with Comp Plan)

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ATTACHMENTS

Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study)

Notarized Letter of Authorization (ASI25-001_LE25-003-Authorization)

Pre-submittal Meeting Notes (Q24-096-Presub Notes)

Vicinity Map (ASI25-001_LE25-003-Vicinity Map)

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Drainage Study (ASI25-001_LE25-003-Drainage Study)

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Noise and EMF Study (ASI25-001-Noise and EMF Study)

Legal Description/Ownership Information (ASI25-001_LE25-003-Legal Desc)

Resubmittal Checklist (ASI25-001-Resubmittal Checklist)

Land Development Application Form (ASI25-001-Application)

Summary of Neighborhood Outreach Meeting (ASI25-001_LE25-003-Neighborhood Mtg Summary)

Letter of Intent (ASI25-001-Letter of Intent)

Helicopter Working Rules and Reporting Requirements (ASI25-001_LE25-003-Helicopter Work Rules Reporting)

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Recreational Uses Map (ASI25-001-Recreational Uses Map)

Water Resources Map (ASI25-001-Water Resources Map)

Floodplain Development Permit Application – Tributary to the Kiowa Creek (ASI25-001_LE25-003-Tributary to the Kiowa Creek Permit Appl-FL)

Floodplain Development Permit Application – Black Shack Creek (ASI25-001_LE25-003-Black Shack Creek Permit Appl-FL)

Floodplain Development Permit Application – Box Elder Creek (ASI25-001_LE25-003-Box Elder Creek Permit Appl-FL)

Floodplain Development Permit Application – Coal Creek (3-ASI25-001_LE25-003-Coal Creek Permit Appl-FL)

Copy of CDPHE CDPS Permit (ASI25-001_LE25-003-CDPHE CDPS Permit)

Letters of Service from Water Providers (ASI25-001_LE25-003-Will Serve-Water)

Noxious Weed Control Measures (ASI25-001_Noxious Weed Control Measures)

Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report (ASI25-001-Survey Report)

Communication Regarding Harvest Mile Substation Equipment Additions Permitting Requirements (ASI25-001_LE25-003-Harvest Mile Communication)

LIST OF ACRONYMS AND ABBREVIATIONS

1041	Areas and Activities of State Interest Permit
Act	Powerline Trails Act
APEN	Air Pollutant Emissions Notice
APLIC	Avian Power Line Interaction Committee
Arapahoe County §1041 Regulations	Regulations Governing Areas and Activities of State Interest in Arapahoe County
Application	1041 Permit Application
BMP	Best Management Practice
CCR	Code of Colorado Regulations
CDOT	Colorado Department of Transportation
CDPHE	Colorado Department of Public Health and Environment
CFR	Code of Federal Regulations
Compass	Colorado Cultural Resource Online Database
CPCN	Certificate of Public Convenience and Necessity
CPUC	Colorado Public Utilities Commission
CPW	Colorado Parks and Wildlife
CRS	Colorado Revised Statutes
CWA	Clean Water Act
dBA	A-Weighted Decibels
EMF	Electric and Magnetic Fields
FAA	Federal Aviation Administration
FERC	Federal Energy Regulatory Commission
GESC	Grading, Erosion, & Sediment Control
HDR	HDR, Inc.
IEEE	Institute of Electrical and Electronics Engineers
IPaC	USFWS Information for Planning and Consultation
kV	Kilovolt
mG	Milligauss
NHD	National Hydrography Dataset

NRHP	National Register of Historic Places
NWI	National Wetlands Inventory
OAHP	Office of Archaeology & Historic Preservation
Pathway	Colorado's Power Pathway
PLJV	Playa Lakes Joint Venture
QISG	Quanta Infrastructure Solutions Group, LLC
ROW	Right-of-Way
SC	Species of Concern
SEMSWA	Southeast Metro Stormwater Authority
SWMP	Stormwater Management Plan
TCA	Temporary Construction Area
Tetra Tech	Tetra Tech Inc.
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
WOTUS	Waters of the U.S.
Xcel Energy	Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy

1 INTRODUCTION

Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy (Xcel Energy), proposes to construct, maintain, and operate Colorado's Power Pathway (Pathway) in eastern Colorado. Xcel Energy is submitting this Areas and Activities of State Interest Permit (1041) permit application (Application) for a permit to locate and construct major facilities of a public utility (1041 permit) pursuant to the Regulations Governing Areas and Activities of State Interest in Arapahoe County (Arapahoe County §1041 Regulations, Arapahoe County 2006).

This Application addresses each section in the Arapahoe County §1041 Regulations, as noted in the headings and tables throughout the Application. Like information is grouped throughout the Application. As a result, the Application does not follow the exact subsection order in the Arapahoe County §1041 Regulations.

Pathway is a \$1.7 billion investment proposed by Xcel Energy to improve the state's open, interconnected electric grid and enable future renewable energy development around the state. Pathway will ensure safe, reliable, and economical electric service to the public, boost the regional economy, and create jobs during its construction. Pathway includes:

- Installation of approximately 550 miles of new 345-kilovolt (kV) double-circuit transmission line in 12 counties;
- Construction of four new electric substations (Canal Crossing, Goose Creek, May Valley and Sandstone); and
- Expansion, equipment additions, or equipment upgrades at four existing electric substations (Fort St. Vrain, Pawnee, Harvest Mile and Tundra).

Pathway will be constructed in five segments (Figure 1). The Colorado Public Utilities Commission (CPUC) did not approve construction of the May Valley – Longhorn Extension (Extension) in the January 2024 Phase II Decision regarding Xcel Energy's Electric Resource Plan and Clean Energy Plan. Xcel Energy may bring a proposal to construct the Extension and Longhorn Substation forward again in the future but has paused its further development as part of Pathway.

Each new or expanded electric substation will serve as an endpoint for the transmission line segments:

- Fort St. Vrain – Canal Crossing (Segment 1)
- Canal Crossing – Goose Creek (Segment 2)
- Goose Creek – May Valley (Segment 3)

- May Valley – Sandstone – Tundra (Segment 4)
- Sandstone – Harvest Mile (Segment 5)

The estimated length of each transmission line segment and location of each substation is outlined in Table 1.

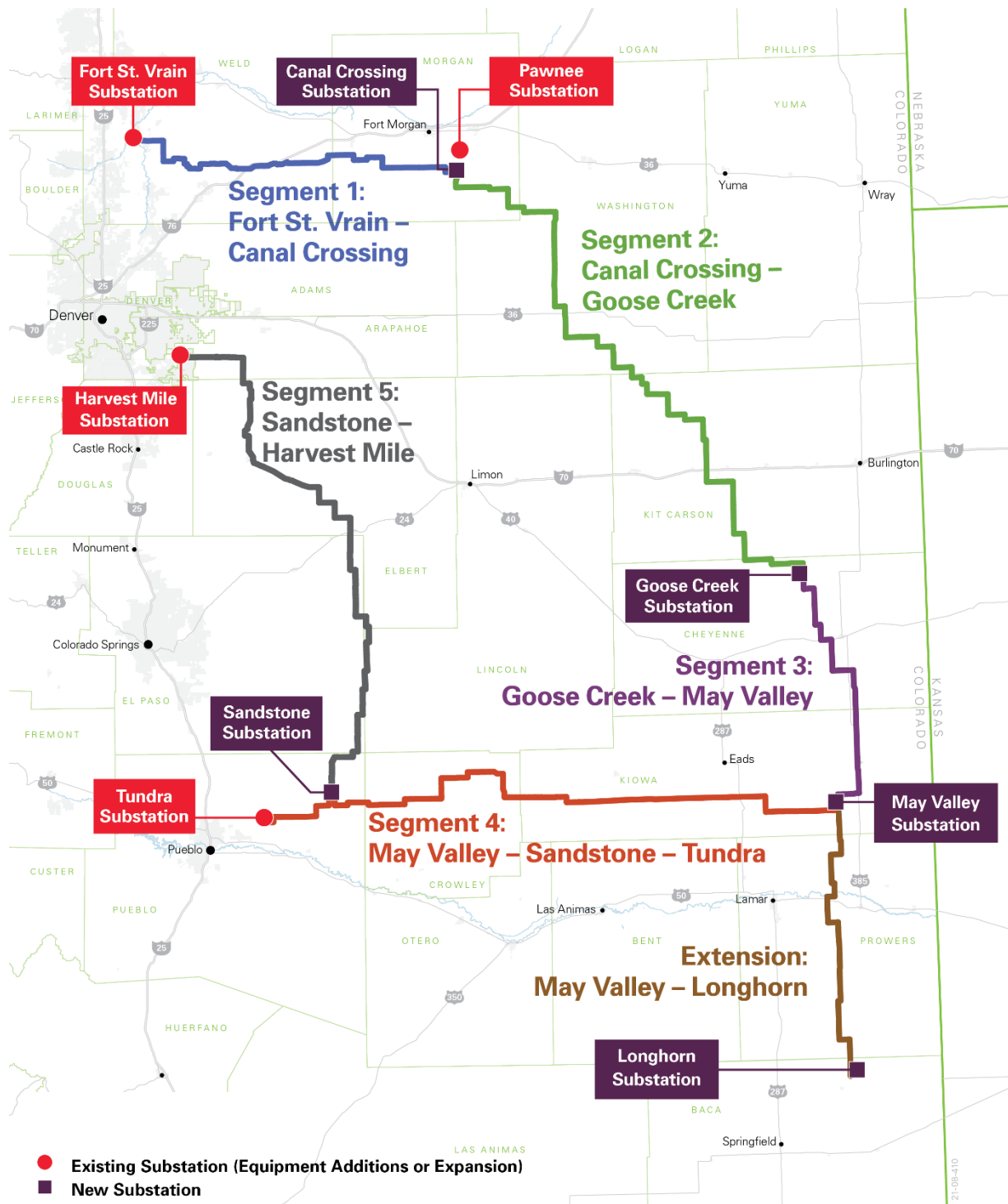


Figure 1: Colorado's Power Pathway

Table 1: Colorado's Power Pathway by County

County	Segment (Estimated Miles of Transmission)							Substation
	1	2	3	4	5*	Ext.**	Total	
Baca	-	-	-	-	-	2	2	New Longhorn
Cheyenne	-	9	35	-	-	-	44	New Goose Creek
Crowley	-	-	-	41	-	-	41	-
Kiowa	-	-	22	64	-	6	92	New May Valley
Kit Carson	-	62	-	-	-	-	62	-
Lincoln	-	-	-	-	4	-	4	-
Morgan	27	21	-	-	-	-	48	New Canal Crossing, Existing Pawnee Equipment Additions
Prowers	-	-	-	-	-	51	51	-
Washington	-	53	-	-	-	-	53	-
Weld	47	-	-	-	-	-	47	Fort St. Vrain Equipment Additions
El Paso	-	-	-	-	45	-	45	-
Elbert	-	-	-	-	48	-	48	-
Arapahoe*	-	-	-	-	18	-	18	Harvest Mile Substation Equipment Additions
Pueblo	-	-	-	25	9	-	34	Tundra Expansion, New Sandstone
Total	74	145	57	130	124	59	589	

* The mileage for Pathway facilities in Aurora (1 mile) is included in Arapahoe County total. The County is not reviewing or approving the 1-mile of power line alignment in Aurora or the equipment additions at the Harvest Mile Substation, which were previously approved under ASI16-004 and L16-006.

** The CPUC did not approve construction of the Extension Segment in the January 2024 Phase II Decision regarding Xcel Energy's Electric Resource Plan and Clean Energy Plan. Xcel Energy may bring a proposal to construct the Extension and Longhorn Substation forward again in the future but has paused its further development as part of Pathway.

Pathway facilities proposed for approval under this Application in Arapahoe County include approximately 18 miles of new 345-kV double-circuit electric transmission line excluding the 1 mile of transmission line that is located within the City of Aurora. Proposed activities in Arapahoe County will also include seeking approval of all temporary construction areas (TCA) associated with construction of the Pathway facilities for the duration needed to complete Pathway construction. Pathway will be constructed in segments, with portions of Segment 5 proposed to be located in Arapahoe County. A description of facilities in Arapahoe County is provided in Section 2.3 of this Application.

This narrative addresses the application submittal requirements from Section III Part C, Section III Part E, Section V Part A, and Section V Part C of the Arapahoe County §1041 Regulations. Note that Pathway is a backbone transmission system that serves Colorado; as such, this Application does not address project-specific details that apply for energy developments or direct utility service projects.

The Eastern Plains region of Colorado is one of the nation's best areas for wind and solar energy generation but it does not currently have a network transmission system that can integrate these new generation resources into the state's interconnected grid system, which is needed to meet the Colorado legislature's statutory clean energy targets. Pathway will support Xcel Energy's Clean Energy Plan (Xcel Energy 2021) that is estimated to deliver as much as an 85 percent reduction in carbon dioxide emissions by 2030 and add approximately 5,000 megawatts of new wind, solar, and other resources. Pathway is a critical component to Xcel Energy's efforts to meet the state's statutorily required clean energy targets as well as Colorado's growing electricity needs. Pathway will also improve safety, reliability, and energy affordability.

In March 2021, Xcel Energy filed a Certificate of Public Convenience and Necessity (CPCN) application with the CPUC describing the purpose, need, and public benefits of constructing Pathway. In February 2022, the CPUC provided verbal approval, and in June 2022, CPUC provided written approval of the CPCN for Segments 1–5 based on a determination that Pathway is in the public interest. While the CPUC determines a public need for Pathway, it does not approve the specific location of specific project facilities. The specific location and land use approvals will be determined through easement negotiations with landowners and the land use approval process in the applicable jurisdictions where the Pathway facilities will be located.

1.1 ESTIMATED PATHWAY SCHEDULE

The estimated approval, construction, and in-service schedule for Pathway facilities is shown in Figure 2. Many variables factor into the schedule for projects of this magnitude. The construction schedule is contingent on acquiring all necessary land rights and permits.

Pathway will be constructed and brought in-service in phases. The estimated construction timeline for each segment and related substation, and anticipated in-service dates are shown in Figure 2 and Table 2.

Segment 5 construction, including the Pathway facilities in Arapahoe County, is expected to last up to 18 months, with construction beginning in Quarter 2 2026 or as soon as reasonably possible post application approval and a target in-service date in Spring 2027. Transmission line Segment 5 and associated new substations and substation expansions or equipment additions will be completed in 2027, assuming required approvals are obtained.

Table 2: Estimated Individual Segment and Substation Construction and In-Service Dates

Segment & Substation	Construction	In-Service Year
Segment 1 & Fort St. Vrain Substation Equipment Additions	Spring 2024– Spring 2026	Spring 2026
Segment 2 & New Canal Crossing & Goose Creek Substations & Pawnee Substation Equipment Additions	Spring 2023– Spring 2025	Spring 2025
Segment 3 & New May Valley Substation	Spring 2023– Spring 2025	Spring 2025
Segment 4, Tundra Substation Expansion & New Sandstone Substation	Spring 2025– Spring 2027	Spring 2027
Segment 5, Harvest Mile Substation Equipment Additions	Quarter 2 2026 or as soon as reasonably possible post application approval–Spring 2027	Spring 2027

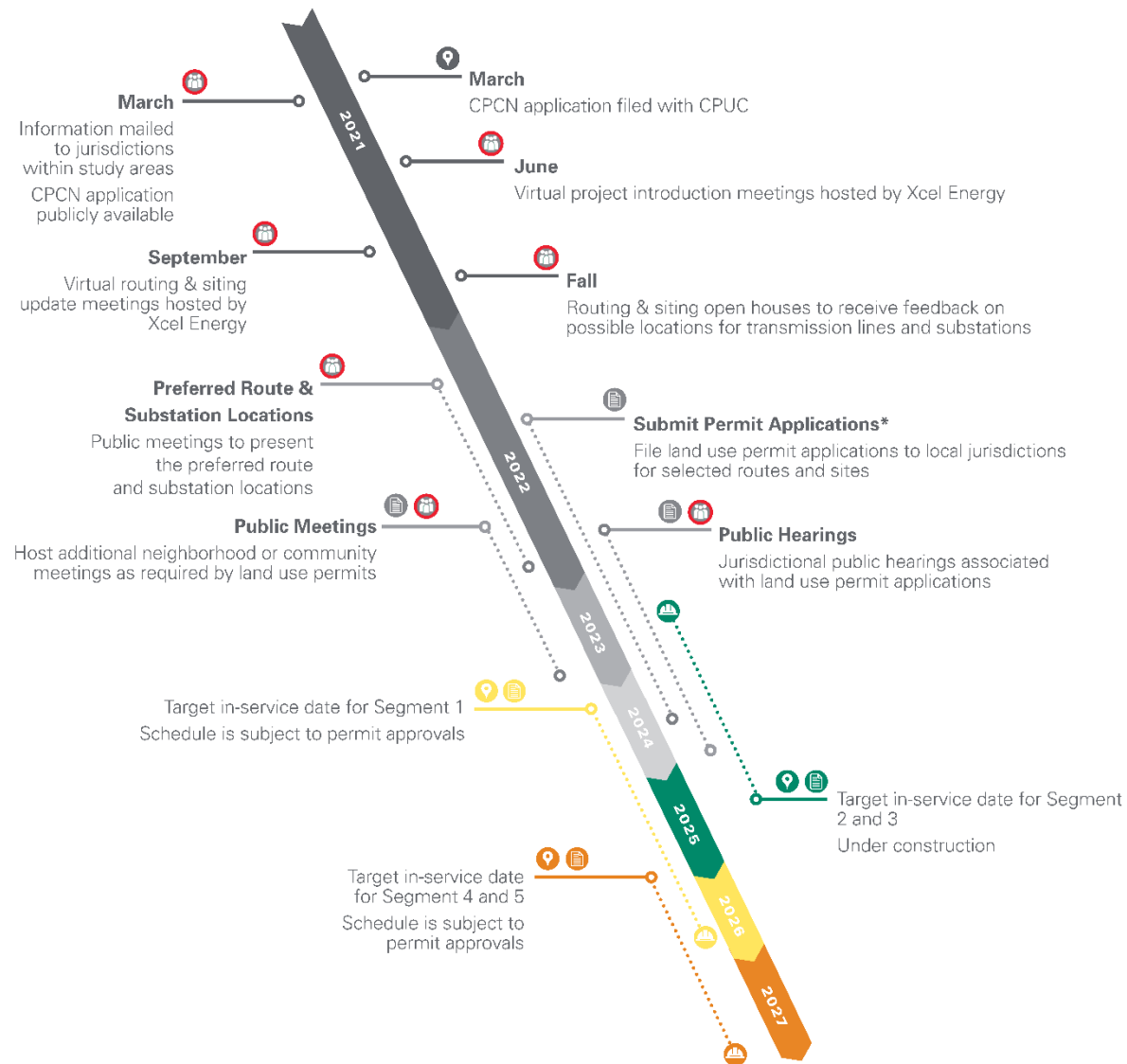


Figure 2: Estimated Pathway Schedule

1.2 PATHWAY ACTIVITIES PRIOR TO SUBMITTAL OF APPLICATION

1.2.a Public Outreach

Public outreach efforts were conducted to receive public and stakeholder feedback and input on transmission line route and substation site selection (see Section 1.2.b, Transmission Line Routing & Substation Siting Studies).

- In June 2021, three virtual introductory meetings were held for the public to discuss Pathway's benefits to communities and the process to be used to identify the locations of the proposed transmission lines and new substations. These meetings were held virtually due to restrictions on large gatherings due to COVID-19.
- In June through September 2021, Pathway representatives met with jurisdictions within Pathway's Study Areas to discuss Pathway and receive feedback. Pathway representatives met with Arapahoe County representatives on July 29, 2021.
- In September 2021, two virtual routing and siting meetings were held for the public to learn about the progress made on Pathway, including the development of focus areas for identification of transmission line links and substation sites. These meetings were held virtually due to restrictions on large gatherings due to COVID-19.
- In October and November 2021, 15 in-person public open houses were held to gather public feedback on the preliminary transmission links. A public open house was held at the Arapahoe County Fairgrounds on November 3, 2021.
- In January through March 2022, 15 in-person open houses were held to present the preferred route for Segments 1, 2, 3, 4, and the Extension and to present additional preliminary transmission links for Segment 5. Public open houses were held at the Arapahoe County Fairgrounds on February 28, 2022.
- In May 2022, four in-person open houses were held to gather additional public feedback on the preliminary transmission links and preferred route for Segment 5. A public open house was held in Aurora on May 2, 2022.
- In August 2022, two in-person open houses were held in the Eastern Review Area, an area further east from the Segment 5 preliminary transmission links and partial preferred route, to gather feedback from landowners in that area about potential additional route options.

- On March 18, 2025, a neighborhood outreach meeting was held at the Arapahoe County Fairgrounds for the Arapahoe County 1041 and Location and Extent permit applications for Pathway. The neighborhood outreach meeting was conducted and noticed in accordance with Section 5-2.1.2 of the Arapahoe County Land Development Code (Arapahoe County 2024) and Part 7 of the Arapahoe County Development Application Manual (Arapahoe County 2019). A summary of the Arapahoe County neighborhood outreach meeting is provided in Summary of Neighborhood Outreach Meeting (ASI25-001_LE25-003-Neighborhood Mtg Summary).

1.2.b Transmission Line Routing & Substation Siting Studies

Routing a new transmission line and siting a substation require a comprehensive review and analysis of factors and criteria including, but not limited to, electric system planning, engineering, environmental and cultural resources, land use, regulatory requirements, land rights, stakeholder input, and public and worker safety. As shown in Figure 3, the five-step routing and siting process assesses constraints and opportunities between segment endpoints to ultimately identify the preferred route location for the transmission line and the preferred locations for new substation sites. The process is described in detail in the routing and siting studies for each segment of Pathway. The Addendum to Routing and Siting Study for Segment 5 is included as ASI25-001_LE25-003-Routing and Siting Study. The other routing and siting studies are not provided because they do not involve transmission lines or substations within Arapahoe County.

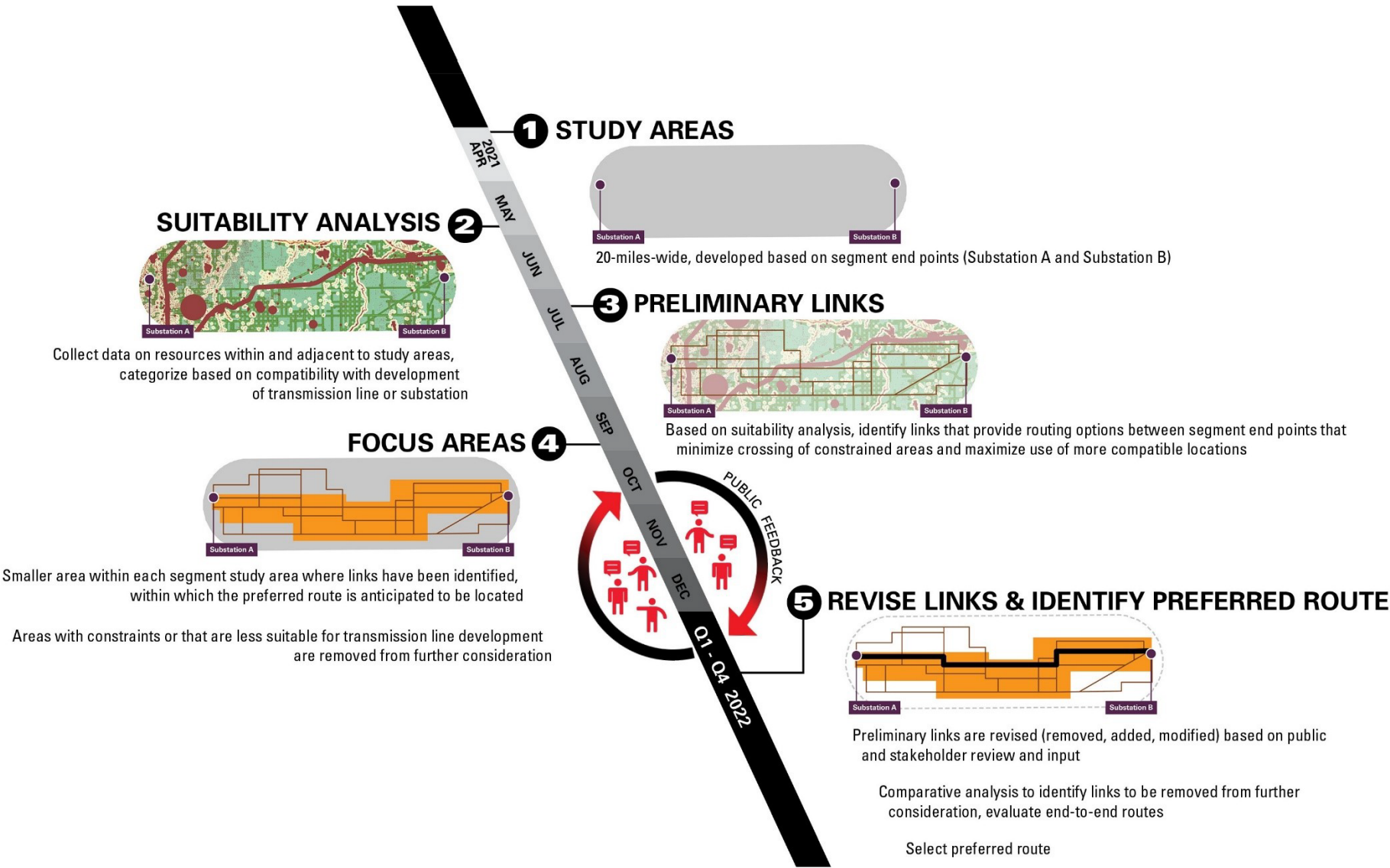


Figure 3: Pathway Routing and Siting Study Process

1.3 REGULATORY FRAMEWORK

Federal, state, and local permits and approvals may be required prior to Pathway construction. For more than 3 years, Xcel Energy has conducted various forms of outreach with each jurisdiction crossed by Pathway to solicit feedback and discuss potential permitting requirements.

Multiple Colorado statutory provisions and local government land use plans and controls apply to Pathway, including approval of a CPCN from the CPUC; notice, consultation, and permit approvals from counties and municipalities, and notice to owners of a mineral estate associated with the substation sites.

All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and during construction as required and may include but are not limited to major land use permits; Street Cut Right-of-Way (ROW) Use permits; temporary use permits; oversize/overweight permits; grading, erosion, and sediment control permits (GESC Permit); floodplain development permits, and stormwater permits.

Xcel Energy anticipates avoiding impacts to jurisdictional waters of the U.S. (WOTUS) in Arapahoe County and therefore does not anticipate that Pathway facilities in the County will require a Nationwide Permit 57 or other U.S. Army Corps of Engineers permitting under the federal Clean Water Act (CWA), Section 404.

The regulatory requirements identified by Xcel Energy that are applicable to Segment 5 are described in Table 3. This table is intended as an illustrative list of the permits and approvals that may be required for Pathway, but other permits or approvals may be required.

Table 3: Land Use Permit Requirements and Applicability to Pathway

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Federal Aviation Administration (FAA)	Structures occurring in Navigable Airspace / applicable to Segment 5	FAA Form 7460-1, Notice of Proposed Construction or Alteration	Objects affecting navigable airspace	Title 14 Code of Federal Regulations (CFR) Part 77	To be submitted following final design.
CPUC	All Segments	CPCN	Need for new electrical facility in Colorado	Colorado Revised Statutes (CRS) 40-5-101, CRS et seq., and Rule 1303 4 Code of Colorado Regulations (CCR) 723-1 and Rules 3002, 3102, and 3206, 4 CCR 723-3	Proceeding No. 21A-0096E, Approved June 2, 2022.
	All Segments	Notification of Intention to Submit Permit Application for Major Electrical Facilities	Filing permit application for location, construction, or improvement of major electrical or natural gas facilities	CRS 29-20-108	In addition to other notifications, Xcel Energy met with Arapahoe County on July 29, 2021; March 3, 2022; and November 21, 2024; about Pathway in Arapahoe County.

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
	All Segments	Government and State Notice Requirements, Mineral Estate Owners	Public hearing by a local government on an application for development	CRS 24-65.5-103, <i>et seq.</i>	In accordance with the statute CRS 24-65.5-103, <i>et seq.</i> , the applicant will provide notice to the mineral estate owners associated with the new substation properties. Mineral owners may choose to waive their right to receive the notice not less than 30 days before the hearing and may also waive their right to a separate hearing regarding notification.
Colorado Department of Public Health and Environment (CDPHE)	All Segments	Construction General Stormwater Permit and Stormwater Management Plan (SWMP)	Construction sites that disturb one acre or greater	5 CCR 1002-61	To be obtained prior to construction.

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
	All Segments	Land Development Air Pollution Emissions Notice (APEN)	Construction disturbance greater than 25 acres and land development activities longer than 6 months	5 CCR 1001-14	To be obtained prior to construction.
Colorado Department of Transportation (CDOT)	Components crossing state and federal roadways / applicable to Segment 5	Access and Crossing Permits	Crossings of state roadway	2 CCR 601-1	To be obtained prior to construction.
Colorado State Historic Preservation Office	To be determined following final design and pre-construction surveys / applicable to Segment 5	Determination of Compliance with Historical, Prehistorical, and Archaeological Resources	Potential impacts to historic, prehistoric and/or archaeological resource	CRS 24-80-401-411, CRS 24-80-1301-1305, 8 CCR 1504-7	Pathway will coordinate with the State Historic Preservation Office on any applicable requirements for cultural resources review.
Burlington Northern Santa Fe Railroad	Components crossing railroads / not applicable to Segment 5	Access and Crossing Permits	Crossings of railroad	49 CFR 200.1 et. Seq., CRS 32-12-123, CRS 37-95-108	To be obtained prior to construction.
Concurrent County Land Use Permits					

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Arapahoe County	Segment 5	1041 Permit (this document)	Proposed development of an activity of state interest (major facility of a public utility) in Arapahoe County	Regulations Governing Areas and Activities of State Interest in Arapahoe County	Submittal in first quarter of 2025.
Arapahoe County	Segment 5	Location and Extent Permit	Proposed development of public facilities in Arapahoe County	CRS 30-28-110	Submittal in first quarter of 2025.
Crowley County	Segment 4	Use by Special Review	Development of public utility and public service structures, including transmission lines in Crowley County	Crowley County Planning and Zoning Manual, Section 2	Use by Special Review Permit approved in Resolution Number 2023-8591 on April 24, 2023.
El Paso County	Segment 5	1041 Permit	Proposed development of an activity of state interest (major facility of a public utility) in El Paso County	El Paso County Land Development Code; Attachment B: Guidelines and Regulations for Areas and Activities of State Interest	Denied by El Paso County Board of County Commissioners on July 24, 2025. Currently under appeal. ¹

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Elbert County	Segment 5	1041 Permit, Use by Special Review	Proposed development of an activity of state interest (major facility of a public utility) in Elbert County	Guidelines and Regulations for Areas and Activities of State Interest Elbert County	Denied by Elbert County Board of County Commissioners on July 2, 2025. Currently under appeal. ¹
Pueblo County	Segment 4, 5; Tundra Substation	1041 Permit	Proposed development of an activity of state interest (major facility of a public utility) in Pueblo County	Pueblo County Code, Title 17, Division 2: Areas and Activities of State and Local Interest	1041 Permit issued on January 9, 2025.

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Weld County	Segment 1; Fort St. Vrain Substation Equipment Additions	1041 Permit, Use by Special Review, and Site Plan Review	Proposed development of an activity of state interest (major facility of a public utility) and change to an existing approved Use by Special Review permit in Weld County	Weld County Charter and County Code Chapter 21 Areas and Activities of State Interest; Weld County Charter and County Code Article 2, Division 5 Special Review Permits for Major Facilities of a Public Utility or Public Agency; Weld County Charter and County Code Article 2, Division 3 Site Plan Review and Minor Amendment to a Use by Special Review Procedural Guide	1041 Permit issued on April 3, 2024. Use by Special Review Permit issued on February 20, 2024. Site Plan Review conditionally approved on November 14, 2023.

