FOOTE LAW
FIRM, LLC

Larimer County Commission Chair Kristin Stephens
Larimer County Commissioner John Kefalas
Larimer County Commissioner Jody Shadduck-McNally

March 6, 2025

Dear Commissioners:

The Northern Colorado Partners for Clean Energy (NCP4CE) submits the following comments regarding Platte River Power Authority's (PRPA) 1041 Permit Application for five new aeroderivative combustion turbines and related infrastructure at the Rawhide site. The application is 24-ZONE3715. NC4PCE respectfully asks you to deny PRPA's 1041 application because it fails to meet Sections 10.1.9.E and 10.1.9.C of Larimer County's Land Use Code (LUC).

I. EXECUTIVE SUMMARY

Larimer County suffers from poor air quality, particularly during the summer high ozone season. Yet PRPA proposes to build a new gas plant that will emit substantial ozone precursors and contribute to poor air quality for decades. PRPA's proposal contradicts community values, lacks community trust, and perpetuates unnecessary harmful emissions.

PRPA's 1041 application does not comply with the Larimer County Land Use Code, specifically Sections 10.9.1.E and 10.9.1.C, and therefore the Commissioners must deny it. PRPA failed to prove it complied with the LUC in several ways:

- PRPA drastically undervalued the energy capacity of renewable resources, therefore leading to it to unnecessarily recommend more than 200 Megawatts (MW) of new gas capacity to maintain grid reliability;
- PRPA failed to address any of the implications of it joining a wholesale power market in 2026, including how that wholesale market will reduce PRPA's need for new gas generation and also create an out-of-state market for the excess power PRPA's new gas facilities will generate;
- PRPA overestimated the battery capacity necessary to make up for a lack of new gas turbines in some of its scenarios, thus increasing the estimated costs of its lesser carbon portfolios;
- PRPA ignored the implications of its new gas generation emissions on ozone and failed to present any minimization or mitigation measures; and

- PRPA presented an unobtainable timeline for converting its new gas turbines to green hydrogen, meaning the turbines will run on gas for many years longer than claimed.

PRPA claims it needs at least 200 MW of new gas capacity to account for peak power demand in the summer and during extreme weather events. Yet its proposal sets PRPA up to be a net power exporter to customers outside of its four-city service area, inequitably leaving Larimer County with the harmful emissions while others benefit from the electricity. PRPA has not shown it has first avoided environmental impacts that can be avoided, then minimized those impacts that cannot be avoided, then mitigated those impacts that cannot be avoided or minimized. Its 1041 application must be denied.

II. INTRODUCTION AND SUMMARY OF THE NCP4CE'S OPPOSITION

NCP4CE is a committee of the Colorado Coalition for a Livable Climate, a group encompassing 52 grassroots non-profit organizations and individual supporters including elected officials, former elected officials, community leaders, and energy subject matter experts. NCP4CE seeks to transition our economy and society beyond fossil fuels to a future built on clean energy. By drastically reducing greenhouse gas emissions, we can preserve our environment for future generations, create an equitable, vibrant, and clean energy economy, and avoid the most disastrous impacts of climate change.

NCP4CE largely consists of Larimer County residents and PRPA ratepayers. NCP4CE representatives have participated in over a dozen public comment sessions and hearings related to PRPA's application over a two-year period, including most recently the Larimer County Planning Commission's hearing on February 12, 2025. Its representatives have engaged in dialogue with PRPA employees and submitted detailed questions and feedback throughout the process.[1] Unfortunately, NCP4CE cannot point to any part of PRPA's 1041 application where NCP4CE's involvement and extensive feedback made a bit of difference.

Instead, PRPA has relentlessly pursued its desire to build a large quantity of new gas generation to account for peak electricity demand and infrequent "dark calm" periods when solar and wind assets are not producing. In 2018, PRPA announced to much fanfare its goal to achieve 100% carbon-free electricity by 2030.[2] PRPA's 1041 application and accompanying Integrated Resource Plan (IRP) fall far short of its stated carbon-free goal, and they do so unnecessarily.

[1] For example, NCP4CE contributed to eight letters and statements released by the Fort Collins Sustainability Group related to the IRP. Available at https://www.focosustainability.org/category/prpa/

[2] Platte River Power Authority, "Action Calls for 100% non-carbon mix by 2030," December 6, 2018. Available at: https://prpa.org/news-releases/platte-river-board-passes-energy-policy/

Indeed, the IRP does not even bother to model a scenario where PRPA would be carbon-free by 2030, as it previously promised.

This is why NCP4CE has consistently called for the involvement of a trusted independent third-party review of the IRP by the National Renewable Energy Laboratory (NREL) in Golden. NREL regularly partners with utilities to assist in a wide variety of subject matter areas, including but not limited to grid integration, distribution system modeling, storage integration, solar and wind forecasting, and resource planning.[3] Yet PRPA brushed aside ratepayer and state legislator requests for it to seek NREL assistance, even if the assistance merely included confirming the assumptions and analysis PRPA and its consultants used. Instead, PRPA claims additional consultation is unnecessary because it knows NREL would merely agree with PRPA's conclusion.

PRPA often highlights its characteristics of being a local non-profit public power utility, including how it makes decisions reflecting community needs and values and reacts quickly to those needs and values.[4] This IRP does not reflect community needs and values. It adds at least 200 MW of additional gas capacity to PRPA's portfolio, and it does so unnecessarily. Just as importantly, as explained in the sections below, PRPA fails to meet its burden in proving adherence with the Larimer County Comprehensive Plan and the Larimer County Land Use Code.

III. THE APPLICATION DOES NOT COMPLY WITH THE LARIMER COUNTY LAND USE CODE

a. PRPA's burden of proof demands more than generalities and sidestepping.

The Larimer County Land Use Code clearly states that the 1041 applicant must prove it met each and every one of the Code's requirements to receive approval. LUC Section 6.3.5.B.2 states, "The applicant bears the burden of ensuring that an application contains sufficient information to demonstrate compliance with application requirements." It cannot meet just most of the Code's requirements and be approved; it must prove them all.

PRPA claims it has met all the elements of the Land Use Code.[5] However, PRPA's claims do not withstand any reasonable scrutiny, particularly as applied to LUC Sections 10.9.1.E and 10.9.1.C. Proving something is often much different than merely stating it. Key parts of PRPA's analysis relied upon unsupported generalities. The Commission is required to demand more.

[3] *See e.g.* "Our Partners" available at: https://www2.nrel.gov/workingwithus/partners-a-z.
[4] Platte River Power Authority (PRPA), "2024 Integrated Resource Plan" (IRP) at 20-21.
[5] PRPA, "Item 3. Project Description Rawhide New Generation Project 1041 Permit Application."

