Statement made by Tri-State Generation and Transmission Association Regarding the report: ***"Distributed Wind Generation Study for Northeast Colorado"***

1. The study is fairly well done and technically accurate. Clearly scattering small generators around the distribution network is feasible and there is a finite limit before expensive upgrades might be required. In the case of wind generation there are a number of problems that Tom Wind identified not the least of which is voltage flicker which would be particularly challenging at the distribution level. What is missing from the report is the impact on the transmission grid and bulk generation system. It was not a part of the study but it should perhaps be mentioned.

2. We assume one purpose of distributing the wind machines around the system was to avoid or minimize the cost of distribution and substation equipment. However, they have to give up the value of being in better wind resource areas and the economy of scale inherent in constructing a single large wind farm complex. There is also the question whether the value of distributed generation is negated by these other factors.

3. We understand that Tom Wind's study was directed towards the technical feasibility and not the economic justification.

4. Because of our plan to build an 800 mile transmission corridor from Kansas to the Front Range which will tie into the WAPA transmission corridor recently announced to bring connectivity from Wyoming to the Front Range, any wind project will be impacted by this availability of new transmission capacity. These positive changes should be pointed out to any prospective developers of wind projects.

5. All of Tri-State Generation and Transmission Association Co-ops have an "all requirements" contract which requires them to purchase their energy needs above 25 kW from Tri-State. This puts Tri-State in the position of being the purchaser of wind energy above this 25 kW limit. It is important to mention in your literature that they get Tri-State involved in the planning as soon as the developers decide to consider a project. The consultant will also need a copy of our "interconnection standards" in order to complete their design.