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
City of Aurora	Segment 5	Conditional Use Permit and Site Plan	Proposed development of a conditional use in City of Aurora	Aurora Unified Development Ordinance, Article 146 Zoning and Subdivision Procedures, Section 5 Specific Procedures	Conditional Use Permit and Site Plan approved August 28, 2024.
Lincoln County	Segment 5	Use by Special Review	Proposed new land use or development	Lincoln County Zoning Resolution, Article 3 Use by Special Review Procedures	Use by Special Review Permit issued on August 28, 2024.
County and City Land Use Permits Filed in Summer 2022					
Morgan County	Segment 1, 2; Canal Creek Substation, equipment additions at Pawnee Substation	1041 Permit	Proposed development of an activity of state interest (major facility of a public utility) in Morgan County	Guidelines and Regulations for Areas and Activities of State Interest	1041 Permit issued on November 16, 2022.
Kit Carson County	Segment 2	Land Use Change Permit	Any proposed change in land use in unincorporated Kit Carson County	Kit Carson County Code, Article 2	Land Use Change Permit issued on September 21, 2022.

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Washington County	Segment 2	Use by Special Review and 1041 Permit	Proposed development of transmission line in Washington County	Application for Use by Special Review, Washington County	Use by Special Review Permit was issued on November 21, 2022; 1041 Permit was issued on December 13, 2022.
Cheyenne County	Segment 2, 3; Goose Creek Substation	Conditional Use Permit and 1041 Permit	Proposed development of a conditional use in Cheyenne County	Cheyenne County Comprehensive Plan and Zoning Ordinance	Conditional Use Permit was issued on September 30, 2022. 1041 Permit was issued on September 30, 2022.
Kiowa County	Segments 3 and 4; New May Valley Substation	1041 Permit	Proposed development of an activity of state interest (major facility of a public utility) in Kiowa County	Guidelines and Regulations for Areas and Activities of State Interest County of Kiowa	1041 Permit was issued on November 22, 2022.

Jurisdiction	Pathway Components	Title	Trigger	Statutory Reference	Status
Other County and City Land Use Permits Considered					
Town of Platteville	Segment 1	Not applicable	Town confirmed that the only permit approval required was from the CDOT	Platteville Municipal Code, Chapters 15-18	Not applicable
Privately Negotiated Easements with Landowners					
Xcel Energy is currently negotiating with the potentially affected landowners for necessary land rights along the proposed transmission line route. These negotiations include securing an option for a permanent non-exclusive easement for the 150-foot-wide ROW of the transmission line, as well as permanent and temporary easements required for access and TCAs during and after construction. Once land surveying, final engineering design, and permitting have been completed, Xcel Energy will exercise the options and record the final easements. The easements for each phase of Pathway within Arapahoe County will be secured and recorded prior to construction starting on that phase.					

Note:

1. Xcel Energy strives to work collaboratively with local communities and jurisdictions to locate utility infrastructure projects and secure necessary local permitting. Despite over four years of collaboration with local officials, landowners and other stakeholders, Elbert and El Paso County Commissioners have denied the necessary local land use permits for the portions of Pathway within their respective jurisdictions.

Elbert and El Paso counties' decisions jeopardize the timely and cost-effective completion of Colorado's Power Pathway, which is crucial for ensuring that we can provide safe and reliable service, acquire new clean energy resources to reduce statewide greenhouse gas emissions and facilitate clean energy resources' ability to qualify for federal tax credits before the opportunity expires. In response, Xcel Energy filed appeals with the CPUC to seek permission to proceed with Pathway along the proposed route within those two counties despite the local land use permit denials. The CPUC determined in 2022 that Pathway was necessary and in the public interest for the state. We have also filed appeals of the local land use permit denials in district courts to protect our statutory authority to provide safe, reliable and economical electricity in Colorado.

Pathway will deliver significant economic benefits to rural communities through local tax revenue, landowner lease payments and temporary and permanent jobs, while expanding and enhancing the state's interconnected transmission network — benefiting all Coloradans. We look forward to working with Arapahoe County to ensure we can deliver these benefits to our customers and communities including but not limited to those in Arapahoe County.

2 SECTION III PART C: APPLICATION SUBMITTAL REQUIREMENTS

2.1 APPLICATION FEE III(C)(1)

2.1.a Payment of Application Fee III(C)(1)(a)

Xcel Energy has paid a \$10,000 deposit and will pay hourly wages for Arapahoe County employees for reviews that exceed \$10,000.

2.1.b County Action on Application III(C)(1)(b)

Xcel Energy understands that Arapahoe County will take no action on the Application package until all fees and expenses related to the Application review process have been paid.

2.1.c Payment of Consultant III(C)(1)(c)

Xcel Energy understands that it will be responsible to pay for any consultant that Arapahoe County may need to retain to analyze, evaluate or provide information to Arapahoe County regarding all or a portion of an application where Arapahoe County Staff does not have expertise.

2.2 INFORMATION DESCRIBING THE APPLICANT III(C)(2)

The applicant is Public Service Company of Colorado, a Colorado corporation conducting business as Xcel Energy.

2.2.a Applicant's Contact Information III(C)(2)(a)

The following information shows the applicant, engineer, surveyor, and consultants contact information to address Section III(C)(2)(a).

Applicant:

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Senior Manager, Siting and Land Rights
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Project Manager
LW Survey
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Permitting Contact:

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Senior Agent, Siting and Land Rights
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Engineer:

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Consultant:

Stephanie Phippen
Permitting and Environmental Lead
Tetra Tech, Inc. (Tetra Tech)
390 Union Blvd, Suite 400
Lakewood, CO 80228
303-980-3515
Stephanie.Phippen@tetrattech.com

2.2.b Applicant's Qualifications and Expertise III(C)(2)(b)

Xcel Energy is a major U.S. electricity and natural gas company, with operations in 8 Western and Midwestern states. Xcel Energy provides a comprehensive portfolio of energy-related products and services to 3.7 million electricity customers and 2.1 million natural gas customers through its regulated operating companies.

Construction contractors will be chosen prior to construction. Pathway will be constructed in compliance with all applicable federal, state, and local permits and authorizations. Construction contractors will work with the appropriate jurisdictions to obtain and follow all related construction permits. The following information provides the names, addresses, and qualifications of the Xcel Energy representatives responsible for constructing and operating Pathway.

Xcel Energy and their construction contractor Quanta Infrastructure Solutions Group, LLC (QISG) have prepared and obtained the following land use permits for Pathway as of December 2025:

- Cheyenne County – Conditional Use Permit, 1041 Permit
- City of Aurora – Conditional Use Permit and Site Plan
- Crowley County – Use by Special Review Permit
- Kiowa County – 1041 Permit
- Kit Carson County – Land Use Change Permit
- Lincoln County – Use By Special Review Permit
- Morgan County – 1041 Permit
- Pueblo County – 1041 Permit
- Washington County – Use by Special Review Permit, 1041 Permit
- Weld County – Site Plan Review Permit, Use by Special Review Permit, 1041 Permit

All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and maintained during construction as required.

Applicant:

Jennifer Chester
Senior Manager, Siting and Land Rights
Xcel Energy
3500 Blake Street
Denver, CO 80205
Phone: 303-285-6533
Email: Jennifer.L.Chester@xcelenergy.com

Qualifications: Jennifer Chester is the Senior Manager of Siting and Land Rights responsible for overseeing routing/siting, permitting, and public outreach activities for Xcel Energy projects in Colorado. Ms. Chester has 24 years of experience working in the utility planning industry as a consultant and utility employee routing and siting facilities, working with project stakeholders in public outreach forums, land use permitting activities, as well as other state and federal processes required for the construction and operation of electric transmission facilities.

Engineer:

Parker Wrozek, P.E.
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303-285-6724
stanley.p.wrozek@xcelenergy.com

Qualifications: Parker Wrozek is the Senior Manager of Transmission Line Engineering for Xcel Energy – Colorado. He leads a team of engineers and designers who complete designs of high voltage transmission lines from 44 kV to 345 kV. He has over 15 years of experience with design, procurement, and construction of high voltage transmission lines on numerous projects across the United States, and is responsible for maintaining high quality designs while meeting cost, schedule, regulatory, and permitting requirements. Mr. Wrozek is a registered Professional Engineer in the State of Colorado and has a Bachelor of Science degree in Civil Engineering from Michigan Technological University.

Construction:

Stephen Cirfus
Construction Manager
Quanta Infrastructure Solutions Group, LLC
1050 17th St. Denver, CO 8026

Qualifications: Quanta Services is the industry leader in providing specialized infrastructure solutions to the electric power, renewable energy, and communications industries. QISG serves as the program management platform and single point of accountability on large infrastructure projects executed by the family of Quanta companies and select strategic partners. Quanta Services has completed over 16,500 miles of 230-kV, 345-kV, 500-kV and 765-kV transmission line construction since 2014.

QISG is currently constructing or has recently completed the following projects within North America:

- SunZia Transmission project, 550-mile, high-voltage direct current transmission line spanning from New Mexico to Arizona.
- Energy Gateway Program, a new 128-mile 500-kV transmission line in Idaho.
- West Fort McMurray 500-kV Transmission Line, a 310-mile, high voltage transmission line in North-Central Alberta, Canada.

PAR Electrical, the Quanta transmission line operating unit constructing the transmission line, has been constructing transmission line projects since 1954. The

company has completed 200 miles of Pathway transmission line construction since 2024.

Stephen Cirfus is the Lead Construction Manager for Pathway. He has 5 years of experience managing the construction of transmission lines. He has 13 years of experience as a project safety lead/manager prior to becoming a construction manager.

QISG will be responsible for all required access permitting and building permits necessary for construction of Pathway (e.g., the construction trailer). The electric transmission line and associated facilities are exempt from the International Building Code requirements.

Operations:

Brett Gruesner
Senior Control Center Manager
Network Reliability Lead
18201 West 10th Ave.
Golden, CO 80401
303-273-4810

Qualifications: Brett Gruesner is the Sr. Control Center Manager of the Transmission Control Center with 18 years of experience operating Xcel Energy's transmission grid in Colorado.

2.2.c Authorization of the Application III(C)(2)(c)

Xcel Energy is currently negotiating with the potentially affected landowners for necessary land rights along the proposed transmission line route. These negotiations include securing an option for a permanent non-exclusive easement for the 150-foot-wide ROW of the transmission line, as well as permanent and temporary easements required for access and temporary construction areas (TCAs) during and after construction. Once land surveying, final engineering design, and permitting have been completed, Xcel Energy will exercise the options and record the final easements. The easements for each phase of Pathway within Arapahoe County will be secured and recorded prior to construction starting on that phase. A notarized Letter of Authorization from Xcel Energy to certify the authority of Jennifer L. Chester, Senior Manager, Siting and Land Rights, to act on behalf of Xcel Energy is provided as ASI25-001/LE25-003-Authorization. A notarized Letter of Authorization from Xcel Energy to certify that Tetra Tech, Inc. is authorized to act on behalf of Xcel Energy for this Application is also included in ASI25-001/LE25-003-Authorization.

2.2.d Applicant's Financial and Technical Capability III(C)(2)(d)

The applicant has both the financial and technical ability to construct, maintain, and operate Pathway. As described in Xcel Energy's 2024 Annual Report (ASI25-001-Annual Report), Xcel Energy is a major U.S. electricity and natural gas company, with operations in eight Western and Midwestern states; Xcel Energy held seventy billion, thirty-five million dollars in assets in 2024. See additional discussion of financial feasibility in Section 2.6.

As a public utility providing service to customers in Colorado, Xcel Energy is authorized by law to recover the prudently incurred costs associated with providing utility service in rates charged to customers. Xcel Energy finances the construction of electrical infrastructure through both debt and equity and recovers those costs from customers over the life of the infrastructure.

Pursuant to the CPUC's CPCN approval on June 2, 2022, Pathway is deemed to be in the public interest and recovery of the anticipated cost of Pathway is appropriate. The CPUC evaluated extensive cost and schedule information in arriving at this decision. The full written approval and Xcel Energy's CPCN application with the CPUC can be found by visiting the E-Filings page on the CPUC website and entering Proceeding No. 21A-0096E in the Search field. Based on its careful review of the estimated costs, proposed sources of funding (i.e., FERC-jurisdictional transmission rates, Transmission Cost Adjustment rider, and base rates), and other related factors, the CPUC's approval of the CPCN for Pathway demonstrates that (i) Xcel Energy has the technical and financial capability to construct, maintain, and operate Pathway, and (ii) there is a public convenience and necessity for Pathway. In accordance with the 1041 Act at C.R.S. § 24-65.1-105(1), any order, rule, or directive issued by the County pursuant to 1041 Act shall not be inconsistent with or in contravention of any decision, order, or finding of the CPUC with respect to public convenience and necessity for Pathway. All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and during construction for each phase of Pathway within Arapahoe County as required, and best management practices (BMPs) will be implemented to address public health, safety, and welfare and in accordance with permit conditions. Xcel Energy's 2024 Annual Report is provided as ASI25-001-Annual Report.

As described in Section 2.2.b, the Xcel Energy representatives responsible for constructing and operating Pathway have demonstrated technical ability to construct, maintain, and operate Pathway. As of December 2025, construction has begun on Pathway Segments 1 and 4. Construction on Segments 2 and 3 has concluded and those segments (approximately 200 miles of transmission line) are in-service (Xcel Energy 2025a).

2.3 INFORMATION DESCRIBING THE PROJECT III(C)(3)

This Application addresses only the portion of the Pathway transmission line and all TCAs for staging and laydown yards, and conductor stringing areas that are located in unincorporated Arapahoe County and associated with construction of the Pathway facilities for the duration needed to complete Pathway construction. Land use permitting in other counties crossed by Pathway is occurring concurrently or has already been approved, as described in Table 3.

This Application package was prepared pursuant to the requirements of the Arapahoe County §1041 Regulations. The Application also was prepared based on direction provided by Arapahoe County representatives during the Pre-submittal Meeting held on November 21, 2024. A copy of the Pre-submittal Meeting Notes is provided as Q24-096-Presub Notes.

This section addresses requirements of the 1041 Regulations, Section III.C.3 (a) through (e), information describing the project.

2.3.a Plans and Specifications of the Project III(C)(3)(a)

Pathway facilities proposed for approval under this Application in Arapahoe County include approximately 18 miles of 345-kV double-circuit transmission line in Segment 5 excluding the 1 mile of transmission line that is located within the City of Aurora (Vicinity Map [ASI25-001_LE25-003-Vicinity Map]). The proposed route in Arapahoe County is generally located in the area east of E-470 and south of I-70 and the Town of Watkins and is oriented in a west to east direction. The proposed route runs on the north side of and parallel to East Quincy Avenue south of Watkins and Strasburg and west of Brick Center Road (County Road 129) as shown on Vicinity Map (ASI25-001_LE25-003-Vicinity Map).

The existing Harvest Mile Substation is located west of the Arapahoe County Fairgrounds and Regional Park. A map showing proposed facilities in Arapahoe County is included as Vicinity Map (ASI25-001_LE25-003-Vicinity Map). The following sections describe the Pathway facilities within Arapahoe County.

2.3.a.1 Transmission Line

The new 345-kV double circuit transmission line will be constructed using steel poles. A single pole will be used for most transmission pole locations; however, two poles will be required in certain locations where the weight of the conductor requires extra structural support. These are typically 'angle locations' where the line changes direction. Each pole will be placed on a concrete foundation. Voltage, conductor sag, pole type, terrain, length of span between transmission poles, and minimum clearances of existing

buildings influence the necessary height of transmission pole. The transmission poles will be weathering steel and a brown or rust color. The anticipated physical characteristics of a double-circuit pole are summarized in Table 4, and a representative transmission pole with line is shown in Figure 4. Typical transmission pole configurations, representative photographs, and visual simulations of Pathway are included in Plans, Representative Photographs, and Simulations (ASI25-001_LE25-003-Photosim).

Table 4: Typical 345-kV Double Circuit Transmission Line Characteristics

Characteristic	Anticipated Design
Typical height	105-140 feet (no pole will exceed a 199-foot maximum height)
Right-of-way	150 feet total width, 75 feet on either side of the centerline
Span length	Typically 950 feet between transmission poles, up to 1,400 feet
Material/color	Weathering steel, brown or rust color
Clearance	Maintain all clearances as required by National Electric Safety Code

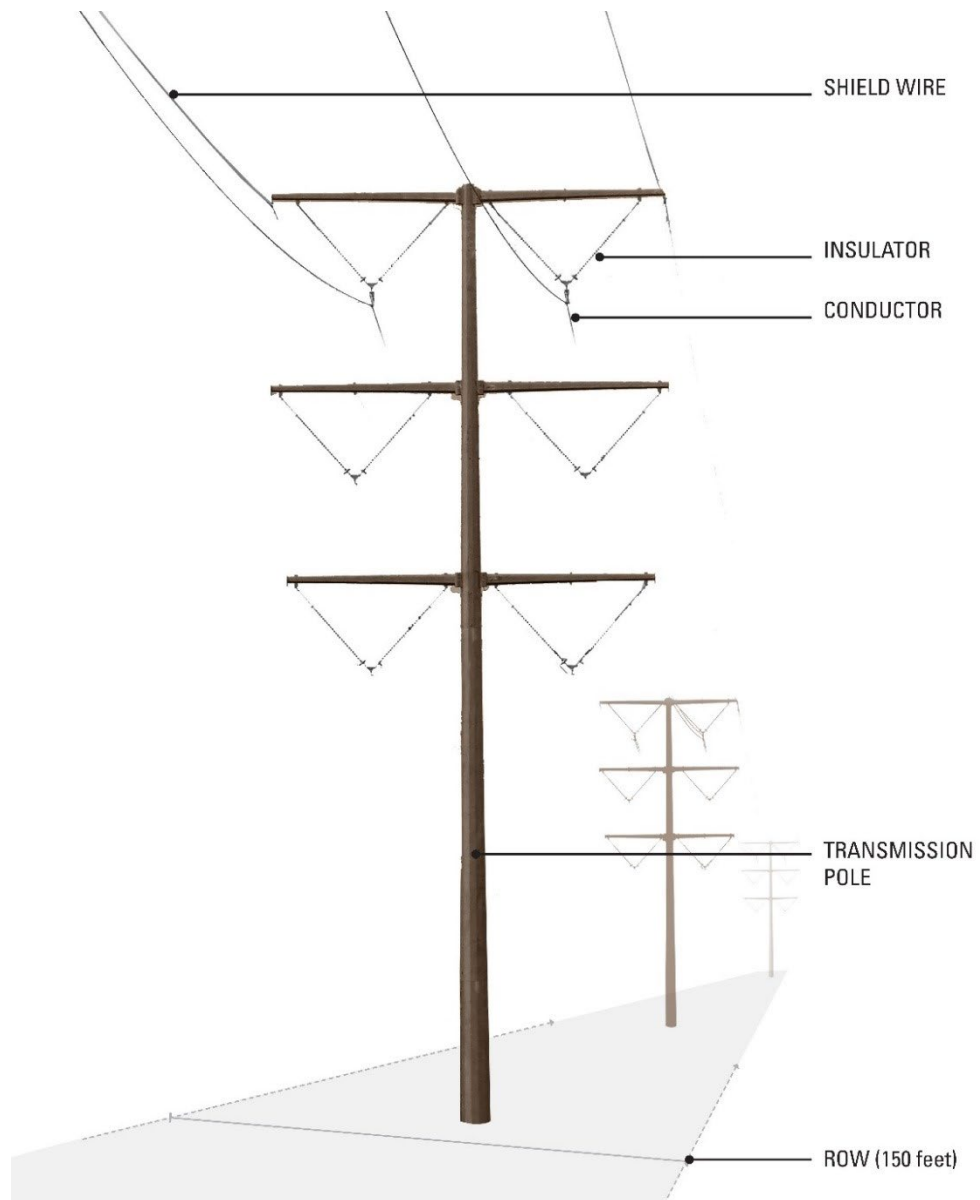


Figure 4: Typical Transmission Pole Configuration (Illustrative)

Segment 5 begins in Arapahoe County at the existing Harvest Mile Substation, located west of South Harvest Mile Road and south of East Quincy Avenue. The route proceeds northwest to East Quincy Avenue and proceeds east along East Quincy Avenue for approximately 11.5 miles (approximately 1 mile of East Quincy Avenue is located in City of Aurora jurisdiction). Approximately 1.5 miles west of Brick Center Road (County Road 129), the proposed route turns south and proceeds due south for 5 miles to County Line Road (County Road 50). The route turns to the east and proceeds along County Line Road (County Road 50) for approximately 1.25 miles then turns south and crosses into Elbert County (Vicinity Map [ASI25-001_LE25-003-Vicinity Map]).

The Harvest Mile Substation equipment additions were previously addressed through planning approvals, and the remaining ground disturbing activities are limited to minor foundation work within the existing fenced substation area. On December 15, 2025, the Southeast Metro Stormwater Authority (SEMSWA) confirmed that the Harvest Mile Substation foundation work does not require a GESC permit. As such, the GESC materials submitted with this Application are limited to transmission line–related work only. Copies of the email correspondence between Xcel Energy and/or their consultant HDR Inc. (HDR), Arapahoe County, and SEMSWA are provided as ASI25-001_LE25-003-Harvest Mile Communication. A GESC Plan for the transmission line is provided in ASI25-001_LE25-003-GESC Plans, a GESC Report for the transmission line is provided in ASI25-001_LE25-003-GESC Report, and a GESC Permit Application for the transmission line is provided in ASI25-001_LE25-003-Permit Appl-GS.

In addition, in a separate communication sent on November 13, 2025, from Molly Orkild-Larson of the Arapahoe County Planning Division, it was acknowledged that no additional land use permits are required to complete equipment additions within the fence line of the Harvest Mile Substation (see ASI25-001_LE25-003-Harvest Mile Communication).

2.3.a.2 Substation

Transmission substations are essential components of the electric transmission grid and are connection points for two or more transmission lines and for generation interconnections with wind, solar, natural gas, and other energy sources. Transmission substations include electrical equipment located inside a secured fenced area. The existing Harvest Mile Substation site and facility is owned in fee by Public Service Company of Colorado.

The equipment additions for the Harvest Mile Substation were permitted through the Pawnee-Daniels 345-kV Transmission Line project in 2017 (case numbers ASI16-004 - 1041 Case File, L16-006 – Planning Case File, and EL16-006 – Engineering Case File) and are not part of the approvals sought in this Application. As described in Section

2.3.a.1, Arapahoe County and SEMSWA have confirmed that no additional planning or GESC permits are required for installation of the Harvest Mile Substation equipment additions. Copies of the email correspondence between Xcel Energy and/or their consultant HDR, Arapahoe County, and SEMSWA are provided as ASI25-001_LE25-003-Harvest Mile Communication.

The substation upgrade will be constructed on the current parcel of land owned by the Public Service Company of Colorado and accessed via the existing access drive off of Harvest Mile Road. The Harvest Mile Substation equipment additions will upgrade the existing 345-kV and 230-kV yard and is expected to be in-service by 2027.

The existing detention pond and stormwater conveyance system have sufficient capacity to manage the minor increase in impervious area associated with the previously approved planned upgrades. See the Engineer's Certificate of No Impact Letter (LE25-003-Flood Cert) for additional information and supporting calculations. A Drainage Study is provided in ASI25-001_LE25-003-Drainage Study.

The low voltage auxiliary power, or station service, is derived from the transmission system to power the control and communication equipment. In the event of a primary station service outage or other issue, an automatic switch to a backup source will ensure continuity of substation operations.

2.3.a.3 Transmission Line and Substation Access

Construction access roads will allow construction crews and vehicles to access transmission pole locations and TCAs (described in Section 2.3.a.4). Traffic controls may be required near TCAs during construction to ensure the safety of crews and the travelling public. Prior to construction, Xcel Energy contractors will consult with Arapahoe County staff to ensure all necessary traffic control or right-of-way permits are submitted and approved where required.

Access to the Harvest Mile Substation will use existing access; no upgrades to the existing substation access road are needed. The existing Harvest Mile Substation access road was permitted under the Pawnee-Daniels Park 345-kV Transmission Line Location and Extent and 1041 Permits (Case Numbers L16-006 and ASI16-004).

Where practicable, existing public roads and private roads will be utilized during Pathway construction, maintenance, and operation. Some private roads may require improvements and some new access roads will need to be constructed to accommodate construction equipment and long-term maintenance of the transmission line.

Where road improvements are needed, Xcel Energy will acquire any necessary grading, stormwater, and erosion control permits and comply with permit requirements. If access cannot be contained within the 150-foot electric transmission line easement, Xcel Energy will acquire permanent or temporary access easements where necessary access routes traverse private property. Some access easements may remain post-construction to maintain access to transmission lines for operation and maintenance activities.

2.3.a.4 Temporary Construction Areas

Temporary Construction Areas include staging/laydown areas, helicopter fly yards, and conductor stringing areas (each are addressed in subsections below). TCAs will be used during construction to stage construction equipment and materials including construction trailers, cranes, and transmission poles. Some TCAs may require grading to level out the area for equipment placement and materials storage. TCAs are also necessary when stringing the conductor wire. This Application seeks approval of the TCAs required for Pathway construction for the duration necessary to complete Pathway construction as shown on the Location and Extent Plan (LE25-003-Plan Set). At the end of each construction phase, all equipment will be removed from the TCAs solely used for that construction phase. No proposed improvements at the TCAs will be permanent, and TCAs will be restored in a manner generally similar to preconstruction conditions.

The TCAs will be an approved accessory use for the Pathway transmission lines and substation in Arapahoe County under this Application. The final location for all accessory uses of the Pathway transmission line including temporary pull sites and TCAs for Pathway are shown in the revised Location and Extent Plan (LE25-003-Plan Set).

Construction contractors also will use TCAs to store water trucks, traffic control items, and BMP materials. Water will be used in dust suppression, and compaction activities. Traffic control will be implemented where required for the safety of the construction crews and the traveling public. BMPs will be installed to meet stormwater, grading, and erosion control requirements. Construction contractors will work with the appropriate governmental entities to obtain and follow all related construction permits.

Staging/Laydown Areas

Staging and laydown areas will be located within the TCAs and used for equipment delivery, storage, and assembly. Additional TCAs used for transmission pole laydown and staging may be required for construction.

The Beichle Laydown Yard will be located northwest of the intersection of East Quincy Avenue and County Road 129 in parcel number 2067-00-0-00-322 as shown on the

Vicinity Map (ASI25-001_LE25-003-Vicinity Map). Prior to the use of the Beichle Laydown Yard for construction, Xcel Energy will obtain a Temporary Use Permit from Arapahoe County for use of the Beichle Laydown Yard to store materials. Xcel Energy has coordinated with the Public Works Staff to allow for material storage ahead of construction related activities.

Helicopter Fly Yards

One TCA will be used as a helicopter fly yard in this area where helicopter assistance is required for transmission pole installation. Usage of helicopters will occur during daylight hours. The time of use will be from 7am to 5pm. Xcel Energy's construction contractor will comply with all FAA rules regarding the use of helicopters in construction. The Helicopter Working Rules and Reporting Requirements (ASI25-001-Helicopter Work Rules Reporting) describes the construction contractor's working rules, requirements for prior authorization, incident reporting and response requirements, and best practices for helicopter use. A helicopter will only be used to support the installation of overhead conductor and optical ground wire. No heavy lifting of steel poles or foundation materials will be conducted with a helicopter.

In Arapahoe County, the Beichle Laydown Yard will be used as a helicopter fly yard. The size of the helicopter fly yard will be one acre within the Beichle Laydown Yard. The total duration of usage of helicopters in Arapahoe County will be approximately three months. Xcel Energy has submitted a Temporary Use Permit application to Arapahoe County for the use of the Beichle Laydown Yard as a temporary construction laydown yard in unincorporated Arapahoe County for storage of materials prior to the yard used for construction of Pathway.

Conductor Stringing Areas

TCAs will be used for stringing the conductor wire. The locations and use of TCAs for this function are required at specific angles to ensure the conductor wire is pulled in line with the transmission poles, thereby limiting the strain on the poles. In addition, TCAs may be used adjacent to public ROW for temporary guarding/protecting of the roadway during stringing of the new transmission line. These temporary guard sites will be restored following construction, as described above.

2.3.a.5 Construction Process

Construction Phases

Construction of the transmission line and substation equipment additions is expected to occur in phases that generally include the following: construction access and vegetation clearing, installation of BMPs, equipment mobilization and material delivery, foundation

construction, transmission pole placement and installation, conductor wire stringing and electrical equipment installation, and land restoration.

Construction access road improvements, grading, and setup of TCAs, along with vegetation work, will be conducted in phases prior to construction of the transmission line and substation. Proposed access roads will allow construction crews and vehicles to access transmission pole locations and TCAs.

Vegetation management within the Pathway ROW and substation equipment additions will be required prior to, or in conjunction with, construction. Trees and tall vegetation growing within or near the Pathway ROW can cause downed lines, power outages and wildfire. Vegetation management crews will work to prevent these situations from occurring. Vegetation management involves the use of various types of treatment including removing, pruning, and mowing vegetation and the treatment of vegetation with herbicides to ensure safe operations. The extent of this work will vary along the transmission line and substation area depending on the level of vegetation encroachment and additional ROW needs.

Transmission Line Construction

Once the pre-construction preparation work has been completed, work on the transmission lines and work within the substation will begin. The new transmission pole foundations will consist of concrete reinforced with steel that can range in diameter and depth based upon the subsurface conditions. Construction crews will begin drilling for transmission pole foundations. Reinforced concrete drilled pier foundations typically range from 6 to 9 feet in diameter and are drilled 20 to 40 feet deep. Once construction crews have drilled the hole for the new transmission pole, the foundation is installed, and the hole is backfilled. Substation foundations are installed in a similar manner which includes excavation followed by pouring the concrete.

Transmission poles will be placed using cranes. Crane installation will involve first hauling the transmission pole pieces to the location and then assembling the transmission poles at the installation locations and setting them with the crane. Once assembled, transmission poles will be transported by truck to installation locations and cranes will lift the transmission poles into place.

Once all the transmission poles are in place, the conductor wire and optical ground wire are strung using a temporary pulley system attached to the insulators. Conductor is pulled from one transmission pole to the next through a pulley system temporarily placed on the transmission pole. After a section of conductor is pulled through a series of transmission poles, the conductor is attached to insulators, which are attached to the transmission pole and the pulleys are removed. Trucks, heavy equipment, and helicopters are used in this process. FAA safety requirements may require residences

near the transmission line to evacuate during helicopter use. Xcel Energy and the construction contractor will coordinate with the FAA during helicopter operations and obtain all required permits. Xcel Energy and the construction contractor will provide residents with prior notice if evacuation is required.

Other equipment including bird diverters, spacers, and anti-galloping devices are also installed as needed. TCAs will be located at specific angles to ensure the conductor wire is pulled in line with the transmission poles, remaining in alignment.

Substation Equipment Additions Construction

New equipment will be installed at the Harvest Mile substation located at 4455 S. Harvest Mile Road, Aurora, Colorado 80016. Please note that these equipment additions were permitted in 2017 (case numbers ASI16-004 - 1041 Case File, L16-006 – Planning Case File, and EL16-006 – Engineering Case File) as part of Public Improvement No: PI17-0007 and are not part of the approvals sought in this Application. All proposed equipment updates will follow the design provided for the substation through the Pawnee-Daniels Park 345-kV Transmission Line project that was permitted in 2017 (case numbers ASI16-004 - 1041 Case File, L16-006 – Planning Case File, and EL16-006 – Engineering Case File). Following substation grading and foundation installation, steel equipment support structures will be erected on site. Electrical equipment (circuit breakers, bus work, capacitor banks, surge arresters, Station Service Voltage Transformers, insulators, and an electrical equipment enclosure containing control and communication devices) will be installed after the foundations and support structures are in place. Equipment testing and placing in service occurs after construction is complete. In some cases, substation equipment additions may be constructed in phases. An initial phase may be followed by the addition of more equipment in phases as system needs require until the final buildout is complete.

