

April 25, 2025

Colorado Public Utilities Commission  
Eric Blank, Commission Chairman  
Megan Gilman, Commissioner  
Tom Plant, Commissioner

**RE: Docket No. 23A-0585E – Support for Tri-State’s 2023 Electric Resource Plan Phase II**

Dear Commissioners:

The Associated Governments of Northwest Colorado (AGNC) is a council of governments representing Mesa, Garfield, Rio Blanco, and Moffat counties, with Grand, Delta, and Montrose counties as associate members. We also serve as the federally designated Economic Development District (EDD) for Region 11, responsible for advancing strategies to strengthen and diversify the regional economy through the implementation of our Comprehensive Economic Development Strategy (CEDS).

We write to express our strong support for Tri-State Generation and Transmission Association’s 2023 Electric Resource Plan (ERP) Phase II filing, including the FLEXSR preferred portfolio and the associated request for a Certificate of Public Convenience and Necessity (CPCN) waiver for the new natural gas resource.

Tri-State’s FLEXSR preferred portfolio was selected through a competitive, market-based process that balances cost, reliability, and environmental stewardship. It includes 700 megawatts of solar and wind resources and 957 megawatts of dispatchable and semi-dispatchable resources, including battery storage and a new natural gas resource with hydrogen blend capability. Tri-State is positioned to achieve an 80% reduction in greenhouse gas emissions from wholesale electricity sales in Colorado by 2030 while maintaining industry-standard reliability metrics.

The actions proposed in Tri-State’s Phase II filing directly advance several of AGNC’s CEDS goals:

- **Diversifying Economies Impacted by Coal Transition:**  
The development of a 307 MW natural gas facility in Moffat County, in addition to the 145 MW solar project already under construction in South Moffat County, provides essential infrastructure that supports business retention, attracts private investment, and fosters economic diversification across Northwest Colorado, helping rural communities transition from a coal-dependent economy to a more resilient and balanced energy future.
- **Strengthening Foundational Infrastructure:**  
By integrating 700 MW of renewable energy and 957 MW of dispatchable and storage

resources, Tri-State's plan builds the foundation for future economic growth in communities including ours—key goals outlined in AGNC's CEDS.

- **Supporting Workforce Development and Community Resilience:**

The construction and ongoing operation of these energy projects will create skilled jobs and workforce development opportunities, helping AGNC's communities build resilience in the face of economic shifts while supporting broader business attraction and expansion efforts.

Tri-State's ERP Phase II filing reflects a responsible and balanced approach to Colorado's energy future—achieving clean energy goals while protecting grid reliability, controlling costs, and supporting rural economic development needs identified in AGNC's CEDS.

AGNC respectfully urges the Commission to approve Tri-State's FLEXSR preferred portfolio and grant the requested CPCN waiver for the new natural gas resource. Supporting this plan is essential to securing both energy reliability and long-term economic stability for Northwest Colorado's transitioning communities.

Sincerely,



Cody Davis  
AGNC Chair  
Mesa County Commissioner



Doug Overton  
AGNC Vice-Chair  
Rio Blanco County Commissioner