The Larimer County staff analysis included in the Planning Commission's packet failed to hold PRPA to its burden of proof.[6] Staff's deference to PRPA's assertions are clear throughout its comments with the widespread use of passive phrases like "the applicant has indicated," "PRPA determined," "the applicant appears to have considered," "based on the submitted documentation," and "it is our understanding." A closer and more critical look at PRPA's application, and particularly its IRP, reveals several material flaws. PRPA stacked the deck for the inclusion of at least 200 MW of new gas generation by using extraordinarily low electric generation values for renewable energy assets. PRPA also ignored one of its own less environmentally impactful energy generation scenarios in favor of building 200+ MW of new gas capacity. Even if new gas capacity were unavoidable, PRPA failed to propose adequate measures to minimize and mitigate the air quality impacts of its new gas turbines, including important limitations on running its new units during high ozone days.

NCP4CE believes PRPA does not need new gas capacity, but even if it did, it is clear PRPA is proposing more new gas than would be necessary for its own needs. We can think of no logical reason for this proposed overbuild other than PRPA intends to sell excess power outside of its existing four municipal utility customers. This would present an untenable situation for Larimer County, an area already suffering from unfortunate and continuing air quality difficulties as it consistently exceeds the National Ambient Air Quality Standards for ozone. Larimer County residents, including those in the Denver Metro / North Front Range ozone nonattainment area, would particularly feel the impacts of the new gas emissions at Rawhide on the unhealthy summer high ozone days while electricity customers somewhere within SPP's 15-state radius would benefit from the wholesale purchase of PRPA's excess gas generation.

In addition, beyond the equity issue of creating emissions in the nonattainment area while selling electricity outside the PRPA service area, the proposed new gas assets are scheduled to be online as soon as January 2028 while the Rawhide coal unit is scheduled to run until the end of December 2029. For the years of 2028 and 2029, the plantwide Rawhide emissions will have notably higher greenhouse gases contributing to climate change and nitrogen oxides contributing to ozone formation with the existing turbines, the coal unit, and the new turbines able to be operated simultaneously.

If the Commission seeks answers to the legitimate questions and concerns outlined in this letter, it will likely find PRPA responding with generalities or dodging the questions, as it has in previous forums. That dodging and weaving should not hide the fact that PRPA has not met its burden of proof in this 1041 application. PRPA did not meet its burden because its proposal simply does not meet all the criteria of the LUC. In particular, this letter focuses on Sections 10.9.1.E and

[6] Planning Commission Special Hearing Agenda, February 12, 2025 at 231-246.

10.9.1.C in that order, because the basis for PRPA's non-compliance with Section 10.9.1.C starts with its failure to adhere to the mitigation hierarchy in Section 10.9.1.E.

b. PRPA did not comply with the mitigation hierarchy requirement of LUC Section 10.9.1.E.

LUC Section 10.9.1.E reads:

> The proposed project incorporates and reflects the growth, development, and environmental and mitigation policies in the Larimer County Comprehensive Plan and regulations in Article 4.0, Development Standards to *ensure that the development, to the greatest extent possible, has mitigated any impacts to the environment and natural resources, and will not significantly degrade the environment or natural resources, or exacerbate or worsen climate change*. *The mitigation shall follow a hierarchy to first avoid impacts to resources of highest value, second minimize the impacts that are unavoidable and finally mitigate the impacts that occur.*
>
> (emphasis added).

Section 10.9.1.E incorporates the commonly referenced "mitigation hierarchy." The mitigation hierarchy requires an applicant to prove three separate and distinct things: first, that the environmental impacts of the applicant's project could not have been avoided; second, that any unavoidable environmental impacts were minimized; and third, all unavoidable environmental impacts, once minimized, were also mitigated.

The ordinance clearly articulates the required tiered analysis of the mitigation hierarchy. Only if the impacts are unavoidable does the analysis turn to minimization; and only if further minimization is not possible does the analysis turn to mitigation. If impacts are avoidable, they must first be avoided before moving to minimization. If impacts can be minimized, they must be minimized before moving to mitigation. The plain language of Section 10.9.1.E. indicates a mandatory tiered approach to environmental protection. When construing ordinances, courts first look to the plain language of the ordinance.[7] They "interpret every word, rendering none superfluous; undefined words and phrases are read in context and construed literally according to

[7] *State v. Nieto*, 993 P.2d 493 (Colo. 2000).

common usage."[8] If the ordinance is clear and unambiguous, it must be applied as written.[9] To do so otherwise would be an arbitrary and capricious exercise of authority.[10]

This section further explains how PRPA failed to meet all three of the elements of the mitigation hierarchy in its application. PRPA did not avoid environmental impacts that could be avoided, it did not minimize unavoidable impacts that could have been minimized, and it did not mitigate impacts that otherwise could not have been avoided or minimized. It simply jumped to its preferred solution, which was 200+ MW of new gas generation, without addressing whether those environmental impacts could first be avoided, then minimized, then realistically mitigated.

1. PRPA could have avoided adverse environmental impacts of its recommended new generation portfolio, but it did not.

PRPA claims it must build five new aeroderivative gas-powered turbines that can generate at least 200 MW of power to meet summertime peak load and account for the occasional dark calm event. But a closer examination of the foundation of PRPA's claim reveals fundamental flaws in its analysis.

The IRP outlines the generation resources PRPA claims it will need to meet its members' future electricity demand. It gets to its final recommendation by comparing five different portfolio scenarios ranging from adding no new carbon resources to adding at least 240 MW of new gas generation. While the IRP and its underlying information is voluminous, its content can be summarized into two main categories: (1) what the demand for electricity will be over the next decade; and (2) what resources PRPA will need to meet that demand. The assumptions that went into the analysis of both of those prongs largely determined the result. Like many endeavors, the inputs that go into the exercise and those that are left out impact the outcome. In this case, PRPA's decisions to exclude any analysis of its 2026 entry into a regional wholesale energy market and its undervaluing of renewable energy assets led to its unsupportable conclusion that new gas generation assets and their accompanying environmental impacts are unavoidable. That conclusion is erroneous.

A. PRPA did not address either the positive or negative impacts of its 2026 membership in the Southwest Power Pool in its application.

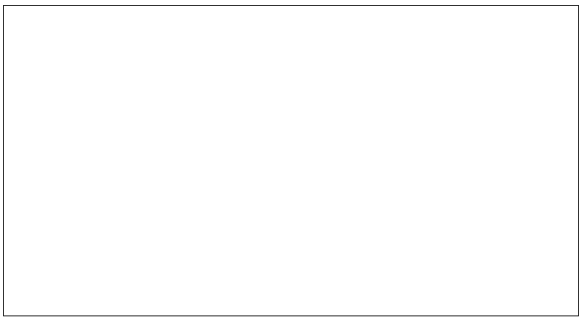
[8] *Colo. Water Conservation Bd. v. Upper Gunnison River Water Conservancy Dist*., 109 P.3d 585, 597, 599 (Colo.2005) (*citing People v. Yascavage*, 101 P.3d 1090, 1093 (Colo.2004)).
[9] *Sooper Credit Union v. Sholar Group Architects, P.C.,* 113 P.3d 768, 771 (Colo. 2005).
[10] *See e.g., Farmer v. Colorado Parks & Wildlife*, 382 P.3d 1263 (Colo. App. 2016) (lack of standards leads to arbitrary conduct).