Once construction has been completed, the temporary work area at the substation will be restored in a manner generally similar to their condition prior to construction. This work may include fence repair, rut removal, decompaction, tilling, seeding, and stabilization measures. Areas not needed for ongoing operations and maintenance at the Harvest Mile Substation will be reclaimed and/or reseeded as soon as practicable and following construction.

2.3.a.6 Construction Staffing, Vehicles, and Equipment

The first workers, vehicles, and equipment to mobilize for Pathway will conduct investigative fieldwork and prepare work areas for construction. Prior to construction and during the Pathway planning and design stages, soil borings are taken to understand the sub-surface conditions where Pathway facilities will be built. Geotechnical borings are taken using bore drill rigs. Vegetation clearing is utilized to

meet requirements for conductor clearances, minimize potential ignition sources, and to provide access within the Pathway ROW. Tree clearing and other vegetation removal is completed with both manual and mechanized equipment and will take place on the identified access route and the area within the easement.

It is anticipated that one 12-hour shift per day (Monday through Saturday) from 6:00 am – 6:00 pm will be worked during transmission line and substation construction. Xcel Energy will work with the Director of the Department of Public Works & Development to obtain approval for project work subject to a street cut/ROW use permit to be performed during the proposed 12-hour shift. Shifts will be during daylight hours, early morning to early evening to reduce disturbance to residential subdivisions in the area. If additional hours are required for a shift, a 24-hour work permit will be obtained in advance from Arapahoe County. In addition, if hours of a shift need to be reduced within certain areas of the project footprint, Xcel Energy will coordinate this possibility with the County. The maximum number of construction workers on site for the substation and transmission line on any one day will be approximately 95 total¹. At peak construction there will be an estimated maximum of 30 construction workers at the Harvest Mile Substation.

Portable temporary bathrooms that will be serviced on a regular basis will be on site during the construction period. Portable toilets used on the Pathway ROW are trailer mounted and are hauled to the Pathway ROW in the morning and removed from the Pathway ROW at the end of the work day. When stationary portable toilets are utilized, they are removed from the Pathway ROW for maintenance; no cleaning activities occur within the Pathway ROW. There are poles located in the 100-year floodplain. Xcel Energy will submit separate floodplain permits for processing by Arapahoe County and SEMSWA, as applicable, to ensure compliance with each jurisdiction's regulations on this matter.

Bottled water will be provided to employees at the laydown yard and carried in vehicles in coolers. Bottled water is provided by a local commercial vendor.

Transmission line construction is expected to be completed in phases over the duration of the construction schedule for Pathway. The impact to local public roads will vary day-by-day as the construction moves along the Pathway transmission line route.

Harvest Mile Substation equipment additions construction is expected to last up to 12 months. The expected vehicle trips per day in Arapahoe County during transmission line and Harvest Mile Substation equipment additions construction is summarized in Table 5. The approved Traffic Impact Study waiver is provided as ASI25-001_LE25-003-Traffic Waiver APR.

¹ Personnel may not be located or concentrated at same work area on the same day.

Table 5: Estimated Daily Vehicle Trips during Transmission Line and Substation Equipment Additions Construction in Arapahoe County

Major Construction Tasks	Approximate Construction Duration (Weeks)	Approximate Daily Passenger Car Trips	Approximate Daily Truck trips by Vehicle Type	Approximate Total Daily Roundtrips
Transmission Line Construction				
Foundation Installation (~4 per day)	33 weeks	15	Flatbed trucks 5 Concrete trucks 28	48
Steel Pole Installation (~4 per day)	33 weeks	10	Flatbed and Semi-trucks 25	35
Conductor/Optical Ground Wire	36 weeks	5	Semi-trucks 15 Crane 1 Aerial Lifts 2	23
Substation Equipment Additions Construction				
Concrete Installation	4 weeks	10	Concrete trucks 18	28
Rock Installation	8 weeks	10	Flatbed and Semi-trucks 48	58
Reclamation	12 weeks	5	Flatbeds 2 Semi-trucks 2	9

Neither the transmission line nor the substation will have any permanent on-site employees. Upon completion, Pathway will be operated and monitored remotely 24 hours a day, 7 days a week, 365 days a year to provide safe and reliable electric service. On average, the substation will be visited one to two times per month for inspections and maintenance. The transmission line will be inspected regularly (at least annually) to look for the following:

- Non-compatible vegetation and hazards within the Pathway ROW.
- Equipment needing repair or replacement.
- Pathway ROW encroachments, which can be hazardous to safety and reliable operations.
- Anything that might jeopardize safe, reliable operation of the power line.

Operations and maintenance staff must visit the Pathway ROW for these inspections, but visits typically are minimal, and landowners will be contacted prior to on-site inspections or maintenance. However, in cases of emergency, advanced contact may not be possible.

It is anticipated that an average of 30 trucks per day will be utilized during the construction of the transmission line for crews, spotting materials, framing poles, and erecting poles. Concrete truck deliveries will be made daily when the foundations and

piers are being constructed. Multiple deliveries of yard rock (up to 48 per day) and cement (up to 28 per day) will be required daily at certain stages of construction. Materials will be delivered to the laydown yard at the onset of construction. An additional 10 to 15 trucks will be needed to deliver steel poles, conductor, anchor bolts, and foundation materials daily to work areas. The impact to local public roads will vary day-by-day as the construction moves along the Pathway transmission line route.

A crane, drill rig, concrete truck, boom trucks, trailers, transmission poles, steel casing, and rebar cages are equipment and materials that will be moved into the site for construction. The transmission line poles are delivered by truck and assembled at the foundation site and set in place with the use of cranes and other heavy equipment. Trucks, heavy equipment and sometimes helicopters are used to install conductor wire after all transmission poles are erected in an area.

Similar equipment is used for substation equipment construction and includes a crane, drill rig, concrete truck, boom trucks, trailers, support equipment, steel casing, and rebar cages. A staging area on the substation site will be designated for truck traffic to deliver materials to the substation. Concrete will be delivered via concrete trucks, and the concrete will be pumped or poured on site. Concrete truck deliveries will be made when the foundations and piers are constructed. Multiple deliveries of yard rock (up to 48 per day) and cement (up to 18 per day) will be required daily at certain stages of construction (see Table 5). To mitigate any potential impacts to local County roads, Traffic Control Plans will be prepared and followed during construction.

Xcel Energy's construction contractor will prepare Traffic Control Plans for E Quincy Avenue and will coordinate with Arapahoe County regarding lane and road closures. Construction materials will not be loaded or offloaded along E Quincy Avenue. Vendors will be prohibited from parking on public roadways around the construction of staging areas. Traffic Control Plans have been submitted to Arapahoe County with the Temporary Use Permit Application (record number ZTU-2025-00004) for the Beichle Laydown Yard.

2.3.b Alternatives III(C)(3)(b)

The purpose of Pathway is to create a network transmission system that can integrate new generation resources needed to meet Colorado's clean energy goals. Several alternatives to the Project were considered, including non-structural alternatives, structural alternatives, and design alternatives (Addendum to Routing and Siting Study for Segment 5 [ASI25-001_LE25-003-Routing and Siting Study]).

The existing electric transmission infrastructure is not adequate to meet expanding current and projected future electrical demand. Due to the scale of such demand, energy conservation measures are not a viable option. Therefore, no non-structural

alternatives are viable (such as conservation of energy use, no development, or management [different scheduling, conservation programs, facility design, land trades etc.]).

Alternatives to the Project such as alternate locations and routes, alternative types of facilities, use of existing ROWs, joint use of ROWs with other utilities, and upgrades to existing facilities were analyzed. Pathway routing and siting efforts were divided by segment and documented in a series of routing and siting studies. Each routing and siting study is interrelated due to the overlap in segment Study Areas and shared substation endpoints. Each Routing and Siting Study documents the process utilized to review and consider reasonable siting and routing alternatives for the new major electrical facilities [(pursuant to CRS 29-20-108(4)(a) and (b))]. The routing and siting studies do not identify specific construction-related components, such as laydown/staging yards, access routes and haul routes. The Addendum to Segment 5 Routing and Siting Study is included in ASI25-001_LE25-003-Routing and Siting Study and provides an alternatives analysis to address this requirement.

Design alternatives concerning access, landscaping, and architectural controls were examined. Given the small area occupied by the transmission poles and the existing substation footprint landscaping is not proposed as part of Pathway. Access to the transmission poles from nearby Interstate, U.S. Highways, and local roads will be confirmed prior to construction.

Determining the location of the preferred route was accomplished through an extensive process described in Section 1.2.b that included engaging the public, landowners and other stakeholders. Cultural and historic resources, technical and engineering requirements, environmental constraints, existing and planned land use, and other factors were evaluated and compared to establish the transmission line route options. Resources that influenced the selection of the proposed route in Arapahoe County included: existing linear infrastructure, location of proposed route to the south of Arapahoe County, location of existing Harvest Mile Substation, residences, existing land uses (solar facilities, Arapahoe County Fairgrounds, Aurora Reservoir, Peter Binney Water Purification Facility), future proposed projects, and Air National Guard flight training areas.

Of the approximately 18-mile transmission line route in Arapahoe County, approximately 13 miles (76 percent) is co-located along existing electric transmission infrastructure and existing roads. The preferred route chosen has the highest percentage (63 percent) of co-location with existing linear infrastructure, including existing transmission lines, roads, rail and pipelines for its entire length and is less impactful to the landscape compared to other route alternatives. This route was considered based on feedback from the public, jurisdiction staff and Colorado Parks and Wildlife. Access for

construction and maintenance is favorable along this route option given its proximity to existing infrastructure. Generally, this route option balances impacts across resources due to its co-location with other existing infrastructure. For these reasons, the Project as proposed in this Application is the preferred alternative among those analyzed in the Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study).

2.3.c Schedules III(C)(3)(c)

It is anticipated that one 12-hour shift per day (Monday through Saturday) from 6:00 am – 6:00 pm will be worked during transmission line construction. Shifts will be during daylight hours, early morning to early evening to reduce disturbance to residential subdivisions in the area. If additional hours are required for a shift, a 24-hour work permit will be obtained in advance from Arapahoe County. In addition, if hours of a shift need to be reduced within certain areas of the project footprint, Xcel Energy will coordinate this possibility with the County. The maximum number of construction workers on site for the substation and transmission line on any one day will be approximately 95 total². At peak construction there will be an estimated maximum of 30 construction workers at the Harvest Mile Substation.

Transmission line construction is expected to be completed in phases over the duration of the construction schedule for each Pathway segment. Construction of the Pathway transmission line is expected to occur in phases that generally include the following: construction access and vegetation clearing, installation of BMPs, equipment mobilization and material delivery, foundation construction, transmission pole placement, and installation, conductor wire stringing and electrical equipment installation, and land restoration. Construction access road improvements, grading, and setup of TCAs, along with vegetation work, will be conducted before construction of the transmission line. Proposed access roads will allow construction crews and vehicles to access transmission pole locations and TCAs as needed.

Xcel Energy's construction contractor will implement Traffic Control Plans as needed to ensure safe and efficient traffic flow. Delivery drivers and construction crews will avoid Gun Club Road and Harvest Road whenever possible. The majority of construction traffic will be routed east/west along Quincy Avenue and south on County Road 129.

Segment 5 construction, including the Pathway facilities in Arapahoe County, is expected to last up to 18 months, with construction beginning in Quarter 2 2026 or as soon as reasonably possible post application approval and a target in-service date in Spring 2027. See Section 1.1 of this 1041 Application for additional information

² Personnel may not be located or concentrated at same work area on the same day.

regarding the Pathway schedule. The estimated operational life of Pathway is more than 50 years.

The transmission line will not have any permanent on-site employees. Upon completion, Pathway will be operated and monitored remotely 24 hours a day, 7 days a week, 365 (24/7/365) days a year to provide safe and reliable electric service. The transmission line will be inspected regularly (at least annually) to look for the following:

- Non-compatible vegetation and hazards within the Pathway ROW.
- Equipment needing repair or replacement.
- Pathway ROW encroachments, which can be hazardous to safety and reliable operations.
- Anything that might jeopardize safe, reliable operation of the power line.

Operations and maintenance staff must visit the Pathway ROW for these inspections, but visits typically are few, and landowners will be contacted prior to on-site inspections or maintenance. However, in cases of emergency, advanced contact may not be possible.

Table 6 shows the estimated maximum number of employees, number of shifts, and employees per shift during the construction and operation and maintenance phases of Pathway.

Table 6: Employees and Shifts per Phase (Estimated)

Construction Phase	Employees	Shifts	Employees per Shift
Construction	60 to 80 employees for transmission line	One 12-hour shift (Monday to Saturday)	Up to 80 employees
Operations	None; the facilities are unstaffed with the exception of remote monitoring	Remotely monitored 24/7/365	None
Maintenance	2-6 employees	1 to 2 times a month, as needed	2 to 6 employees

2.3.d Need For the Project III(C)(3)(d)

Public utilities are required under CRS 40-5-101 to obtain a CPCN from the CPUC prior to constructing a new facility or system or the extension of an existing facility or system. In determining whether to grant a CPCN, the CPUC considers whether the utility has established: (1) a present or future need for the facility; (2) that existing facilities are not reasonably adequate and available to meet that need; and (3) that the utility has evaluated alternatives to the proposed facility.

In March 2021, Xcel Energy filed a CPCN application with the CPUC describing the purpose, need, alternatives, and public benefits of constructing Pathway. In June 2022, CPUC provided written approval of the CPCN for Segments 1–5, finding that Xcel Energy has demonstrated that the public convenience and necessity requires construction of Pathway. The CPUC determined that Xcel Energy has sufficiently demonstrated the need for Pathway Segments 1–5; existing facilities are not adequate or available to meet the need for increased transmission capacity to serve required new renewable generation or to provide the reliability and resiliency necessary to support a system highly dependent on variable resources; and other alternatives will not negate the need for Pathway. The full written approval and Xcel Energy's CPCN application with the CPUC can be found by visiting the E-Filings page on the CPUC website and entering Proceeding No. 21A-0096E in the Search field.

The CPUC did not approve construction of the Extension in the January 2024 Phase II Decision regarding Xcel Energy's Electric Resource Plan and Clean Energy Plan. Xcel Energy may bring a proposal to construct the May Valley – Longhorn Extension and Longhorn Substation forward again in the future but has paused its further development as part of Pathway.

While the CPUC determines a public need for Pathway, it does not approve the location of specific project facilities. The location and land use approvals will be through easement negotiations with landowners and the land use approval process in the applicable jurisdictions where the Pathway facilities would be located. The Addendum to Routing and Siting Study for Segment 5 is attached to this Application as ASI25-001_LE25-003-Routing and Siting Study (see Sections 1.2.b and 2.3.b for additional information).

2.3.e Conservation Techniques III(C)(3)(e)

Several conservation techniques will be employed during construction and operation of Pathway. Construction of Pathway will adhere to BMPs and erosion control measures outlined in the SWMP as well as the GESC Plan. Construction activities will be performed by methods that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into flowing streams or dry watercourses, lakes, and underground water sources. Activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment.

Electrical components of the transmission lines will be separated to minimize the risk of avian contact and will follow APLIC guidelines (APLIC 2006). Bird flight diverters or other marking devices may be used as determined necessary for specific locations.

Section 2.17 of this Application discusses potential impacts from construction and operations of Pathway in Arapahoe County and also proposed mitigation measures where appropriate.

2.4 PROPERTY RIGHTS, PERMITS, AND OTHER APPROVALS III(C)(4)

Before commencing construction on a parcel, Xcel Energy will acquire the required Pathway ROW easements for the area underlying the transmission line for such parcel and thereby will hold a recognized property interest in the land on which Pathway is proposed. All easements required for construction of Segment 5 of Pathway on a parcel within Arapahoe County will be secured and recorded (or Order of Immediate Possession obtained from the district court, as applicable) prior to the start of Pathway construction on that individual parcel. Application requirements of subsections of III(C)(4) are addressed as follows:

2.4.a Permits and Approvals III(C)(4)(a)

Federal, state, and local permits/approvals may be required prior to construction of Pathway. A list of federal, state, and local permits and approvals that have been or will be required for the project is provided in Section 1.3. Local permits and approvals that may be required by Arapahoe County include, but are not limited to, this 1041 Permit, Street Cut ROW Use Permits, GESC Permit; Floodplain Development Permit; Oversize/Overweight Permits, and Temporary Use Permits. Any necessary construction-related authorizations, which are typically administrative in nature, will be obtained between the time local land use permits are approved and when construction begins.

Xcel Energy is currently negotiating with all of the landowners for necessary land rights along the proposed transmission line route. These negotiations include securing an option for a permanent non-exclusive easement for the 150-foot-wide ROW of the transmission line as well as permanent and temporary easements required for access and TCAs during and after construction. Once land surveying, final engineering design and permitting are complete, Xcel Energy will exercise the options and record the final easements. The easements required for Pathway construction on a parcel within Arapahoe County will be secured and recorded (or Order of Immediate Possession obtained from the district court, as applicable) prior to construction starting on that individual parcel.

State approvals anticipated for Pathway may include permits for road, bridge and highway crossings or road occupancy permits from CDOT and stormwater discharge permits and APEN from CDPHE. Xcel Energy will negotiate easements with the

Colorado State Land Board for the portions of the Pathway transmission line on state-owned lands. The CPUC has provided written approval of the CPCN for Segments 1 through 5 based on a determination that Pathway is in the public interest (see Section 1).

Federal permits may be required for construction-related impacts to wetland or waterbodies from the U.S. Army Corps of Engineers. Xcel Energy anticipates avoiding impacts to jurisdictional WOTUS in Arapahoe County and therefore does not anticipate that Pathway facilities in the county will require U.S. Army Corps of Engineers permitting. The field-verified wetlands within the transmission line easements are shown in the revised Location and Extent Plan Set (LE25-003-Plan Set).

Studies under the National Environmental Policy Act, including but not limited to an Environmental Impact Statement, are currently not anticipated to be required due to the lack of a federal nexus (i.e., Colorado's Power Pathway does not use federal funding, cross federal lands, or require federal permits or approvals).

2.4.b Federal and State Consultation Correspondence III(C)(4)(b)

Pathway has conducted informal coordination with federal and state agencies including the U.S. Fish and Wildlife Service (USFWS) and the Colorado Parks and Wildlife (CPW); however, formal consultation is not required. A list of federal, state, and local permits and approvals that have been or will be required for Pathway, including informal coordination, is provided in Section 1.3.

Xcel Energy has met with CPW staff and has also engaged with the USFWS regarding Colorado's Power Pathway and will follow regulation-based recommended non-disturbance buffers and construction timing restrictions to avoid or minimize impacts to special-status species. Xcel Energy is engaging with Colorado's State Historic Preservation Office regarding Pathway and has evaluated results of previous surveys as part of the routing and siting process.

Other federal and state agencies that Pathway has coordinated with about the Project include CDOT, National Park Service, and the Colorado State Land Board.

No federal or state mitigation measures are required for Pathway in Arapahoe County. Xcel Energy will use mitigation measures as described in Section 2.17 of this document.

2.4.c Water Use III(C)(4)(c)

Pathway will not require water use during operation of the Project following construction. Water to be used during construction for dust suppression, equipment cleaning at the laydown yard, and compaction activities and will be obtained from a locally permitted source and brought to the site. Pathway will not require water rights for construction or

operation and will not affect existing water rights. Letters of Service from the current and planned water providers are provided as ASI25-001_LE25-003-Will Serve-Water. See additional discussion in Section 2.5.

2.5 REGIONAL WATER QUALITY MANAGEMENT PLAN III(C)(5)

Water to be used during construction will be obtained from a locally permitted source. Pathway will not require water use during operation. Xcel Energy's construction contractor's water source providers in Arapahoe County are as follows:

- Current Provider: On Time Communications LLC
 - Address: 1661 E Floyd Ave, Aurora, CO 80013
 - Agreement Duration: Current until September 2027
 - Daily Water Supply: 2,500 gallons
 - Water Source Location: OTC Yard, 2550 E 70th Ave, Denver, CO 80229
- Planned Provider: Pure Cycle
 - Address: 34501 E Quincy Ave, Building 1, Watkins, CO 80137
 - Daily Water Supply: 20,000 gallons
 - Water Source Location: Lowry Ranch fill station 39.637273, -104.622664, Arapahoe County, Colorado 80137.

Letters of Service from the current and planned water providers are provided as ASI25-001_LE25-003-Will Serve-Water.

Existing stormwater detention facilities at the Harvest Mile Substation are adequate for detention, water quality treatment and discharge rate control for the previously approved equipment additions since the impervious areas will not exceed the original design assumption. Therefore, Pathway will not be inconsistent with the South Platte Basin Implementation Plan (Colorado Water Conservation Board 2022). Xcel Energy will comply with permit Application requirements, County standards, and construction protocols to ensure that Pathway does not violate water quality standards. Prior to construction, a GESC Permit will be obtained from Arapahoe County for the transmission line and a Storm Water Permit for Construction Activities will be obtained from CDPHE.

2.6 FINANCIAL FEASIBILITY OF THE PROJECT III(C)(6)

The applicant has both the financial and technical ability to develop and operate Pathway. As described in Xcel Energy's 2024 Annual Report (ASI25-001-Annual Report), Xcel Energy is a major U.S. electricity and natural gas company, with operations in eight Western and Midwestern states; Xcel Energy held seventy billion, thirty-five million dollars in assets in 2024.

As a public utility providing service to customers in Colorado, Xcel Energy is authorized by law to recover the prudently incurred costs associated with providing utility service in rates charged to customers. Xcel Energy finances the construction of electrical infrastructure through both debt and equity and recovers those costs from customers over the life of the infrastructure.

Per the CPUC's CPCN approval on June 2, 2022, Pathway is in the public interest and Xcel Energy will be permitted to recover the prudently incurred cost of constructing Pathway. As part of the CPCN proceeding, the CPUC evaluated extensive cost and schedule information in finding that Pathway is needed and in the public interest. In accordance with the 1041 Act at C.R.S. § 24-65.1-105(1), any order, rule, or directive issued the County pursuant to 1041 Act shall not be inconsistent with or in contravention of any decision, order, or finding of the CPUC with respect to public convenience and necessity for Pathway. All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and during construction as required, and BMPs will be implemented to address public health, safety, and welfare and in accordance with permit conditions. As part of the decision-making process in this proceeding, the CPUC, carrying out its primary function to ensure the health, safety and welfare of Colorado citizens, determined that Pathway is a public necessity for the residents of Colorado. Because the CPUC has found that Pathway is needed and in the public interest, Xcel Energy will be permitted to recover the prudently incurred costs of constructing Pathway from customers in rates that are regulated by the CPUC over the life of Pathway. The Project Cost Estimate, Project Cost Forecast, and the Colorado's Power Pathway Summary Schedule dated February 25, 2021, from the CPUC CPCN application are provided as 2-ASI25-001-CostSchedulefromCPCN. These cost estimates and forecasts were used by the CPUC in making their decision to issue the CPCN for Pathway, which serves as the requisite findings that (i) Xcel Energy has the technical and financial capability to construct, maintain, and operate Pathway, and (ii) there is a public convenience and necessity for Pathway.

The written approval and Xcel Energy's application with the CPUC can be found by visiting the E-Filings page on the CPUC website and entering Proceeding No. 21A-0096E in the Search field. Regulatory documents associated with the project, including

notices, filings, public comments, and more, are also available online. Filing materials can also be found on Colorado's Power Pathway Regulatory Filings webpage.

As described in Section 2.2.b, the Xcel Energy representatives responsible for constructing and operating Pathway have demonstrated technical ability to develop and operate Pathway. As of November 2025, construction has begun on Pathway Segments 1 and 4, and Segments 2 and 3 are in-service (Xcel Energy 2025a).

In accordance with the 1041 Act at C.R.S. § 24-65.1-105(1), any order, rule, or directive issued the County pursuant to 1041 Act shall not be inconsistent with or in contravention of any decision, order, or finding of the CPUC with respect to public convenience and necessity for Pathway. All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and during construction as required, and BMPs will be implemented to address public health, safety, and welfare and in accordance with permit conditions.

2.6.a Construction Costs and Period of Construction III(C)(6)(a)

Pathway is estimated to cost approximately \$1.7 billion and the Sandstone to Harvest Mile segment will cost approximately \$372 million. Construction of the Sandstone to Harvest Mile segment, including the Harvest Mile Substation equipment additions, will begin in Quarter 2 2026 or as soon as reasonably possible post application approval and be completed in Spring 2027.

The Project Cost Estimate, Project Cost Forecast, and the Colorado's Power Pathway Summary Schedule dated February 25, 2021, from the CPUC CPCN application are provided as ASI25-001-CostSchedulefromCPCN. The following information regarding period of construction from the CPUC CPCN application is provided in ASI25-001-CostSchedulefromCPCN:

The section titled *Colorado's Power Pathway Summary Schedule dated February 25, 2021, from the Colorado's Power Pathway Certificate of Public Convenience and Necessity Application* includes the summary schedule for permitting, procurement, and construction/testing for all Pathway segments. Permitting for all segments was estimated to be finalized at the end of the third quarter of 2025. Procurement for all segments was estimated to be finalized at the end of the third quarter of 2026. Construction and testing of all segments was estimated to be finalized at the end of the second quarter of 2027.

2.6.b Revenues and Operating Expenses III(C)(6)(b)

See Sections 2.6.c, 2.6.d, and 2.6.e for information regarding revenues. The Project Cost Estimate, Project Cost Forecast, and the Colorado's Power Pathway Summary

Schedule dated February 25, 2021, from the CPUC CPCN application are provided as ASI25-001-CostSchedulefromCPCN. The following information regarding operating expenses from the CPUC CPCN application is provided in ASI25-001-CostSchedulefromCPCN:

The section titled *Project Cost Estimate from the Colorado's Power Pathway Certificate of Public Convenience and Necessity Application* is the cost estimate for Pathway and includes the total estimated costs by segment for engineering, permitting, project management, land acquisition/easements, materials, construction, risk reserve, and overheads plus escalation. The total estimated costs for all Pathway segments was \$1,695,458,156 and the total estimated costs for Segment 5 was \$366,577,469.

The section titled *Project Cost Forecast from the Colorado's Power Pathway Certificate of Public Convenience and Necessity Application* includes the cost estimate from the CPCN versus actual cost and forecast by cost category (i.e., engineering, permitting, project management, land acquisition/easements, materials, construction, risk reserve, and overheads plus escalation) from the time that the cost information for the CPCN application was estimated through the estimated completion of construction of Pathway in 2028. It includes the estimated costs from the CPCN application, the estimated costs at completion, and the variance between the estimated costs from the CPCN application and the estimated costs at completion. This project cost forecast concluded that the estimated costs from the CPCN application and the estimate at completion were identical at \$1,695,458,156.

2.6.c Proposed Debt III(C)(6)(c)

Xcel Energy is a public utility regulated by the Federal Energy Regulatory Commission (FERC). In Colorado, FERC has jurisdiction over the rates, terms, and conditions of transmission of electricity. Pathway is funded through FERC-jurisdictional transmission rates. Transmission rates establish the utility's "cost of service" for providing transmission service. Cost of service includes the costs to the utility of building, operating, and maintaining transmission facilities, plus a reasonable return on investment to compensate the utility's shareholders and debtors for their investment risks (FERC 2022). Cost for wholesale transmission customers will be through FERC-jurisdictional transmission rates (Xcel Energy 2025b).

As a public utility, Xcel Energy is required to file a Transmission Cost Adjustment bill rider with the CPUC. The Transmission Cost Adjustment recovers the transmission investments not already in base rates and is subject to annual changes effective on January 1 each year (Xcel Energy 2025b). Xcel Energy will recover the retail share costs through the Transmission Cost Adjustment rider until included in the base rates (Xcel Energy 2025b). Therefore, Pathway is not anticipated to accrue debt.

2.6.d Contract Agreement for Revenues or Services III(C)(6)(d)

As described in Section 2.6.c, Xcel Energy will recover the retail share of capital costs associated with constructing the Pathway facilities through its Transmission Cost Adjustment, subject to the terms set forth in Xcel Energy's Transmission Cost Adjustment tariff. Xcel Energy will recover the share of costs associated with Pathway from wholesale transmission customers through its FERC-jurisdictional transmission rates. Xcel Energy's 2024 Annual Report is provided as ASI25-001-Annual Report.

2.6.e Persons Paying for Use of the Project or Benefitting from Revenues III(C)(6)(e)

Xcel Energy, its wholesale transmission customers, and ultimately the customers served by Xcel Energy and wholesale transmission customers will pay for the use of Pathway through the authorization granted by the CPUC. See also the response to Section 2.6.d.

Pathway will deliver short- and long-term economic benefits to communities across eastern and southern Colorado, including Arapahoe County. More immediately, Pathway construction will provide local jurisdictions and host communities with potential additional tax revenue and employment opportunities. Revenue may increase for some local businesses, such as restaurants, gas stations, grocery stores, and hotels, as well as other local businesses.

2.6.f Cost of Mitigation Measures III(C)(6)(f)

The cost of mitigation measures are included in the overall construction line item of the cost estimate included in the Project Cost Estimate, Project Cost Forecast, and the Colorado's Power Pathway Summary Schedule dated February 25, 2021, from the CPUC CPCN application (ASI25-001-CostSchedulefromCPCN), which is \$82,013,986 for construction of Segment 5, as shown in *Project Cost Estimate from the Colorado's Power Pathway Certificate of Public Convenience and Necessity Application*. The cost of the SWMP, restoration, and vegetation management for the Pathway facilities in Arapahoe County is approximately \$330,000.

2.6.g Project Financing III(C)(6)(g)

As described in Section 2.6.c, Xcel Energy will recover the retail share of capital costs associated with constructing the Pathway facilities through its Transmission Cost Adjustment, subject to the terms set forth in Xcel Energy's Transmission Cost Adjustment tariff. Xcel Energy will recover the share of costs associated with Pathway from wholesale transmission customers through its FERC-jurisdictional transmission rates.

2.7 LAND USE III(C)(7)

2.7.a Land Uses Within and Adjacent to Project Impact Area III(C)(7)(a)

That part of Pathway located within unincorporated Arapahoe County is in the following zone districts: A-1 (Agricultural-1), A-E (Agricultural Estate), I-2 (Heavy Industrial), I-2 PUD (Heavy Industrial Planned Unit Development), O (Open), F (Floodplain) (Arapahoe County 2022). The existing Harvest Mile Substation is also located in parcels zoned as A-1 (Agricultural-1). Existing land uses in the vicinity of the Pathway ROW include low density residential development, low density commercial development, the Arapahoe County Fairgrounds, public works facilities for the City of Aurora, photovoltaic solar facilities, existing high voltage transmission lines, and agricultural uses.

2.7.b Project Compliance with Local Land Use Plans, Impact and Net Effect to Land Use Patterns III(C)(7)(b)

As set forth in Chapter 3, Section 3-3.9 of the Arapahoe County Land Development Code (Arapahoe County 2024), an application for a Major Public Utility Facility (including transmission line and transmission substation) must comply with the Arapahoe County §1041 Regulations. A permit is required to be obtained pursuant to the Arapahoe County §1041 Regulations in order to conduct site selection and construction of major facilities of a public utility whether located on private or public lands within the unincorporated areas of the County (Arapahoe County 2006).

The 2018 Arapahoe County Comprehensive Plan (Arapahoe County 2022) has several goals and strategies applicable to Pathway. Pathway consistency with the Arapahoe County Comprehensive Plan is included in ASI25-001_LE25-003-Consistency with Comp Plan.

Pathway is sited mainly within "Agriculture" zone districts within Arapahoe County and is compatible with agricultural use. The transmission line alignment spans existing irrigation ditches and pivot irrigation in fields to minimize effects to existing productive agricultural operations. Aside from the small footprint of the individual transmission poles and the Harvest Mile Substation equipment additions, areas under and around Pathway facilities can continue in agricultural use. If the Pathway transmission line encroaches into an easement or right-of-way (fee owned) for a ditch, and such encroachment will negatively impact the carriage of vested or decreed conditional water rights, Xcel Energy will enter into any legally required agreement or written evidence of an adequate attempt to mitigate the impacts with the affected ditch company or water right holder. Xcel Energy will provide evidence to the Arapahoe County Planning Division after agreements are finalized. Temporary impacts to agricultural activities are expected to be minor. Disturbed areas surrounding new transmission poles will be

revegetated following construction to a condition reasonably similar to the preconstruction condition. Construction and operation of the transmission line will not interfere with continued use of the surrounding areas for agricultural uses. Xcel Energy will avoid the removal of existing landscaping where possible. Disturbed areas would be returned to preconstruction conditions or reseeded according to landowner requests and Arapahoe County requirements.

