

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO**

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**IN THE MATTER OF THE APPLICATION OF )  
PUBLIC SERVICE COMPANY OF COLORADO ) PROCEEDING NO. 23A-\_\_\_\_EG  
FOR APPROVAL OF ITS 2024-2028 CLEAN )  
HEAT PLAN. )**

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**VERIFIED APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR  
APPROVAL OF ITS 2024-2028 CLEAN HEAT PLAN**

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Pursuant to Rule 1303 of the Colorado Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure (4 CCR 723-1), Rule 3002 of the Commission’s Rules Regulating Electric Utilities (4 CCR 723-3), and Rules 4002, 4726, and 4729-4730 of the Commission’s Rules Regulating Gas Utilities (4 CCR 723-4), Public Service Company of Colorado (“Public Service” or the “Company”) hereby submits this Verified Application (“Application”) requesting Commission approval of the Company’s 2024-2028 Clean Heat Plan, as set forth herein.

**I. INTRODUCTION AND OVERVIEW OF FILING**

1. In support of this Application, Public Service is filing the Direct Testimony and supporting attachments of nine witnesses. In addition, the Company is filing its Clean Heat Plan as Hearing Exhibit 101, Attachment JW1-1.

2. The following table identifies these witnesses and provides a summary of their Direct Testimony:

Hearing Exhibit	Witness	Summary of Direct Testimony
<b>HE 101</b>	<p><b>Jack W. Ihle</b></p> <p>Regional Vice President, Regulatory Policy</p>	<p>Mr. Ihle presents the overview of the 2024-28 Clean Heat Plan, specifically discussing the policy and regulatory aspects of this filing. He also presents the various portfolios brought forward by the Company in this filing and discusses the Company’s preferred option, the Clean Heat Plus portfolio.</p>
<b>HE 102</b>	<p><b>Dan Aas</b></p> <p>Director at Energy and Environmental Economics, Inc.</p>	<p>Mr. Aas is employed by Energy and Environmental Economics, Inc. (“E3”), which performed the modeling used in the development of the portfolios presented in this filing. Mr. Aas describes the modeling analysis of the presented portfolios.</p>
<b>HE 103</b>	<p><b>John Goodenough</b></p> <p>Director of Sales, Energy</p>	<p>Mr. Goodenough presents the Company’s methodology for developing its initial forecasts, including a reference (base) forecast along with high and low variations.</p>
<b>HE 104</b>	<p><b>Lauren W. Quillian</b></p> <p>Director, Energy and Environmental Policy</p>	<p>Ms. Quillian provides context for the greenhouse gas emissions reductions achieved through the presented portfolios. She details the accounting methodology developed through stakeholder processes to calculate emissions reductions, and discusses areas of improvement in greenhouse gas accounting for the natural gas system.</p>
<b>HE 105</b>	<p><b>Nick C. Mark</b></p> <p>Manager, Demand Side Management Strategy and Policy</p>	<p>Mr. Mark presents what the Company is currently doing for gas Demand-Side Management (“DSM”) and Beneficial Electrification (“BE”), along with discussing the role DSM and BE will play in the portfolios presented in this filing. Mr. Mark explores the challenges of the scale of DSM and BE needed.</p>
<b>HE 106</b>	<p><b>Sydney M. Lieb</b></p> <p>Manager, Energy and Environmental Policy</p>	<p>Dr. Lieb explains the emissions reduction potential enabled by certified natural gas (“CNG”), and why the Company encourages the Commission to consider approving its use. Dr. Lieb provides context on the CNG resource and its corresponding emissions reduction capacity.</p>

<b>HE 107</b>	<p><b>Edward P. Weinberg</b></p> <p>Senior Consultant, Strategic Asset Planning</p>	<p>Mr. Weinberg describes the market for renewable natural gas (“RNG”) and other projects that fall under the “recovered methane” category of the Clean Heat statute. Mr. Weinberg compares Colorado’s RNG market to more developed markets, and highlights some challenges faced in other markets. He also discusses the Company’s proposed coalbed methane recovery project and Renewable*Connect Natural Gas product.</p>
<b>HE 108</b>	<p><b>Michael C. Jensen</b></p> <p>Director, Clean Fuels PMO</p>	<p>Mr. Jensen discusses the hydrogen market, including its current state, the projected trajectory of the market, and the potential use of hydrogen in the Company’s efforts to meet its 2050 clean energy goals. Mr. Jensen discusses several Company hydrogen initiatives in development.</p>
<b>HE 109</b>	<p><b>Ray Gardner</b></p> <p>Area Vice President, Gas Engineering</p>	<p>Mr. Gardner discusses two of the Company’s proposed market transformation initiatives: introduction of advanced mobile leak detection technology and a hydrogen blending demonstration project. Mr. Gardner also addresses the operational issues associated with the incorporation of clean fuels in the natural gas system, including the technical integration of hydrogen into the LDC system.</p>

## II. COMPLIANCE WITH CLEAN HEAT PLAN REQUIREMENTS

3. Senate Bill 21-264 (“SB 21-264”), passed in 2021, established specific clean heat targets applicable to Colorado’s gas LDCs, as well as a framework for the filing and approval of utility Clean Heat Plans to achieve those targets and associated provisions related to cost recovery. SB 21-264’s Clean Heat Plan requirements are primarily codified at § 40-3.2-108, C.R.S. (referred to throughout the Company’s filing as the “Clean Heat Statute”).