One example of a large missing piece in PRPA's inadequate 1041 application is an analysis of how PRPA's capacity needs may change once it joins the Southwest Power Pool's Regional Transmission Organization - West (SPP-West) in 2026.[11] PRPA's membership in the SPP West will give it access to a 15-state regional wholesale electricity market with over 100 other distribution utilities.[12] PRPA's SPP-West membership will open access to a much more extensive and geographically diverse suite of wholesale power purchases. In practice, this will mean PRPA has more insurance against localized demand spikes, peak loads, and extraordinary weather events like dark calm periods because it can purchase excess power from other operators throughout the Midwest and Rocky Mountain regions.

The implications of PRPA's impending membership in the SPP-West and the impacts on PRPA's generation needs are profound, but PRPA barely mentions it in its 1041 application. The IRP duly noted PRPA's impending April 2026 SPP-West membership in a timeline illustration, but went into no detail about how PRPA expects its SPP-West membership to impact its resource needs. The IRP merely indicated, "[f]or IRP modeling, analysts assumed purchases or sales up to 150 MW in any hour."[13] NCP4CE assumes PRPA has done its internal due diligence on what its SPP-West membership means for its resource allocation and operations, but it did not disclose any of that information in its 1041 application. For example, from its consultant's report on weather data and projected future "dark calm" scenarios, we see withheld information related to how much renewable capacity may be available to PRPA through its SPP-West participation. It is vitally important for the County and the public to know how much renewable capacity PRPA plans to purchase from the SPP. Instead, PRPA's application shows this figure:[14]

6.1.2. ISO/RTO Renewable Capacity: History and Projection

Figure 70. (NOT PUBLIC INFORMATION)



NOTE: FIGURE 70 SHALL NOT BE SHARED PUBLICLY. THE PROJECTED CAPACITY BY YEAR IS NOT PUBLIC INFORMATION AND IS PROPIETARY S&P Global DATA

[11] For more information about the Southwest Power Pool, *see* https://www.spp.org/about-us/
[12] More information available at the FERC website: https://www.ferc.gov/introductory-guide-participation-southwest-power-pool-processes
[13] IRP at 105.
[14] ACES, "Platte River Power Authority Extreme Weather Event and Dark Calm Analysis" at 58. Available at https://prpa.org/wp-content/uploads/2023/04/2024IRP-Extreme-weather-events-and-Dark-Calm-Analysis-by-ACES.pdf

Additionally, the one sentence in PRPA's IRP about the implications of its forthcoming membership in the SPP indicates its "analysts assumed purchases *or sales* up to 150 MW in any hour."[15] Completely unaddressed in PRPA's 1041 application was the anticipated impacts of SPP's ability to control PRPA's generation assets. That control means the SPP could activate PRPA's new gas turbines at any time to sell up to 150 MW of power anywhere within SPP's market. Public comment brought this to the attention of the Planning Commissioners during their February 12, 2025 hearing, and a couple of Planning Commissioners followed up with PRPA on that point.

PRPA acknowledged SPP can control the dispatch of PRPA's new gas assets during that colloquy, although it did so in its characteristically roundabout way.[16] SPP ability to control PRPA's new gas assets means Larimer County would suffer the adverse impacts, particularly on air quality, while utility customers outside of Larimer County would benefit from the power.

PRPA's 1041 application accounts for none of the SPP's impacts – either positive or negative – on PRPA's power generation needs. It substantially impacts PRPA's need for new gas turbines if it can purchase up to 150 MW of power from the SPP when necessary. None of PRPA's IRP scenarios accounted for the ability to purchase power from the wholesale market during peak periods or dark calm events. At the same time, none of PRPA's emissions projections accounted for using PRPA's gas turbines to sell electricity outside of PRPA's service area. PRPA may claim building new gas turbines and the accompanying environmental impacts are unavoidable in its 1041 application, but the exclusion of such important data points indicates otherwise.

B. PRPA drastically undervalued renewable energy generation in its application.

The selective analysis in PRPA's IRP was not limited to excluding the implications of PRPA joining the SPP-West wholesale energy market. PRPA also significantly undervalued the contribution of renewable resources to its power generation scenarios, thus artificially elevating the importance of new gas generation assets. PRPA claims the installation of new gas generation and its associated environmental impacts are unavoidable, but a closer look at the data shows that assertion is questionable at best.

It is a well-known principle that the results of a calculation depend on the inputs and formula of the calculation. Fiddling with the inputs can often significantly change the results. PRPA employed this principle when calculating the Effective Load Carrying Capacity (ELCC),

[15] IRP at 105.
[16] Larimer County Planning Commission special meeting, February 12, 2025 at 3:00-3:02. Available at https://reflect-vod-fcgov.cablecast.tv/store-4/2653-LC-Planning-Commission-Special-Feb-12-2025-pt1-v1/vod.mp4

which then informed its Planning Reserve Margin (PRM), ultimately determining whether, in PRPA's opinion, new gas capacity was necessary. Like many terms related to utilities, the ELCC is a topic worthy of entire seminars, but for the purposes of this discussion it has been defined by NREL as "the amount by which the system's loads can increase when the generator is added to the system while maintaining the same system reliability."[17] In other words, the ELCC measures how much renewable energy must be added to the system in lieu of fossil generation to maintain acceptable reliability. A low ELCC percentage corresponds with a low projected ability for a renewable energy resource to produce energy when the grid is most likely to experience electricity shortfalls. In contrast, a high ELCC percentage corresponds to a high projected ability for a renewable energy resource to produce energy when the grid most needs it. There is no universally accepted way to calculate ELCC; rather, it requires using some combination of various inputs and judgment.[18]

As indicated, the ELCC percentage informs the utility's Planning Reserve Margin. NREL defines the PRM as "the quantity of generator capacity above the expected peak demand needed to meet the target reliability metric in the future system."[19] In other words, how much more generation capacity, expressed in a percentage, does a utility need to account for extraordinary weather events and avoid blackouts? In its IRP, PRPA determined it needs a 19.9% PRM to maintain the desired level of system reliability.[20] NCP4CE is not questioning PRPA's assertion that it should have a 19.9% PRM, but it does dispute PRPA's assertion that it must deploy 200+ MW of new methane gas generation (on top of its existing 388 MW of gas generation) to meet that 19.9% PRM cushion.

Much of the PRM calculation depends on the assumptions underlying the ELCC. Generally speaking, a lower ELCC number will result in a lower PRM. A lower PRM means the system is likelier to fail during extraordinary weather events. Cost-effectively raising the PRM while still using low ELCC numbers almost always requires adding more firm dispatchable generation resources (i.e. gas plants) to the utility's portfolio.