Upon completion, Pathway will be operated and monitored remotely 24 hours a day, 7 days a week, 365 days a year to provide safe and reliable electric service. On average, the substation will be visited one to two times per month for inspections and maintenance. The transmission line will be inspected regularly (at least annually) to look for the following:

- Non-compatible vegetation and hazards within the Pathway ROW.
- Equipment needing repair or replacement.
- Pathway ROW encroachments, which can be hazardous to safety and reliable operations.
- Anything that might jeopardize safe, reliable operation of the power line.

Operations and maintenance staff must visit the Pathway ROW for these inspections, but visits typically are minimal, and landowners will be contacted prior to on-site inspections or maintenance. However, in cases of emergency, advanced contact may not be possible.

Where feasible, the Pathway transmission line route through Arapahoe County is co-located along existing infrastructure to minimize impacts to the surrounding area. The transmission line will be visible to viewers with direct, open views. Viewers located farther away are likely to experience less visual impact because the existing screening (topography, vegetation, buildings) and distance from the facilities will decrease potential views. It is not feasible to screen views of tall, vertical transmission structures organized as a linear feature extending across a landscape. However, while proposed structures would be visible in unobstructed views, there are some locations along portions of the Pathway route in Arapahoe County where there is irregular topography or mature vegetation, where existing built or natural features may serve to intermittently screen views of proposed structures. Typical transmission pole configurations, representative photographs, and visual simulations of Pathway are provided in Plans, Representative Photographs, and Simulations (ASI25-001_LE25-003-Photosim).

2.8 LOCAL GOVERNMENT SERVICES III(C)(8)

2.8.a Existing Capacity and Demand for Local Government Services III(C)(8)(a)

Pathway will not require additional local government services beyond those currently provided in the area. Pathway creates no additional demand for transportation infrastructure, educational facilities, housing, water (other than temporary need for water for Pathway construction), wastewater treatment, or public transportation. See additional discussion of emergency response in Sections 2.15 and 2.17 of this Application.

2.8.b Project Impact on Local Government Services III(C)(8)(b)

As described in Section 2.3.a.6, during construction, it is anticipated that an average of 30 trucks per day will be utilized during the construction of the transmission line. The impact to local roads will vary day-by-day as the project moves along the route. The construction of the Harvest Mile Substation equipment additions will involve mostly personal vehicle trips for construction workers of 10 trips per day. A staging area on the substation site will be designated on site for truck traffic to deliver materials to the substation; these trips will be approximately 1 to 2 trips per week. Concrete will be delivered via concrete trucks, and the concrete will be pumped or poured on site. A large number of concrete truck deliveries will be made when the foundations and piers are constructed. To mitigate any potential impacts to local county roads, Traffic Control Plans will be prepared and followed during construction. The approved Traffic Impact Study waiver is provided as ASI25-001_LE25-003-Traffic Waiver APR.

2.9 FINANCIAL BURDEN ON COUNTY RESIDENTS III(C)(9)

Pathway is estimated to cost approximately \$1.7 billion and the Sandstone to Harvest Mile segment will cost approximately \$372 million. Per the CPUC's CPCN approval on June 2, 2022, in doing so, the CPUC determined that Xcel Energy met its burden of proof to establish that Pathway is in the State's public interest and recovery of the anticipated cost of Pathway is appropriate through provision of required CPCN application materials and testimony. The full written approval and Xcel Energy's CPCN application with the CPUC can be found by visiting the E-Filings page on the CPUC website and entering Proceeding No. 21A-0096E in the Search field. Revenues associated with Pathway are collected through cost-of-service rates regulated by the CPUC and Federal Energy Regulatory Commission. The Project Cost Estimate, Project Cost Forecast, and the Colorado's Power Pathway Summary Schedule dated February 25, 2021, from the CPUC CPCN application are provided as ASI25-001-CostSchedulefromCPCN.

Project construction will require substantial amounts of contract labor, while also providing local jurisdictions and host communities with additional tax revenues and potential employment opportunities. Once Pathway has been completed, it will drive ongoing job opportunities and employment in the clean energy projects (wind, solar, etc.) that ultimately interconnect to Pathway.

Xcel Energy currently pays property taxes for its assets located in Arapahoe County. In 2024, Xcel Energy paid \$26,204,914.40 in Arapahoe County property taxes. After construction of Pathway in Arapahoe County, Xcel Energy will pay additional property taxes based on the valuation of the new facilities located within the County. This amount is estimated to be approximately 1.26% of the installed cost of Pathway in Arapahoe County which are estimated to be approximately \$440,000 per year based on current cost and rate projections but subject to change.

Xcel Energy does not anticipate any negative financial impacts or burdens to Arapahoe County residents due to construction, operation, and maintenance of Pathway. As described previously in this section, the CPUC gave Xcel Energy CPCN approval for Pathway, and in doing so, determined that Xcel Energy met its burden of proof to establish that Pathway is in the State's public interest and that recovery of the anticipated cost is appropriate.

2.10 LOCAL ECONOMY III(C)(10)

Pathway will deliver short- and long-term economic benefits to communities across eastern and southern Colorado, including Arapahoe County. More immediately, Pathway construction will provide local jurisdictions and host communities with potential additional tax revenue and employment opportunities. Xcel Energy anticipates that a crew of up to 95 construction workers will be needed for construction of Pathway in Arapahoe County. Construction crews may reside in the area during construction.

Revenue may increase for some local businesses, such as restaurants, gas stations, grocery stores, and hotels, as well as other local businesses.

2.10.a Description of the Local Economy III(C)(10)(a)

In April 2025 the total labor force in Arapahoe County was 374,090, with 360,379 employed and 13,711 unemployed; Arapahoe County's unemployment rate of 3.7 percent was lower than the unemployment rate of 4.8 percent for Colorado as a whole during this period (U.S. Bureau of Labor Statistics 2025). The employment by industry for the civilian employed population 16 years and older in Arapahoe County in 2023 (U.S. Census Bureau 2025b) consists of the following workforce:

- Educational services, and healthcare and social assistance – 21.4 percent

- Professional, scientific and management, and administrative and waste management services – 15.2 percent
- Retail trade – 10.0 percent
- Arts, entertainment, and recreation, and accommodation and food services – 9.7 percent
- Finance and insurance, and real estate and rental and leasing – 8.6 percent
- Construction – 6.7 percent
- Transportation and warehousing, and utilities – 6.4 percent
- Manufacturing – 5.6 percent
- Other services, except public administration – 5.3 percent
- Public administration – 4.1 percent
- Information – 3.2 percent
- Wholesale trade – 2.7 percent
- Agriculture, forestry, fishing and hunting, and mining – 1.0 percent.

Table 7 provides the top nonemployer sales, value of shipments, or revenue by economic sector in Arapahoe County in 2023; the total for all sectors is \$4.38B (U.S. Census Bureau 2025a).

Table 7: Nonemployer Statistics in Arapahoe County, Colorado

Economic Sector	Nonemployer Sales, Value of Shipments, or Revenue
Real estate, rental and leasing	\$883,633,000
Transportation and warehousing	\$656,499,000
Construction	\$643,908,000
Professional, scientific, and technical services	\$571,052,000
Retail trade	\$307,437,000
Other services (except public administration)	\$258,655,000
Health care and social assistance	\$231,280,000
Finance and insurance	\$222,732,000
Administrative, support, waste management and remediation services	\$191,638,000
Arts, entertainment, and recreation	\$102,037,000
Wholesale trade	\$97,631,000
Accommodation and food services	\$51,490,000
Mining, quarrying, and oil and gas extraction	\$46,961,000

Economic Sector	Nonemployer Sales, Value of Shipments, or Revenue
Educational services	\$41,434,000
Information	\$33,523,000
Manufacturing	\$33,158,000
Agriculture, forestry, fishing and hunting	\$8,228,000
Utilities	\$3,451,000
Total for all sectors	\$4,384,747,000

Source: U.S. Census Bureau 2025a

2.10.b Description of Impacts and Net Effect of the Project on the Local Economy III(C)(10)(b)

Pathway will deliver short- and long-term economic benefits to communities across eastern and southern Colorado, including Arapahoe County. More immediately, Pathway construction will provide local jurisdictions and host communities with potential additional tax revenue and employment opportunities. Xcel Energy anticipates that a crew of up to 95 construction workers will be needed for construction of Pathway in Arapahoe County.

Construction crews may reside in the area during construction. Revenue may increase for some local businesses, such as restaurants, gas stations, grocery stores, and hotels, as well as other local businesses. Existing businesses and social services are adequate to support Pathway due to the small size of the construction crew and temporary nature of the construction activities.

Given the relatively small size of the crews needed for construction of Pathway, no impacts to emergency health care facilities or law enforcement services are anticipated. Pathway will create no additional demand for transportation infrastructure, educational facilities, housing, water (other than trucked-in water for construction), wastewater treatment, or public transportation. In addition, construction and operation of Pathway will not impact the value of agricultural grazing, recreational, and other lands.

Xcel Energy is coordinating with each Fire District crossed by Pathway in Arapahoe County, which include the Sable Altura Fire Protection District, Aurora Fire Rescue District, and the Bennett-Watkins Fire Rescue District. Xcel Energy has obtained the Letters of Service provided by the Sable Altura Fire Protection District, Aurora Fire Rescue District, and the Bennett-Watkins Fire Rescue District; the Letters of Service from each Fire District and the Fire District Coordination Letters are provided in Fire District Letters of Service (LE25-003-Will Serve-Fire).

Once Pathway has been constructed, it will facilitate ongoing job opportunities and employment associated with the clean energy projects (wind, solar, etc.) that will ultimately interconnect to Pathway.

Additionally, generation developers will have the opportunity to build projects that otherwise were infeasible due to lack of transmission access to market and/or transmission constraints. These generation projects may provide other additional economic development through increased jobs associated with construction and local tax-based revenue associated with land usage, and payments to existing landowners.

New electric power generated in the Eastern Plains will be delivered to the Harvest Mile Substation in Arapahoe County where it can be distributed throughout the system in Arapahoe County to meet future electric demand needs for business, redevelopment, and new projects.

Pathway is designed to enhance Colorado's electric transmission infrastructure, providing significant benefits to all Colorado residents, including those in Arapahoe County. Xcel Energy currently owns and operates several high voltage electric transmission lines within Arapahoe County and provides transmission service to other utilities, including those that directly serve Arapahoe County homes and businesses. Xcel Energy directly serves over 278,000 customers in Arapahoe County (Xcel Energy 2024); Pathway will connect directly to the existing 230-kV Harvest Mile Substation that serves Arapahoe County. The interconnected nature of the state's electric grid ensures that improvements in transmission capacity and reliability have widespread positive impacts to the state as a whole. Therefore, while Arapahoe County residents may receive electricity from different local providers that connect to the state's electric grid, Pathway's enhancements to the state's transmission infrastructure offer benefits through improved grid reliability, access to new generation resources, economic opportunities, and support for statewide environmental objectives and requirements.

1. Enhanced Grid Reliability and Resilience:

- Pathway will strengthen Colorado's electric grid, reducing the likelihood of outages and improving the system's ability to handle peak demands. This enhancement benefits all users connected to the grid, regardless of their specific local service provider.

2. Open Access Transmission:

- Colorado operates an open transmission system, allowing various utilities and cooperatives to utilize the transmission infrastructure. This open access ensures that the benefits of enhanced transmission capacity are shared across multiple service providers, benefiting Arapahoe County residents through improved grid performance.
- Pathway will provide bulk electric transmission capacity in eastern Colorado and will not change local electric service providers. Pathway will

create a network transmission system that can integrate new generation resources needed to meet Colorado's clean energy goals and requirements. Pathway is a backbone transmission system that will connect generation sources in eastern Colorado to demand throughout Colorado. The current electric transmission facilities in the Eastern Plains do not have adequate capacity to meet the forecasted demand. Facilities in Arapahoe County are part of the larger Pathway that creates a transmission "loop" to provide additional transmission capacity. Pathway will be able to integrate approximately 6,500 megawatts of electric power output from new generation sources.

3. Economic Development and Job Creation:

- The construction and maintenance phases of Pathway are projected to create jobs and stimulate economic activity in Arapahoe County. This influx can lead to increased demand for local services and generate additional tax revenues, which can be reinvested into community projects and services, contributing to community development and prosperity.

4. Compliance with State Energy Policies:

- Pathway aligns with Colorado's legislative mandates aimed at reducing carbon emissions and promoting renewable energy adoption. By supporting these policies, Pathway contributes to environmental sustainability efforts that benefit all residents of the state.

Pathway supports the state-mandated goal of an 80% reduction in carbon emissions by 2030, which all electric utilities are required to comply with. Colorado has an open transmission system, so Xcel Energy's transmission lines also carry electricity generated by other utilities and cooperatives around the state, benefitting everyone who uses electricity. All transmission providers in Colorado will have access to Colorado's Power Pathway to deliver clean, renewable energy to its customers, who will still be serviced by their current power provider. Because Colorado's open transmission system carries electricity generated by multiple utilities that is distributed to homes and businesses by local power companies, both electric utilities and electricity users around the state benefit from Pathway. The design and need of Pathway have been approved by the CPUC and represents the use and application of best technology and industry standards for transmission and transformation of electric energy.

Given the relatively small size of the crews needed for construction and the temporary nature of the construction activities, no impacts to availability of public resources and services are anticipated. Xcel Energy will coordinate with local first responders to discuss any concerns within their response area and offer free online safety training through the Responding to Utility Emergencies Program. Measures to avoid impacts to existing transportation during construction include the following:

- Traffic Control Plans will be developed in areas where travel on roadways could be impacted during construction.

- Construction updates and schedules will be discussed with local government officials as needed as details are determined.
- Necessary road use and ROW permits will be obtained from Arapahoe County and from CDOT for state highway/interstate crossings as needed prior to construction.

2.11 RECREATIONAL OPPORTUNITIES III(C)(11)

2.11.a Description of Present and Potential Recreational Uses III(C)(11)(a)

The Pathway route in Arapahoe County is located approximately 1 mile north of the Aurora Reservoir (see the Recreational Uses Map [ASI25-001-Recreational Uses Map]). The Aurora Reservoir is owned by the City of Aurora and is the main water supply for the City of Aurora. Allowable recreational uses at the Aurora Reservoir include: biking, hiking/walking, swimming, archery, boating, water sports, fishing, picnicking, and wildlife viewing (City of Aurora 2025).

Three existing pedestrian trails are crossed by the proposed Pathway route where it crosses E Quincy Avenue near the Arapahoe County Fairgrounds, Senac Creek at E Quincy Avenue, and Black Shack Creek at E Quincy Avenue (Arapahoe County 2025; see the Recreational Uses Map [ASI25-001-Recreational Uses Map]). The three existing transmission lines on the south side of E Quincy Avenue also cross the existing trails along Senac Creek and Black Shack Creek where these creeks cross E Quincy Avenue.

There are currently no existing trails located on the north side of E Quincy Avenue where the transmission line route will be located (see the Recreational Uses Map [ASI25-001-Recreational Uses Map]); no publicly available information could be obtained regarding the location of any future recreational trails in Arapahoe County. Based on discussions with Arapahoe County, future trails/sidewalks are planned along Quincy Avenue.

The Powerline Trails Act (Act) was passed in 2022 to help raise awareness and create opportunities for Public Entities, defined as “the state, a local government, or a district” to co-locate public recreation trails within transmission corridors. The general assembly sought to encourage, facilitate, and accelerate Powerline Trail development within Colorado while recognizing that the co-location of such trails needs to occur with public safety in mind.

Public Entities can review the information on Xcel Energy’s website (Xcel Energy 2025b) to evaluate whether a trail can safely co-locate within the transmission corridor and see examples of Powerline Trails elsewhere in Colorado. Xcel Energy has a long

history of working with local governments who wish to co-locate public recreation trails within its transmission corridors and would be happy to address any thoughts, questions, or interest your jurisdiction may have in potential future Powerline Trails.

Xcel Energy is not in the business of building, owning, or maintaining public recreation trails and its land rights typically do not give it the right to do so. Nor does the Act require a transmission provider to allow a Powerline Trail or any other facility on any of its transmission corridors. Xcel Energy's role under the Act is limited to facilitating the potential co-location of such trails by providing guidance to Public Entities on things such as what safety clearances need to be maintained, which materials should be used in the construction of the trail, and where such trails can safely be co-located with Xcel Energy's facilities. Powerline Trails will ultimately be constructed by Public Entities after consulting with Xcel Energy, the CPW, and landowners about the safety and feasibility of such trails after the transmission corridor is constructed.

2.11.b Location of Recreational Uses III(C)(11)(b)

Pedestrian trails in the vicinity of the proposed Pathway route are located on the south side of E Quincy Avenue, along Senac Creek, along Black Shack Creek, in the neighborhoods near the Aurora Reservoir, and in the vicinity of the Aurora Reservoir (Arapahoe County 2025; see the Recreational Uses Map [ASI25-001-Recreational Uses Map]). The Pathway route in Arapahoe County is located approximately 1 mile north of the Aurora Reservoir (see the Recreational Uses Map [ASI25-001-Recreational Uses Map]).

2.11.c Impact and Net Effects of the Project on Recreational Uses and Revenues III(C)(10)(c)

Pathway is not expected to impact or change the character of the Aurora Reservoir recreation area or recreational experiences because of the distance between the recreation resource and Pathway. Pathway is not anticipated to result in visual impacts to recreational users of Aurora Reservoir. The Aurora Reservoir is greater than 1 mile south of East Quincy Avenue, and three existing high voltage transmission lines, two photovoltaic solar facilities, and a wastewater treatment plant are between the Aurora Reservoir and the Pathway transmission line.

Pedestrian trails are present along the proposed route. During construction, trails may need to be temporarily closed during stringing or other construction activities for public safety. Trails will be reopened after work has been completed and will have no long-term impacts. Pathway will work with Arapahoe County as needed regarding trail crossings. Based on discussions with Arapahoe County, future trails/sidewalks are planned along Quincy Avenue. Xcel Energy will continue to coordinate with Arapahoe

County and does not anticipate that Pathway will impact construction of future trails in Arapahoe County, and Pathway will have no effect on recreational uses and revenues.

2.12 ENVIRONMENTAL IMPACT ANALYSIS III(C)(12)

The sections that follow address Section III.C.12 of the 1041 Regulations, including subsections (a.) through (h.) that relate to potential impacts from construction and operations of Pathway in Arapahoe County and also proposed mitigations where appropriate. Additional mitigation measures are provided in Section 2.17. Additional information about the environmental factors considered during the routing and siting study process is provided in Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study).

2.12.a Air Quality III(C)(12)(a)

2.12.a.1 *Airsheds Affected by the Project III(C)(12)(a)(i)*

The affected local airshed is the area directly surrounding Pathway and any temporary use areas within Arapahoe County. Arapahoe County is located within the Metropolitan Denver Intrastate Air Quality Control Region (40 CFR 81.16). Operation of a transmission line does not emit relevant air emissions. Impacts to the seasonal pattern of air circulation and microclimates are not anticipated.

2.12.a.2 *Ambient Air Quality and State Air Quality Standards III(C)(12)(a)(ii)*

Arapahoe County is in attainment with National Ambient Air Quality Standards for the following criteria pollutants: particulate matter, carbon monoxide, nitrogen oxides, sulfur dioxide, and lead; Arapahoe County is in non-attainment for ozone (EPA 2025), therefore, this geographic area has air quality that fails to meet the National Ambient Air Quality Standards for ground-level ozone.

2.12.a.3 *Impacts and Net Effect of the Project on Air Quality III(C)(12)(a)(iii)*

Short-term effects are anticipated from a temporary increase in construction vehicles, which may increase fumes and fugitive dust, construction equipment exhaust (fumes), and clearing and preparing areas for construction (dust). The short-term effects are not expected to cause a public nuisance. If a nuisance arises during construction, the nuisance will be mitigated in coordination with Arapahoe County.

It is anticipated that an average of 30 trucks per day will be utilized during construction of the transmission line. The impact to local roads will vary day-by-day as the construction moves along the route.

The construction of the Harvest Mile Substation equipment additions will involve mostly personal vehicle trips for construction workers of 10 trips per day. Concrete truck deliveries will be made daily when the foundations and piers are constructed. Multiple deliveries of yard rock (up to 48 per day) and cement (up to 28 per day) will be required daily at certain stages of construction (see Table 5 in Section 2.3.a.6). Water trucks will be utilized during construction activities to suppress dust from vehicles and equipment as necessary within the Pathway ROW and county roads as per coordination with Arapahoe County. Xcel Energy will apply for a CDPHE APEN for land development prior to construction and follow state standards to control the release of fugitive dust related to construction if necessary. The APEN will be required for a disturbance greater than 25 contiguous acres and land development activities longer than 6 months.

During operation, Pathway will not generate trips in excess of those currently experienced as the transmission line facilities represent a passive use and will not be staffed. Transmission line operations will not require on-site staff and will be monitored remotely. Visits from personnel will be limited to emergencies or maintenance and inspection activities and increased fumes, exhaust and dust during operation is not expected.

2.12.b Visual Quality III(C)(12)(b)

The existing visual landscape in the area around the proposed Pathway transmission line route consists of mainly agricultural land uses including pivot irrigated crops and pastureland. Trees are sparse and shrub/scrub and herbaceous land cover dominate the area (see the NLCD Land Cover Map in Addendum to Routing and Siting Study for Segment 5 [ASI25-001_LE25-003-Routing and Siting Study]). Industrial facilities present near Pathway facilities include solar farms, high-voltage electric transmission lines, and industrial development. Electric distribution lines are visible throughout the area and are generally located along roads to serve residential and commercial areas. There are several existing high voltage transmission lines and electrical substations in Arapahoe County (HIFLD 2022). Other linear infrastructure, including local roads exist in proximity to Pathway. Where feasible, the Pathway route through Arapahoe County is co-located along this existing infrastructure to minimize new impacts to the surrounding area. The transmission line will be visible to viewers with direct, open views. Viewers located farther away are likely to experience less visual impact because the existing screening (topography, vegetation, buildings) and distance from the facilities will decrease potential views. Typical transmission pole configurations, representative

photographs and visual simulations of Pathway are included in Plans, Representative Photographs, and Simulations (ASI25-001_LE25-003-Photosim).

2.12.b.1 *Ground Cover and Vegetation, Forest Canopies, Waterfalls and Streams, or Other Natural Features III(C)(12)(b)(i)*

The Land Cover Resource Map in the Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study), illustrates land cover for Pathway in Arapahoe County. The total acreage and percent of land cover types within 1 mile of proposed Pathway facilities is presented in Table 8. Land cover is dominated by grassland/herbaceous cover (approximately 83 percent) and cultivated crops (approximately 5 percent). Forested areas and open water areas each consist of less than 0.1 percent of land cover types within 1 mile of proposed Pathway facilities in Arapahoe County.

Table 8: Land Use and Land Cover Present within 1 Mile of Proposed Pathway Facilities in Arapahoe County

Land Use/Land Cover Description	Acres	Percent
Grassland/Herbaceous	18,454.8	83.4
Cultivated Crops	1,161.2	5.2
Developed, Open Space	680.3	3.1
Scrub/Shrub	507.3	2.3
Developed, Low Intensity	250.5	1.1
Barren Land (Rock/Sand/Clay)	4.4	<0.1
Emergent Herbaceous Wetlands	550.8	2.5
Developed, Medium Intensity	319.2	1.4
Open Water	19.3	<0.1
Developed, High Intensity	163.3	0.7
Woody Wetlands	10.7	<0.1
TOTAL	22,121.8	100

Source: NLCD 2019

2.12.b.2 *Viewsheds, Scenic Vistas, Unique Landscapes or Land Formations III(C)(12)(b)(ii)*

While much of the surrounding landscape provides broad, panoramic views, no designated vistas, scenic viewpoints, or scenic byways occur in or near the Pathway facilities in Arapahoe County. No state or federally designated scenic highways or scenic byways are located near Pathway facilities in Arapahoe County (CDOT 2025, USFHA 2025).

2.12.b.3 *Buildings, Structure Design and Materials, and Elevations* ***III(C)(12)(b)(iii)***

Typical transmission pole configurations and representative photographs are included in Plans, Representative Photographs, and Simulations (ASI25-001_LE25-003-Photosim).

2.12.b.4 *Impacts and Net Effect of the Project on Visual Quality* ***III(C)(12)(b)(iv)***

The Pathway route through Arapahoe County is co-located along existing transmission infrastructure for approximately 13 miles and along East Quincy Avenue to reduce visual impacts. The type of steel used will be weathering steel that oxidizes to resemble a natural brown look and is not shiny. Visual impacts of the transmission line will vary based on proximity and with distance, the scale of the transmission line poles will be minimized. The visual landscape along the route features existing transmission lines, roadways, and industrial elements, and Pathway will result in an incremental increase in poles in the viewshed. Representative photographic simulations are included in Plans, Representative Photographs, and Simulations (ASI25-001_LE25-003-Photosim).

Pathway is not anticipated to result in visual impacts to recreational users of Aurora Reservoir. The Aurora Reservoir is greater than 1 mile south of East Quincy Avenue, and three existing high voltage transmission lines, two photovoltaic solar facilities, and a wastewater treatment plant are between the Aurora Reservoir and the Pathway transmission line.

Existing undisturbed trees, shrubs, and native vegetation will be preserved to the extent possible to maintain visual contrast in the landscape. Following construction, the Pathway ROW will be restored in a manner generally similar to pre-construction conditions.

2.12.c *Surface Water Quality III(C)(12)(c)*

2.12.c.1 *Surface Waters and State Water Quality Standards III(C)(12)(c)(i)*

A desktop analysis of the portion of Pathway within Arapahoe County was completed to identify potentially jurisdictional wetlands and other WOTUS that may be subject to regulation under Section 404 of the CWA. The following digital information was evaluated for the 150-foot Pathway ROW and an additional 50-foot buffer on either side of the Pathway ROW:

- USFWS National Wetland Inventory (NWI) dataset (USFWS 2023a)
- U.S. Geological Survey (USGS) National Hydrography Dataset (NHD; USGS 2023a)

- Playa Lakes Joint Venture (PLJV) Probable Playa Dataset (PLJV 2019)

The Water Resources Map (ASI25-001-Water Resources Map), illustrate the mapped NWI, NHD, and PLJV locations within Arapahoe County. The major NHD-mapped drainages associated with wetland and other WOTUS features near proposed Pathway facilities in Arapahoe County include Box Elder Creek, Coal Creek, Murphy Creek, Senac Creek, Black Shack Creek, and associated unnamed tributaries. NWI-mapped features associated with these drainages include riverine wetlands, freshwater emergent wetlands, and freshwater forested/shrub wetlands. As outlined in Table 9, the transmission line ROW intersects 20 of these mapped wetland features, the longest crossing of which is approximately 224 feet. No PLJV-mapped playas are located near Pathway facilities.

Table 9: NWI Length Crossed by the Transmission Line in Arapahoe County

NWI Wetland Type	Approximate Length (Feet)
Riverine	10
Riverine	10
Riverine	11
Riverine	20
Riverine	26
Riverine	105
Riverine	136
Riverine	22
Riverine	35
Riverine	28
Riverine	21
Riverine	20
Riverine	30
Riverine	32
Riverine	28
Riverine	35
Riverine	20
Riverine	50
Riverine	224
Freshwater Emergent Wetland	23

The Water Resources Resource Map (ASI25-001-Water Resources Map), also illustrate the mapped FEMA floodplain data available for Arapahoe County. The transmission line will span or avoid any wetlands, streams, lakes, and reservoirs as possible. There are poles located in the FEMA-designated 100-year floodplain. Xcel Energy will submit separate floodplain permits for processing by Arapahoe County and SEMSWA, as applicable, to ensure compliance with each jurisdiction's regulations on this matter.

The Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report is provided as ASI25-001-Survey Report. As described in ASI25-001-Survey Report Tetra Tech evaluated potential wetland areas (where access was available) by documenting general observations on dominant vegetation, soil characteristics, and hydrology in areas of interest (i.e., areas with potential intersections between the transmission line ROW and potential wetland and streams). Tetra Tech wetland scientists conducted site visits within areas where land access has been granted to Xcel Energy to perform wetland evaluations and jurisdictional stream determinations within the transmission line ROW. The site visits were conducted in unincorporated Arapahoe County in October 2023, February 2024, July 2024, April 2025, and November 2025. The field-verified wetlands are shown in Figure 2, Arapahoe County Sheet Maps, of ASI25-001-Survey Report.

2.12.c.2 Impacts and Net Effect of the Project on Surface Water Quantity and Quality III(C)(12)(c)(ii)

Pathway intends to avoid impacts to wetlands and WOTUS features to the extent practicable. All aquatic features and streams intersecting Pathway's ROW in Arapahoe County have been evaluated through desktop aerial evaluations and subsequent field verification.

No federally jurisdictional wetlands or waters will be impacted by the Project, and 404 Clean Water Act permits will not be required by the USACE. The span between transmission line poles can be up to 1,400 feet, and thus can be sited to avoid pole placement within and to span across wetlands and other WOTUS features to avoid permanent impacts. Based on the lengths provided in Table 9 in Section 2.12.c.1, it is not anticipated that Pathway will result in any permanent impacts to wetlands or other WOTUS features in Arapahoe County. Associated access roads, laydown yards and other appurtenant features of Pathway will also be sited to avoid permanent impacts to wetlands and WOTUS features. In the event that a regulated water resource cannot be avoided, Pathway will comply with applicable federal and state regulations, including permit requirements under Section 404 of the CWA. Other appurtenant features of Pathway will also be sited to avoid permanent impacts to wetlands and WOTUS features. In the event that a regulated water resource cannot be avoided, Pathway will comply with applicable federal and state regulations, including permit requirements under Section 404 of the CWA.

Temporary impacts to wetlands and WOTUS during construction of Pathway will be avoided. To avoid potential indirect impacts from construction-related erosion and sediment movement during construction, Pathway will adhere to BMPs outlined in the SWMP as well as the GESC Plan, which will include erosion control and revegetation measures. In areas where access roads are not planned to cross a wetland or stream

and crossing of a wetland or stream is not necessary for Pathway construction, driving access will be restricted by installing high-visibility construction fencing as a visual aid to prohibit construction subcontractors from driving through aquatic features in order to avoid impacts to potentially jurisdictional wetlands, State Waters, and WOTUS. Section 3.5 of ASI25-001-Survey Report provides a description of the mitigation measures proposed in specific locations in unincorporated Arapahoe County where the Pathway transmission line ROW is located near field-verified wetlands. The field-verified wetlands within the transmission line easement are shown in the revised Location and Extent Plan Set (LE25-003-Plan Set).

Pathway will not generate pollutant loads. Construction of the transmission line will not create runoff in excess of previous site levels and will not change existing topography or adversely affect drainage. No alteration in the pattern or intensity of surface drainage as a result of construction or operation of the transmission line will occur.

Xcel Energy will comply with permit application requirements, County standards, and construction protocol to ensure that Pathway does not violate water quality standards. Prior to construction, a GESC Permit will be obtained from Arapahoe County for the transmission line and a Storm Water Permit for Construction Activities will be obtained from CDPHE.

