Tri-State Generation and Transmission Association, Inc.
Proposed Revisions to Generator Interconnection Procedures

Response to Stakeholder Comments

This document presents Tri-State's response to all Stakeholder questions, comments and requests for clarification regarding Tri-State proposed revisions to its Generator Interconnection Procedures (GIP) and Agreement (GIA). As a result of the Stakeholder comments, Tri-State has made a number of changes to its Revised GIP and GIA. Tri-State expects to implement its Revised GIP and GIA in mid 2010.

Since Tri-State began this queue reform process, it has received inquiries regarding interconnection of generators less than twenty megawatts (20 MW). Tri-State will process interconnection requests from generators 20 MW or less under these procedures. As all generator interconnection requests will be under the same procedures and subject to the same standard agreement, Tri-State has adopted a new title for this process: Generator Interconnection Procedures.

Throughout the Stakeholder process, Tri-State has modified its proposal for Revised GIP in response to stakeholder concerns. In response to recent Stakeholder comments, Tri-State is making the following additional changes to the Revised GIP and GIA:

(i) The deposit required with an interconnection request for a project 75MW or less is reduced from $250,000 to $75,000. Deposits for small generators will be $50,000 for generators larger than 10 MW but no greater than 20 MW and $25,000 for generators 10 MW or less.

(ii) Tri-State has added a fourth option for generators to select prior to executing a Facilities Study: Network Resource not identified in a Load and Resource Transmission Study.

(iii) Tri-State will accept a letter of credit as well as cash to satisfy deposit requirements for facility costs.

(iv) Site Control requirements will be revised to allow for a demonstration of 25% site control with the interconnection request; 50% site control prior to executing the Facilities Study Agreement and 100% site control prior to executing the GIA.

(v) The "time out" period after the System Impact Study is extended from one year to eighteen months.

(vi) The definition of Force Majeure has been revised to clarify that Economic hardship is not a Force Majeure event and Section 5.14 of the GIA has been revised to include Stakeholder proposed language regarding the implementation of a Force Majeure caused suspension under the GIA.

A. Stakeholder Process

Tri-State posted a Large Generator Interconnection Procedures concept paper on its website on February 13, 2009, conducted a Stakeholder meeting at its Headquarters on February 19, 2009, and accepted comments on its proposal through March 19, 2009. Tri-State received numerous questions and comments at the February 19th meeting. Subsequent to that meeting, Tri-State received comments from stakeholders. Tri-State posted all the comments and a transcript of the February 19th meeting on its website.

Tri-State held a second Stakeholder meeting at its Headquarters on May 5th at which it presented a revised proposal based on stakeholder feedback. At the May 5th meeting, Tri-State received comments from several Stakeholders. Tri-State requested additional comments through June 12, 2009. Tri-State received no additional comments during that time period but did receive additional comments from the Colorado Independent Energy Association and the Interwest Energy Alliance after the June 12th date.

In response to concerns raised by Stakeholder comments, Tri-State also conducted a limited comment period for thirty-one days concluding on December 21, 2009 to take additional feedback on two issues:

(1) Expedited studies for Interconnection Customers with a Purchase Power Agreement or Network Resource designation (Section 7.1.1 of the Revised GIP); and
(2) Suspension of the Generator Interconnection Agreement (Section 5.14.1 of the Revised GIA).

B. Response to Stakeholder Comments

1. GIP Application Process

Tri-State implemented changes to the deposit and Site Control requirements in the Interim GIP and GIA effective January 12, 2009. Those changes have generally been carried forward in the Revised GIP. Stakeholders requested clarification on Tri-State's GIP application process including deposit amounts, the status of applications currently in the queue, documentation of Site Control, and future application windows.

a. Deposits.

Stakeholders generally acknowledged that, compared to the $10,000 initial deposit under the *pro forma* GIP, larger deposits are an appropriate initial screening tool to reduce the number of applications. Some stakeholders requested that Tri-State reduce the proposed deposit amount for smaller projects from $125,000 to $75,000, or implement a sliding scale that would set deposits for all projects between $40,000 and $90,000 according to the size of the project.

Stakeholders requested clarification as to how the deposit would be applied, i.e., that the deposit would be treated as prepayment for study work. Stakeholders also requested that

Tri-State agree to accept alternatives in lieu of a cash deposit such as a letter of credit or corporate guarantee.