The spreadsheet copied below as Figure 1 shows the ELCC and PRM dynamics at work.[21] The vertical columns show the ELCC percentages assigned to various types of generation by

[17] National Renewable Energy Laboratory, "Using Wind and Solar to Reliably Meet Electricity Demand" at 1. Available at: https://www.nrel.gov/docs/fy15osti/63038.pdf
[18] Energy + Environmental Economics (E3), "Capacity and Reliability Planning in the Era of Decarbonization: Practical Application of Effective Load Carrying Capacity in Resource Adequacy," December 2020 at 9-12. Available at https://www.ethree.com/wp-content/uploads/2020/08/E3-Practical-Application-of-ELCC.pdf
[19] National Renewable Energy Laboratory, "Advanced Guide to Understanding Power System Model Results for Long-Term Resource Plans" at 7. Available at https://www.nrel.gov/docs/fy24osti/88337.pdf
[20] IRP at 122-23.
[21] The entire spreadsheet is attached as Exhibit 1 to the electronic version of this letter, and each of its cells and tabs can be observed via the electronic file.

PRPA in its IRP compared with summer and winter ELCC percentages assigned to each type of generation by the Southwest Power Pool. A quick perusal shows PRPA assigns much lower ELCC numbers to renewables than its soon-to-be wholesale power market partner. For example, PRPA's numbers for wind are a mere 6%, while the SPP's summertime wind ELCC is 18% and winter wind is 31%. PRPA's extraordinarily low ELCC percentages continue for solar and storage. PRPA does not explain in its application why its ELCC numbers are so much lower than the SPP.

Figure 1: Comparison between PRPA and SPP Effective Load Carrying Capabilities

Planning Reserve Margins (PRMs) Based on PRPA and SPP Effective Load Carrying Capacities (ELCCs): No Coal, No New Aeroderivative Turbines

Resource	2030 PRPA Nameplate Capacity - No Coal, No New Gas	PRPA IRP ELCC Percentages		SPP Summer Tier 1 ELCC Percentages		SPP Winter Tier 1 ELCC Percentages	
	MW	%	MW	%	MW	%	MW
Coal	0	100%	0	0	0	0	0
Hydro	70	100%	70	100%	70	100%	70
CTs	388	100%	388	100%	388	100%	388
AeroDerivative*	0	100%	0	0	0	0	0
Solar	52	9%	5	62%	32	37%	19
Solar new	300	9%	27	62%	185	37%	110
Wind	231	6%	14	18%	41	31%	71
Wind new	460	6%	28	18%	82	31%	142
Storage 4-hr	177	58%	103	89%	157	70%	124
Storage LT	10	58%	6	97%	10	76%	8
Solar DER	141	0%	0	0%	0	0%	0
Storage DER	32	0%	0	0%	0	0%	0
Totals	**1,861**		**640**		**966**		**931**
2030 Projected Peak Demand			650		650		475
Projected 2030 PRMs			-1.6%		48.6%		96.0%
PRPA Required PRM			19.9%		19.9%		19.9%
SPP Required PRMs			n/a		16.0%		36.0%
Shortfall, MW			**-140**		**None**		**None**

The practical result of PRPA's comparatively low ELCC assumptions is shown at the bottom of Figure 1. PRPA's projected 2030 peak demand is approximately 650 MW.[22] Combining PRPA's arbitrary ELCC numbers with its reasonable PRM shows a peak demand power shortfall of 140 MW, which PRPA claims must be made up by gas generation (note: 140 MW is still significantly less than the 200+ MW of gas capacity PRPA has requested in its 1041 application). However, when using the SPP's ELCC numbers and assuming the same PRM, the calculation reveals *zero* shortfall in power during the 2030 peak demand period. In other words, the SPP's ELCC numbers show PRPA's 2030 peak demand can be met by the renewable resources it already proposes to add in its IRP. Additional gas capacity is superfluous.

[22] IRP at 61.

PRPA is likely to respond to this observation by claiming it did, in fact, model a "no new carbon" portfolio, but the implementation of such a portfolio was cost-prohibitive.[23] But here again, we see the impact of PRPA using extremely low ELCC percentages in reaching its conclusion. The main difference between PRPA's "no new carbon" and recommended "optimal new carbon" portfolios is the nameplate capacity of 4-hour battery storage. As can be seen from Figure 2 below, PRPA proposed the addition of 175 MW of 4-hour battery capacity plus 200 MW of new dispatchable thermal (a.k.a. gas turbines) capacity in its optimal new carbon portfolio. However, to make up for the loss of 200 MW of new thermal capacity in its "no new carbon" portfolio, PRPA claims it will need a massive increase of 4-hour battery capacity (from 175 MW to 2,850 MW) to account for the missing 200 MW of gas capacity. The IRP does not go into further detail about why PRPA believes it takes 2,675 MW of additional battery capacity to make up for 200 MW of gas capacity, but the comparatively low ELCC percentages PRPA assigns to 4-hour battery storage is one of the main reasons. Battery storage is still comparatively expensive at this point, and such a significant difference in battery storage installation between one portfolio and the other created a large percentage of the extra cost.[24]

Figure 2: Comparison of five portfolios (IRP Table 26)

	No new carbon	Minimal new carbon	Carbon-imposed cost	Optimal new carbon	Additional new carbon (lowest cost)
2024-2029 incremental additions (MWs)					
Wind	300	300	400	400	300
Solar	450	500	350	300	300
Four-hour storage	2,850	1,050	275	175	100
Long-duration storage	10	10	10	10	10
Dispatchable thermal	0	80	160	200	240

[23] *Id*. at 160.

[24] PRPA's application does not specify the expected costs of batteries in its application. The attached Black & Veatch report describes the expected costs of many resources but leaves out any cost projections for 4-hour batteries.

NCP4CE does not know why PRPA chose the ELCC calculations or 4-hour battery storage valuation it did for the IRP, but it does know using different, and commonly accepted, assumptions lead to much different results. This is one of the many reasons NCP4CE has consistently called for PRPA to work with an independent third party with subject matter expertise like NREL to produce an IRP worthy of public confidence. As outlined earlier in this letter, it is the PRPA's burden to show its IRP avoided environmental impacts that are avoidable, and issues like this show its application simply does not meet that burden.

2. PRPA did not minimize unavoidable environmental impacts.

The second element of the mitigation hierarchy requires the applicant to prove any unavoidable environmental impacts will be mitigated. Here too, PRPA has not met its burden. First, PRPA has not minimized impacts because it seeks to install more gas capacity than it claims it needs. Second, PRPA has not shown its "optimal carbon" portfolio adequately minimized impacts, particularly because two of its other cost-effective and feasible portfolios would result in the construction of less gas capacity.

A. PRPA will install more than 200 MW of new gas capacity if its application is approved as written.

Much of the IRP and PRPA's communications about the IRP assume the necessity of installing 200 MW of new gas capacity. However, it is important to recognize that PRPA's use of the 200 MW figure for its proposed new gas capacity underestimates the actual amount of capacity it seeks to install at its Rawhide site. As described in its "3. Project Description" attachment to the 1041 application, "Platte River determined it will need *at least* 200 MW of dispatchable capacity" from General Electric LM6000 combustion turbine generator units.[25] Each LM6000 until is listed by General Electric as producing between 46 and 57 MW.[26] Multiplying five new LM6000 units times the manufacturer's nameplate capacity equals between 230 and 285 MW.