2.12.c.3 *Impacts and Net Effect of the Project on Streambed* ***III(C)(12)(c)(iii)***

Pathway intends to avoid impacts to streambeds to the extent practicable. The span between transmission line poles can be up to 1,400 feet, and thus can be sited to avoid pole placement within and to span across streambeds to avoid impacts. Based on the lengths provided in Table 9 in Section 2.12.c.1, it is not anticipated that Pathway will result in any impacts to streambeds in Arapahoe County. Associated access roads, laydown yards and other appurtenant features of Pathway will also be sited to avoid impacts to streambeds. In the event that a regulated water resource cannot be avoided, Pathway will comply with applicable federal and state regulations, including permit requirements under Section 404 of the CWA. To avoid potential indirect impacts from construction-related erosion and sediment movement during construction, Pathway will adhere to BMPs outlined in the SWMP as well as the GESC Plan, which will include erosion control and revegetation measures. Section 3.5 of ASI25-001-Survey Report provides a description of the mitigation measures proposed in specific locations in unincorporated Arapahoe County where the Pathway transmission line ROW is located near field-verified wetlands.

2.12.d Groundwater Quality and Quantity III(C)(12)(d)

2.12.d.1 *Groundwater and Aquifer Levels; At a minimum, the description should include: Seasonal Water Levels in Each Subdivision of the Aquifer Affected by the Project III(C)(12)(d)(i)(a)*

Arapahoe County is located in the Denver Basin aquifer. The following general descriptions are based on the reports Groundwater Levels in the Denver Basin Bedrock Aquifers 2015 (Colorado DWR and DNR 2015), Colorado Groundwater Atlas (CGS 2020), and Groundwater Availability of the Denver Aquifer System (USGS 2011). The Denver Basin is a unique geologic formation along the Front Range reaching generally from Greeley on the north to Colorado Springs on the south, and from the Foothills on the west to Limon on the east. The Denver Basin is composed of bedrock aquifers, or water bearing formations, that lie one on top of the other in layers. The aquifers in the Denver Basin include the Dawson, Denver, Arapahoe, and Laramie-Fox Hills aquifers. Northern portions of the Dawson and Arapahoe aquifers are differentiated into Upper and Lower aquifers. These aquifers are generally composed of sandstones, siltstones and conglomerates interlayered with beds of mudstone and shale with a combined thickness of approximately 3,200 feet. Saturated thicknesses range from 0 to 400 feet.

Construction and operation of Pathway are not anticipated to impact existing aquifers. Pathway will not require permanent drawing out of a well or aquifer.

2.12.d.2 *Artesian Pressure in Aquifers III(C)(12)(d)(i)(b)*

Both the Laramie-Fox Hills and Arapahoe aquifers are generally under artesian pressure at the present time. Because construction and operation of Pathway are not anticipated to impact aquifers, their artesian nature will be unaffected.

2.12.d.3 *Groundwater Flow Directions and Levels III(C)(12)(d)(i)(c)*

Regional groundwater flow in the Denver Basin bedrock and alluvial aquifers is generally away from the topographic high and recharge area of the Palmer Divide toward discharge areas along the South Platte River to the north and toward the discharge areas of Monument Creek, Black Squirrel Creek, and Big Sandy Creek to the south (USGS 2014). Downward hydraulic gradients also result in the downward movement of groundwater between aquifers, particularly from the Dawson and Denver aquifers into the Arapahoe aquifer; the Laramie-Fox Hills aquifer is an exception to this process because of its effective separation from overlying units by the Laramie confining unit. Although the rate of downward flow is small in comparison with lateral flow in the bedrock aquifers, downward flow occurs over a large area and likely results in large volumes of water moving between aquifers. Pathway is not anticipated to alter groundwater flow.

2.12.d.4 *Aquifer Recharge Rates and Areas III(C)(12)(d)(i)(d)*

Recharge to the alluvial and bedrock aquifers occurs by infiltration of incident precipitation, streamflow, lawn-irrigation return flow in developed areas, irrigation return flow in agricultural areas, and downward inter-aquifer flow. Precipitation recharge to the bedrock aquifers is low, estimated as 1 to 2 percent of annual precipitation, and precipitation recharge to the alluvial aquifer has been estimated as 7 percent of annual precipitation. Pathway is not anticipated to impact aquifer recharge rates.

2.12.d.5 *Aquifer Storage Capacity III(C)(12)(d)(i)(e)*

Pathway does not propose aquifers to be used as part of a water storage system, therefore, this requirement does not apply to this Application.

2.12.d.6 *Seepage Losses III(C)(12)(d)(i)(f)*

Pathway will not affect any subsurface dam or stream-aquifer interfaces.

2.12.d.7 *Groundwater Quality and Classification III(C)(12)(d)(i)(g)*

Groundwater quality data and information for the aquifers in the analysis area were reviewed from the Quality of Groundwater in the Denver Basin Aquifer System, Colorado 2003-5 (USGS 2014).

The USGS National Water Quality Assessment Program studies in the Denver Basin from 2003 to 2005 collected water-quality data from wells completed in the shallow (less than 115 ft) alluvial aquifer to the deepest bedrock aquifer (more than 2,000 ft below land surface). For the Denver Basin, water-quality constituents of concern for human health or because they might otherwise limit use of water include total dissolved solids (TDS), fluoride (F), sulfate (SO₄), nitrate (NO₃), iron (Fe), manganese (Mn), selenium (Se), radon (Rn), uranium (U), arsenic (As), pesticides, and volatile organic compounds (VOCs). Because construction and operation of Pathway are not anticipated to impact aquifers, their water quality will be unaffected.

2.12.d.8 *Locations of Water Wells and Uses III(C)(12)(d)(i)(h)*

Impacts to groundwater wells are not anticipated. The Water Wells Map in the Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study) provides mapping and discussion of the consideration of water wells during the siting process for Pathway. Prior to construction and during the Pathway planning and design stages, soil borings will be taken to understand the sub-surface conditions where Pathway facilities will be built. During the design stages of the Project, if it is determined that a pole foundation has potential to affect a water well, Xcel Energy will evaluate options to avoid or mitigate impacts to these wells.

2.12.d.9 *Impacts and Net Effect of Project on Groundwater III(C)(12)(d)(ii)*

Construction and operation of Pathway is not anticipated to impact existing groundwater quality or quantity, or groundwater rights for agricultural uses. BMPs will be used during construction to control sediment and runoff from work areas. Required construction and waste management procedures will prevent accidental spills or runoff of sediment or contaminants to waterbodies or groundwater.

Water to be used during construction will be obtained from a locally permitted source and brought to the site. Pathway will not require water rights for construction or operation and will not affect existing water rights.

2.12.e *Wetlands and Riparian Areas III(C)(12)(e)*

2.12.e.1 *Floodplains, Wetlands, and Riparian Areas III(C)(12)(e)(i)*

A map showing water resources within the vicinity of Pathway is provided as ASI25-001-Water Resources Map. The transmission line subject to this 1041 Application will cross wetlands and floodplains associated with Box Elder Creek, Coal Creek, Murphy Creek, Senac Creek, and Black Shack Creek in Arapahoe County. Pathway will avoid regulated floodplains to the extent practicable. The transmission line will span floodplain areas with overhead conductors. As such, no impacts to floodplains are anticipated. Xcel Energy will submit separate floodplain permits for processing by Arapahoe County and SEMSWA, as applicable, to ensure compliance with each jurisdiction's regulations on this matter. Table 10 notes the floodplain areas spanned by Pathway in Arapahoe County.

Table 10: Floodplain Areas Spanned by Pathway Facilities in Arapahoe County

Flood Zone	Length (feet)
Zone A (100-Year Floodplain, High Risk)	2992.0
Zone AE (100-Year Floodplain, High Risk)	1461.11

Additional information on floodplains, wetlands, and riparian areas is provided in Section 2.12.c Surface Water Quality.

2.12.e.2 *Source of Water Interacting with Surface Systems to Create Each Wetland III(C)(12)(e)(ii)*

The major NHD-mapped drainages associated with wetland and other WOTUS features near proposed Pathway facilities in Arapahoe County include Box Elder Creek, Coal Creek, Murphy Creek, Senac Creek, and associated unnamed tributaries (see the Water Resources Map, ASI25-001-Water Resources Map).

2.12.e.3 *Impacts and Net Effect of the Project on Floodplains, Wetlands, and Riparian Areas III(C)(12)(e)(iii)*

Pathway intends to avoid impacts to floodplains, wetlands and WOTUS features to the extent practicable. The span between transmission line poles can be up to 1,400 feet, and thus can be sited to avoid pole placement within and to span across floodplains, wetlands and other WOTUS features to avoid permanent impacts. Pathway will avoid regulated floodplains to the extent practicable. The transmission line will span floodplain areas with overhead conductors. Based on the lengths provided in Table 10 in Section 2.12.e.1, it is not anticipated that Pathway will result in any permanent impacts to floodplains in Arapahoe County. As such, no impacts to floodplains are anticipated. Xcel Energy will submit separate floodplain permits for processing by Arapahoe County and SEMSWA, as applicable, to ensure compliance with each jurisdiction's regulations on this matter.

The potential wetlands and WOTUS identified through desktop analysis of NWI data that may be impacted by construction of Pathway will be verified in the field and inventoried and/or delineated to determine the actual locations and extent of wetlands prior to construction of Pathway. As described in ASI25-001-Survey Report Tetra Tech evaluated potential wetland areas (where access was available) by documenting general observations on dominant vegetation, soil characteristics, and hydrology in areas of interest (i.e., areas with potential intersections between the transmission line ROW and potential wetland and streams). Tetra Tech wetland scientists conducted site visits within areas where land access has been granted to Xcel Energy to perform wetland evaluations and jurisdictional stream determinations within the transmission line ROW. The site visits were conducted in unincorporated Arapahoe County in October 2023, February 2024, July 2024, April 2025, and November 2025. The field-verified wetlands are shown in Figure 2, Arapahoe County Sheet Maps, of ASI25-001-Survey Report.

The span between transmission line poles can be up to 1,400 feet, and thus can be sited to avoid pole placement within and to span across floodplains, wetlands and other WOTUS features to avoid permanent impacts. Based on the lengths provided in Table 9 in Section 2.12.c.1, it is not anticipated that Pathway will result in any permanent impacts to wetlands or other WOTUS features in Arapahoe County. Associated access roads, laydown yards, and other appurtenant features of Pathway will also be sited to avoid permanent impacts to wetlands and WOTUS features. In the event that a regulated water resource cannot be avoided, Pathway will comply with applicable federal and state regulations, including permit requirements under Section 404 of the CWA.

Temporary impacts to wetlands and WOTUS during construction of Pathway will be avoided. To avoid potential indirect impacts from construction-related erosion and sediment movement during construction, Pathway will adhere to erosion and sediment control BMPs outlined in the SWMP as well as the GESC Plan, which will include erosion control and revegetation measures. In areas where access roads are not planned to cross a wetland or stream and crossing of a wetland or stream is not necessary for Pathway construction, driving access will be restricted by installing high-visibility construction fencing as a visual aid to prohibit construction subcontractors from driving through aquatic features in order to avoid impacts to potentially jurisdictional wetlands, State Waters, and WOTUS. Section 3.5 of ASI25-001-Survey Report provides a description of the mitigation measures proposed in specific locations in unincorporated Arapahoe County where the Pathway transmission line ROW is located near field-verified wetlands.

2.12.f Terrestrial and Aquatic Animals and Habitat III(C)(12)(f)

2.12.f.1 Terrestrial and Aquatic Animals; Stream Flows and Lake Levels Needed to Protect the Aquatic Environment; Threatened or Endangered Animal Species and Their Habitat III(C)(12)(f)(i)

A desktop analysis of the portion of Pathway within Arapahoe County was completed to characterize the environmental setting of Pathway and evaluate the potential for occurrence of special-status species based on available habitat. The analysis included the transmission line route plus a 1-mile buffer. The 1-mile buffer was used to evaluate biological resources that could be influenced by project construction or operation (e.g., raptor nests). To assess the potential for occurrence of special-status species within the county, the following publicly available information was reviewed:

- Google Earth Aerial Imagery (Google 2023)
- National Land Cover Database (NLCD 2019)
- USFWS Information for Planning and Consultation (IPaC) online tool (USFWS 2025b)
- USFWS Critical Habitat Portal (USFWS 2025c)
- Colorado Natural Heritage Program Species Elements Database (CNHP 2023)
- CPW Species Activity Mapping Data (CPW 2025a)
- CPW State Species List (CPW 2025b)
- Online species profiles and distribution information (CPW 2025c)

In addition to publicly available information, windshield and ground-based surveys of proposed Pathway facility locations were completed since September 2021 until present (where access was available) to identify any potential areas of concern for biological resources and identify habitat for special status species. Ground-based raptor nest surveys and aerial raptor nest surveys were initially conducted in April and May 2022 to identify potentially active eagle and other raptor nests within 0.5-mile of the proposed transmission line route. Ground based raptor nest surveys along Segment 5 of Pathway have been ongoing since the initial aerial raptor nest surveys in 2022. Every nesting season since 2022, Tetra Tech biologists have performed ground-based raptor nest surveys to account for changes in the transmission line alignment and newly acquired property access, as well as to verify the presence and activity of previously mapped nests and document newly constructed nests. Since May of 2022, burrowing owl habitat/prairie dog colony surveys have also been completed along the ROW of Segment 5 where landowner access has been granted. Biologists have made an effort to document potential swift fox dens observed during these surveys but have yet to encounter any. Surveys for nesting raptors, burrowing owls, and other ground nesting birds will continue to be conducted in areas with suitable nesting habitat prior to construction activities of that phase of construction. Surveys to assess areas for suitable Preble's meadow jumping mouse habitat and Ute-ladies' tresses habitat were completed in October of 2023 and determined that suitable habitat for both species was not present along Segment 5 within Arapahoe County.

The Colorado's Power Pathway – Arapahoe County Biological Resources and Wetlands and Waters of the U.S. Survey Report is provided as ASI25-001-Survey Report. The field-verified raptor nests and suitable burrowing owl habitat identified within and adjacent to the transmission line ROW are shown in Figure 2, Arapahoe County Sheet Maps, of ASI25-001-Survey Report.

Figure 1 of ASI25-001-Survey Report shows the CPW-designated habitat within Arapahoe County. As shown in Figure 1 of ASI25-001-Survey Report, the proposed route in Arapahoe County crosses a portion of swift fox, ferruginous hawk, and common garter snake overall range as mapped by CPW (CPW 2025a). The entirety of the proposed route in Arapahoe County overlaps black-tailed prairie dog high-potential colony occurrence range, Preble's meadow jumping mouse overall range, golden eagle breeding range, and burrowing owl breeding range (CPW 2025a).

Pathway has been conducting ongoing coordination with CPW and USFWS regarding potential biological resources that may be impacted by Pathway. Pathway had a project introduction meeting with CPW on December 12, 2021, followed by a routing workshop on January 10, 2022, and a follow-up routing discussion on April 22, 2022. On May 9, 2022, Pathway had a project introduction meeting with USFWS. The feedback received from CPW and USFWS during these meetings has been used to inform the routing and

siting of Pathway. Xcel Energy met with CPW on June 10, 2025, to discuss CPW referral agency comments to several of the Pathway Segment 5 permit applications that are ongoing, including CPW's comments to the Arapahoe County 1041 Application. CPW was provided a summary of the meeting notes and concurred with them. CPW has confirmed the approach Xcel Energy is taking related to biological issues for Pathway. Pathway will continue to coordinate with CPW and USFWS through permitting, construction, and operation of Pathway, as needed, to ensure compliance with all applicable federal and state regulations.

2.12.f.2 Critical Wildlife Habitat and Livestock Range III(C)(12)(f)(ii)

2.12.f.2.1 Land Cover

The Land Cover Resource Map in Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study), illustrates land cover for Pathway in Arapahoe County. Land cover is dominated by grassland/herbaceous cover (approximately 83 percent) and cultivated crops (approximately 5 percent). The total acreage and percent of land cover types within 1 mile of proposed Pathway facilities is presented in Table 8 in Section 2.12.b.1.

2.12.f.2.2 Management Areas and Priority Habitat

Federal, state, and local agencies designate areas to help conserve habitats critical to migratory birds and other sensitive species (e.g., National Wildlife Refuges, National Grasslands, state parks, and state wildlife areas). The Jurisdiction Resource Maps in Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study), illustrate land jurisdictions in Arapahoe County. There are no federally or state-managed conservation areas within 1 mile of proposed Pathway Facilities in Arapahoe County. In addition, no USFWS-designated Critical Habitat is mapped in the same area (USFWS 2022c).

2.12.f.2.3 Special Status Wildlife

The USFWS IPaC online tool and CPW online databases were used to identify federally and state-protected species that may occur near Pathway facilities in Arapahoe County, including species listed or proposed for listing under the Endangered Species Act, bald and golden eagles protected under the Bald and Golden Eagle Protection Act, and state-listed threatened or endangered species (CPW 2025a, CPW 2025b, CNHP 2025, USFWS 2025c). In addition to the federally and state-listed species that receive regulatory protection, state Species of Concern (SC) were also evaluated. Although SC species do not receive any regulatory protection, they have been identified by the state as having management interest either due to declining populations or habitat loss.

The Wildlife Species Habitat and Avian Habitat Resource Maps in Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study), illustrate mapped special-status wildlife and avian habitat in Arapahoe County. A total of

15 special-status wildlife species were identified as potentially occurring within 1 mile of proposed Pathway facilities in Arapahoe County. Table 11 outlines the likelihood of occurrence of each species based upon review of known species ranges, habitat requirements, land cover data, and aerial imagery.

Table 11: Special-Status Wildlife Species Potentially Occurring within 1 Mile of Proposed Pathway Facilities in Arapahoe County

Common Name	Scientific Name	Federal/ State Status ¹	Habitat Associations/ Range	Likelihood of Occurrence ²
Mammals				
Black-tailed prairie dog	<i>Cynomys ludovicianus</i>	- / SC	Occurs in the eastern third of Colorado, in shortgrass prairie habitat below 6,000 feet elevation. The species lives in colonies and they construct burrows where they live and raise their young. 1-mile buffer of proposed Pathway facilities is within the overall species range and high potential colony occurrence area (CPW 2025a).	High
Gray wolf	<i>Canis lupus</i>	FE / SE	Requires large areas of contiguous habitat, including forests and mountain terrain, with an abundance of prey and cover. The species has been considered extirpated from Colorado until very recently and is not known to occur east of I-25.	Unlikely
Preble's meadow jumping mouse	<i>Zapus hudsonius preblei</i>	FT/ ST	Riparian vegetation with adjacent, preferably undisturbed grassland and nearby water sources. 1-mile buffer of proposed Pathway facilities is within mapped overall range; however, the nearest mapped occupied habitat occurs approximately 6 miles south in Elbert County (CPW 2025a).	Low
Swift fox	<i>Vulpes velox</i>	- / SC	Occurs in shortgrass prairie habitat with flat or rolling terrain and high visibility over long distances, up to 7,000 feet elevation. 1-mile buffer of proposed Pathway facilities within overall species range (CPW 2025a).	Moderate

Common Name	Scientific Name	Federal/ State Status ¹	Habitat Associations/ Range	Likelihood of Occurrence ²
Birds				
Bald eagle	<i>Haliaeetus leucocephalus</i>	BGEPA / SC	Large rivers, lakes, and reservoirs with an abundance of fish. Nesting is typically in large trees close to water. The 1-mile buffer of proposed Pathway facilities is located within overall species range. A previously CPW-mapped active nest site is mapped approximately 0.8 mile north of the proposed Pathway facilities. The proposed Pathway facilities and 1-mile buffer are located within a bald eagle winter concentration area and winter forage.	High
Ferruginous hawk	<i>Buteo regalis</i>	- / SC	Occurs in arid and open habitats including grasslands, sagebrush or saltbush plains, and deserts. Nests in lone trees, cliffs, rock outcrops, or on the ground in a high area like a knoll. 1-mile buffer of proposed Pathway facilities within species breeding range.	Moderate
Golden eagle	<i>Aquila chrysaetos</i>	BGEPA / -	Open native habitats with an abundance of prey. Nesting occurs on cliffs, knolls, and raised areas. 1-mile buffer of proposed Pathway facilities within overall species range.	Moderate
Piping plover ³	<i>Charadrius melodus</i>	FT / ST	Reservoirs, lakes, and rivers with sand and gravel areas and sparse vegetation. 1-mile buffer of proposed Pathway facilities outside range for the species.	Unlikely – No downstream impacts anticipated.

Common Name	Scientific Name	Federal/ State Status ¹	Habitat Associations/ Range	Likelihood of Occurrence ²
Western burrowing owl	<i>Athene cunicularia hypugaea</i>	- / ST	Open habitats with low or sparse vegetation on gently sloping terrain. Nesting typically occurs in small mammal burrows. Often found nesting in the perimeters of prairie dog colonies. 1-mile buffer of proposed Pathway facilities occurs in species breeding range and high potential prairie dog colony occurrence area.	Moderate
Whooping crane ³	<i>Grus americana</i>	FE / SE	Freshwater marshes, wet prairies, shallow lakes, and lagoons. 1-mile buffer of proposed Pathway facilities outside range for the species.	Unlikely – No downstream impacts anticipated.
Fish				
Pallid sturgeon ³	<i>Scaphirhynchus albus</i>	FE / -	Large river systems with firm sandy bottoms (i.e., Missouri River). 1-mile buffer of proposed Pathway facilities outside range for the species.	Unlikely – No downstream impacts anticipated.
Reptiles				
Common gartersnake	<i>Thamnophis sirtalis</i>	- / SC	Occurs in grasslands, prairies, streams, wetlands, and is often found near water. 1-mile buffer of proposed Pathway facilities within overall species range.	Moderate
Insects				
Monarch butterfly	<i>Danaus plexippus</i>	FPT / -	Found in a wide variety of habitats and are known to occur in grasslands and prairie habitats in Colorado. The species requires milkweed (<i>Asclepias</i> spp.) host plants to lay their eggs.	Moderate

1 FPT = Federal Proposed Threatened (not protected under the ESA), FE = Federally Endangered, FT = Federally Threatened, ST = State Threatened, SE = State Endangered, SC = State Species of Concern

2 Likelihood of Occurrence: Unlikely–unsuitable habitat in project and vicinity; Low–marginally suitable habitat in project and vicinity; Moderate–suitable habitat present in project, or species known to occur in habitat similar to project; High–highly suitable habitat present in project, or known populations exist in project vicinity.

3 Platte River Species = Water-related activities or uses in the Platte River Basins may affect these species in downstream reaches.

In addition to listed species, CPW tracks and maps data for big game species habitat throughout the state (CPW 2025a). Figure 1 of ASI25-001-Survey Report shows mapped big game habitat in Arapahoe County. Mountain lion (*Puma concolor*) overall range and peripheral range is located within the 1-mile buffer of proposed Pathway facilities. Three mule deer (*Odocoileus hemionus*) concentration areas, one migration corridor, four sever winter ranges, one winter concentration area and three areas identified as winter range occur within the 1-mile buffer of proposed Pathway facilities. Two pronghorn antelope (*Antilocapra americana*) concentration areas, one winter concentration area, one area identified as winter range occur within the 1-mile buffer of proposed Pathway facilities. Two white-tailed deer (*Odocoileus virginianus*) concentration areas and two areas identified as winter range occur within the 1-mile buffer of proposed Pathway facilities. No other big game species habitat is mapped in the same area (CPW 2025a).

2.12.f.3 *Impacts and Net Effect of the Project on Terrestrial and Aquatic Animals III(C)(12)(f)(iii)*

Potential impacts to wildlife species would primarily be associated with temporary disturbance from construction activities within the Pathway ROW, namely the removal and management of vegetation. In addition, increased noise and equipment movement during construction may temporarily displace mobile wildlife species from the immediate workspace area. These impacts are considered short-term in duration and normal wildlife movements would be expected to resume after construction has been completed and disturbed areas have been restored in a manner generally similar to preconstruction conditions.

Pathway will avoid or minimize impacts to habitat generally as practicable. Impacts to most vegetation will be temporary and limited to the 150-foot-wide Pathway ROW and TCAs. The Pathway ROW will be cleared of tall vegetation for ongoing maintenance. Measures will be implemented to minimize the spread of noxious weeds in the Pathway ROW, as described in ASI25-001_Noxious Weed Control Measures. To avoid or minimize impacts to aquatic habitat within the Pathway ROW, surface waters, riparian areas, and wetlands in areas less than 1,400 feet width at the crossing will be spanned as practicable. Pathway will adhere to BMPs and erosion control measures outlined in the SWMP as well as the GESC Plan.

To avoid or minimize impacts to wildlife, Pathway will implement measures such as requiring proper trash and food debris disposal and compliance with posted speed limits. CPW regulatory-based recommendations (CPW 2021) will be incorporated where practicable.

To avoid or minimize potential project impacts to Mule Deer Severe Winter Range and Winter Concentration Areas, permitted and authorized human activities associated with the construction, operation and decommissioning phases will be conducted outside the December 1st to April 30th timeframe. If this cannot be achieved, construction activities will start outside of the winter timing within Mule Deer Severe Winter Range as requested by CPW. To avoid or minimize potential project impacts to Mule Deer Migration Corridors, access roads and linear routes will be kept under 1 linear mile per each square mile of habitat that intersects Pathway. To avoid or minimize potential project impacts to Pronghorn Winter Concentration Areas, permitted and authorized human activities associated with the construction, operation and decommissioning phases will be conducted outside the January 1st to April 30th timeframe. If this cannot be achieved, these activities will begin outside the winter timing as requested by CPW.

To avoid or minimize potential project impacts to swift fox, Xcel Energy will conduct preconstruction surveys for active swift fox den sites along the Pathway right-of-way and other areas of disturbance within swift fox overall range. If active swift fox den sites are observed, no human encroachment, surface disturbance, or construction activity will occur within 0.25 miles of an active maternal den site from March 15 through June 15, where feasible.

Pathway has been sited to avoid known eagle nest and roost locations to the extent practicable. CPW regulatory-based recommendations (CPW 2021) will be incorporated where practicable. All project construction activities will implement appropriate CPW avoidance buffers around active raptor nests to the extent practicable (CPW 2020). If construction activities must occur inside CPW recommended buffers of an active raptor nest, a qualified biologist will be assigned to monitor the active raptor nest during project construction to ensure nesting raptors do not become disturbed and abandon their nest.

Vegetation clearing during migratory bird breeding season (generally April 15 through September 1) could impact active nests by disturbing or destroying them, resulting in fatalities of adults, eggs, and/or young. To avoid or minimize potential project impacts to migratory birds and raptors, including eagles, Pathway will conduct tree/vegetation clearing during the nonbreeding season for birds (September 1 through April 15) if feasible. If vegetation clearing cannot occur during the nonbreeding season, vegetation clearance surveys, raptor nest surveys, and burrowing owl surveys may be conducted per USFWS and CPW guidance to identify avian nesting activity and determine appropriate avoidance buffers (CPW 2020, CPW 2021) or monitor active nest sites until determined to be inactive. Surveys for nesting raptors, burrowing owls, and other ground nesting birds will be conducted in areas with suitable nesting habitat prior to construction activities. Additionally, lighting, construction noise, and vibration in the immediate vicinity of active nests, could potentially result in nest failure or abandonment. To avoid these potential impacts, Pathway has been sited to avoid

known eagle nest and roost locations to the extent practicable. Operation of Pathway could result in direct impacts to raptor species through electrocution and/or collision. Xcel Energy is a member of Avian Power Line Interaction Committee (APLIC) and the transmission line will be designed in accordance with the “Suggested Practices for Avian Protection on Power Lines, the State of the Art in 2024” (APLIC 2024) and “Reducing Avian Collisions with Power Lines: The State of the Art in 2012” (APLIC 2012). To reduce the risk of electrocution and collision, electrical components of the transmission lines and Harvest Mile Substation equipment additions will be separated to minimize the risk of avian contact and will follow APLIC guidelines (APLIC 2006). Bird flight diverters or other marking devices may be used as determined necessary for specific locations.

Xcel Energy will continue to coordinate with USFWS and CPW to address concerns regarding wildlife impacts throughout planning, design, and construction of Pathway, and will comply with all regulatory requirements.

2.12.g Terrestrial and Aquatic Plant Life III(C)(12)(g)

2.12.g.1 *Terrestrial and Aquatic Plant Life Including Type and Density, and Threatened or Endangered Plant Species and Habitat III(C)(12)(g)(i)*

The Land Cover Resource Map in Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study), illustrates land cover for Pathway in Arapahoe County. Land cover is dominated by grassland/herbaceous cover (approximately 83 percent) and cultivated crops (approximately 5 percent). The total acreage and percent of land cover types within 1 mile of proposed Pathway facilities is presented in Table 8 in Section 2.12.b.1.

The USFWS IPaC online tool and CPW online databases were used to identify federally and state-protected species that may occur near Pathway facilities in Arapahoe County, including state-listed threatened or endangered species (CPW 2025a, CPW 2025b, CNHP 2025, USFWS 2025c). Two federally-threatened plants, Ute ladies'-tresses orchid (*Spiranthes diluvialis*) and Western prairie fringed orchid (*Platanthera praeclara*), were identified as potentially occurring within 1 mile of proposed Pathway facilities in Arapahoe County (see Table 12).

Table 12: Special-Status Plant Species Potentially Occurring within 1 Mile of Proposed Pathway Facilities in Arapahoe County

Common Name	Scientific Name	Federal / State Status ¹	Habitat Associations/ Range	Likelihood of Occurrence ²
Plants				
Ute ladies'-tresses orchid	<i>Spiranthes diluvialis</i>	FT / -	Moist meadows associated with perennial stream terraces, floodplains, and oxbows at elevations below 6,500 feet.	Low
Western prairie fringed orchid ³	<i>Platanthera praeclara</i>	FT / -	Unplowed, calcareous prairies and sedge meadows.	Unlikely – 1-mile buffer of proposed Pathway facilities outside range for the species. Suitable habitat is not present within 1-mile of Pathway facilities in Arapahoe County.

1 FPT = Federal Proposed Threatened (not protected under the ESA), FE = Federally Endangered, FT = Federally Threatened, ST = State Threatened, SE = State Endangered, SC = State Species of Concern

2 Likelihood of Occurrence: Unlikely–unsuitable habitat in project and vicinity; Low–marginally suitable habitat in project and vicinity; Moderate–suitable habitat present in project, or species known to occur in habitat similar to project; High–highly suitable habitat present in project, or known populations exist in project vicinity.

3 Platte River Species = Water-related activities or uses in the Platte River Basins may affect these species in downstream reaches.

2.12.g.2 Impacts and Net Effect of the Project on Terrestrial and Aquatic Plant Life III(C)(12)(g)(ii)

As described in Table 12 in Section 2.12.g.1, the likelihood of occurrence of the Ute ladies'-tresses orchid within 1 mile of Pathway facilities in Arapahoe County is low. Surface waters, riparian areas, and wetlands in areas less than 1,400 feet width at the crossing will be spanned as practicable, therefore impacts to the Ute ladies'-tresses orchid are not anticipated. As also described in Table 12, impacts to the Western prairie fringed orchid are not anticipated because the 1-mile buffer of proposed Pathway facilities is outside the range for the species and suitable habitat is not present within 1-mile of Pathway facilities in Arapahoe County. Impacts to most vegetation will be

temporary and limited to the 150-foot-wide Pathway ROW and TCAs. The Pathway ROW will be cleared of tall vegetation for ongoing maintenance. Measures will be implemented to minimize the spread of noxious weeds in the Pathway ROW, as described in ASI25-001_Noxious Weed Control Measures. Pathway will adhere to BMPs and erosion control measures outlined in the SWMP as well as the GESC Plan.

Xcel Energy will maintain the transmission line ROW in accordance with its vegetation management standards for the life of Pathway and can provide Arapahoe County with contact information for any questions or concerns it may have about vegetation management of the line going forward. Xcel Energy performs vegetation maintenance in alignment with its existing Vegetation Management Standards (Xcel Energy 2026) which include wildfire risk mitigation strategies. The Standards include following an Integrated Vegetation Management approach regarding ongoing maintenance with an objective of clearing all noncompatible vegetation within the maintained right-of-way of the easement (Xcel Energy 2026). Vegetation maintenance for Xcel Energy's facilities is required to be in compliance with requirements defined in the North American Electric Reliability Corporation standard FAC-003-5 Transmission Vegetation Management. Version 5: March 4, 2022 (NERC 2022).