Tri-State Response:

Tri-State recognizes the merits of stakeholder comments for reducing the deposit for projects up to and including 75 MW. For those projects, Tri-State will reduce the deposit from $125,000 to $75,000. Tri-State will not adopt lower deposits for larger generators because the lower deposit amounts fail to cover the estimated cost of the interconnection studies. The deposit for a project larger than 75 MW will remain at $250,000. Deposits for small generators (20MW or less) will be as follows: $ 50,000 for generators larger than 10MW but no larger than 20MW and $ 25,000 for generators 10MW or less. Tri-State anticipates that in most cases the deposit amount will cover estimated costs to complete the System Impact Study, the Facilities Study and project management through signing of an GIA.

Tri-State clarifies that the deposit will be applied toward cost of project study work and administration of the request. The Interconnection Customer will be responsible to advance additional funds if actual costs exceed the deposit amount. If an Interconnection Customer withdraws its application prior to completion of the interconnection studies or the final cost of the interconnection studies is less than the deposit amount, Tri-State will refund all unused deposit funds with interest less the non-refundable $25,000.

When Tri-State implemented the Interim LGIP, based on the then-current state of the financial markets, Tri-State adopted a cash-only policy for deposits for facilities to be constructed under the LGIA. Tri-State will modify that policy and accept Letters of Credit or cash deposits as security for facility costs. As set forth in sections 8 and 11 of the GIP, this security must be submitted prior to the Facilities Study Agreement and execution of the GIA.

b. Windows for Submission of Requests.

Stakeholders requested clarification concerning the timing of Request Windows and scoping meetings, and whether System Impact Studies following one Request Window would be completed before the next Request Window.

Tri-State Response:

Tri-State clarifies that, on a semi-annual basis, it will open a two-month window for accepting requests. The first request window each year will open approximately one month after Tri-State publishes its annual Load and Resource Transmission Study.

Tri-State would prefer to complete all System Impact Studies prior to the next Request Window. However, depending of the volume of interconnection requests received during any one Request Period window, it may be difficult to complete all of the System Impact Studies for that Request Window prior to the opening of the next Request Window.

Therefore, Tri-State will not require System Impact Studies for all interconnection requests received during a Request Window to be completed prior to the opening of the next Request Window.

c. Site Control.

Stakeholders requested less stringent requirements for Site Control, and recommended that a reduced demonstration of Site Control should be sufficient in the early stages of the GIP process. Some stakeholders sought to reduce the demonstration of Site Control to 10% of the land area needed to support a wind generation project. One stakeholder suggested that an early requirement would be harmful to landowners because they would be confronted with more developers promoting early lease agreements for speculative projects. Stakeholders also requested clarification on information required to demonstrate Site Control.

Tri-State Response:

Tri-State continues to believe that proof of Site Control is critical and that a lack of Site Control could result in a project having to be canceled even if a project has a buyer for the output. This, in turn, could result in the need for restudies for other pending interconnection requests. Tri-State initially proposed to require demonstration of 50% Site Control with the interconnection request and demonstration of 100% Site Control prior to executing the Facilities Study Agreement. Upon review of the stakeholder comments, Tri-State agrees that its Revised GIP contains other significant project milestones. Accordingly, Tri-State will revise its proposed GIP to require a graduated demonstration of Site control as follows: 25% Site Control with the submission of the interconnection request, 50% Site Control prior to executing the Facilities Study Agreement, and 100% Site Control prior to execution of the GIA.

Tri-State has not found that deposits are equivalent to site control and thus will not reinstate the practice of accepting deposits in lieu of Site Control. Finally, Tri-State will look to industry practice to verify reasonably required land area for each project.

Tri-State will require documentation of Site Control to include a compilation of lease or ownership rights as described above, for a valid term and with a GIS map of the project site with reference to the project layout and the areas under Site Control. Documentation would typically include copies of leases, deeds, or option agreements, or recorded memoranda of such, which Tri-State will treat as Confidential Information under Section 13.1 of the GIP and Article 22 of the GIA.

2. Transition Rules for Existing Interconnection Requests

Stakeholders requested clarification on how the revised deposits, study methods, milestones, and suspension rules would affect Interconnection Customers with projects already in the queue.

Tri-State Response:

Tri-State will honor all study agreements that were tendered prior to the effective date of the Revised GIP. Projects will transition from the Interim GIP and study methodologies to the Revised GIP upon completion of work under the latest executed agreement. For example, if Tri-State is performing a System Impact Study for an Interconnection Customer, after the system impact study results are posted in a final study report, the interconnection request will be then be processed under the Revised GIP. This includes the option to defer the Facilities Study Agreement for up to eighteen months. If an Interconnection Customer has not executed a System Impact Study Agreement prior to the effective date of the Revised GIP, the interconnection request will be processed under the Revised GIP.