It is clear PRPA failed to account for the true power generation capacity of its proposed new gas turbines by between 30 and 85 MW throughout its application. Even assuming 200 MW of new gas capacity is required to maintain reliability, which NCP4CE has shown is not the case, PRPA's application failed to minimize impacts by seeking to install between 230 and 285 MW of new gas, well above what PRPA claims is necessary. The environmental and emissions impacts of 230-285 MW of gas generation will be higher than 200 MW, although how much higher is

[25] PRPA, "Item 3. Project Description Rawhide New Generation Project 1041 Permit Application." at 4-5.
[26] GE Vernova website, available at https://www.gevernova.com/gas-power/products/gas-turbines/lm6000

unknown because PRPA did not address the issue in its application. This is the opposite of minimizing impacts as the Land Use Code requires.

B. PRPA's "carbon-imposed cost" portfolio meets its own reliability and cost guidelines with less environmental impacts.

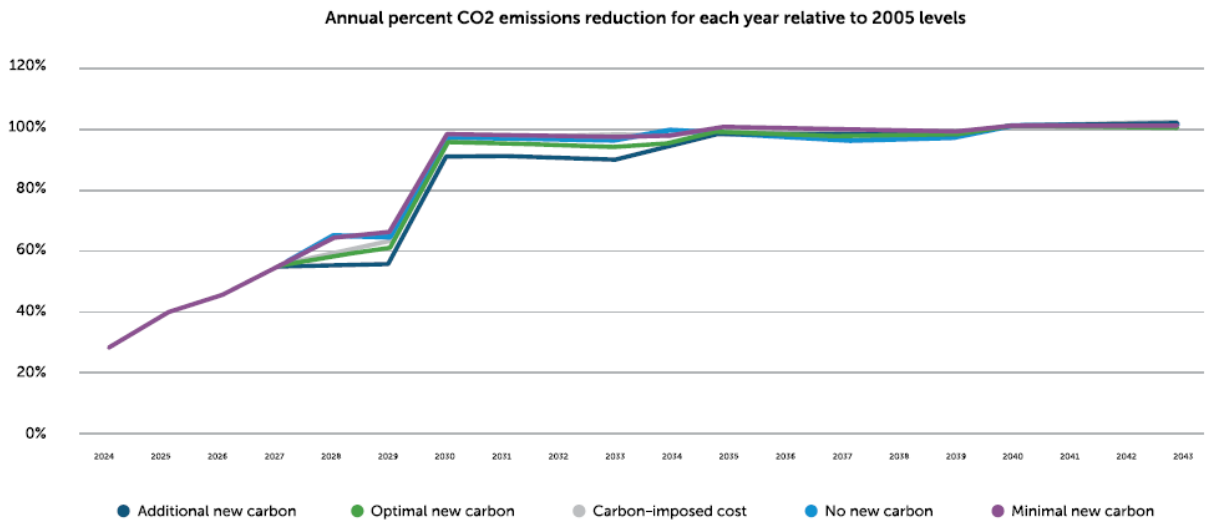
As previously referenced, PRPA modeled five different resource portfolios ranging from a "no new carbon" portfolio with zero added gas generation on one end to an "additional carbon" portfolio adding 240 MW of added gas on the other. PRPA ultimately recommended its "optimal carbon" portfolio which would add at least 200 MW of gas generation to its portfolio. However, another scenario in the PRPA's list would provide reliable power within 1% of the cost of the "optimal carbon" portfolio and even reduce emissions more of the "optimal carbon" portfolio. PRPA called it the "carbon-imposed cost" portfolio.

The "carbon-imposed cost" portfolio increased its solar allocation by 50 MW and increased 4-hour battery storage by 100 MW over the "optimal carbon" portfolio in return for a reduction of new gas generation by 40 MW. Figure 2 on page 11 of this letter shows a graphical comparison between these two scenarios. As illustrated in the two additional figures below, PRPA found its "carbon-cost" portfolio would be virtually identical in costs and provide better short-term emissions reductions to its "optimal carbon" portfolio.

Figure 3: PRPA portfolio cost comparison (IRP table 32)

20-year net present value ($000)	
No new carbon	$5,344,991
Minimal new carbon	$3,372,202
Carbon-imposed cost	$2,779,024
Optimal new carbon	$2,772,407
Additional new carbon	$2,761,036

Figure 4: comparison of emissions reductions of PRPA's five portfolios (IRP Figure 58)



However, PRPA recommended the adoption of its "optimal carbon" portfolio – the one with an additional 40+ MW of gas generation – even though the "carbon-imposed costs" portfolio presented a cost-effective and workable path forward.[27] The sum of PRPA's reasoning for picking the cost-effective and workable portfolio with more emissions was this: "[w]hile this portfolio is reliable for the historically experienced weather uncertainties, it may not be reliable if weather events continue to become more extreme as they have in the recent past."[28] The IRP contained no further analysis on the point, and consistent with the rest of the IRP excluded any mention of the role the SPP-West wholesale power market may play in providing power in case of a vaguely referenced future extreme weather event.

That kind of conclusory analysis may have been acceptable for the PRPA, but it is not consistent with LUC 10.9.1.E. The LUC's mitigation hierarchy requires an applicant to minimize environmental impacts that cannot be avoided. In this case, according to its own IRP, PRPA can minimize the impacts of emissions while maintaining reliability and cost-effectiveness by choosing the "carbon-imposed cost" portfolio. It provides a similar cost, better emissions reductions, and maintains system reliability – all according to the PRPA's own analysis. It would deploy more renewable resources and build less gas, all more consistent with PRPA's own 2018

[27] IRP at 161.
[28] *Id.*

carbon-free declaration and the Larimer County Comprehensive Plan's emphasis on providing carbon-free electricity.[29] Yet PRPA deliberately chose a more environmentally impactful path.

C. PRPA's "minimal new carbon" portfolio would also meet its reliability and cost metrics if PRPA appropriately valued renewable energy resources

The previous section outlined how PRPA failed to minimize environmental impacts by not choosing a feasible and cost-effective portfolio instead of its preferred "optimal new carbon" portfolio. The same analysis applies to another of PRPA's modeled scenarios, which was entitled the "minimal new carbon" portfolio.[30] The minimal new carbon portfolio would add only 80 MW of new gas capacity, as opposed to the 200+ MW PRPA advocated for in this 1041 application. The minimal new carbon would build less wind but more solar than the optimal new carbon scenario. To make up for 120 less MW of new gas, it would build 1,050 MW of 4-hour battery storage, which is double PRPA's total peak demand just in new battery assets. PRPA did not explain why adding twice its peak demand in batteries would be necessary on top of all its sizeable solar, wind, and gas assets. However, its extraordinarily low ELCC value for 4-hour batteries (58% vs. SPP's 89%) – as shown previously on page 10 of this letter – likely played a role. All told, with the artificially elevated battery allocation the minimal new carbon portfolio would include a total of 1,940 MW of new assets, when its peak demand is anticipated to be 650 MW.