2.12.h Soils, Geologic Conditions, and Natural Hazards III(C)(12)(h)

2.12.h.1 *Soil, Geologic Conditions, and Natural Hazards III(C)(12)(h)(i)*

The Karst Areas and Soil Erodibility Maps in Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study), show areas of evaporite basin and soil erodibility within Arapahoe County.

Pathway facilities will be located in areas mapped as loams, silts, clays, alluvium, and eolian deposits (NRCS 2023).

2.12.h.2 *Risks to the Project from Natural Hazards III(C)(12)(h)(ii)*

A geotechnical study, based on soil borings at Harvest Mile Substation site and along the length of the transmission line will be conducted for the project. Engineers will use this study to determine the size and type of foundations needed to support substation equipment and transmission line poles as well as soil resistivity. No significant natural hazards have been identified in the areas planned for Pathway development in Arapahoe County. Professional engineers will guide construction and do not foresee any unusual risks. Pathway is designed to withstand seismic considerations and is not anticipated to impact or be impacted by subsidence.

2.12.h.3 *Impacts and Net Effect of the Project on Soil, Geologic Conditions, and Effects on Streambed and Aquifer Recharge Areas III(C)(12)(h)(iii)*

Construction and operation of Pathway will result in minimal permanent impacts to soils and geologic conditions, with the exception of the footprints of the individual transmission poles.

Construction and operation of Pathway is not anticipated to impact existing streambed or aquifer recharge areas. Surface waters, riparian areas, and wetlands in areas less than 1,400 feet width at the crossing will be spanned as practicable. BMPs will be used during construction to control sediment and runoff from work areas. Required construction and waste management procedures will prevent accidental spills or runoff of sediment or contaminants to waterbodies or groundwater.

2.13 **NUISANCES III(C)(13)**

The CPUC provides reasonableness determinations associated with noise and requires CPCN applicants to evaluate the expected level of noise of the proposed transmission facilities. Xcel Energy is required to meet state standards as outlined in the Colorado Public Utilities Commission's Rules Regulating Electric Utilities 4 CCR 723-3.

Construction-related noise will result in temporary short-term increases in noise in areas where construction and staging are taking place. Short-term noise will result during substation construction, foundation construction, and assembly and erection of the transmission line poles. Short-term noise is anticipated from construction equipment such as auguring machines, cranes, heavy machinery, and trucks. Construction vehicles and equipment will be maintained in proper operating condition and equipped with manufacturer's standard noise control devices (e.g., mufflers or engine enclosures).

Indirect effects from post-construction activities, which include the noise from transmission line inspections and maintenance activities are anticipated to be negligible because of their short duration and infrequency.

All high-voltage transmission lines experience significant corona during wet weather, when water droplets form on the line. In normal, fair weather conditions, corona and its corresponding audible noise are usually at low levels (approximately 25 decibels less than wet weather noise). Corona also increases approximately 1 decibel for every 1,000 feet in elevation gain.

In accordance with C.R.S. § 25-12-103(12)(a), which is part of the statutory framework governing noise abatement, the CPUC may determine in the context of reviewing an

application for a CPCN for electric transmission facilities that the projected noise levels for such facilities are reasonable. Under C.R.S. § 25-12-103(12)(b), because of the statewide need for reliable electric service and the public benefit provided by electric transmission facilities, no county may adopt an ordinance or resolution setting noise standards for electric transmission facilities that are more restrictive than what is determined to be reasonable by the CPUC as part of the CPCN approval process. Therefore, Xcel Energy is required to meet CPUC state standards as outlined in 4 CCR 723-3. The CPUC provides reasonableness determinations associated with noise and requires CPCN applicants to evaluate the expected level of noise of the proposed transmission facilities. Based on the noise study conducted for Pathway (Noise and EMF Study [ASI25-001-Noise and EMF Study]), the maximum projected noise level measured at 25 feet from the edge of the Pathway ROW is 49.8 A-weighted decibels (dBA), and the maximum projected noise level at 25 feet from the Harvest Mile Substation is 57 dBA. Pursuant to CPUC Rule 3206(f), noise levels below 50 dBA are not subject to further review (4 CCR 723-3). Pursuant to CPUC Rule 3206(f), noise levels below 75 dBA are deemed reasonable for land within Industrial Zoning at 25 feet from the property line (4 CCR 723-3). The Harvest Mile Substation is not located on land for which there is a zoning-dependent noise level limit deemed reasonable by CPUC Rule 3206(f) as Rule 3206(f) does not identify an audible noise level that is deemed reasonable for land zoned agricultural. However, the Arapahoe County approved use of the Harvest Mile Substation property is most closely related to an industrial use. When considered as an industrial property, the noise from the Harvest Mile Substation is not anticipated to exceed 75 dBA at 25 feet from the property line, which is deemed reasonable by the CPUC for industrial zoned property. The projected noise levels from the Pathway transmission line and Harvest Mile Substation were deemed reasonable by the CPUC.

The full buildout of the Harvest Mile Substation equipment additions, unrelated to the transmission line, was permitted through the Pawnee-Daniels 345-kV Transmission Line project in 2017 (case numbers ASI16-004 - 1041 Case File, L16-006 – Planning Case File, and EL16-006 – Engineering Case File). The substation site, pad layout, and drainage were all designed and permitted for the full buildout as part of the Pawnee-Daniels 345-kV Transmission Line permits. The installation of the new equipment at the Harvest Mile Substation is not part of the request for this Application for Pathway. This Application for Pathway is intended to cover transmission improvements. As a part of Pathway, Xcel Energy is constructing the infrastructure at the Harvest Mile Substation as permitted through the Pawnee-Daniels 345-kV Transmission Line project in 2017. The CPUC evaluates the noise levels per state statute 4 CCR 723-3. Noise levels are assessed based on specific land uses. A substation isn't specifically called out as a land use in 4 CCR 723-3, but 4 CCR 723-3 does have reasonable noise limits for industrial zoned properties, which is the most analogous use to the Harvest Mile Substation. The

Harvest Mile Substation property boundary is approximately several hundred feet from the substation equipment so the dBA at the property boundary will be much lower than 75 dBA.

2.14 AREAS OF PALEONTOLOGICAL, HISTORIC, OR ARCHAEOLOGICAL IMPORTANCE III(C)(14)

2.14.a Sites of Paleontological, Historic or Archaeological Interest III(C)(14)(a)

The Historic Places Map in Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study), shows designated historic places and historic districts within Arapahoe County.

Desktop cultural resources reviews were completed in December 2022 and again in April 2025. Cultural resource and paleontological records were reviewed using archaeological site files and the Colorado Cultural Resource Online Database (Compass) maintained by the Colorado Historic Society Office of Archaeology & Historic Preservation (OAHP). Included in the Compass database are records of properties listed in the National Register of Historic Places (NRHP). The cultural resources site file search was conducted for a 150-foot buffer of the transmission line ROW within Arapahoe County (the Research Area).

No paleontological resources have been recorded within the Research Area.

Within the Research Area, four (4) previous cultural resource surveys have been conducted (report numbers AH.LG.NR8, MC.AE.R26, MC.CH.R3, and MC.E.R35). These surveys include approximately 1.0 miles of Segment 5.

Within the Research Area are four (4) previously recorded cultural resources. These include: a prehistoric lithic scatter (5AH.73), a prehistoric open camp (5AH.414), a historic fence (5AH.1642), and a historic transmission line (5AH.1643). The open camp, fence, and transmission line have been determined Not Eligible for listing in the NRHP by the OAHP, and the lithic scatter is Unevaluated (the site's eligibility for listing in the NRHP has not been evaluated by archaeologists or the OAHP).

2.14.b Impacts and Net Effect of the Project on Sites of Paleontological, Historic or Archaeological Interest III(C)(14)(b)

Higher voltage transmission lines are generally installed crossing over lower voltage lines to avoid potential interference. Pathway will cross the historic transmission line. Note that the exact location of the historic transmission line cannot be provided within public documents in accordance with the required confidentiality agreement with the

State Historic Preservation Office. If needed, the Pathway transmission poles on either side of the historic transmission line will be designed to be taller to increase the clearance. Pathway will span site 5AH.1642. Site 5AH.73 will be re-surveyed and an official determination of eligibility will be obtained before construction of this project phase and the site will not be impacted. No transmission line poles will be constructed within site boundaries and the sites will not be impacted. No permits need to be obtained from the State Historic Preservation Office.

2.15 HAZARDOUS MATERIALS DESCRIPTION III(C)(15)

2.15.a Description of Hazardous, Toxic, and Explosive Substances, Locations, and Practices and Procedures to Avoid Accidental Release or Exposure III(C)(15)(a)

No hazardous materials will be permanently used, stored, or generated on site of Pathway facilities. Hazardous materials used during construction and operation in Arapahoe County may include:

- 6,500 cubic yards of concrete
- Unleaded fuel
- Diesel fuel
- Hydraulic fluid.

Unleaded and diesel fuel will be delivered by authorized vendors, and concrete will be transported by concrete vendor trucks. Unleaded and diesel fuel will be stored at the following locations in Arapahoe County:

- Beichle Laydown Yard 3935 S County Rd 129, Bennett, CO 80102
- Harvest Mile Substation 4455 S Harvest Rd, Aurora, CO, 80016.

Hazardous materials used during construction and operation will be used and disposed of in compliance with all applicable federal, state, and local regulations. Pathway construction in Arapahoe County will comply with the Spill Prevention and Response Procedures.

Spill Prevention and Response Procedures

To prevent accidental release and exposure to harmful substances, and to mitigate environmental impacts, the following procedures will be implemented:

- **Training and Protocol Adherence:** All project vendors must complete environmental training and adhere to the Colorado's Power Pathway Spill Response Protocol.
- **Immediate Response:** In the event of a spill, Mears Group will respond immediately. The individual who discovers and reports the spill will contain it until Mears Group arrives for official cleanup.
- **Spill Kits:** Standard spill kits are distributed to all vendors and laydown yards.
- **Notification:** Once a spill has occurred Pathway team will contact QISG Environmental team and QISG safety team, to respond to proper clean up and disposal.
- **QISG Environmental Contacts:**
 - Ridenour, Daniel daniel.ridenour@quantaig.com
 - Andros, Leslie landros@canacre.com
 - Maher, Sushila sushila.maher@canacre.com
 - Cirfus, Stephen stephen.cirfus@quantaig.com
- **QISG Safety Contacts:**
 - Crow, David david.crow@quantaig.com
 - Cook, Anthony Anthony.Cook@Mears.net
 - Trammell, Johnny jotrammell@quantaig.com
- **Contaminated Material Removal:** Contaminated soil and materials used to contain the spill will be removed and transported to Buffalo Ridge Landfill in Keenesburg, Colorado.
- **Concrete Procurement and Transport:** Approximately 6,500 cubic yards of concrete are required for 132 structures in Arapahoe County. American Eagle Ready Mix will procure and transport the concrete, prioritizing local vendors.
- **Accidental Discharge Response:** In case of accidental discharge, spill kits will be used to contain the material, which will then be taken to a designated recycling center. The QISG Environmental Team will be notified immediately to determine any additional measures needed.

2.15.b Location of Chemical and Waste Storage Areas, and Spill Containment Measures III(C)(15)(b)

Enclosed containment will be provided for trash disposal. Construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials as described in Section 2.15.a, will be removed and taken to a disposal facility authorized to accept such materials.

Construction, operation, and maintenance activities will comply with applicable federal, state, and local laws and regulations regarding the use of hazardous substances. Construction activities will be performed by methods that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into flowing streams or dry watercourses, lakes, and underground water sources. All activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment.

2.16 BALANCE BETWEEN BENEFITS AND LOSSES III(C)(16)

2.16.a Description of Foreseeable Benefits III(C)(16)(a)

The development of Pathway in Arapahoe County is anticipated to provide local economic benefits during construction and potential long-term economic benefits should new generation resources be developed in the area. Construction will require substantial amounts of contract labor, while also providing local jurisdictions and host communities with additional tax revenues and potential employment opportunities.

The short-term economic benefits of Pathway are driven by the \$1.7 billion investment in electric transmission assets in Colorado, which includes payments for land acquisitions and easements, as well as the creation of construction jobs and indirect economic stimulus of construction activities. Expected long-term benefits include tax payments to the counties that will be crossed by the Pathway transmission line and substations (see Section 2.9).

Pathway will also help facilitate the development of new electric generation resources in these areas that will also provide tax revenues and employment opportunities. Moreover, once Pathway is completed, it will drive ongoing job opportunities and employment in the energy generation projects that ultimately interconnect to Pathway.

Pathway will also improve the state's electric reliability, therefore benefiting all consumers in Colorado.

2.16.b Description of Foreseeable Losses III(C)(16)(b)

Construction and operation of Pathway will result in minimal permanent impacts to natural resources or agricultural lands. Lands can continue in productive agricultural use, with the exception of the footprint of the individual transmission poles.

2.17 MONITORING AND MITIGATION PLAN III(C)(17)**2.17.a Description of Mitigation for the Project III(C)(17)(a)**

Section 2.12 address potential impacts from construction and operations of Pathway in Arapahoe County and also proposed mitigation measures where appropriate. A summary of this information is included in Table 13. Additional information about the environmental factors considered during the routing and siting study process is provided in Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study).

Table 13: Proposed Mitigation Measures

Resource	Description of Proposed Mitigation
Agriculture	Areas disturbed during construction of Pathway will be restored in coordination with the landowners and their current land use.
Air Quality	Water trucks will be used during construction activities to suppress dust from vehicles and equipment as necessary within the Pathway ROW and county roads as per coordination with Arapahoe County. If necessary, Xcel Energy will apply for an APEN for land development prior to construction and follow state standards to control the release of fugitive dust related to construction. The APEN is required for a land disturbance greater than 25 contiguous acres and land development activities with a duration longer than 6 months.
Biological Resources	Pathway will avoid or minimize impacts to habitat as practicable. Impacts to most vegetation will be temporary and limited to the 150-foot-wide Pathway ROW and TCAs. The Pathway ROW will be cleared of tall vegetation for ongoing maintenance. Measures will be implemented to minimize the spread of noxious weeds in the Pathway ROW, as described in ASI25-001_Noxious Weed Control Measures. To avoid or minimize impacts to aquatic habitat within the Pathway ROW, surface waters, riparian areas, and wetlands in areas less than 1,400 feet width at the crossing will be spanned as practicable. Pathway will adhere to BMPs and erosion control measures outlined in the SWMP as well as the GESC Plan. To avoid or minimize impacts to wildlife, Pathway will implement measures such as requiring proper trash and food debris disposal and compliance with posted speed limits. CPW regulatory-based recommendations (CPW 2021) will be incorporated where practicable. To avoid or minimize potential project impacts to Mule Deer Severe Winter Range and Winter Concentration Areas, permitted and authorized human activities associated with the construction, operation and decommissioning phases will be conducted outside the December 1st to April 30th timeframe. If this cannot be achieved, construction activities will start outside of the winter timing within Mule Deer Severe Winter Range as requested by CPW. To avoid or minimize potential project impacts to Mule Deer Migration Corridors, access roads and linear routes will be kept under 1 linear mile per each square mile of habitat that intersects Pathway. To avoid or minimize potential project impacts to Pronghorn Winter Concentration Areas, permitted and authorized human activities associated with the construction, operation and decommissioning phases will be conducted outside the January 1st to April 30th timeframe. If this cannot be achieved, these activities will begin outside the winter timing as requested by CPW.

Resource	Description of Proposed Mitigation
	To avoid or minimize potential project impacts to swift fox, Xcel Energy will conduct preconstruction surveys for active swift fox den sites along the Pathway right-of-way and other areas of disturbance within swift fox overall range. If active swift fox den sites are observed, no human encroachment, surface disturbance, or construction activity will occur within 0.25 miles of an active maternal den site from March 15 through June 15, where feasible. To avoid potential impacts to nesting eagles, Pathway has been sited to avoid known eagle nest and roost locations to the extent practicable. CPW regulatory-based recommendations (CPW 2021) will be incorporated where practicable. All project construction activities will implement appropriate CPW avoidance buffers around active raptor nests to the extent practicable (CPW 2020). If construction activities must occur inside CPW recommended buffers of an active raptor nest, a qualified biologist will be assigned to monitor the active raptor nest during project construction to ensure nesting raptors do not become disturbed and abandon their nest. To avoid or minimize potential Pathway impacts to migratory birds and raptors, including eagles, Pathway will conduct tree/vegetation clearing during the nonbreeding season for birds (September 1 through April 15) if feasible. If vegetation clearing cannot occur during the nonbreeding season, vegetation clearance surveys, raptor nest surveys, and burrowing owl surveys may be conducted per USFWS and CPW guidance to identify avian nesting activity and determine appropriate avoidance buffers (CPW 2020, CPW 2021) or monitor active nest sites until determined to be inactive. Surveys for nesting raptors, burrowing owls, and other ground nesting birds will be conducted in areas with suitable nesting habitat prior to construction activities. In addition, electrical components of the transmission lines and Harvest Mile Substation equipment additions will be separated to minimize the risk of avian contact and will follow APLIC guidelines (APLIC 2006). Bird flight diverters or other marking devices may be used as determined necessary for specific locations. Xcel Energy met with CPW on June 10, 2025, to discuss CPW referral agency comments to discuss their referral agency comments to several of the Pathway Segment 5 permit applications that are ongoing, including CPW's comments to the Arapahoe County 1041 Application. CPW was provided a summary of the meeting notes and concurred with them. CPW has confirmed the approach Xcel Energy is taking related to biological issues for Pathway. Xcel Energy will continue to coordinate with USFWS and CPW to address concerns regarding wildlife impacts

Resource	Description of Proposed Mitigation
	throughout planning, design and construction of Pathway, and will comply with applicable regulatory requirements.
Electric and Magnetic Fields (EMF)	Xcel Energy will communicate with landowners adjacent to Pathway regarding the safe operation of equipment near a transmission line. Xcel Energy is required to meet state standards as outlined in 4 CCR 723-3. The CPUC provides reasonableness determinations associated with electric and magnetic fields and requires CPCN applicants to evaluate the expected level of noise of the proposed transmission facilities. A Noise and EMF Study was conducted for Pathway and submitted as part of Pathway's CPCN application, Proceeding No. 21A-0096E (Noise and EMF Study [ASI25-001-Noise and EMF Study]). The study concluded that magnetic field levels at the edge of the Pathway transmission line ROW are projected to be 54.7 milligauss (mG). These levels are below the 150 mG level deemed reasonable by CPUC Rule 3206(e) at 25%, 50% and 100% of the conductor current carrying capacity and were deemed reasonable by the CPUC. Because the projected EMF levels are deemed reasonable by the CPUC, they do not need to be mitigated to a lower level. Pathway facilities will be designed, constructed, operated, and maintained to meet or exceed applicable standards of design and performance set forth in the National Electrical Safety Code.
Land Use	Pathway will not cause a significant change in land use in the immediate area. Current uses adjacent to the Pathway facilities will be able to continue mainly unchanged post construction.
Noise	Construction vehicles and equipment will be maintained in proper operating condition and equipped with manufacturer's standard noise control devices (e.g., mufflers or engine enclosures). Construction activities will comply with the requirements of CRS 25-12-103.5 of a maximum of 80 dBA between 7:00 AM and 7:00 PM, and 75 dBA between the next 7:00 PM and the next 7:00 AM. In accordance with C.R.S. § 25-12-103(12)(a), which is part of the statutory framework governing noise abatement, the CPUC may determine in the context of reviewing an application for a CPCN for electric transmission facilities that the projected noise levels for such facilities are reasonable. Under C.R.S. § 25-12-103(12)(b), because of the statewide need for reliable electric service and the public benefit provided by electric transmission facilities, no county may adopt an ordinance or resolution setting noise standards for electric transmission facilities that are more restrictive than what is determined to be reasonable by the CPUC as part of the CPCN approval process. Therefore, Xcel Energy is required to meet CPUC state standards as outlined in 4 CCR 723-3. The CPUC provides reasonableness determinations associated with noise and requires

Resource	Description of Proposed Mitigation
	CPCN applicants to evaluate the expected level of noise of the proposed transmission facilities. Based on the noise study conducted for Pathway (Noise and EMF Study [ASI25-001-Noise and EMF Study]), the maximum projected noise level measured at 25 feet from the edge of the Pathway ROW is 49.8 dBA, and the maximum projected noise level at 25 feet from the Harvest Mile Substation is 57 dBA. Pursuant to CPUC Rule 3206(f), noise levels below 50 dBA are not subject to further review (4 CCR 723-3). Pursuant to CPUC Rule 3206(f), noise levels below 75 dBA are deemed reasonable for land within Industrial Zoning at 25 feet from the property line (4 CCR 723-3). The Harvest Mile Substation is not located on land for which there is a zoning-dependent noise level limit deemed reasonable by CPUC Rule 3206(f) as Rule 3206(f) does not identify an audible noise level that is deemed reasonable for land zoned agricultural. However, the Arapahoe County approved use of the Harvest Mile Substation property is most closely related to an industrial use. When considered as an industrial property, the noise from the Harvest Mile Substation is not anticipated to exceed 75 dBA at 25 feet from the property line, which is deemed reasonable by the CPUC for industrial zoned property. The projected noise levels from the Pathway transmission line and Harvest Mile Substation were deemed reasonable by the CPUC. The full buildout of the Harvest Mile Substation equipment additions, unrelated to the transmission line, was permitted through the Pawnee-Daniels 345-kV Transmission Line project in 2017 (case numbers ASI16-004 - 1041 Case File, L16-006 – Planning Case File, and EL16-006 – Engineering Case File). The substation site, pad layout, and drainage were all designed and permitted for the full buildout as part of the Pawnee-Daniels 345-kV Transmission Line permits. The installation of the new equipment at the Harvest Mile Substation is not part of the request for this Application for Pathway. This Application for Pathway is intended to cover transmission improvements. As a part of Pathway, Xcel Energy is constructing the infrastructure at the Harvest Mile Substation as permitted through the Pawnee-Daniels 345-kV Transmission Line project in 2017. The CPUC evaluates the noise levels per state statute 4 CCR 723-3. Noise levels are assessed based on specific land uses. A substation isn't specifically called out as a land use in 4 CCR 723-3, but 4 CCR 723-3 does have reasonable noise limits for industrial zoned properties, which is the most analogous use to the Harvest Mile Substation.
Natural Hazards	Transmission lines are designed to withstand extreme weather conditions and protective devices at line terminals stop the electricity flow under abnormal operating circumstances. The

Resource	Description of Proposed Mitigation
	transmission poles will be equipped with shield wires above the energized line; this equipment adds to the pole height but also provides protection against lightning strikes. Xcel Energy's transmission lines are monitored 24/7/365 for line contact, the term describing when an object comes in contact with the transmission line conductors. If there is an unanticipated event in the line, the line is isolated from the system to protect the public and the line from operating under unsafe conditions. Xcel Energy's transmission lines are inspected annually to check for line connections and damage. Xcel Energy's facilities are designed, constructed, operated and maintained to meet or exceed applicable requirements of the Institute of Electrical and Electronics Engineers (IEEE) standards and accepted industry standards and practices including IEEE 979, Guide for Substation Fire Protection. Applicable fire laws and regulations, as outlined in CRS 31-15-601, will be observed during construction and normal operation of the transmission line and substation. In the rare event of a fire emergency, Xcel Energy will likely be aware of an issue before the general public or emergency responders. Nevertheless, the public is encouraged to contact Xcel Energy's emergency number: 800-895-1999. In the event of an outage or equipment failure, the affected equipment is immediately de-energized by the breaker equipment and Xcel Energy personnel are dispatched to the site. Xcel Energy personnel receive safety training for emergency situations relating to high-voltage electrical equipment. Xcel Energy also coordinates closely with local fire departments and first responders and consults with them to discuss any concerns within their response area. Xcel Energy offers free online safety training to fire departments and first responders that is based on national standards through its Responding to Utility Emergencies Program.
Cultural Resources	Pathway will avoid identified cultural resource locations to the extent practicable. No transmission line poles will be constructed within site boundaries and the sites will not be impacted. If needed, the Pathway transmission poles on either side of the historic transmission line will be designed to be taller to increase the clearance.
Socioeconomic	Given the relatively small size of the crews needed for construction and the temporary of the construction activities, no impacts to availability of public resources and services are anticipated. Revenue may increase for some local businesses, such as restaurants, gas stations, grocery stores, and hotels, as well as other local businesses.

Resource	Description of Proposed Mitigation
Soils and Geology	Pathway will be constructed based on the result of geotechnical studies to determine the size and type of foundations needed to support transmission line poles and avoid geological hazards. During construction, Xcel Energy's contractor will minimize any soils impacts by strictly adhering to a CDPHE-regulated SWMP and will institute and maintain erosion and sediment control BMPs designed to protect soils and prevent erosion.
Toxic and Hazardous Substances	No hazardous materials will be permanently used, stored, or generated on site of Pathway facilities. Hazardous materials used during construction and operation will be used and disposed of in compliance with all applicable federal, state, and local regulations. Construction, operation, and maintenance activities will comply with applicable federal, state, and local laws and regulations regarding the use of hazardous substances. Pathway construction in Arapahoe County will comply with the Spill Prevention and Response Procedures provided in Section 2.15.a. Construction activities will be performed by methods that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into flowing streams or dry watercourses, lakes, and underground water sources. Activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment.
Transportation	Traffic Control Plans will be developed in areas where travel on roadways could be impacted during construction. Construction updates and schedules will be discussed with local government officials as needed as details are determined. Necessary road use and ROW permits will be obtained from Arapahoe County and from CDOT for state highway/interstate crossings as needed prior to construction. Xcel Energy will negotiate a Road Damage Agreement with Arapahoe County to cover road repairs required due to Pathway construction traffic.
Vegetation	Pathway will avoid or minimize impacts to vegetation generally as practicable. Impacts to most vegetation will be temporary and limited to the 150-foot-wide Pathway ROW and TCAs. The Pathway ROW will be cleared of tall vegetation for ongoing maintenance. Measures will be implemented to minimize the spread of noxious weeds in the Pathway ROW, as described in ASI25-001_Noxious Weed Control Measures. To avoid or minimize impacts to aquatic habitat within the Pathway ROW, surface waters, riparian areas, and wetlands in areas less than 1,400 feet width at the crossing will be spanned as practicable. Pathway will adhere to BMPs and erosion control measures outlined in the SWMP as well as the GESC Plan.

Resource	Description of Proposed Mitigation
	After construction has been completed for the Pathway segment, all TCAs and the transmission line ROW will be restored in a manner generally similar to their condition prior to construction or as may be provided for in private agreements. This work may include drain tile and fence repair, rut removal, decompaction, tilling, seeding and stabilization measures. All areas not needed for ongoing operations and maintenance and not being used for crop production, will be re-seeded as soon as practicable following construction in a given area. Xcel Energy's ROW agents will meet with landowners to learn about site-specific circumstances which may need to be addressed, including any loss or damage that occurs to crops or other non-restorable property during construction. Xcel Energy will maintain the transmission line ROW in accordance with its vegetation management standards for the life of Pathway and can provide Arapahoe County with contact information for any questions or concerns it may have about vegetation management of the line going forward. Xcel Energy performs vegetation maintenance in alignment with its existing Vegetation Management Standards which include wildfire risk mitigation strategies. The Standards include following an Integrated Vegetation Management approach regarding ongoing maintenance with an objective of clearing all noncompatible vegetation within the maintained right-of-way of the easement. Vegetation maintenance for Xcel Energy's facilities is required to be in compliance with requirements defined in the North American Electric Reliability Corporation standard FAC-003-5 (NERC 2022).
Visual Resources	Where feasible, the Pathway route through Arapahoe County is co-located along existing linear infrastructure to minimize impacts to the surrounding area. The type of steel used will be weathering steel, which oxidizes to resemble a natural brown look and is not shiny. Existing undisturbed trees, shrubs, and native vegetation will be preserved to the extent possible to maintain visual contrast in the landscape. Following construction, the Pathway ROW will be restored to pre-construction conditions.
Waste	Enclosed containment will be provided for trash disposal. Construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials, will be removed and taken to a disposal facility authorized to accept such materials as provided in Section 2.15.a. Construction activities will be performed by methods that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into flowing streams or dry watercourses, lakes, and underground water sources. All activities will follow BMPs for the

Resource	Description of Proposed Mitigation
	management of wastes to avoid and minimize effects from potential spills or other releases to the environment. Pathway will not create any wastewater nor have any facilities requiring wastewater treatment. Portable temporary bathrooms that will be serviced on a regular basis will be on site during the construction period.
Water Resources	Transmission poles will be set back from channel banks to avoid impacts to floodplains where practicable. Temporary impacts to wetlands and WOTUS during construction of Pathway will be avoided. To avoid potential indirect impacts from construction-related erosion and sediment movement during construction, Pathway will adhere to BMPs outlined in the SWMP as well as the GESC Plan, which will include erosion control and revegetation measures. In areas where access roads are not planned to cross a wetland or stream and crossing of a wetland or stream is not necessary for Pathway construction, driving access will be restricted by installing high-visibility construction fencing as a visual aid to prohibit construction subcontractors from driving through aquatic features in order to avoid impacts to potentially jurisdictional wetlands, State Waters, and WOTUS. Construction activities will be performed in a manner that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into flowing streams or dry watercourses, lakes, and underground water sources. All activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment. Impacts to water quality will be minimized during construction through BMPs and the site-specific SWMP. Pathway will not impact the quantity or quality of water flowing off of the site. The transmission line will span streams and waterways that cross the corridor and impacts to jurisdictional waters will be avoided. Xcel Energy will comply with permit application requirements, County Standards, and construction protocol to ensure that Pathway does not violate water quality standards. Prior to construction, a GESC Permit will be obtained from Arapahoe County for the transmission line and a Storm Water Permit for Construction Activities will be obtained from CDPHE.

2.17.a.1 Mitigation Implementation and Financing III(C)(17)(a)(i)

Impacts will be minimized during construction of Pathway and will be addressed by Xcel Energy. If mitigation attributable to impacts is required, it will be addressed and financed during construction by Xcel Energy pursuant to permit requirements.

2.17.a.2 Unavoidable Impacts that Cannot be Mitigated III(C)(17)(a)(ii)

Mitigation proposed to avoid and minimize adverse impacts of Pathway are listed by resource in Table 13. Mitigation measures will be implemented as described in Table 13 and as required by the site-specific SWMP and ROW permits. It is anticipated that all adverse impacts can be mitigated.

2.17.b Description of Methodology to Measure Impacts and Effectiveness of Mitigation Measures III(C)(17)(b)

Mitigation measures are listed by resource in Table 13. Monitoring will be measured as required by the site-specific SWMP and ROW permits.

2.17.c Proposed Monitoring III(C)(17)(c)

Mitigation measures are listed by resource in Table 13. Effectiveness of mitigation and monitoring efforts will be evaluated as required by the site-specific SWMP and ROW permits.

2.18 TRANSPORTATION IMPACTS III(C)(18)**2.18.a Impacts on Transportation Patterns III(C)(18)(a)**

Construction of Pathway is not expected to result in significant effects to Arapahoe County transportation and any impacts will be temporary in nature. Work crews will mobilize each day from the laydown yard to the work areas. Traffic to local work areas will be limited to supervisory vehicles transporting work crews, required construction equipment, and equipment delivery vehicles. It is not anticipated that construction equipment or labor transportation will have a significant impact on traffic volumes or flow on local roadways or state/county highways. Any increases in traffic will be short term in nature and limited to the construction time period near individual transmission poles.

Pathway facilities in unincorporated Arapahoe County will cross or be located parallel to East Quincy Avenue for approximately 11.5 miles and cross (listed west to east) South Harvest Road, East Quincy Avenue, South Watkins Road, South Manila Road, South Lookout Hill Road, Tom Bay Road, E Geddes Avenue, and County Line Road (County Road 50).

Construction traffic is discussed in Section 2.3.a.6 of this Application. Traffic will be delayed temporarily for the time it takes to string conductor across the road. Traffic Control Plans will be developed in areas where travel on roadways could be impacted during construction. Construction updates and schedules will be discussed with local government officials as needed as details are determined. Necessary road use and ROW permits will be obtained from Arapahoe County as needed prior to construction. Xcel Energy will negotiate a Road Damage Agreement with Arapahoe County to cover road repairs required due to Pathway construction traffic.