3. Project Scoping and Study Processes

Stakeholders requested clarification or had comments regarding the GIP study process including improvement of early communications, adoption of a formal pre-queue application process, the option for prospective Interconnection Customers to obtain access to data and conduct their own Feasibility Studies, and how the Load and Resource Transmission Study fits into the GIP process. Stakeholders also provided comments regarding stand-alone studies versus cluster studies, cost allocation, and the impact on in-process study work whenever new Network Resources are designated.

a. Early Stage Communications with Interconnection Customers and Prospective Interconnection Customers.

Stakeholders recommended methods, such as those being implemented at Midwest ISO, to improve early communications and customer education about the transmission system, including a formal pre-queue process.

Tri-State Response:

Tri-State's Revised GIP includes an open meeting to be conducted at the outset of each Request Window. At this meeting Tri-State will review the results of the Load and Resource Transmission Study and provide information to assist prospective Interconnection Customers with submission of a complete interconnection request.

Tri-State agrees that an early and thorough understanding of the transmission system and interconnection process is beneficial to all participants. Tri-State commits to continuing to provide on a timely basis information and assistance during the interconnection process. Based on its experience, Tri-State does not believe that a formal Pre-Application Phase will provide any additional information or assistance to interested parties.

b. Feasibility Studies.

Tri-State received stakeholder comments both for and against reinstating the Feasibility Study stage on a mandatory or optional basis, and requested clarification about the means to obtain access to base cases and conduct self-serve Feasibility Studies.

Tri-State response:

Tri-State remains persuaded that the two-stage System Impact Study in the Revised GIP achieves all the benefits of a Feasibility Study in a more timely and efficient manner. An Interconnection Customer will have an opportunity to downsize its projects upon review after the first stage of the SIS, i.e., the steady state power flow results. Allowing time for the Interconnection Customer to review the power flow studies extends the time for completion of the SIS as compared to the traditional one-stage study. However, even with an extended review period, the process still requires less time than having Tri-State perform both a Feasibility and System Impact Study.

A prospective Interconnection Customer that is willing to engage its own staff or hire study consultants for preliminary screening purposes will have the opportunity to refine their business plans before incurring the expense of submitting an interconnection request application. Tri-State encourages Interconnection Customers to access WECC base case data at an early stage in the queue or prior to submitting an application. Tri-State will add a Confidentiality Agreement to its GIP to facilitate customer access to the same WECC data in the same format that Tri-State uses for GIP studies.

c. Load and Resource Transmission Study.

Stakeholders requested clarification about the role of Tri-State's proposed Load and Resource Transmission Study.

Tri-State Response:

Under Tri-State's Transmission Tariff, Network Customers are required to submit annual Load and Resource Plans. Tri-State will aggregate these plans into a single plan for the Tri-State system. From this information, Tri-State will identify Resource Areas, that is, areas in the Tri-State system where Tri-State Network Customers anticipate needing additional resources to serve their network customer load. These areas will be modeled in a Load and Resource Transmission Study. Based on this information, Tri-State will determine system Network Upgrades (and estimated cost) needed to accommodate the new resources identified in the Load and Resource Transmission Study.

This approach will benefit Interconnection Customers that plan to market their projects as Network Resources. All Interconnection Customers will have the same information concerning new generation needed to serve Network Customers, and the Network Upgrades that Tri-State will build to support those resources.

d. Stand-Alone Studies Versus Cluster Studies.

Tri-State did not receive any stakeholder comments regarding its proposal to perform stand-alone studies or that such studies would be unfair to any particular Interconnection Customer. However, some stakeholders did recommend cluster studies as a more comprehensive approach to queue management.

In particular, CIEA and Interwest suggested a two-phase System Impact Study process. The proposal calls for first-stage and second-stage cluster windows that would be open for six months each, with each to be followed by a second six month cluster window of the same type every year. After the results from the first-stage study, Interconnection Customers would be allowed to modify their requests to reduce the size of projects, make technical substitutions and change their In-Service Date. Entry into the second stage would be limited by certain milestones, some of which are similar to those proposed by Tri-State. CIEA and Interwest suggested that restudies would not be needed because dropouts after the first stage would be replaced by new candidates ready to enter the second stage, and then the scope would be finalized. The proposal also suggests that the second-stage modeling would be harmonized with "transmission planning projects included in the Colorado Long Rang transmission Planning Group (CLRTPG), Colorado Coordinated Planning Group (CCPG) and PSCO Senate Bill 100 (SB-100) transmission studies."