Predictably, PRPA rejected the minimal new carbon portfolio because it would be "noticeably more expensive than others, again due to the large battery buildout."[31] That was a foregone conclusion after PRPA stacked the scenario with much more battery buildout than necessary. Just like PRPA's carbon-imposed cost portfolio, the minimal new carbon portfolio would have minimized environmental impacts to Larimer County while maintaining system reliability. PRPA did not recommend either of those technically feasible and cost-effective portfolios, however, opting to advocate for the more environmentally damaging "optimal carbon" portfolio.

D. PRPA's new gas plant will contribute to Larimer County's ozone nonattainment and PRPA did not propose any minimization measures for ozone precursors.

LUC Section 10.9.1.E requires the application to incorporate and reflect the "growth, development, and environmental and mitigation policies in the Larimer County Comprehensive

[29] Larimer County Comprehensive Plan, available at https://www.larimer.org/sites/default/files/uploads/2019/larimercountycomprehensiveplan2019_vol1_0.pdf
[30] IRP at 148.
[31] *Id*. at 156.

Plan." The Comprehensive Plan set a policy direction squarely towards renewable energy production and consumption within the County. That is appropriate for many reasons, not the least of which is Larimer County's current air quality issues. The American Lung Association currently grades Larimer County as an "F" for air quality.[32] The Fort Collins-West monitoring station is consistently in the top 4 worst air quality monitors in the state, according to the Regional Air Quality Council.[33] To be fair, this is not just the result of emissions coming from within Larimer County; ozone precursors generated outside of Larimer County also play a significant role. However, on top of Larimer County's existing ozone issue, it would be far afield from the Comprehensive Plan's principles to voluntarily approve a significant and unnecessary new source of ozone precursors to operate in the county for decades.

PRPA's application did not address the impact of its proposed new gas turbines on Larimer County's ozone problem. It did not model the impact of its new gas emissions on ozone nonattainment. It barely mentioned ozone at all. Most importantly, it failed to propose any minimization measures for ozone season or ozone action days.[34] PRPA's Air Pollution Emissions Notices (APEN) filed with the Colorado Department of Public Health and Environment are instructive to this point. PRPA has sought permission from the state – and Larimer County through this 1041 application – to run each of its five new gas turbines for up to 4,380 hours each year (26 weeks at 24 hours a day 7 days a week). PRPA would like those 4,380 hours to be split evenly between seasons, so 25% from December through February, 25% from March through May, 25% from June through August, and 25% from September through November. The period between June and August is typically marked by dozens of days where ozone is at unhealthy levels in Larimer County and the rest of the nonattainment area, exceeding the daily ozone standards. Yet PRPA wants approval to run its new turbines up to 1,095 hours during the season with highest ozone concentrations. The relevant section of PRPA's APEN filing is highlighted in Figure 5, below.

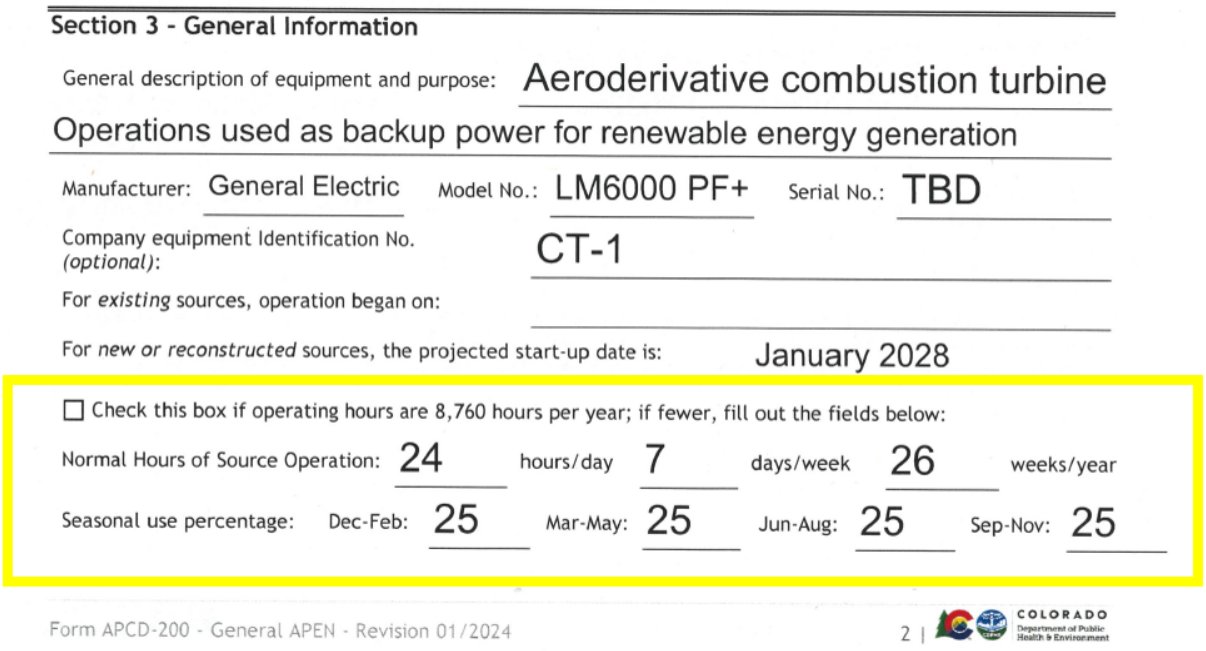
Figure 5: PRPA's air permit operating hours representation[35]

[32] American Lung Association, "State of the Air 2024," available at https://www.lung.org/research/sota/city-rankings/states/colorado/larimer

[33] *See e.g.* Regional Air Quality Council, "Current 8-hour Ozone Summary," available at https://raqc.org/current-8-hour-ozone-summary/

[34] Ozone season in the Denver Metro / North Front Range is defined as the period between May 31 and August 31. Ozone Action Days are when ozone levels are expected to exceed 70 parts per billion. See Colorado Department of Public Health and Environment, "Ozone pollution and your health," available at https://cdphe.colorado.gov/ozone-pollution-and-your-health#:~:text=The%20state%20health%20department's%20Air,Day%20Alert%E2%80%9D%20is%20in%20effect.

[35] This APEN was filed for proposed Unit 1 (CT-1). All the APENs filed for the other units show the same operating hours specification.



Section 3 - General Information

General description of equipment and purpose: Aeroderivative combustion turbine Operations used as backup power for renewable energy generation

Manufacturer: General Electric Model No.: LM6000 PF+ Serial No.: TBD

Company equipment Identification No. *(optional)*: CT-1

For *existing* sources, operation began on:

For *new or reconstructed* sources, the projected start-up date is: January 2028

☐ Check this box if operating hours are 8,760 hours per year; if fewer, fill out the fields below:

Normal Hours of Source Operation: 24 hours/day 7 days/week 26 weeks/year

Seasonal use percentage: Dec-Feb: 25 Mar-May: 25 Jun-Aug: 25 Sep-Nov: 25

Form APCD-200 - General APEN - Revision 01/2024 2 | COLORADO Department of Public Health & Environment

Seasonal limitations on operations in the ozone nonattainment area are common. They include use restrictions on gasoline-powered lawn and garden equipment, oil and gas extraction activity limitations, and voluntary reductions in driving activities by the general public, among others.[36] PRPA has not proposed any kind of seasonal limitation to minimize ozone impacts caused by its proposed new gas turbines. Combined with the prospect of PRPA selling power generated from its new gas turbines to customers outside of its four-city service area, this means Larimer County will not only feel the impacts of emissions for someone else's power generally, but it will feel the impacts of those emissions on the worst possible days of the ozone season.

