



HIGHLINE ELECTRIC ASSOCIATION

P.O. Box 57, 1300 South Interoccean, Holyoke, Colorado 80734 970-854-2236 Fax: 844-996-1318

To: Sedgwick County Planning and Zoning
ATTN: Eva Contreras
315 Cedar Street
Julesburg, CO 80737
econtreras@sedgwickcountygov.net
CC: kelly@wlflawfirm.com

And: Chase Marston
National Renewable Solutions
cmarston@natrs.com
CC: kdecker@fostergraham.com

July 15, 2024

I have attached to this letter Alex Astley's response, on behalf of Highline Electric Association, to Eva Contreras' letter of May 4, 2023 requesting comment on NRS's application for a Special Use Permit. Alex's commentary in the attached letter remains applicable to the current permit application.

If Sedgwick County or NRS personnel have any additional questions or comments for Highline Electric Association, we would be happy to provide further information.

Thank you,

A handwritten signature in blue ink that reads 'Dennis L. Herman'.

Dennis Herman
dennis@hea.coop
General Manager

Attachment





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To: Sedgwick County Assessor
ATTN: Eva Contreras
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And: Mauli Sands
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May 15, 2023

Staff from Highline Electric Association (“HEA”) has reviewed the NRS application for Special Use Permit for the Overland Pass Energy project, as described in Eva Contreras’ letter to HEA dated May 4, 2023. HEA operates an electric sub-transmission system and an electric distribution system in the proposed project area, and is grateful for the opportunity to comment on this project application. HEA has the following commentary for consideration by both Sedgwick County and NRS personnel.

1. The application notes that this proposed project has an estimated electrical capacity of 750 Megawatts, and anticipates construction in two stages. Further, the application notes that electrical off taking and transmission negotiations are ongoing and not part of this application.
 - a. HEA’s historic experience is that off taking, and transmission, and interconnection negotiations may or may not be substantially arranged prior to permitting for a project, but that ongoing negotiations are often subject to confidentiality agreements.
 - b. **HEA’s sub-transmission and distribution systems are not rated for an interconnection of this magnitude, and NRS should anticipate partnering with incumbent or incoming transmission suppliers to facilitate interconnection of their project.**
2. Section 4 “Request of Reduction of Setback,” includes a request that Sedgwick County reduce the setback requirements for a wind turbine from above-ground public electric power lines or communication lines from the current 2 times system height to 1.5 times system height. HEA believes that a setback requirement from overhead power lines is important as it minimizes the risk that a damaged or destroyed turbine could hit power lines and disrupt electric service and create unsafe electrical system conditions.
 - a. It is not immediately clear to HEA whether the “system height” means the height of “the main tower body,” or the height of “the main tower body plus the length of the blade when upright.”
 - b. **If the “system height” includes the length of a blade, HEA believes that the proposed 1.5 times setback from our overhead facilities will be adequate.**
 - c. **If the “system height” refers exclusively to the height of the “main tower body,” HEA believes that the existing 2 times setback is more appropriate for application of desirable safety factors.**
3. HEA utilizes wireless communications technology as a critical component of our system operations in the county. Our wireless systems include point-to-point and point-to-multipoint microwave equipment between our electrical substations, communications towers, and remote line equipment.
 - a. With no coordination and site review, HEA communications personnel estimate a moderate risk that wind turbine or various tower sites developed under the scope of this project could impact our existing communications systems. With strong coordination between HEA and NRS

- personnel to complete site reviews, HEA communications personnel estimate that the risk of negative impact to our communications systems can be reduced to near zero.
- b. Attachment 2.09 shows a site overview and map book, containing early-iteration proposed turbine sites. Attachments 2.12 and 2.13 describe an analysis which NRS performed to review potential impact to communications systems, however HEA was unable to engage with NRS closely enough to provide meaningful technical feedback at that time.
 - c. **HEA requests that NRS personnel engage with our communications personnel to exchange GIS mapping data, with which HEA and/or NRS would perform signal propagation and impact analysis. Based on results of such analysis, HEA may request that NRS omit or relocate certain turbine sites to mitigate impact to our existing facilities.** The Special Use Permit application under sub-header “Notice to Operation of Communication Link” on page 11, indicates that NRS already intended to engage in such efforts as their project development continues.
4. HEA utilizes both overhead and underground power lines in our sub-transmission and distribution systems. As part of construction and maintenance of our systems, we participate in the Colorado 811 underground facilities locate system.
 - a. **Utilization of the Colorado 811 system prior to any digging, and participation in this system for flagging all buried facilities, is a critical function of not only incumbent utilities like HEA, but also incoming utilities like NRS would be if this project is developed.**
 5. HEA’s historic experience with wind farms in other counties have shown that wind tower erection typically utilizes large cranes which move from one turbine site to another while still assembled. These cranes are often tall enough that our distribution lines may need to be temporarily raised or buried in locations along the crane’s drive path.
 - a. **If the project proceeds, HEA would welcome contact from NRS at the appropriate stage when they are developing their turbine erection and crane traversal plans, so that we may jointly identify and mitigate proposed distribution line crossings.**

If Sedgwick County or NRS personnel have any additional questions or comments for Highline Electric Association, we would be happy to provide further information.

Respectfully submitted,



Alex Astley, PE
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Engineering Manager

Highline Electric Association
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