Tri-State response:

Tri-State recognizes that the selection of the correct study methodology is a critical decision for improving the generation interconnection process. One of the concerns that Tri-State has with the cluster study approach is the nature of its transmission system. Tri-State operates a 5,000+ mile transmission system extending over four states. Tri-State could not perform a single cluster study for its entire system. Rather, Tri-State would be required to manage multiple clusters simultaneously which would be very difficult and would not likely result in a more timely and efficient study process.

Tri-State has concluded that the serial, stand-alone, study methodology will likely take less time than performing multiple cluster studies and thus better serve our Interconnection Customers. However, Tri-State has retained the flexibility to adopt a cluster study methodology to use in those cases where it determines that using cluster studies will be more efficient.

3. Milestones, Sequence of Work, and Cost Allocation

Stakeholders requested clarification regarding the paths and milestones to obtain a Facilities Study. Stakeholders also suggested that the issue of cost allocation should be explored more thoroughly; for example, CIEA and Interwest recommended a Cost Allocation Task Force.

Tri-State Response:

Paths and Milestones for Facilities Study.

Under Tri-State's Revised GIP, prior to the Facilities Study, each Interconnection Customer will be required to provide partial security for the cost of a project's Interconnection Facilities, and those Network Upgrades identified in the System Impact Study which will not be funded by Tri-State. In addition, each Interconnection Customer may select any one of four options to qualify a project as ready for a Facilities Study, all of which will be studied in order of 'first ready, first served.' The four options are:

Project designated as a Network Resource: The project must be located near or within a Resource Area and less than or equal to the maximum resource amount specified for that area. Network Upgrades will be designed and built by Tri-State in accordance with the Load and Resource Transmission Study. For this option, the Interconnection Customer must provide documentation from a Network Customer that the project will be designated as a Network Resource.

Project not identified as a Network Resource in the Load and Resource Transmission Study:
This option is available for an Interconnection Customer whose project does not qualify for designation under the Load and Resource Plan or has not been designated as a Network Resource, but still wants the ability to offer its project as a Network Resource. Additional Network Upgrades must be funded by the Interconnection Customer in accordance with the GIP.

Project with a Transmission Service Request: This option is available for a project with generation that is not located in a Resource Area, exceeds the Resource Area requirements, or will be purchased by a customer other than a Network Customer. By submitting a Transmission Service Request, the Interconnection Customer will gain the certainty of knowing that its project can be delivered and at what cost. In this process all necessary Network Upgrades will be identified in advance of a single Facilities Study, or concurrent Facilities Studies, for Interconnection Service and Transmission Service.

Project without purchase and transmission commitments: Any project may obtain a Facilities Study and execute a GIA without meeting the requirements of either of the first three options. Such a project will proceed at the Interconnection Customer's risk that there will not be sufficient capacity available on the transmission system to deliver any or all of the project's output without construction of additional Network Upgrades.

Cost Allocation.

CIEA/Interwest requested that cost allocation be addressed in the Revised GIP and GIA or in the alternative a Cost Allocation Task Force be established. The cost allocation methodology for Interconnection Facilities and Network Upgrades is clearly spelled out in the Revised GIP and GIA. Tri-State will fund the cost for Network Upgrades required

for resources built in accordance with the Load and Resource Transmission Study. Interconnection Customers will fund and receive transmission credits for Network Upgrades which are constructed for resources which are not identified in the Load and Resource Transmission Study. Interconnection Customers will also be responsible for funding all required Interconnection Facilities. Tri-State finds no reason to establish a Task Force with respect to cost allocation.

4. Non-Discrimination

Some stakeholders commented that the GIP reforms are discriminatory because:

a. They favor Tri-State's network customers and resources over independent power producers;
b. Tri-State proposes to provide expedited System Impact studies for Interconnection Customers whose projects are designated as Network Resources or have evidence of a Purchase Power Agreement commitment with a third party;
c. The Facilities Study threshold requirements favors the Network Resource path because this path does not require funding for Interconnection Facilities prior to the Facility Study;
d. Early demonstration of site control is discriminatory to wind generators because of the large land requirements relative to conventional resources.