4. Section VII of Mr. Ihle’s Direct Testimony provides an overview of the Application’s compliance with the applicable requirements of the Clean Heat Statute and the Commission’s Rules relating to Clean Heat Plans (Rules 4725-4733), including a roadmap of where each provision is addressed in the Company’s Direct Testimony.

## III. OTHER INFORMATION REQUIRED BY COMMISSION RULES 3002 AND 4002

5. The Name and Address of Applicant. Public Service is an operating public utility subject to the jurisdiction of this Commission, engaged, *inter alia*, in the generation, purchase, transmission, distribution, and sale of electricity in various areas in the State of Colorado. The name and address of Public Service is:

Public Service Company of Colorado  
1800 Larimer Street, Suite 1100  
Denver, CO 80202-5533

6. Name Under Which Applicant Provides Service in Colorado. All operations conducted by the Company in Colorado are conducted under the name of Public Service Company of Colorado, under the trade name of Xcel Energy.

7. Representatives to Whom Inquiries Concerning the Applicant Should be made. Please send copies of all notices, pleadings, correspondence, and other documents regarding this filing to undersigned counsel and:

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8. Agreement to Comply. Public Service agrees to answer all questions propounded by the Commission or its Staff concerning this Application. The Commission or any member of its Staff may inspect Public Service's books and records as part of the investigation into this Application. Public Service understands that if any portion of this Application is found to be false or to contain material misrepresentations, any authorities granted pursuant to the Application may be revoked upon Commission order.

9. Description of Existing Operations and General Colorado Service Area. Public Service's existing operations and general service areas in Colorado are set forth in the Company's tariffs on file with the Commission.

10. Location of Hearing. Public Service requests that it be held in Denver, Colorado.

11. Acknowledgment. Public Service acknowledges that the Company has read and agrees to abide by the provisions of Rules 3002(b)(XI)(A) through (C) and Rules 4002(b)(IV) through (VI) and (b)(XI)(A) through (C).

12. Statement Under Oath. Jack W. Ihle, Regional Vice President, Regulatory Policy, states under penalty of perjury that the contents of the Application are true, accurate, and correct to the best of his knowledge. Mr. Ihle's verification is attached to this Application.

13. Required Information. Pursuant to Rules 1310(a), 3002(c), and 4002(c), Public Service hereby incorporates by reference the following information, which is currently on file with the Commission in Proceeding No. 06M-525EG:

- a. A copy of Public Service's Amended Articles of Incorporation, as last filed on October 3, 2006.
- b. The name, business address and title of each of Public Service's officers and directors, as last filed on April 4, 2023.
- c. The names and addresses of affiliated companies that conduct business with Public Service, as last filed on April 4, 2023.
- d. The name and address of Public Service's agent for service of process, as last filed on April 4, 2023.
- e. A copy of Public Service's most recent audited balance sheet, income statement, and statement of retained earnings, as last filed on April 4, 2023.

#### **IV. REQUESTED APPROVALS**

WHEREFORE, Public Service respectfully requests that the Commission issue an order granting its Application and the requested relief as described herein and in its supporting and concurrently-filed Direct Testimony, and in particular:

- Approve the Company's 2024-2028 Clean Heat Plan;
- Approve the selection of Clean Heat Plus as the preferred portfolio for the Clean Heat Plan;
- Approve the Company's proposed Market Transformation Portfolio, including the Market Transformation Initiatives and the Innovation Fund;
- Approve the Company's proposed budgets within the Clean Heat Plus portfolio and the Market Transformation Portfolio, as supported by the testimony of the Company's witnesses;
- Approve the Plan, Do, Check, Act framework, including the 60/90-Day Notice process and the budget flexibility mechanisms;
- Approve the Company's proposed cost recovery mechanisms, including the Clean Heat Support Gas Adjustment and the Clean Heat Support Electric Adjustment;
- Open an M Docket within 60 days of a final order in this Proceeding to explore open issues such as seams, cost-sharing between electric and gas customers, the treatment of transportation customers, and other issues that require Commission and stakeholder input prior to the filing of the Company's next Clean Heat Plan;
- Approve the Company's proposal to file its next Clean Heat Plan no later than August 1, 2027;
- Approve the Company's proposal to track and defer costs incurred in association with preparing and litigating this proceeding into a non-interest-bearing regulatory asset to be reviewed for recovery purposes in a future rate proceeding; and
- Grant any waivers or variances the Commission deems necessary for approval and implementation of the Clean Heat Plan.

Dated this 1st day of August 2023.

Respectfully submitted,

By: /s/ Christopher M. Irby  
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**ATTORNEYS FOR PUBLIC SERVICE  
COMPANY OF COLORADO**