



Memorandum of Understanding Collaboration for Neighborhood Residential Market Transformation Project

The intent of this Memorandum of Understanding¹ between the Colorado Energy Office (“CEO”), Energy Outreach Colorado (“EOC”), City and County of Denver Office of Climate Action Sustainability and Resiliency (“CASR”), and Public Service Company of Colorado (the “Company”) is to: support a neighborhood residential retrofit market transformation project as part of the Company’s inaugural Clean Heat Plan to be filed August 1, 2023. Residential single-family homes consume a significant amount of gas for heating and other appliance load. Scaling residential retrofits of energy efficiency and beneficial electrification measures will be critical to helping gas local distribution companies (“LDCs”) and the State meet sector-specific emissions reduction targets. As part of the Company’s Clean Heat Plan, CEO, EOC, CASR, and the Company wish to pursue a project to better understand how to achieve economies of scale in neighborhood recruitment and implementation of energy efficiency and beneficial electrification measures. CEO, EOC, CASR, and the Company will seek to locate the project in a Disproportionately Impacted Community,² and if possible an area facing gas system constraints or upgrades.

Such efficiencies may include recruitment and deployment costs, as well as participation improvements and project timelines. The costs and utility bill impacts of deep residential retrofits are important to consider for both scalability and affordability. Therefore, a foundational requirement of the pilot will involve mitigating or improving energy cost burdens for income-qualified households and minimizing energy cost burdens for market rate households.

CEO, EOC, CASR and the Company will collaborate toward achieving the objectives of the neighborhood residential retrofit project in the following ways:

Policy Alignment

CEO, EOC, CASR, and the Company support a neighborhood residential retrofit project as being aligned with the statewide greenhouse gas emissions reduction goals under House Bill 19-1261 and Senate Bill 23-016, and the sector-specific emissions reduction targets for LDCs under the Clean Heat Statute, Senate Bill 21-264. The project will allow the Company, CEO, EOC, and CASR to test neighborhood-scale implementation of a comprehensive approach to residential decarbonization, including energy efficiency (e.g., shell measures, showerheads, and aerators), beneficial electrification

¹ This MOU is a voluntary agreement and not intended to be legally binding on any party. This MOU does not alter or modify any existing agreements between the parties. The parties agree that this MOU is to memorialize the intent of the parties regarding the project, but it does not create a legal agreement between the parties. It is agreed by the parties that nothing in this MOU will be deemed or construed as creating a joint venture, trust, partnership, or any other legally binding relationship or responsibility among the parties. This MOU is for the benefit of the parties and does not create third-party rights. Nothing in this MOU constitutes a waiver of any law, ordinance, or regulatory jurisdiction. Any party may terminate this MOU at any time upon notice to the other parties. No party to this MOU foregoes its right to take any position it deems advisable in its sole discretion, nor does any party commit to take any position, on any issue in the CHP application made to the Colorado PUC.

² As codified in § 24-4-109(2), C.R.S. pursuant to House Bill 23-1233

(e.g., heat pumps, cooking, water heating, and dryers), distributed energy resources, and demand response.

Roles and Responsibilities

The Company will provide overall management and administration of the project, and provide funding for the project as part of an approved Clean Heat Plan portfolio, under section 40-3.2-108, C.R.S.

CEO, EOC, and CASR will provide general and technical assistance to the project, including identification of neighborhoods and community engagement efforts, definition of metrics and evaluation measures. CEO, EOC, and CASR will work with the Company to identify additional partners and potential additional funding, customer engagement pathways, and advisement on measurement and evaluation processes

CEO, EOC, and CASR will serve as advisors in developing the operational plan and outreach strategies for engaging with both DI/IQ customers and market rate customers in the community selected as part of the Phase I process.

Scope, Timeline, and Next Steps

CEO, EOC, CASR, and the Company anticipate a project size of 100-200 participating existing single-family homes, compared against a control group of 100 existing mixed-fuel, single-family homes. The participants will include 50-100 income-qualified customers and 50-100 market-rate customers, across the income spectrum.