Tri-State Response:

a. The Revised GIP are non-discriminatory, treating all interconnection requests, whether from Tri-State or an independent power producer, in a comparable manner. Tri-State's commitment to process and study all Interconnection Requests on a comparable basis regardless of ownership is set forth in Section 2.2 of the Revised GIP. The Revised GIP provide that an interconnection request may proceed either as a designated network resource, a non-designated network resource or as a merchant resource to be sold to a third party either on or off the Tri-State transmission system. While some Stakeholders have claimed potential discrimination under the Revised GIP between independent power producer resources and designated Tri-State Network Resources, no Stakeholder provided any specific example of such claimed discrimination. The Revised GIP does not treat a Network Resource or a merchant resource differently. Either resource must meet the same GIP requirements and milestones.

b. In its Interim GIP and in the Revised GIP, Tri-State has implemented a "fast track" for performing System Impact Studies. A resource which has either been designated as a Network Resource, or for which there is a purchase power commitment, will proceed to the System Impact Study ahead of interconnection requests in the queue who do not have such commitments. Any interconnection request, whether for a designated Network Resource or

for a resource which will be sold to a third party, will qualify for fast-track processing. This fast track does not favor Tri-State resources or Tri-State customers over other projects, as some Stakeholders contend. Rather, the process will allow both committed Tri-State Network Resources and resources for which a third party has committed to purchase the output to be studied ahead of other resources that do not have such commitments.

c. Tri-State agrees that there should be the same Facilities Study deposit requirements for all interconnection requests. All interconnection requests will be required to submit a deposit of 25% of estimated Interconnection Facilities and Network Upgrade costs prior to the Facilities Study.

d. Tri-State's site control requirement is uniform for all resources. Due to the fact that renewable energy projects usually require more extensive land acquisition than conventional resources, they are faced with a greater challenge with respect to site control. Tri-State has addressed this issue by adoption of graduated site control requirement under the Revised GIP which should significantly mitigate the burden associated with siting renewable energy projects.

5. Suspension

Several stakeholders expressed concern about Tri-State restricting GIA suspension rights to Force Majeure events only, and have suggested that applicants should be allowed a 180-day suspension period during the GIA, or suspension for a reason other than Force Majeure. Another stakeholder suggested that Tri-State should allow suspension of work on interconnection facilities and network upgrades that are solely used by that project. Tri-State received additional comments regarding clarification of what constitutes a Force Majeure event.

Tri-State Response:

Suspension of construction is one of the primary uncertainties that causes problems and delays with the Order 2003 interconnection process. Tri-State will retain its current provision allowing suspension only for Force Majeure events. Tri-State has adopted most of the wording changes suggested by certain Stakeholders for Section 5.14 with respect to implementing a suspension as a result of Force Majeure. The opening of this section now reads:

> "If a Force Majeure event occurs that may impact the construction of facilities identified in Appendix A, Interconnection Customer must provide documentation to the Transmission Provider describing the event and the basis for Suspension. If the documentation comports with the definition of Force Majeure in Section 1.1 of this Agreement, the Transmission Provider shall approve such suspension, which approval shall not be unreasonably withheld. The

Transmission Provider shall suspend at any time all work, or otherwise agreed upon work, ….”

Tri-State has clarified its definition of Force Majeure by deleting Article 16.1.1 and adding the content to the definition of Force Majeure: “Economic Hardship is not considered a Force Majeure event.”

Upon further review, Tri-State agrees with the stakeholder suggestion to extend the option to delay the commencement of an Interconnection Facilities Study after completion of the System Impact Study from one year to eighteen months without having to withdraw its Interconnection Request. When the Interconnection Customer meets the Facilities Study milestones, it will be studied in sequential order after the most recent Interconnection Customer who has met the milestones. Tri-State will not adopt the suggestion to allow suspension of those projects which require interconnection facilities and network upgrades which are only for that project. While a suspension may have no impact on the reliability of the transmission system, suspension does have a material impact on subsequent Interconnection Requests because Tri-State must include the suspended project as an assumption in future System Impact Studies. If the Interconnection Customer cancels its project, lower queued interconnection requests will need to be restudied as a result of a suspension.

6. Other Questions and Issues

a. A stakeholder suggested that Tri-State modify the SIS to allow assessment of project curtailment if Network Upgrades are scheduled to be in service after the planned In-Service-Date of the generator.