PRPA's lack of ozone minimization strategies does not adequately protect air quality and violates Section 10.9.1.E.

3. PRPA has not proven its environmental impacts, even if unavoidable and minimized as much as possible, have been mitigated.

This letter has repeatedly stressed the LUC requirement of all 1041 applicants to show they have properly applied the mitigation hierarchy. PRPA failed to adhere to any of the three parts of the mitigation hierarchy, including the final element which requires any unavoidable impacts that have already been minimized to also be mitigated. As explained in this section, PRPA's main

[36] Colorado Department of Public Health and Environment, "Federal ozone pollution standards and Colorado nonattainment areas," available at https://cdphe.colorado.gov/nonattainment-federal-ozone-pollution-standards#:~:text=The%20rule%20restricts%20the%20use,in%20the%20ozone%20nonattainment%20area.

mitigation strategy rested upon the unlikely conversion of its new turbines from burning gas to burning green hydrogen. And it overlooked the obvious mitigation strategy of reducing vehicular traffic to and from the Rawhide site during the construction of the new turbines.

A. PRPA's reliance on burning hydrogen in its new turbines instead of gas is entirely speculative.

Even though PRPA has not shown the environmental impacts of installing 200+ MW of new gas are unavoidable, and then has not shown any unavoidable impacts have been minimized, it still attempts to claim the environmental impacts of its new gas turbines will be mitigated in the future because the turbines will convert to burning 50% green hydrogen by 2035 and 100% green hydrogen by 2040.[37] Just like the first two prongs of the LUC's mitigation hierarchy, though, PRPA's claims fall well short here also.

Unlike the first two elements of the mitigation hierarchy, PRPA could legitimately argue its mitigates environmental impacts *if* its green hydrogen timeline was based on something other than speculation. Converting the new gas turbines to green hydrogen would mitigate (but not eliminate) any unavoidable impacts that have already been fully minimized. However, PRPA's put forth no reliable evidence that it would, in fact, be able to convert its gas turbines to green hydrogen during the timeframe it claims.

Details of PRPA's plans for hydrogen deployment are sparse, to say the least. PRPA's IRP merely states:

> Hydrogen can be used as fuel in traditional power generation machines like CTs with some modifications. Hydrogen can be used as fuel in traditional power generation machines like CTs with some modifications. But there are significant techno-economic challenges to store and transport hydrogen. The [Black & Veatch] study concluded that green hydrogen could be a viable option for Platte River starting in the middle of the next decade.[38]

Consulting the Black & Veatch report itself provides little support for PRPA's stated optimism.[39] The study outlines a multitude of technical and cost roadblocks that make green hydrogen deployment a highly speculative endeavor. Some of the technical, feasibility, and cost-effectiveness challenges noted in the Black & Veatch report include:

---

[37] IRP at 136.
[38] *Id*. at 109.
[39] Black & Veatch, "Independent Review of Dispatchable Capacity Needs," available at https://prpa.org/2024irp/information/

- There is a need to store large amounts of hydrogen for later use in power generation/energy storage applications, especially when hydrogen power generation complements wind and solar generation. Development of the technology to store large amounts of hydrogen is in its infancy.[40]

- The storage volumes for liquefied hydrogen would be much smaller than the storage volumes for compressed hydrogen at the same mass. However, liquefied hydrogen requires far more complex auxiliary equipment and requires cryogenic temperatures, boil-off compressors, and other ancillaries.[41]

- Hydrogen leaks more than methane gas. Some compressed storage applications may require special materials to line the inside of the vessel to prevent leakage.[42]

- Hydrogen has a higher flame temperature than that of natural gas; therefore, blending hydrogen into the fuel will result in the combustion turbine burning at a higher temperature. This higher temperature correlates directly to a higher production of ozone precursor nitrogen oxide emissions (e.g., at 35 percent hydrogen in natural gas, nitrogen oxide emissions are estimated to increase by 20 percent).[43]

- For a greenfield power generation station with 100 percent hydrogen fueling, the capital, O&M, and levelized costs are not yet well understood, as none have been constructed or operated yet.[44]

- Large quantities of low-carbon hydrogen are not yet available to enable large-scale hydrogen power generation applications. This is expected to remain the case at least through 2030.[45]

- Costs associated with the production, storage, and transportation of hydrogen remain high and are currently not competitive with gas or other decarbonization options.[46]

The Black & Veatch report concludes "[i]f the current pace of industry interest and policy support continues, hydrogen can potentially be used at large scales and may become feasible in

[40] *Id*. at § 5-21.
[41] *Id*.
[42] *Id*.
[43] *Id*. at § 5-23.
[44] *Id*. at § 5-24.
[45] *Id*.
[46] *Id*. at § 5-25.

100 percent hydrogen fueled power generation stations beyond the 2030 timeframe."[47] PRPA relies upon this thinnest of assurances to make its bold, yet largely unsupported, prediction that it will achieve 50% green hydrogen use by 2035 and 100% green hydrogen use by 2040 in its new methane gas plant.[48] NCP4CE is aware of no other Colorado utility setting hydrogen deployment goals anywhere close to what PRPA predicts in its IRP, and the technical and economic difficulties outlined in the Black & Veatch report show the less ambitious goals of the other utilities are much more in line with reality.

Additionally, the odds of PRPA's farfetched hydrogen plans succeeding just got even longer after the completin of its IRP. All the challenges identified by Black & Veatch in its April 2024 report were difficult enough to overcome with much more supportive federal political and fiscal policies in place. The current political climate, which is likely to continue until at least 2028, is much different. The Trump administration has jeopardized the future of green hydrogen along with many other existing and potential clean industry technologies.[49] PRPA has not adjusted its already ambitious 50% by 2035 and 100% by 2040 timelines to reflect this new reality. It is increasingly likely PRPA will burn nothing but gas in its new turbines – and create the accompanying emissions – far beyond 2040.

The Applicant must prove it will mitigate any impacts not already avoided or minimized. PRPA's hydrogen timeline estimate is perhaps one level above a random guess, far from actually proven as required by the LUC.

B. PRPA proposes no mitigation measures for the construction period for its new turbines or the two-year period the new turbines and existing coal unit would overlap.

If the Commissioners approve PRPA's 1041 application, there will be a substantial impact on air quality through the construction process. Numerous vehicles will travel to and from the

[47] *Id*. It should be noted that the funding and supportive policy known to Black & Veatch at the time of its report have fundamentally changed with the new Presidential administration.