The budget for the project will be approximately \$10 million, including \$4-5 million for providing retrofits to income-qualified customers, \$3-4 million for incentives for market-rate customers, and an incremental \$1-2 million for monitoring, verification, and reporting. CEO, EOC, CASR, and the Company anticipates the initial education and outreach phases of the project will also require initial and separate funding.

Phase I of the project will involve the selection of neighborhoods, identification of funding and partners, and determination of baseline and secondary metrics. Estimated timing is June – September 2024, or no more than six months after Commission approval of the Company’s Clean Heat Plan.

Phase II of the project will involve engaging customers and implementing the retrofit measures. Phase II may happen concurrently or in parallel with Phase I and is likely to conclude within a year of Phase I concluding. Estimated timing is June 2024 – June 2025, or one year, following Phase I.

Phase III of the project will involve measuring and evaluating cost impacts, impacts to the distribution grid, cost savings to the gas distribution system, calculated GHG reductions, barriers, and effectiveness. Estimated timing is June 2024 – September 2025, or concurrently with Phase II followed by a three-month closure and reporting period.

Metrics

Primary metrics may include:

- Cost per dekatherm avoided for a neighborhood approach vs. individual single-family home approach.
- Achievable penetration rate for a neighborhood approach vs. individual single-family home approach.
- Speed of implementation

Secondary metrics may include:

- Associated electric system costs versus avoided gas system costs
- Marketing and educational effectiveness
- Pre- and post-indoor air quality

For the Colorado Energy Office:



Name: Will Toor

Title: Executive Director

Date: July 27, 2023

For Energy Outreach Colorado:

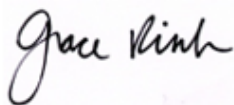


Name: Jennifer Gremmert

Title: CEO & Executive Director

Date: July 28, 2023

For the City and County of Denver:

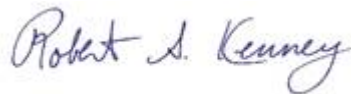


Name: Grace Rink

Title: Executive Director, Office of
Climate Action Sustainability, and
Resiliency

Date: 07/28/23

**For Public Service Company
of Colorado:**



Name: Robert S. Kenney

Title: President

Date: 07/28/2023



SOUTHERN UTE INDIAN TRIBE

August 1, 2023

Colorado Public Utilities Commission
1560 Broadway, Suite 250
Denver, CO 80202

Re: Public Service Company of Colorado Clean Heat Plan and Market Transformation Initiatives

This letter is to communicate the support of the Southern Ute Indian Tribe (“Tribe”) for the Clean Heat Plan submitted by the Public Service Company of Colorado (the “Company”) to the Colorado Public Utilities Commission (“Commission”). On June 24, 2021, Governor Jared Polis signed Colorado Senate Bill 21-264 into law, requiring Colorado gas distribution utilities to reduce greenhouse gas emissions by 4% by 2025, and by 22% by 2030, from a 2015 baseline. Colorado gas distribution utilities must file a Clean Heat Plan with the Commission demonstrating actions they will take to achieve these clean heat targets. A Clean Heat Plan may include different emissions-reduction mechanisms that will replace traditional natural gas, reduce the emissions intensity of the gas system, and advance gas energy efficiency programs for customers.

By the adoption of SB 21-264, the Colorado General Assembly has determined that there is significant potential to reduce emissions of methane from active and inactive coal mines, landfills, wastewater treatment plants, agricultural operations, and other sources of methane pollution through development of methane recovery and biomethane projects, with the potential for significant economic development opportunities, especially in rural Colorado. The Tribe, through its business division known as the Growth Fund (the “Growth Fund”), is in the process of implementing improved methane capture pilot wells on the west side of the Southern Ute Indian Reservation along the Fruitland Formation Outcrop (the “Methane Capture Project”), in potential coordination with the Colorado Energy Office and the Colorado School of Mines, in order to capture and thereby reduce naturally seeping emissions of methane and carbon dioxide. The Methane Capture Project is an enhancement of a previous project operated by the Tribe from 2008 to 2018 through which it successfully captured emissions from the Fruitland Formation Outcrop and generated carbon credits for approximately 420,000 metric tons of carbon removed from the environment. We believe that this project provides exactly the type of emissions reduction mechanism and supply-side resource contemplated by the legislation.