Tri-State Response:

Tri-State’s current and Revised GIA provide, in Section 5.7, that an Interconnection Customer may request that its project be allowed to operate in a limited manner in the event that construction of interconnection facilities or network upgrades will not occur until after the projected in-service date of the generating facility. Tri-State will work with the Interconnection Customer to allow connection of generation on an incremental basis within the capability of the existing transmission system.

b. CIEA and Interwest suggest Tri-State adopt alternative milestones for eligibility for execution of a Facilities Study Agreement:
    i. Evidence of PPA
    ii. Purchase Order for generator equipment specific to application
    iii. LOC or payment of 100% of share of Network Upgrades
    iv. Move designation of NR requirement from the GIP to the GIA

Tri-State Response:

Tri-State's proposed milestones are similar to the CIEA/Interwest proposal but not identical. In addition to a Purchase Power Agreement, Tri-State will retain the alternative milestones of either a Network Resource designation or a valid Transmission Service Request because either of those is equivalent to evidence of a power purchase contract. i.e. each of the alternative milestones is reasonable evidence of the proposed generating facility continuing through the interconnection process. Tri-State does not agree that a purchase order for generation equipment provides significant proof that the project will proceed as the generator purchase order can be cancelled or transferred to another project. Under the Revised GIP an Interconnection Customer will be required to make a deposit equal to 25% of the Interconnection and Network Upgrade costs for which the Interconnection Customer is responsible.

c. Stakeholders expressed concern that Tri-State's requirement to designate a customer prior to the Facilities Study limits flexibility.

Tri-State Response:

Tri-State remains concerned that speculative projects, i.e., those without a customer, are likely to withdraw from the interconnection queue, thus delaying completion of study work for projects with customers. However, as mentioned in the answer to the previous comment, Tri-State will extend to eighteen months after completion of the Interconnection System Impact Study, the time for a customer to satisfy the customer designation milestone. If an Interconnection customer opts for the "time out" period, and subsequently is able to designate a customer for its resource, the interconnection request will be able to proceed to an Interconnection Facilities Study with only an update of the Interconnection System Impact Study. Interconnection Customers, who prefer to move forward with their project without a specific customer designation or transmission service request, have the option to proceed using the "at risk" option. Under that option an Interconnection Customer can proceed to the Facilities Study and execution of an GIA without assurance that any or all of the project output can be delivered to the transmission system.

d. Stakeholders desire timelines for GIP and TSR processes.

Tri-State Response:

Tri-State has prepared a revised timeline and posted it on its website.

e. Stakeholders requested clarification of mechanisms available to recoup network upgrade costs if the applicant is not a Network Customer.

Tri-State Response:

If the Interconnection Customer is also the transmission customer, Tri-State will apply transmission credits to the customer's transmission bill on a dollar-for-dollar basis based on transmission service taken until the interconnection customer has been reimbursed for its Network Upgrade security deposit. If a third party is the transmission customer, Tri-State will make a cash refund to the Interconnection Customer on a dollar-for-dollar basis equal to amount of transmission service provided to the third party until the Interconnection Customer has received a complete refund for its Network Upgrade security deposit.

f. A stakeholder pointed out that Tri-State's proposal stated that it would only examine Interconnection Facilities and limited Network Upgrades in the System Impact Study.

Tri-State Response:

The stakeholder's statement is correct as to the initially proposed Revised GIP. Tri-State has revised its thinking on this approach. In the System Impact Study, Tri-State will study the Interconnection Facilities and all Network Upgrades. The System Impact Study will include cost estimates for relevant Network Upgrades as well as the required Interconnection Facilities.

g. Stakeholders asked whether Tri-State intended to submit the reformed GIP to FERC.

Tri-State Response:

Tri-State is non-jurisdictional and is not required to submit the GIP to FERC. At present it does not intend to submit its Revised GIP and GIA to FERC.

h. A stakeholder asked whether Tri-State has a networking process to connect developers with landowners.

Tri-State Response:

No.

i. A stakeholder asked whether Tri-State can identify interconnection facilities that have upgradeable capacity without facility modifications or added exposure to developers.

Tri-State Response:

Developers are able to determine transmission facilities with Available Transmission Capability by examining Tri-State's OASIS. Tri-State will not

provide additional capability information outside of its normal Tariff planning and interconnection processes.

j. A stakeholder indicated Tri-State's site control requirements may have a negative impact on landowners through causing them to enter into agreements with developers prematurely.

Tri-State Response:

Landowner relationships are the responsibility of the applicant and governed by normal contractual considerations between the landowner and developer. The graduated site control requirements in the Revised GIA do not favor either party.

k. Stakeholders requested publication of a calendar for the Revised GIP process.

Tri-State Response:

Tri-State will publish a schedule concurrent with its Revised GIP. The schedule will be updated annually and included in GIP Business Practices.