[48] Importantly, even if PRPA did somehow achieve a conversion to 50% hydrogen by 2035, that does not mean the plant's carbon emissions will be reduced by the same rate. The use of 50% hydrogen in combustion activities corresponds to just 25% of a reduction in carbon emissions. See United States Environmental Protection Agency, "Hydrogen in Combustion Turbine Electric Generating Units Technical Support Document," May 23, 2023. Avail at https://www.google.com/url?q=https://www.epa.gov/system/files/documents/2023-05/TSD%2520-%2520Hydrogen%2520in%2520Combustion%2520Turbine%2520EGUs.pdf&sa=D&source=docs&ust=1739227144962406&usg=AOvVaw3Vm7QcfluSBptT1qhKS_O8

[49] *See, e.g.* Avi Salzman, "Hydrogen Energy Faces Pivotal Moment Under Trump," *Barron's*, February 25, 2025 ("Several energy sources face a perilous future under President Donald Trump, but none seem to be on the brink of a make-or-break moment quite like hydrogen"), available at https://www.barrons.com/articles/dow-hydrogen-power-energy-trump-1afe2c66

Rawhide site over several years, including during high ozone seasons. Some of these vehicles will likely drive many miles through the ozone nonattainment area to the relatively remote location of the Rawhide station. It is not uncommon for entities engaging in high-impact fossil-fuel related activities to limit those activities during high ozone days or at least during the afternoons of those days. PRPA does not detail what kinds of vehicular and other emissions impacts can be expected due to the construction of its new gas plant, nor the types of mitigation measures that it will implement to reduce its contribution to high ozone days.

This is on top of the emissions implications of PRPA running its new gas units alongside its existing coal unit for up to two years. PRPA would like to complete its new gas generation in 2028 and run those units for some unspecified amount of time between 2028 and the closing of its coal unit at the end of 2029. Mitigation for those two years would be important, but PRPA did not include proposed measures in its application.

Section 10.9.1.E requires air quality mitigation measures to be implemented for unavoidable impacts that have already been minimized. PRPA's failure to consider or at least mention mitigation measures for the extensive traffic necessary during the construction phase is another reason its application is deficient.

c. PRPA's application failed to comply with LUC 10.9.1.C

For many of the same reasons PRPA failed to comply with LUC Section 10.9.1.E, as detailed above, its application also failed to comply with LUC 10.9.1.C. That section requires the following:

> The applicant has adequately considered reasonable siting and design alternatives, including co-location when requested by Larimer County, or shown why such alternatives are not available or not feasible, and the proposed project is the best alternative available based on consideration of consistency with the Comprehensive Plan, Land Use Code, need, existing technology, cost, and impact on the site and surrounding property.

First, as to whether no new gas or less new gas is available or feasible, PRPA's application shows the no new carbon, minimal new carbon, and carbon-imposed cost portfolios are both available and feasible. PRPA argued its no new carbon and minimal new carbon portfolios would be too expensive; however, its undervaluation of renewable energy facilities and overestimation of the amount of necessary battery generation shows those arguments were flawed. Out of its 215-page IRP and 1000+ page 1041 application, the only reason PRPA gave for its rejection of the carbon-imposed cost portfolio was "it may not be reliable if weather events continue to become

more extreme as they have in the recent past."[50] No further reasoning or analysis accompanied that conclusion. That hardly qualifies as PRPA having "adequately considered" the carbon-imposed cost portfolio, as required under LUC 10.9.1.C.

Second, PRPA must prove its plan for installing five new gas turbines producing 200+ MW of fossil-fueled power with its associated emissions is the "best alternative available" based on consideration of the Larimer County Comprehensive Plan among other factors. PRPA indisputably claims its choice of 200+ MW of new gas is the best alternative available, and it does not hesitate to invoke the specter of mass power outages and community harm if it cannot install its preferred portfolio. However, when going beyond PRPA's unsupported proclamations to appropriately analyzing the application, the Commission should see an unnecessary request clearly at odds with the Comprehensive Plan.

For example, the Environmental Public Health section of the Comprehensive Plan (which PRPA failed to address in its application) encourages county decisions to "seek to reduce stationary and mobile source emissions and pollutants which cause adverse health effects, impair visibility, and contribute to climate change. Remain within the state and federal air quality standards."[51] The PRPA application seeks permission to unnecessarily install gas turbines that will cause adverse health impacts and contribute to climate change. Similarly, the Comprehensive Plan urges the County to "support municipal and private utilities plans that will provide customers with choices to utilize carbon-free energy."[52] PRPA's application does not provide customers with that choice. Its new resources would add 200+ MW of carbon energy on top of its existing 388 MW of gas capacity, with no end of gas generation in sight.

The totality of the circumstances points squarely at PRPA predetermining the need for 200+ MW of new gas generation regardless of the need of its service territory. Its failure to adequately consider alternatives more in line with the Comprehensive Plan and the Land Use Code is fatal to its 1041 application.

IV. CONCLUSION: THE COMMISSIONERS MUST DENY PRPA'S APPLICATION

PRPA's application does not comply with the Larimer County Land Use Code, and therefore the Commission must deny it. Approval would be wholly inconsistent with the LUC.

[50] IRP at 161.
[51] Larimer County Comprehensive Plan at 37.
[52] *Id*. at 43.

There is no exception in the LUC that allows the applicant to avoid compliance if it has been working on its application for several years, has already taken steps to begin construction, or feels a time crunch to get its facility built. PRPA will likely claim all three of these excuses in response to the Commission's serious consideration of denying the application. The County's legal solution is not to approve the 1041 now in light of PRPA claims it will take many years to build an unnecessary new gas plant, but to require PRPA to put together an IRP and a 1041 application in a way that complies with the LUC.[53]

While it is not up to the County, NCP4CE, or any other party to write a compliant 1041 application for PRPA, NCP4CE would suggest PRPA doing it right the next time by using a trusted third-party like NREL to verify calculations and assumptions, allowing the RAQC to complete its ozone modeling and properly avoiding, minimizing, or mitigating any impacts to ozone shown by the RAQC modeling, and putting aside its stubborn and mistaken assumption that 200+ MW of new capacity is necessary to ensure reliability.

In the meantime, NCP4CE requests the Commission follow its Land Use Code and deny PRPA's 1041 application.

Respectfully submitted,

Michael Foote, Reg. No. #34358

Foote Law Firm, LLC

Counsel for NCP4CE

[53] New facilities installing aeroderivative turbines from the same manufacturer as those proposed in the current application required less than two years between breaking ground and operation. *See e.g.* "Supporting coal-to-gas conversion for Colorado Springs Utilities," available at https://www.gevernova.com/gas-power/resources/case-studies/colorado-springs-coal-to-gas-conversion; "GE Vernova to supply aeroderivative gas turbine equipment for Colorado peaker plant," available at https://www.power-eng.com/gas/turbines/ge-vernova-to-supply-aeroderivative-gas-turbine-equipment-for-colorado-peaker-plant/; "GE Vernova operates LM6000VELOX package at Dominion Energy's Bushy Park," available at https://www.turbomachinerymag.com/view/ge-vernova-operates-lm6000velox-package-at-dominion-energy-s-bushy-park.