



March 22, 2011

Kevin Magner

City and County of Denver
201 W. Colfax Ave., Dept 611
Denver, CO 80202

Dear Mr. Magner:

Pursuant to the Franchise Agreement in place between Xcel Energy and the City & County of Denver, Xcel Energy is the owner of both street lighting facilities, traffic signal poles and ancillary facilities within the City & County of Denver. Per the Franchise Agreement, the City & County of Denver pays Xcel Energy for the maintenance of these facilities. Since Xcel Energy will own, maintain, and will be liable for the facilities, we establish the product offering.

Xcel Energy has established a standard offering of street lighting products listed in the Standard Offering 2010 book and CD. The standard offering CD has been provided to both the Colorado Department of Transportation (CDOT) and the City and County of Denver. Xcel Energy has provided Catalog Identification numbers (CAT ID #'s) for street lights in the Standard Offering 2010 book. The Cat ID #'s correspond to the utility grade components that Xcel Energy uses and maintains for its system.

Xcel Energy has established an approved vendor for the traffic signal poles. The vendor selected was Valmont Industries Inc. This selection, as all of our standard offerings, was made based on the engineering criteria as detailed in the American Association of State Highway and Transportation Officials, (AASHTO 2001) for wind load. Of equal importance are matching with ancillary devices, delivery time for parts, interchangeability of parts, and quality assurance of the manufacturer. To perform an analysis for another vendor, any material submittals will require a year and a half for review. This review would include both internal and external engineering studies and analysis, as well as, on-site observation of the manufacturing processes. Currently, we are not researching another vendor.

The Company's position has changed from how we dealt with street lighting facilities in the past. By standardizing on the products we offer and maintain; we are able to provide a better response rate for repairs. We now allow for jurisdictions to meter and maintain street lighting facilities if the jurisdiction wants a product that is not in the Xcel Energy Standard Offering or does not have written approval for installation by Xcel Energy. We have had to take this position to meet the service levels requested by the jurisdictions we serve.

Sincerely

Steve Smith
Manager of Outdoor Lighting
303-571-3945.