Pathway does not cross any railroads in Arapahoe County; as such, no impacts to railroads are anticipated.

Pathway is not located within the approach or departure zone of any airports in Arapahoe County. The closest airport to the Pathway route within Arapahoe County is the Buckley Space Force Base, approximately 4 miles to the northwest. On March 19, 2025, Xcel Energy met with Buckley Space Force Base authorities to discuss their concerns regarding potential interference of the transmission line route on training activities on Colorado State Land Board property outside of the base area within Arapahoe County. Subsequent to this conversation Xcel Energy revised the proposed transmission line route to avoid the areas of concern. On April 2, 2025, Xcel Energy met with Buckley Space Force Base to discuss the revised route. During this meeting, Buckley Space Force Base confirmed that the revised route addressed their concerns relative to training areas on State Land Board property and has confirmed that Pathway is not anticipated to impact training activities. The transmission line route that was approved by Buckley Space Force Base is the route proposed in this Application (see Vicinity Map ASI25-001_LE25-003-Vicinity Map). Therefore, no impacts to airports are anticipated. Xcel Energy will file with FAA as necessary for certain equipment or areas of the line.

2.18.a.1 *Transportation Facilities Required to Support Existing and Future Land Uses III(C)(18)(a)(i)*

No additional transportation facilities are required to support construction or operation of Pathway.

2.18.a.2 *Traffic Model Data III(C)(18)(a)(ii)*

Arapahoe County Public Works and Development has approved Xcel Energy's waiver request for providing a traffic impact study for Pathway for the following reasons:

- The project causes low trip generations – 106 total daily trips for the Transmission Line construction, 95 total daily trips for the construction of Substation Equipment Additions, and 1-2 times annual inspections.

- Generates a low impact to the traffic patterns expected during operation of the Pathway.

The approved Traffic Impact Study waiver is provided as ASI25-001_LE25-003-Traffic Waiver APR.

2.18.a.3 *Traffic Volume Impacts III(C)(18)(a)(iii)*

Arapahoe County Public Works and Development has approved Xcel Energy's waiver request for providing a traffic impact study for Pathway for the following reasons:

- The project causes low trip generations – 106 total daily trips for the Transmission Line construction, 95 total daily trips for the construction of Substation Equipment Additions, and 1-2 times annual inspections.
- Generates a low impact to the traffic patterns expected during operation of the Pathway.

The approved Traffic Impact Study waiver is provided as ASI25-001_LE25-003-Traffic Waiver APR.

2.18.a.4 *Level of Service and Capacity III(C)(18)(a)(iv)*

Arapahoe County Public Works and Development has approved Xcel Energy's waiver request for providing a traffic impact study for Pathway for the following reasons:

- The project causes low trip generations – 106 total daily trips for the Transmission Line construction, 95 total daily trips for the construction of Substation Equipment Additions, and 1-2 times annual inspections.
- Generates a low impact to the traffic patterns expected during operation of the Pathway.

The approved Traffic Impact Study waiver is provided as ASI25-001_LE25-003-Traffic Waiver APR.

2.18.a.5 *Transportation Access Information III(C)(18)(a)(v)*

Arapahoe County Public Works and Development has approved Xcel Energy's waiver request for providing a traffic impact study for Pathway for the following reasons:

- The project causes low trip generations – 106 total daily trips for the Transmission Line construction, 95 total daily trips for the construction of Substation Equipment Additions, and 1-2 times annual inspections.
- Generates a low impact to the traffic patterns expected during operation of the Pathway.

The approved Traffic Impact Study waiver is provided as ASI25-001_LE25-003-Traffic Waiver APR.

2.19 BENEFIT/COST ANALYSIS III(C)(19)

Pathway is estimated to cost approximately \$1.7 billion and the Sandstone to Harvest Mile Segment will cost approximately \$372 million.

Project construction will require substantial amounts of contract labor, while also providing local jurisdictions and host communities with additional tax revenues and potential employment opportunities. Once Pathway has been completed, it will drive ongoing job opportunities and employment in the clean energy projects (wind, solar, etc.) that ultimately interconnect to Pathway. Pathway will not require additional local government services beyond those currently provided in the area. Pathway creates no additional demand for transportation infrastructure, educational facilities, housing, water (other than water for construction), wastewater treatment, or public transportation.

2.20 SUBMITTAL OF ENGINEERING STUDIES III(C)(20)

The Drainage Study is provided as ASI25-001_LE25-003-Drainage Study. The GESC Report is provided as ASI25-001_LE25-003-GESC Report, the GESC Plan is provided as ASI25-001_LE25-003-GESC Plans, and a GESC Permit Application is provided in ASI25-001_LE25-003-GESC Permit Application. The approved Traffic Impact Study waiver is provided as ASI25-001_LE25-003-Traffic Waiver APR.

2.21 REFERRALS TO OUTSIDE AGENCIES AND RESPONSE TO REFERRAL COMMENTS III(C)(21)

2.21.a Determination of Outside Referral Agencies III(C)(21)(a)

Xcel Energy understands that the Application will be provided to outside referral agencies. Agency comments are expected after the first submittal of the Application. Xcel Energy will provide responses to referral agency comments upon receipt.

2.21.b Review of Referral Packets III(C)(21)(b)

Xcel Energy understands that the Planning Division will review the referral packets in order to determine that there is sufficient information in the referral packet.

2.21.c Referral Packet Production and Mailing III(C)(21)(c)

Xcel Energy understands that if the referral packets are not sent electronically to the referral agencies, Xcel Energy will be responsible for putting the referral packets

together and addressing the envelopes, but the Planning Division will be responsible for mailing the packets.

2.21.d Referral Entity Response Time III(C)(21)(d)

Xcel Energy understands that the referral entities will have 30 days to respond. If a referral entity does not respond within the 30-day timeframe, the assumption will be made that the referral entity does not have an objection to the 1041 Application.

2.21.e Applicant Response to Comments III(C)(21)(e)

Following receipt of referral agency comments, Xcel Energy will respond to all of the referral comments and that response will be included as part of the Application.

3 SECTION III PART E: ADDITIONAL SUBMITTAL REQUIREMENTS APPLICABLE TO MAJOR FACILITIES OF A PUBLIC UTILITY

The following sections address additional submittal requirements applicable to major facilities of a public utility to address 1041 Regulations, Section III(E) 1 through 7.

3.1 MAP AND DESCRIPTION OF AREAS AROUND THE PROPOSED MAJOR FACILITIES OF A PUBLIC UTILITY III(E)(1)

Pathway facilities proposed for approval under this Application in Arapahoe County include approximately 18 miles of 345-kV double-circuit transmission line in Segment 5 excluding the 1 mile of transmission line that is located within the City of Aurora (Vicinity Map [ASI25-001_LE25-003-Vicinity Map]). The proposed route in Arapahoe County is generally located in the area east of E-470 and south of I-70 and Watkins and is oriented in a west to east direction. The proposed route runs parallel to East Quincy Avenue south of Watkins and Strasburg and west of Brick Center Road (County Road 129) as shown in Vicinity Map (ASI25-001_LE25-003-Vicinity Map).

A detailed description of Pathway is included in Section 2.3. A list of the townships, ranges, and sections crossed by Pathway facilities within unincorporated Arapahoe County is provided in Legal Description/Ownership Information (ASI25-001_LE25-003-Legal Desc).

3.2 POTENTIAL FOR NEARBY ACTIVITIES TO DISRUPT UTILITY SERVICES III(E)(2)

Xcel Energy's transmission lines are monitored 24/7 for line contact, the term describing when an object comes in contact with the transmission line conductors. If there is an unanticipated event in the line, the line is isolated from the system to protect the public

and the line from operating under unsafe conditions. Xcel Energy's transmission lines are inspected annually to check for line connections and damage. For the safety of the general public, unauthorized personnel are not permitted to enter the substation site or come in contact with the transmission line conductor wire. Nearby activities are not anticipated to disrupt the operation of the transmission line or substation.

Xcel Energy's substations and powerlines are monitored and controlled remotely from an operations center where event response is coordinated. In the rare event of an emergency, Xcel Energy will likely be aware of an issue before the general public or emergency responders. Nevertheless, the public is encouraged to contact Xcel Energy's emergency number: 800-895-1999 in the event of an emergency.

Unauthorized personnel, including emergency responders, should not approach the facilities and should not touch the electric lines or anyone or anything in contact with them. In the event of an outage or transformer failure, the affected substation equipment is immediately de-energized by the breaker equipment and Xcel Energy personnel are dispatched to the site. Xcel Energy personnel receive safety training for emergency situations relating to high-voltage electrical equipment. Xcel Energy also coordinates closely with local fire departments and first responders and consults with them to discuss any concerns within their response area. Xcel Energy offers free online safety training to fire departments and first responders that is based on national standards through the Responding to Utility Emergencies Program.

3.3 EXISTING COMMUNITY PATTERNS III(E)(3)

Pathway will not cause a significant impact in the immediate area in Arapahoe County. Current uses adjacent to the Pathway facilities will be able to continue mainly unchanged after construction, thereby preserving desirable community and rural patterns which exist. Following construction, agricultural activities along the transmission line route can continue outside of the small area occupied by the transmission poles.

Land Use is discussed in further details in Section 2.7.

3.4 COMPLIANCE WITH ADOPTED COMPREHENSIVE PLAN PROVISIONS III(E)(4)

Pathway complies with the following policies of the 2018 Arapahoe County Comprehensive Plan (Arapahoe County 2022): Growth Management; Public Facilities and Services; Neighborhood Livability; Economic Health; Transportation and Mobility; Natural and Cultural Resources and Environmental Quality; Rural Area; and Tier 3. A summary of Pathway compliance with each of these policies is provided in this section.

Compliance with the applicable subgoals and policies of each of these policies are discussed in more detail in ASI25-001_LE25-003-Consistency with Comp Plan.

Growth Management Policies (Goals GM1 and GM3; Policies GM 1.2, GM 1.3, GM 3.1, GM 3.4, GM 3.5)

Pathway has been designed to mitigate against negative impacts to property owners with respect to use and enjoyment of their land including but not limited to agricultural practices. The transmission line alignment spans existing irrigation ditches and pivot irrigation in fields and follows section lines, road ROWs, and property boundaries to minimize effects on existing uses and agricultural operations. Aside from the transmission pole foundation footprint, areas under and around Pathway facilities can continue to be used for agricultural operations after construction has been completed.

The proposed Pathway alignment through unincorporated Arapahoe County is generally located in areas with low risks from both natural- and human-caused hazards. However, due to the spatial nature of the project, the proposed route will require crossing multiple FEMA-mapped floodplain boundaries within the County's jurisdiction. Pathway will avoid regulated floodplains to the extent practicable. The transmission line will span floodplain areas with overhead conductors where feasible. Xcel Energy will submit separate floodplain permits for processing by Arapahoe County and SEMSWA, as applicable, to ensure compliance with each jurisdiction's regulations on this matter.

Additionally, transmission lines are built and maintained to meet or exceed safety standards, such as those specified by the National Electrical Safety Code (NESC) and the North American Electric Reliability Corporation. Every effort is made to ensure safety in construction, operation, and maintenance of transmission lines. Transmission lines are designed to withstand extreme weather conditions, and protective devices at line terminals stop the electricity flow under abnormal operating circumstances. The transmission poles will be equipped with shield wires above the energized line; this equipment adds to the pole height but also provides protection against lightning strikes.

Xcel Energy's transmission lines are monitored 24/7/365 for line contact, the term describing when an object comes in contact with the transmission line conductors. If there is an unanticipated event in the line, the line is isolated from the system to protect the public and the line from operating under unsafe conditions. Xcel Energy's transmission lines are inspected annually to check for line connections and damage. For the safety of the general public, unauthorized personnel are not permitted to come in contact with the transmission line conductor wire.

Public Facilities and Services Policies (Goals PFS 6, PFS 7, PFS 8, PFS 12, PFS 13; Policies PFS 6.1, PFS 7.1, PFS 8.1, PFS 12.1, PFS 12.2, PFS 12.3, and PFS 13.1)

Pathway will improve the state's electric grid and enable future renewable energy development by providing backbone transmission capacity. Pathway will allow developers of energy generation projects to interconnect energy resources located in the areas of the state that are underserved by backbone transmission lines and allow Xcel Energy to deliver energy to electric customers.

Xcel Energy coordinates closely with local fire departments and first responders and consults with them to discuss any concerns within their response area. Xcel Energy offers free online safety training to fire departments and first responders that is based on national standards through the Responding to Utility Emergencies Program.

Xcel Energy's facilities are designed, constructed, operated, and maintained to meet or exceed all applicable requirements of the IEEE standards and accepted industry standards and practices including IEEE 979, Guide for Substation Fire Protection. Applicable fire laws and regulations as outlined in CRS 31-15-601 will be observed during construction and normal operation of the transmission line and substation.

Fires along transmission lines are very rare. Xcel Energy's powerlines are monitored and controlled remotely from an operations center where event response is coordinated. In the rare event of an emergency, Xcel Energy will likely be aware of an issue before the general public or emergency responders. Nevertheless, the public is encouraged to contact Xcel Energy's emergency number 800-895-1999 to report an emergency. Unauthorized personnel, including emergency responders, should not approach the facilities and should not touch the electric lines or anyone or anything in contact with them.

Xcel Energy also coordinates closely with local fire departments and first responders and consults with them to discuss any concerns within their response area. Xcel Energy offers free online safety training to fire departments and first responders that is based on national standards through the Responding to Utility Emergencies Program.

Routing a new transmission line and siting a substation require a comprehensive review and analysis of factors and criteria including, but not limited to, electric system planning, engineering, environmental and cultural resources, land use, regulatory requirements, land rights, stakeholder input, and public and worker safety. Routing and siting studies were prepared to review and consider reasonable routing and siting alternatives for the new major electrical facilities (pursuant to CRS 29-20-108(4)(a) and (b)). The process is described in detail in the routing and siting studies for each segment of Pathway. The

Addendum to Routing and Siting Study for Segment 5 is attached to this Application as ASI25-001_LE25-003-Routing and Siting Study.

Waste generated during construction activities will be properly disposed of. Recyclable and scrapable waste materials, including steel and aluminum, will be collected separately for recycling, where feasible.

Neighborhood Livability Policies (Goals NL1, NL 2, NL3, NL5; Policies NL 1.5, NL 2.1, NL 3.1, NL 3.6, NL 3.7, NL 5.1)

Pathway is a critical component to Xcel Energy's efforts to meet the state's statutorily required clean energy targets as well as Colorado's growing electricity needs. Avoidance of residential neighborhoods, subdivisions and planned developments were major factors in identifying the preferred and alternative routes (see Addendum to Routing and Siting Study for Segment 5 [ASI25-001_LE25-003-Routing and Siting Study]). Residential areas are concentrated in specific sections of Arapahoe County and are more widespread within the more rural parts of unincorporated Arapahoe County where Pathway is sited. Existing residences are shown on Vicinity Map (ASI25-001_LE25-003-Vicinity Map).

By working with individual landowners, obtaining, and meeting applicable federal state and county permits, co-locating the transmission line route, or strategically running the route adjacent to other existing public infrastructure improvements, the Pathway alignment mitigates and minimizes to the furthest extent possible the impacts to the health, safety, and welfare of the adjacent agricultural inhabitants. Pathway will not affect wetlands or critical habitats in Arapahoe County. Sensitive natural resource areas, including wetlands and critical habitats for wildlife, were specifically considered as part of the routing and siting analysis when the preferred location for the transmission line was identified to minimize potential interference from Pathway facilities (see Addendum to Routing and Siting Study for Segment 5 [ASI25-001_LE25-003-Routing and Siting Study]). Xcel Energy has communicated with CPW and USFWS representatives regarding Pathway and will continue to coordinate with them throughout design and construction of Pathway and comply with applicable regulatory requirements.

Pathway will also support healthy communities by enhancing the socioeconomic environment in Arapahoe County during the construction period via increased revenue to local businesses and social services. Construction will require contract labor and provide local jurisdictions and host communities with additional tax revenues and potential employment opportunities. Once in operation, Pathway may facilitate ongoing job opportunities and employment associated with clean energy projects (wind, solar,

etc.) that may be approved by Arapahoe County or its surrounding jurisdictions that will ultimately interconnect to Pathway.

Noise and EMF studies were conducted for Pathway and submitted as part of Pathway's Certificate of Public Convenience and Necessity application. Transmission lines are built and maintained to meet or exceed safety standards, such as those specified by the NESC and the North American Electric Reliability Corporation. Xcel Energy's transmission lines are monitored 24/7/365 for line contact.

Construction, operation, and maintenance activities will comply with applicable federal, state, and local laws and regulations regarding the use of hazardous substances. Xcel Energy will apply for a CDPHE APEN for land development prior to construction.

The Powerline Trails Act was passed in 2022 to help raise awareness and create opportunities for Public Entities to co-locate public recreation trails within Transmission Corridors. Xcel Energy has notified Arapahoe County of the potential for construction of a Powerline Trail within the Pathway Transmission Corridor.

Economic Health Policies (Goals EH 1, EH 4, EH 5; Policies EH 1.1, EH 1.2, EH 1.3, EH 4.1, EH 4.3, EH 5.1)

Pathway is sited in agricultural and industrial use areas and is compatible with these land uses. Pathway will not impact current or future land uses.

Pathway will add a network transmission system that can integrate environmentally friendly wind and solar generation sources in the Eastern Plains region of Colorado where they are most efficient to where the energy demand is the highest. By linking the best areas for generating wind and solar energy with where demand is, Pathway will improve the state's electric grid and enable future renewable energy development in the Eastern Plains region of Colorado. Pathway will increase electric service safety and reliability, boost the regional economy, and create jobs during construction. As such, Pathway will not only encourage but will be a catalyst for environmentally friendly businesses and jobs locating in Arapahoe County.

Pathway will deliver economic benefits to rural communities across eastern and southern Colorado, including Arapahoe County, over the short and long-term. More immediately, Pathway construction will provide local jurisdictions and host communities with potential additional tax revenue and employment opportunities. Xcel Energy anticipates that the maximum number of construction workers on site for the substation and transmission line on any one day will be approximately 95 total³. Construction crews may reside in the area during construction. Revenue may increase for local

³ Personnel may not be located or concentrated at same work area on the same day.

businesses such as restaurants, gas stations, grocery stores, hotels, and other local businesses. Existing businesses and social services are adequate to support Pathway given the size of the construction crew and temporary nature of the construction activities. No impacts to emergency health care facilities or law enforcement services are therefore anticipated.

Once Pathway has been constructed, it may facilitate ongoing job opportunities and employment associated with clean energy projects (wind, solar, etc.) that may be approved by Arapahoe County or its surrounding jurisdictions that will ultimately interconnect to Pathway.

New electric power generated in the Eastern Plains will be delivered to the Harvest Mile Substation in Arapahoe County where it can be distributed throughout the system in Arapahoe County to meet future electric demand needs for business, redevelopment, and new projects.

Pathway is designed to enhance Colorado's electric transmission infrastructure, providing significant benefits to all Colorado residents, including those in Arapahoe County. Xcel Energy currently owns and operates several high voltage electric transmission lines within Arapahoe County and provides transmission service to other utilities, including those that directly serve Arapahoe County homes and businesses. Xcel Energy directly serves over 278,000 customers in Arapahoe County (Xcel Energy 2024); Pathway will connect directly to the existing 230-kV Harvest Mile Substation that serves Arapahoe County. The interconnected nature of the state's electric grid ensures that improvements in transmission capacity and reliability have widespread positive impacts to the state as a whole. Therefore, while Arapahoe County residents may receive electricity from different local providers that connect to the state's electric grid, Pathway's enhancements to the state's transmission infrastructure offer benefits through improved grid reliability, access to new generation resources, economic opportunities, and support for statewide environmental objectives and requirements.

1. Enhanced Grid Reliability and Resilience:

- Pathway will strengthen Colorado's electric grid, reducing the likelihood of outages and improving the system's ability to handle peak demands. This enhancement benefits all users connected to the grid, regardless of their specific local service provider.

2. Open Access Transmission:

- Colorado operates an open transmission system, allowing various utilities and cooperatives to utilize the transmission infrastructure. This open access ensures that the benefits of enhanced transmission capacity are shared across multiple service providers, benefiting Arapahoe County residents through improved grid performance.

- Pathway will provide bulk electric transmission capacity in eastern Colorado and will not change local electric service providers. Pathway will create a network transmission system that can integrate new generation resources needed to meet Colorado's clean energy goals and requirements. Pathway is a backbone transmission system that will connect generation sources in eastern Colorado to demand throughout Colorado. The current electric transmission facilities in the Eastern Plains do not have adequate capacity to meet the forecasted demand. Facilities in Arapahoe County are part of the larger Pathway that creates a transmission "loop" to provide additional transmission capacity. Pathway will be able to integrate approximately 6,500 megawatts of electric power output from new generation sources.
- 3. Economic Development and Job Creation:**
 - The construction and maintenance phases of Pathway are projected to create jobs and stimulate economic activity in Arapahoe County. This influx can lead to increased demand for local services and generate additional tax revenues, which can be reinvested into community projects and services, contributing to community development and prosperity.
- 4. Compliance with State Energy Policies:**
 - Pathway aligns with Colorado's legislative mandates aimed at reducing carbon emissions and promoting renewable energy adoption. By supporting these policies, Pathway contributes to environmental sustainability efforts that benefit all residents of the state.

Pathway supports the state-mandated goal of an 80% reduction in carbon emissions by 2030, which all electric utilities are required to comply with. Colorado has an open transmission system, so Xcel Energy's transmission lines also carry electricity generated by other utilities and cooperatives around the state, benefitting everyone who uses electricity. All transmission providers in Colorado will have access to Colorado's Power Pathway to deliver clean, renewable energy to its customers, who will still be serviced by their current power provider. Because Colorado's open transmission system carries electricity generated by multiple utilities that is distributed to homes and businesses by local power companies, both electric utilities and electricity users around the state benefit from Pathway. The design and need of Pathway have been approved by the CPUC and represents the use and application of best technology and industry standards for transmission and transformation of electric energy.

Transportation and Mobility Policies (Goals TM 1, TM 2, TM 3; Policies TM 1.2, TM 1.3, TM 2.1, TM 3.1)

Pathway will not require construction of new public roads. Pathway has been sited to preserve section line roadway alignments for future widening and install poles outside of the future road ROW and will obtain easements located outside of existing road ROW. The expansion of Qunicy Avenue will incorporate sidewalks at full build out, Pathway

will not obstruct this. In addition, Pathway will utilize its right-of-way for future trail expansions planned in the area. Pathway has been designed to locate future poles outside of areas designated by the Parks, Recreation & Open Space division for future trail systems.

During construction, temporary traffic impacts are expected to be minor. The impact on local roads will vary daily as construction teams move along the route. Permitting serves to mitigate potential impacts on local County roads. The permitting process includes the development of traffic control plans and necessary tracking control and remediation plans. The resulting conditions of approval will be followed through the Pathway construction. Following construction, no traffic impacts are anticipated.

Natural and Cultural Resources and Environmental Quality Policies (Goals NCR 1, NCR 2, NCR 3, NCR 4, NCR 6, NCR 8; Policies NCR 1.1, NCR 1.2, NCR 1.3, NCR 2.1, NCR 3.1, NCR 4.1, NCR 6.2, NCR 6.4, NCR 8.4)

Federal, state, and local agencies designate areas to help conserve habitats critical to migratory birds and other sensitive species (e.g., National Wildlife Refuges, National Grasslands, state parks, and state wildlife areas). The Jurisdiction Resource Maps in the Addendum to Routing and Siting Study for Segment 5 (ASI25-001_LE25-003-Routing and Siting Study) illustrate land jurisdiction for Pathway in Arapahoe County. No federally or state-managed conservation areas are within 1 mile of proposed Pathway facilities in Arapahoe County. In addition, no Critical Habitat designated by the USFWS is mapped in the same area (USFWS 2025c).

Beyond these priority habitats, Pathway will avoid or minimize impacts to habitat generally as practicable. Impacts to most vegetation will be temporary and limited to the 150-foot-wide Pathway ROW and TCAs. The Pathway ROW will be cleared of tall vegetation for ongoing maintenance. To avoid or minimize impacts to aquatic habitat within the Pathway ROW, surface waters, riparian areas, and wetlands in areas at a crossing will be spanned as practicable. Pathway will adhere to BMPs and erosion control measures outlined in the SWMP as well as the GESC Plan. The Pathway team will continue to coordinate with CPW and USFWS through permitting, construction, maintenance, and operation of Pathway as needed to ensure compliance with applicable federal and state regulations. Visual impacts of the transmission line will vary based on proximity and with distance, the scale of the transmission line poles will be minimized.

A desktop cultural resource analysis was completed in December 2022 and again in April 2025. Cultural resource records were reviewed using archaeological site files and the Compass maintained by the Colorado Historic Society Office of Archaeology & Historic Preservation. Included in the Compass database are records of properties listed in the National Register of Historic Places. The cultural resources site file search was

conducted for a 150-foot buffer of the transmission line ROW within Arapahoe County (the Research Area).

Within the Research Area are four (4) previously recorded cultural resources. These include: a prehistoric lithic scatter (5AH.73), a prehistoric open camp (5AH.414), a historic fence (5AH.1642), and a historic transmission line (5AH.1643). The open camp, fence, and transmission have been determined Not Eligible for listing in the NRHP by the OAHP, and the lithic scatter is Unevaluated (the site's eligibility for listing in the NRHP has not been evaluated by archaeologists or the OAHP).

Higher voltage transmission lines are generally installed crossing over lower voltage lines to avoid potential interference. Pathway will cross the historic transmission line. Note that the exact location of the historic transmission line cannot be provided within public documents in accordance with the required confidentiality agreement with the State Historic Preservation Office. If needed, the Pathway transmission poles on either side of the historic transmission line will be designed to be taller to increase the clearance. Pathway will span site 5AH.1642. Site 5AH.73 will be re-surveyed, and an official determination of eligibility will be obtained before construction of this project phase and the sites will not be impacted. No transmission line structures will be constructed within site boundaries and the sites will not be impacted.

Surface water flow from Pathway will not change due to the minor localized grading impacts and pole installation. Xcel Energy will apply for a CDPHE APEN for land development prior to construction and follow state standards to control the release of fugitive dust related to construction if necessary. Construction, operation, and maintenance activities will comply with applicable federal, state, and local laws and regulations regarding the use of hazardous substances.

Pathway will add a network transmission system that can integrate wind and solar generation sources in the Eastern Plains region of Colorado where they are most efficient to where the energy demand is the highest. Pathway is being routed through some of the best wind and solar resource zones in Colorado. New renewable energy generation is anticipated to be developed in these zones. By linking the best areas for generating wind and solar energy with where demand is, Pathway will improve the state's electric grid and enable future renewable energy development in the Eastern Plains region of Colorado. Pathway will increase electric service safety and reliability, boost the regional economy, and create jobs during construction. This Application describes a portion of Pathway in Arapahoe County; the overall system includes approximately 550 miles of transmission line and new and expanded substations that will encourage development of these Alternative Energy Sources.

Pathway does not connect to a specific power source. Facilities in Arapahoe County are part of the larger Pathway that creates a transmission “loop” to provide additional transmission capacity. Pathway is being routed through some of the best wind and solar resource zones in Colorado. New renewable energy generation is anticipated to be developed in these zones. The location of these new generation resources is currently unknown until Xcel Energy’s Electric Resource Plan process has been completed. Generally, however, new generation resources are expected to interconnect at substations located at segment endpoints.

Rural Area Goals and Policies (Goals RA GM 1, RA EH 1, and RA NCR 1; Policies RA GM 1.1, RA EH1.1, RA EH 2.1, RA EH 2.2, RA NCR 1.1)

Where feasible, the Pathway route through Arapahoe County is co-located along existing infrastructure to minimize impacts to the surrounding area. Of the approximately 18-mile transmission line route in Arapahoe County, approximately 13 miles (76 percent) is co-located along existing electric transmission infrastructure and existing roads. Two existing high voltage transmission lines are located on the south side of East Quincy Avenue as shown in Vicinity Map (ASI25-001_LE25-003-Vicinity Map).

Pathway is compatible with the existing agricultural and industrial land uses that surround the proposed transmission line routing through Arapahoe County. The transmission line alignment spans existing irrigation ditches and pivot irrigation in fields and follows section lines, road ROWs, and property boundaries to minimize effects on existing uses and agricultural operations. Aside from the transmission pole foundation footprint, areas under and around Pathway facilities can continue to be used for agricultural operations after construction has been completed.

No impacts to recreation areas are anticipated.

Tier 3 Goals and Policies (Goal T3 GM1; Policy T3 GM 1.1)

Construction and operation of Pathway will not inhibit agricultural production or operations. Pathway will result in minimal permanent impacts to agricultural lands. Aside from the transmission pole foundation footprint, areas under and around Pathway facilities can continue to be used for agricultural operations after construction has been completed.

Through private agreements with individual landowners, the proposed alignment spans existing irrigation ditches and pivot irrigation in fields. It is designed adjacent to and parallel with section lines, parcel boundaries, and public ROW to limit impacts from the development on overall agricultural operation and production in the area.

Pathway is anticipated to provide local economic benefits during construction and long-term economic benefits should new generation resources be developed in the area.

3.5 PROJECTIONS/FORECASTS OF NEED FOR ELECTRICITY III(E)(5)

The purpose of Pathway is to create a network transmission system that can integrate new generation resources needed to meet Colorado's clean energy goals. The current electric transmission facilities in the Eastern Plains do not have adequate capacity to meet the forecasted demand. Pathway will be able to integrate approximately 6,500 megawatts of electric power output from new generation. Pathway fills a need for a network transmission line facility to connect demand centers with areas of the state best situated for wind and solar generation projects.

3.6 IMPACT ON PROPERTY OWNERS AND CURRENT LAND USES COMPARED WITH ALTERNATE LOCATIONS III(E)(6)

Xcel Energy is currently negotiating with all of the landowners for necessary land rights along the proposed transmission line route. These negotiations include securing an option for a permanent non-exclusive easement for the 150-foot-wide ROW of the transmission line as well as permanent and temporary easements required for access and TCAs during and after construction. Once land surveying, final engineering design and permitting are complete, Xcel Energy will exercise the options and record the final easements. The easements required for Pathway construction on a parcel within Arapahoe County will be secured and recorded (or Order of Immediate Possession obtained from the district court, as applicable) prior to construction starting on that individual parcel.

Temporary impacts to existing land uses are expected to be minor. All disturbed areas surrounding new transmission poles would be revegetated following construction. Construction and operation of the transmission line would not interfere with continued use of the surrounding areas for existing uses.

Xcel Energy's ROW agents will meet with landowners to learn about site-specific circumstances which may need to be addressed, including any loss or damage that occurs to crops or other non-restorable property during construction.

Pathway routing and siting efforts were divided by segment and documented in a series of Routing and Siting studies. Each Routing and Siting Study is interrelated due to the overlap in segment Study Areas and shared substation endpoints. Each Routing and Siting Study documents the process utilized to review and consider reasonable siting and routing alternatives for the new major electrical facilities (pursuant to CRS 29-20-

108(4)(a) and (b)). The Addendum to Segment 5 Routing and Siting Study is included in ASI25-001_LE25-003-Routing and Siting Study and provides an alternatives analysis to address this requirement.

3.7 WATER SUPPLY PLAN III(E)(7)

A permanent water supply will not be required for Pathway, and no impacts to existing water rights are anticipated. Water may be used in dust suppression, and compaction activities. Xcel Energy's construction contractor's water source providers in Arapahoe County are as follows:

- Current Provider: On Time Communications LLC
 - Address: 1661 E Floyd Ave, Aurora, CO 80013
 - Agreement Duration: Current until September 2027
 - Daily Water Supply: 2,500 gallons
 - Water Source Location: OTC Yard, 2550 E 70th Ave, Denver, CO 80229
- Planned Provider: Pure Cycle
 - Address: 34501 E Quincy Ave, Building 1, Watkins, CO 80137
 - Daily Water Supply: 20,000 gallons
 - Water Source Location: Lowry Ranch fill station 39.637273, -104.622664, Arapahoe County, Colorado 80137.