Growth Fund representatives have discussed with the Company its Clean Heat Plan filing and their Market Transformation Initiatives. Since February of this year, the Growth Fund has been in the process of evaluating a potential collaborative working partnership between the Tribe and the Company. The Commission’s approval of the Company’s Clean Heat Plan, with the inclusion of the Methane Capture Project, will support the Tribe’s project efforts from final design to execution to the monitoring of environmental benefits (including reduced emissions) alongside the Company and other supporters.

July 26, 2023
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The Tribe believes that the successful implementation of the Methane Capture Project, in combination with the approval of the Company's Clean Heat Plan, will provide a model for other tribes, states, and utilities. We look forward to collaborating with you, the State of Colorado, the Company, and other stakeholders as we pursue innovative energy projects that benefit Colorado's environment and its people.

Sincerely,

A handwritten signature in blue ink that reads "Melvin J. Baker". The signature is written in a cursive style with a large initial "M".

Melvin J. Baker
Chairman
Southern Ute Indian Tribe

PI

The Payne Institute for Public Policy



Payne Institute
Colorado School of Mines
816 15th St.
Golden, CO 80401

July 20, 2023

To Colorado Public Utilities Commission:

RE: Market Transformation Initiative, Clean Heat Plan.

Thank you for your efforts to address greenhouse gas emissions in Colorado and your unique role in reviewing Xcel Energy's inaugural Clean Heat Plan.

As an organization interested in creating long-term emissions reductions and driving innovation across the economy, the Payne Institute for Public Policy at the Colorado School of Mines is writing to express support for the Southern Ute Indian Tribe's coalbed methane capture project that Xcel's Energy is including in its first Clean Heat Plan filing. As we embark on the transition to reduce emissions for direct-use natural gas, we believe this project could drive innovation and will provide valuable information to scale over time.

As a supporter of this initiative, we have been working collaboratively with the Southern Ute Indian Tribe and Xcel Energy to provide input into the initiative concept, as proposed here. If approved by the Commission, we plan to participate in this initiative from final design to execution to reporting results alongside Xcel Energy and other partners. We will voice our support through our own platforms to educate, raise awareness, engage additional stakeholders and interested parties, and provide our expertise.

Successful implementation of these initiatives through the Clean Heat Plan filing will provide a model for other states and utilities to learn from and follow as the natural gas system strives to reduce carbon and methane emissions throughout the nation while maintaining affordable and reliable service. We look forward to collaborating with Xcel Energy and other interested stakeholders to ensure successful outcomes.

We encourage the Commission to consider approving this important set of market transformation initiatives, including the Southern Ute Indian Tribe's coalbed methane capture project, as part of Xcel Energy's inaugural Clean Heat Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Bazilian".

Morgan Bazilian, Ph.D.
Director, Payne Institute
Professor of Public Policy, Division of Economics and Business
Colorado School of Mines



Memorandum of Understanding All-Electric New Construction Market Transformation Initiative

The intent of this Memorandum of Understanding between Rocky Mountain Institute (“RMI”) and Public Service Company of Colorado (the “Company”) is to support an all-electric new construction market transformation initiative as part of the Company’s inaugural Clean Heat Plan to be filed August 1, 2023, pending approval by the Colorado Public Utilities Commission (the “Commission”). This project seeks to better define the market, customer, and supply chain barriers to the widespread deployment of all-electric new construction, and the solutions to overcome those barriers.

RMI and the Company will collaborate toward achieving the goals of all-electric new construction market transformation initiative in the following ways:

Roles and Responsibilities

The Company will provide overall management and administration of the project and will provide funding for the initiative as part of an approved Clean Heat Plan portfolio. RMI will provide general and technical assistance to the project, including identifying and evaluating new development sites, definition of metrics and evaluation measures, advising on replicable and scalable methods, identification of partners, and measurement and evaluation.