Letters of Service from the current and planned water providers are provided as ASI25-001_LE25-003-Will Serve-Water.

4 SECTION V PART A: GENERAL APPROVAL CRITERIA

This section describes Pathway compliance with Arapahoe County §1041 Regulations General Approval Criteria (V.A. criteria 1 through 21).

4.1 DOCUMENTATION THAT PRIOR TO SITE DISTURBANCE ASSOCIATED WITH THE PROPOSED PROJECT, THE APPLICANT CAN AND WILL OBTAIN ALL NECESSARY PROPERTY RIGHTS, PERMITS AND APPROVALS. THE BOARD MAY, AT ITS DISCRETION, DEFER MAKING A FINAL DECISION ON THE APPLICATION UNTIL OUTSTANDING PROPERTY RIGHTS, PERMITS AND APPROVALS ARE OBTAINED V(A)(1)

Property Rights, Permits and other Approvals are discussed in Section 2.4 and are summarized in this section. Local permits and approvals that may be required by Arapahoe County include, but are not limited to, this 1041 Permit, Street Cut ROW Use Permits, GESC Permit; Floodplain Development Permit; Oversize/Overweight Permits, and Temporary Use Permits. Any necessary construction-related authorizations, which are typically administrative in nature, will be obtained between the time local land use permits are approved and when construction begins.

Xcel Energy is currently negotiating with all of the landowners for necessary land rights along the proposed transmission line route. These negotiations include securing an option for a permanent non-exclusive easement for the 150-foot-wide ROW of the transmission line as well as permanent and temporary easements required for access and TCAs during and after construction. Once land surveying, final engineering design and permitting are complete, Xcel Energy will exercise the options and record the final easements. The easements required for Pathway construction on a parcel within Arapahoe County will be secured and recorded (or Order of Immediate Possession obtained from the district court, as applicable) prior to construction starting on that individual parcel.

State approvals anticipated for Pathway may include permits for road, bridge and highway crossings or road occupancy permits from CDOT and stormwater discharge permits and APEN from CDPHE. Xcel Energy will negotiate easements with the Colorado State Land Board for the portions of the Pathway transmission line on state-owned lands. The CPUC has provided written approval of the CPCN for Segments 1 through 5 based on a determination that Pathway is in the public interest (see Section 1).

All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and during construction of each project phase as required.

4.2 THE PROPOSED PROJECT CONSIDERS THE RELEVANT PROVISIONS OF THE REGIONAL WATER QUALITY PLANS V(A)(2)

Regional water quality management is discussed in Section 2.5, and a summary of this information is provided in this section. Pathway will not be inconsistent with the South Platte Basin Implementation Plan (Colorado Water Conservation Board 2022). Water quality will be maintained during construction by using BMPs and the site-specific SWMP. The transmission line will span streams and waterways that cross the corridor. A permanent water supply will not be required for Pathway.

4.3 THE APPLICANT HAS THE NECESSARY EXPERTISE AND FINANCIAL CAPABILITY TO DEVELOP AND OPERATE THE PROPOSED PROJECT CONSISTENT WITH ALL REQUIREMENTS AND CONDITIONS V(A)(3)

Financial Feasibility is discussed in Section 2.6, information describing the applicant is discussed in Section 2.2, and a summary of this information is provided in this section. Xcel Energy has both the necessary expertise and financial capability to develop and operate Pathway. Per the CPUC CPCN approval on June 2, 2022, in doing so, the CPUC determined that Xcel Energy met its burden of proof to establish that Pathway is in the State's public interest and recovery of the anticipated cost of Pathway is appropriate. All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and during construction as required, and BMPs will be implemented to address public health, safety, and welfare and in accordance with permit conditions.

4.4 THE PROPOSED PROJECT IS TECHNICALLY AND FINANCIALLY FEASIBLE V(A)(4)

Technical and financial feasibility are discussed in Section 2.2.d and Section 2.6, and a summary of this information is provided in this section. Per the CPUC CPCN approval on June 2, 2022, in doing so, the CPUC determined that Xcel Energy met its burden of proof to establish that Pathway is in the State's public interest and recovery of the anticipated cost of Pathway is appropriate. All necessary land use, environmental, and construction permits, approvals and authorizations will be obtained prior to the start of and during construction as required, and BMPs will be implemented to address public health, safety, and welfare and in accordance with permit conditions. Xcel Energy's 2024 Annual Report is provided as ASI25-001-Annual Report.

4.5 THE PROPOSED PROJECT IS NOT SUBJECT TO SIGNIFICANT RISK FROM NATURAL HAZARDS V(A)(5)

Natural Hazards are discussed in Section 2.12.h, and a summary of this information is provided in this section. Pathway has been sited and will implement BMPs to avoid and minimize erosion impacts to soils. Pathway does not contain any mapped natural hazard areas or unique natural features. Pathway is designed to withstand seismic considerations and is not anticipated to impact or be impacted by subsidence.

4.6 THE PROPOSED PROJECT IS IN GENERAL CONFORMITY WITH THE APPLICABLE COMPREHENSIVE PLANS V(A)(6)

Pathway is a necessary capital improvement to expand the existing electric transmission grid system in Colorado. Pathway complies with the following policies of the 2018 Arapahoe County Comprehensive Plan (Arapahoe County 2022): Growth Management; Public Facilities and Services; Neighborhood Livability; Economic Health; Transportation and Mobility; Natural and Cultural Resources and Environmental Quality; Rural Area; and Tier 3. A summary of Pathway compliance with each of these policies is provided in Section 3.4. Compliance with the applicable subgoals and policies of each of these policies are discussed in more detail in ASI25-001_LE25-003-Consistency with Comp Plan.

4.7 THE PROPOSED PROJECT WILL NOT HAVE A SIGNIFICANT ADVERSE EFFECT ON THE CAPABILITY OF LOCAL GOVERNMENT TO PROVIDE SERVICES OR EXCEED THE CAPACITY OF SERVICE DELIVERY SYSTEMS V(A)(7)

Local government services are discussed in Section 2.8, and a summary of this information is provided in this section. Given the relatively small size of the crews needed for construction of Pathway, no impacts to availability of public services or service delivery systems are anticipated.

4.8 THE PROPOSED PROJECT WILL NOT CREATE AN UNDUE FINANCIAL BURDEN ON EXISTING OR FUTURE RESIDENTS OF THE COUNTY V(A)(8)

Financial burden is discussed in Section 2.9, and a summary of this information is provided in this section. Xcel Energy does not anticipate any negative financial impacts or burdens to Arapahoe County residents due to construction, operation, and maintenance of Pathway. Per the CPUC CPCN approval on June 2, 2022, in doing so, the CPUC determined that Xcel Energy met its burden of proof to establish that

Pathway is in the State's public interest and recovery of the anticipated cost of Pathway is appropriate.

4.9 THE PROPOSED PROJECT WILL NOT SIGNIFICANTLY DEGRADE ANY SUBSTANTIAL SECTOR OF THE LOCAL ECONOMY V(A)(9)

The local economy is discussed in Section 2.10, and a summary of this information is provided in this section. Pathway will not degrade any substantial sector of the local economy. Pathway will deliver short- and long-term economic benefits to Arapahoe County. More immediately, Pathway construction will require substantial amounts of contract labor while also providing local jurisdictions and host communities with additional tax revenues and potential employment opportunities. Once Pathway has been constructed, it will drive ongoing job opportunities and employment associated with the clean energy projects (wind, solar, etc.) that will ultimately interconnect to Pathway.

4.10 THE PROPOSED PROJECT WILL NOT UNDULY DEGRADE THE QUALITY OR QUANTITY OF RECREATIONAL OPPORTUNITIES AND EXPERIENCE V(A)(10)

Recreational opportunities are discussed in Section 2.11, and a summary of this information is provided in this section. Pathway will not impact the quality or quantity of recreational opportunities and experiences. Three existing pedestrian trails are crossed by the proposed Pathway route where it crosses E Quincy Avenue near the Arapahoe County Fairgrounds, Senac Creek at E Quincy Avenue, and Black Shack Creek at E Quincy Avenue (see the Recreational Uses Map [ASI25-001-Recreational Uses Map]); the three existing transmission lines on the south side of E Quincy Avenue also cross the existing trails along Senac Creek and Black Shack Creek where these creeks cross E Quincy Avenue. The Pathway route in Arapahoe County is located approximately 1 mile north of the Aurora Reservoir. Pathway is not expected to impact or change the character of the Aurora Reservoir recreation area or recreational experiences because of the distance between the recreation resource and Pathway. During construction, trails may need to be temporarily closed during stringing or other construction activities for public safety. Trails will be reopened after work has been completed and will have no long-term impacts. Pathway will work with Arapahoe County as needed regarding trail crossings.

4.11 THE PLANNING, DESIGN AND OPERATION OF THE PROPOSED PROJECT WILL REFLECT PRINCIPALS OF RESOURCE CONSERVATION, ENERGY EFFICIENCY AND RECYCLING OR REUSE V(A)(11)

Once Pathway has been constructed, it will drive ongoing development associated with the clean energy projects (wind, solar, etc.) that will ultimately interconnect to Pathway. Pathway will support Xcel Energy's Clean Energy Plan (Xcel Energy 2021) that is estimated to deliver as much as an 85 percent reduction in carbon dioxide emissions by 2030 and add approximately 6,500 megawatts of new wind, solar, and other resources.

4.12 THE PROPOSED PROJECT WILL NOT SIGNIFICANTLY DEGRADE THE ENVIRONMENT. APPENDIX "A" INCLUDES THE CONSIDERATIONS THAT WILL BE USED TO DETERMINE WHETHER THERE WILL BE SIGNIFICANT DEGRADATION OF THE ENVIRONMENT. FOR PURPOSES OF THIS SECTION, THE TERM ENVIRONMENT SHALL INCLUDE: V(A)(12)

4.12.a Air Quality V(A)(12)(a)

Air quality is discussed in Section 2.12.a, and a summary of this information is provided in this section. Pathway is not expected to generate smoke. Dust (particulate emissions) will be suppressed using water trucks. Xcel Energy will apply for a CDPHE APEN prior to construction if needed and will follow state standards to control the release of fugitive dust related to construction, if necessary. The APEN will be required for a land disturbance greater than 25 contiguous acres and land development activities with a duration longer than 6 months.

4.12.b Visual Quality V(A)(12)(b)

Visual quality is discussed in Section 2.12.b, and a summary of this information is provided in this section. The Pathway transmission line route through Arapahoe County has been co-located along existing transmission infrastructure and county roads as much as possible to reduce visual impacts. In addition, the weathering steel poles will oxidize to resemble a natural brown look and existing vegetation will be preserved to the extent possible to maintain visual contrast in the landscape.

4.12.c Surface Water Quality V(A)(12)(c)

Surface water quality is discussed in Section 2.12.c, and a summary of this information is provided in this section. Impacts to water quality will be addressed through erosion and sediment control measures will be outlined in the SWMP as well as the GESG Plan.

Construction of the transmission line will not create runoff in excess of previous site levels and will not change existing topography or adversely affect drainage. There will be no alteration in the pattern or intensity of surface drainage or any impacts to lakes or reservoirs as a result of construction or operation of the transmission line.

4.12.d Groundwater Quality V(A)(12)(d)

Groundwater quality is discussed in Section 2.12.d, and a summary of this information is provided in this section. Impacts to groundwater are not anticipated because the transmission poles will not be installed at a depth that is below the water table.

4.12.e Wetlands, Floodplains, Streambed Meander Limits, Recharge Areas, and Riparian Areas V(A)(12)(e)

Wetlands, floodplains, and riparian areas are discussed in Section 2.12.e, and a summary of this information is provided in this section. The transmission line will be sited to span floodplains, wetlands, and riparian areas. Pathway will adhere to BMPs outlined in the SWMP as well as the GESC Plan, which will include erosion control and revegetation measures. In areas where access roads are not planned to cross a wetland or stream and crossing of a wetland or stream is not necessary for Pathway construction, driving access will be restricted by installing high-visibility construction fencing as a visual aid to prohibit construction subcontractors from driving through aquatic features in order to avoid impacts to potentially jurisdictional wetlands, State Waters, and WOTUS.

4.12.f Terrestrial and Aquatic Animal Life V(A)(12)(f)

Terrestrial and aquatic animal life is discussed in Section 2.12.f, and a summary of this information is provided in this section. Pathway will avoid sensitive habitats and known nesting locations to the extent practicable and will implement BMPs to avoid and minimize impacts to terrestrial and aquatic habitat, nesting and migratory birds, and listed species.

4.12.g Terrestrial and Aquatic Plant Life V(A)(12)(g)

Terrestrial and aquatic plant life is discussed in Section 2.12.g, and a summary of this information is provided in this section. Pathway will avoid or minimize impacts to vegetation as practicable. Impacts to most vegetation will be temporary and limited to the 150-foot-wide Pathway ROW and temporary construction areas. The Pathway ROW will be cleared of tall vegetation for ongoing maintenance. Measures will be implemented to minimize the spread of noxious weeds in the Pathway ROW, as described in ASI25-001_Noxious Weed Control Measures. To avoid or minimize impacts to aquatic habitat within the Pathway ROW, surface waters, riparian areas, and

wetlands in areas less than 1,400 feet width at the crossing will be spanned as practicable. Pathway will adhere to BMPs and erosion control measures outlined in the SWMP as well as the GESC Plan.

4.12.h Soil and Geologic Conditions V(A)(12)(h)

Soils and geologic conditions is discussed in Section 2.12.h, and a summary of this information is provided in this section. Pathway will be constructed based on the result of geotechnical studies to effectively site transmission poles and avoid geological hazards. During construction, Xcel Energy's contractor will minimize any soils impacts by strictly adhering to a SWMP regulated by CDPHE and will institute and maintain erosion and sediment control BMPs designed to protect soils and prevent erosion. Pathway is designed to withstand seismic considerations and is not anticipated to impact or be impacted by subsidence.

4.13 THE PROPOSED PROJECT WILL NOT CAUSE A NUISANCE V(A)(13)

Nuisances are discussed in Section 2.13, and a summary of this information is provided in this section. Nuisance vibrations or odors are not anticipated during construction or operation of Pathway.

Construction activities will comply with the requirements of CRS 25-12-103.5 of a maximum of 80 dBA between 7:00 AM and 7:00 PM, and 75 dBA between the next 7:00 PM and the next 7:00 AM.

The CPUC provides reasonableness determinations associated with noise and requires CPCN applicants to evaluate the expected level of noise of the proposed transmission facilities. Xcel Energy is required to meet state standards as outlined in the Colorado Public Utilities Commission's Rules Regulating Electric Utilities 4 CCR 723-3.

In accordance with C.R.S. § 25-12-103(12)(a), which is part of the statutory framework governing noise abatement, the CPUC may determine in the context of reviewing an application for a CPCN for electric transmission facilities that the projected noise levels for such facilities are reasonable. Under C.R.S. § 25-12-103(12)(b), because of the statewide need for reliable electric service and the public benefit provided by electric transmission facilities, no county may adopt an ordinance or resolution setting noise standards for electric transmission facilities that are more restrictive than what is determined to be reasonable by the CPUC as part of the CPCN approval process. Therefore, Xcel Energy is required to meet CPUC state standards as outlined in 4 CCR 723-3. The CPUC provides reasonableness determinations associated with noise and requires CPCN applicants to evaluate the expected level of noise of the proposed transmission facilities. Based on the noise study conducted for Pathway (Noise and

EMF Study [ASI25-001-Noise and EMF Study]), the maximum projected noise level measured at 25 feet from the edge of the Pathway ROW is 49.8 dBA, and the maximum projected noise level at 25 feet from the Harvest Mile Substation is 57 dBA. Pursuant to CPUC Rule 3206(f), noise levels below 50 dBA are not subject to further review (4 CCR 723-3). Pursuant to CPUC Rule 3206(f), noise levels below 75 dBA are deemed reasonable for land within Industrial Zoning at 25 feet from the property line (4 CCR 723-3). The Harvest Mile Substation is not located on land for which there is a zoning-dependent noise level limit deemed reasonable by CPUC Rule 3206(f) as Rule 3206(f) does not identify an audible noise level that is deemed reasonable for land zoned agricultural. However, the Arapahoe County approved use of the Harvest Mile Substation property is most closely related to an industrial use. When considered as an industrial property, the noise from the Harvest Mile Substation is not anticipated to exceed 75 dBA at 25 feet from the property line, which is deemed reasonable by the CPUC for industrial zoned property. The projected noise levels from the Pathway transmission line and Harvest Mile Substation were deemed reasonable by the CPUC.

The full buildout of the Harvest Mile Substation equipment additions, unrelated to the transmission line, was permitted through the Pawnee-Daniels 345-kV Transmission Line project in 2017 (case numbers ASI16-004 - 1041 Case File, L16-006 – Planning Case File, and EL16-006 – Engineering Case File). The substation site, pad layout, and drainage were all designed and permitted for the full buildout as part of the Pawnee-Daniels 345-kV Transmission Line permits. The installation of the new equipment at the Harvest Mile Substation is not part of the request for this Application for Pathway. This Application for Pathway is intended to cover transmission improvements. As a part of Pathway, Xcel Energy is constructing the infrastructure at the Harvest Mile Substation as permitted through the Pawnee-Daniels 345-kV Transmission Line project in 2017. The CPUC evaluates the noise levels per state statute 4 CCR 723-3. Noise levels are assessed based on specific land uses. A substation isn't specifically called out as a land use in 4 CCR 723-3, but 4 CCR 723-3 does have reasonable noise limits for industrial zoned properties, which is the most analogous use to the Harvest Mile Substation. The Harvest Mile Substation property boundary is approximately several hundred feet from the substation equipment so the dBA at the property boundary will be much lower than 75 dBA.

4.14 THE PROPOSED PROJECT WILL NOT SIGNIFICANTLY DEGRADE AREAS OF PALEONTOLOGICAL, HISTORIC, OR ARCHAEOLOGICAL IMPORTANCE V(A)(14)

Paleontological, historic, and archaeological areas of importance are discussed in Section 2.14, and a summary of this information is provided in this section. A Class I cultural resources desktop analysis identified areas previously surveyed and known

cultural resources within a 150-foot buffer of the transmission line ROW. Within the Research Area, four (4) previous cultural resource surveys have been conducted (report numbers AH.LG.NR8, MC.AE.R26, MC.CH.R3, and MC.E.R35). These surveys include approximately 1.0 miles of Segment 5.

Within the Research Area are four (4) previously recorded cultural resources. These include: a prehistoric lithic scatter (5AH.73), a prehistoric open camp (5AH.414), a historic fence (5AH.1642), and a historic transmission line (5AH.1643). The open camp, fence, and transmission line have been determined Not Eligible for listing in the NRHP by the OAHP, and the lithic scatter is Unevaluated (the site's eligibility for listing in the NRHP has not been evaluated by archaeologists or the OAHP).

No transmission line poles will be constructed within site boundaries and the sites will not be impacted. BMPs will be implemented to avoid and minimize any potential impacts to these resources. Pathway is not located within any historic and archaeological areas of importance.

4.15 THE PROPOSED PROJECT WILL NOT RESULT IN UNREASONABLE RISK OF RELEASES OF HAZARDOUS MATERIALS. IN MAKING THIS DETERMINATION AS TO SUCH RISK, THE BOARD'S CONSIDERATION SHALL INCLUDE: V(A)(15)

4.15.a Plans for Compliance with Federal and State Handling, Storage, Disposal and Transportation Requirements V(A)(15)(a)

Hazardous materials are discussed in Section 2.15, and a summary of this information is provided in this section. No hazardous materials will be used, stored, or generated on site of Pathway facilities. Hazardous materials used during construction and operation in Arapahoe County may include:

- 6,500 cubic yards of concrete
- Unleaded fuel
- Diesel fuel
- Hydraulic fluid.

Pathway construction in Arapahoe County will comply with the Spill Prevention and Response Procedures provided in Section 2.15.a. Pathway activities will comply with applicable federal, state, and local laws and regulations regarding the use of hazardous

substances, and activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment.

4.15.b Use of Waste Minimization Techniques V(A)(15)(b)

Waste minimization techniques are discussed in Section 2.15.b, and a summary of this information is provided in this section. Waste generated during construction activities will be properly disposed of. Enclosed containment will be provided for trash disposal. Construction waste, including trash and litter, garbage, other solid waste, petroleum products, and other potentially hazardous materials (see Section 4.15.a), will be removed and taken to a disposal facility authorized to accept such materials. No hazardous materials will be permanently used, stored, or generated on site of Pathway facilities. Pathway will not require transportation of hazardous materials. Construction, operation, and maintenance activities will comply with applicable federal, state, and local laws and regulations regarding the use of hazardous substances. Construction activities will be performed by methods that prevent entrance or accidental spillage of solid matter, contaminants, debris, and other pollutants and wastes into flowing streams or dry watercourses, lakes, and underground water sources. All activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment.

The substation and transmission line will require few maintenance visits during operation and can be considered a passive use of land. Waste will not be generated on an ongoing basis.

4.15.c Adequacy of Spill Prevention and Response Plans V(A)(15)(c)

Spill prevention and response plans are discussed in Section 2.15.b, and a summary of this information is provided in this section. Pathway activities will comply with applicable federal, state, and local laws and regulations regarding the use of hazardous substances, and activities will follow BMPs for the management of wastes to avoid and minimize effects from potential spills or other releases to the environment.

4.16 THE BENEFITS ACCRUING TO THE COUNTY AND ITS CITIZENS FROM THE PROPOSED ACTIVITY OUTWEIGH THE LOSSES OF ANY RESOURCES WITHIN THE COUNTY, OR THE LOSSES OF OPPORTUNITIES TO DEVELOP SUCH RESOURCES V(A)(16)

Benefits and losses are discussed in Section 2.16, and a summary of this information is provided in this section. Pathway is anticipated to provide economic benefits to Arapahoe County. The short-term economic benefits of Pathway are driven by the \$1.7

billion investment in electric transmission assets in Colorado, which includes payments for land acquisitions and easements, as well as the creation of construction jobs and indirect economic stimulus of construction activities. More immediately, Pathway construction will provide local jurisdictions and host communities with potential additional tax revenue and employment opportunities. Revenue may increase during construction for local businesses such as restaurants, gas stations, grocery stores, hotels, and other local businesses.

Once Pathway has been constructed, it will facilitate ongoing job opportunities and employment associated with the clean energy projects (wind, solar, etc.) that may ultimately interconnect to Pathway that will also provide tax revenues and employment opportunities. Expected long-term benefits include tax payments to the counties that will be crossed by the transmission line over the life of the project (see Section 2.9).

4.17 THE PROPOSED PROJECT IS THE BEST ALTERNATIVE AVAILABLE BASED ON CONSIDERATION OF NEED, EXISTING TECHNOLOGY, COST, IMPACT AND THESE REGULATIONS V(A)(17)

Alternatives are discussed in Section 2.3.b, and a summary of this information is provided in this section. Several alternatives to Pathway were considered, including non-structural alternatives, structural alternatives, and design alternatives (Addendum to Routing and Siting Study for Segment 5 [ASI25-001_LE25-003-Routing and Siting Study]).

The existing electric transmission infrastructure is not adequate to meet demand or the Colorado legislature's new clean energy targets. There are no non-structural alternatives (such as conservation of energy use, no development, or transmission management that can meet these requirements.

Alternate locations and routes, alternative types of facilities, use of existing ROWs, joint use of ROWs with other utilities, and upgrades to existing facilities were analyzed. Pathway routing and siting efforts were divided by segment and documented in a series of routing and siting studies. Each routing and siting study is interrelated due to the overlap in segment Study Areas and shared substation endpoints. Each Routing and Siting Study documents the process utilized to review and consider reasonable siting and routing alternatives for the new major electrical facilities (pursuant to CRS 29-20-108(4)(a) and (b)). The Addendum to Segment 5 Routing and Siting Study is included in ASI25-001_LE25-003-Routing and Siting Study and provides an alternatives analysis to address this requirement. Resources that influenced the selection of the proposed route in Arapahoe County included: existing linear infrastructure, location of proposed route to the south of Arapahoe County, location of existing Harvest Mile Substation, residences,

existing land uses (solar facilities, Arapahoe County Fairgrounds, Aurora Reservoir, Peter Binney Water Purification Facility), future proposed projects, and Air National Guard flight training areas.

Design alternatives concerning access, landscaping, and architectural controls were examined. Given the small area occupied by the transmission poles and the substation footprint, and the minimal anticipated visual impact, landscaping is not proposed as part of Pathway. The type of steel used for the transmission poles will be determined through consultation with the local jurisdictions. Access to the transmission poles from nearby Interstate, U.S. Highways, and local roads will be confirmed prior to construction.

4.18 THE PROPOSED PROJECT WILL NOT UNDULY DEGRADE THE QUALITY OR QUANTITY OF AGRICULTURAL ACTIVITIES V(A)(18)

Agriculture is discussed in Section 2.7, and a summary of this information is provided in this section. The transmission line will be compatible with agricultural uses. The transmission line alignment avoids existing irrigation ditches and pivot irrigation in fields to minimize effects to existing productive agricultural operations. Current uses adjacent to the Pathway facilities will be able to continue mainly unchanged after construction of Pathway. Areas disturbed during construction will be restored in coordination with the landowners and their current land use.

4.19 CULTURAL RESOURCES. THE PROPOSED 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 V(A)(19)

Cultural Resources are discussed in Section 2.14, and a summary of this information is provided in this section. A Class I cultural resources desktop analysis identified areas previously surveyed and known cultural resources within a 150-foot buffer of the transmission line ROW. Within the Research Area, four (4) previous cultural resource surveys have been conducted (report numbers AH.LG.NR8, MC.AE.R26, MC.CH.R3, and MC.E.R35). These surveys include approximately 1.0 miles of Segment 5.

Within the Research Area are four (4) previously recorded cultural resources. These include: a prehistoric lithic scatter (5AH.73), a prehistoric open camp (5AH.414), a historic fence (5AH.1642), and a historic transmission line (5AH.1643). The open camp,

fence, and transmission have been determined Not Eligible for listing in the NRHP by the OAHP, and the lithic scatter is Unevaluated (the site's eligibility for listing in the NRHP has not been evaluated by archaeologists or the OAHP).

No transmission line poles will be constructed within site boundaries and the sites will not be impacted. BMPs will be implemented to avoid and minimize any potential impacts to these resources. Pathway is not located within any historic and archaeological areas of importance.

4.20 LAND USE. THE PROPOSED PROJECT WILL NOT CAUSE SIGNIFICANT DEGRADATION OF LAND USE PATTERNS IN THE AREA AROUND THE PROPOSED PROJECT V(A)(20)

Land Use is discussed in Section 2.7, and a summary of this information is provided in this section. Current land uses adjacent to the Pathway facilities will be able to continue mainly unchanged after construction of Pathway. The transmission line alignment avoids existing irrigation ditches and pivot irrigation in fields to minimize effects to existing agricultural operations. Areas disturbed during construction will be restored in coordination with the landowners and their current land uses.

4.21 COMPLIANCE WITH REGULATIONS & FEES. THE APPLICANT HAS COMPLIED WITH ALL APPLICABLE PROVISIONS OF THESE REGULATIONS AND HAS PAID ALL APPLICABLE FEES V(A)(21)

Xcel Energy will comply with all applicable provisions of the Arapahoe County §1041 Regulations and has paid all applicable fees concurrently with the submittal of this Application.

5 SECTION V PART C: ADDITIONAL APPROVAL CRITERIA APPLICABLE TO MAJOR FACILITIES OF A PUBLIC UTILITY

This section describes Pathway compliance with Arapahoe County §1041 Regulations Additional Criteria Applicable to Major Facilities of a Public Utility (V.C. criteria 1 through 4).

5.1 AREAS AROUND MAJOR FACILITIES OF A PUBLIC UTILITY SHALL BE ADMINISTERED SO AS TO MINIMIZE DISRUPTION OF THE SERVICE PROVIDED BY THE PUBLIC UTILITY V(C)(1)

Avoidance of service disruption is discussed in Section 3.2, and a summary of this information is provided in this section. The transmission line will have a typical ROW of

150 feet wide, 75 feet on either side of the centerline. Xcel Energy will maintain the transmission line right-of-way in accordance with its vegetation management standards for the life of Pathway and can provide Arapahoe County with contact information for any questions or concerns it may have about vegetation management of the line going forward. Xcel Energy performs vegetation maintenance in alignment with its existing Vegetation Management Standards which include wildfire risk mitigation strategies. The Standards include following an Integrated Vegetation Management approach regarding ongoing maintenance with an objective of clearing all noncompatible vegetation within the maintained right-of-way of the easement. Vegetation maintenance for Xcel Energy's facilities is required to be in compliance with requirements defined in the North American Electric Reliability Corporation standard FAC-003-5 (NERC 2022).

Vegetation management within the transmission line ROW will be required prior to, or in conjunction with, construction. Trees and tall vegetation growing within or near the Pathway ROW can cause downed lines, power outages, and wildfire. Vegetation management crews will work to prevent these situations from occurring. Vegetation management involves the use of various types of treatment including removing, pruning, and mowing vegetation and the treatment of vegetation with herbicides to ensure safe operations. The transmission line will be inspected regularly (at least annually) to look for the following:

- Non-compatible vegetation and hazards within the Pathway ROW.
- Equipment needing repair or replacement.
- Pathway ROW encroachments, which can be hazardous to safety and reliable operations.
- Anything that might jeopardize safe, reliable operation of the power line.

Operations and maintenance staff must visit the Pathway ROW for these inspections, but visits typically are minimal, and landowners will be contacted prior to on-site inspections or maintenance. However, in cases of emergency, advanced contact may not be possible.

5.2 AREAS AROUND MAJOR FACILITIES OF A PUBLIC UTILITY SHALL BE ADMINISTERED SO AS TO PRESERVE DESIRABLE EXISTING COMMUNITY AND RURAL PATTERNS V(C)(2)

Community Patterns are discussed in Section 3.3, and a summary of this information is provided in this section. Current land uses adjacent to the Pathway facilities will be able to continue mainly unchanged after construction of Pathway. Areas disturbed during construction will be restored in coordination with the landowners and their current land use.

5.3 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 V(C)(3)

There are no known conflicts with adopted local comprehensive, state, and regional master plans. Pathway is a necessary capital improvement to expand the existing electric transmission grid system in Colorado.

Compliance with the Arapahoe County Comprehensive Plan is discussed in Section 3.4 and ASI25-001_LE25-003-Consistency with Comp Plan, and a summary is provided in this section. Pathway complies with the following policies of the 2018 Arapahoe County Comprehensive Plan (Arapahoe County 2022): Growth Management; Public Facilities and Services; Neighborhood Livability; Economic Health; Transportation and Mobility; Natural and Cultural Resources and Environmental Quality; Rural Area; and Tier 3. Compliance with the applicable subgoals and polies of each of these policies are discussed in more detail in ASI25-001_LE25-003-Consistency with Comp Plan.

5.4 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) V(C)(4)

Pathway will negotiate with landowners to grant new transmission line ROW easements and Xcel Energy will construct new infrastructure, limited to the facilities discussed in this Application. Of the approximately 18-mile transmission line route in Arapahoe County, approximately 13 miles (76 percent) is co-located along existing electric transmission infrastructure and existing roads. Pathway is sited in areas already encumbered by linear facilities and does not prohibit adjacent development. Pathway will interconnect at the existing Harvest Mile Substation within the existing fenceline; no additional land adjacent to the existing substation will be necessary for Pathway.

No additional demand for infrastructure, facilities, housing, water (other than trucked-in water for construction), wastewater treatment, or public transportation will be created. Demand on public services is discussed in Section 2.8, and are summarized in this section. Pathway will not require additional local government services beyond those currently provided in the area. Pathway creates no additional demand for transportation infrastructure, educational facilities, housing, water (other than temporary need for water for Pathway construction), wastewater treatment, or public transportation.

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