Areas of Inquiry

Specific areas this project will test may include a) the benefits and efficacy of the technology to support an all-electric home, such as cold climate heat pumps, electric water heating and cooking options, b) the incremental financial support needed to cover incremental costs to builders, c) customer interest and need for educational strategies to inform customers of the benefits of all-electric construction, d) whether there is a business model for all-electric new construction that creates net benefits for dual-fuel utilities (and, if so, what needs to be true to support scaling), and e) the project delivery and scaling benefits of incorporating advanced/industrialized construction methods. Ultimately, RMI and the Company seek more definitive answers as to whether and how all-electric solutions for residential customers can be scaled. Learnings from the market transformation initiative will be used to enhance the Company’s existing residential and income-qualified demand-side management programs including the Energy Star® New Homes program.

Scope, Timeline, and Next Steps

RMI and the Company propose a pilot size of 50-100 new all-electric single-family homes, compared against a control group of homes connected to electric and gas service.

The budget for the pilot, subject to approval by the Commission, will be approximately \$5 million, including \$3 million for customer incentives and direct administrative costs, and an incremental \$2 million for monitoring, verification, and reporting.

Phase I of the initiative will involve the selection of locations, identification of partners, and determination of baseline and secondary metrics. Estimated timing is April – June 2024, or three months after Commission approval.

Phase II of the initiative will involve implementing the project measures in the market transformation initiative neighborhood. Estimated timing is June 2024 – June 2025, or one year, following Phase I.

Phase III of the initiative will involve measuring and evaluating cost impacts, impacts to the distribution grid, barriers to scaling, and cost-effectiveness. Estimated timing is June 2024 – September 2025, or concurrently with Phase II followed by a three-month closure and reporting period.

For Rocky Mountain Institute:

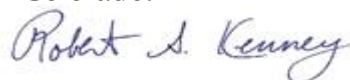


Name: Martha C. Pickett

Title: Managing Director & General Counsel

Date: 07/21/2023

For Public Service Company of Colorado:



Name: Robert S. Kenney

Title: President

Date: 07/26/2023



Memorandum of Understanding Collaboration for Pearl Street Non-Pipeline Alternative Market Transformation Project

The intent of this Memorandum of Understanding (“MOU”)¹ between the City of Boulder (“Boulder”), a Colorado home rule municipality, Boulder County, a public body, corporate and politic, and Public Service Company of Colorado (the “Company”) is to support a non-pipeline alternative (“NPA”) market transformation project for the Pearl Street Mall as part of the Company’s inaugural Clean Heat Plan to be filed August 1, 2023. As part of the Company’s Clean Heat Plan, Boulder, Boulder County, and the Company are interested in exploring the feasibility of an NPA in lieu of the planned Pearl Street Mall expansion project, which would avoid future gas investment for a specific segment of the Company’s system. Given the scope and magnitude of electrification required to achieve the Clean Heat targets, it will be important to understand and test this concept of electrification on diverse customer populations, but geographically targeted portions of the Company’s gas system.

Boulder, Boulder County, and the Company will collaborate toward achieving the objectives of the Pearl Street Mall NPA project in the following ways:

Roles and Responsibilities

The Company will provide overall management and administration of the project, and provide funding for the project as part of an approved Clean Heat Plan portfolio. Boulder and Boulder County will provide general and technical assistance to the project, including customer outreach, permitting assistance, and community engagement.

Scope, Timeline, and Next Steps

Boulder, Boulder County, and the Company anticipate a project size of approximately sixty-six (66) customers on or in the vicinity of the Pearl Street Mall.

¹ This MOU is a voluntary agreement and not intended to be legally binding for either party. This MOU does not alter or modify any existing agreements between the parties. The parties agree that this MOU is to memorialize the intent of the parties regarding the project, but it does not create a legal agreement between the parties. It is agreed by the parties that nothing in this MOU will be deemed or construed as creating a joint venture, trust, partnership, or any other legal relationship among the parties. This MOU is for the benefit of the parties and does not create third-party rights. Nothing in this MOU constitutes a waiver of any law, ordinance, or regulatory jurisdiction. Any party may terminate this MOU at any time upon notice to the other parties.

The Company’s budget for the project will be approximately \$4.5 million, including up to \$3 million for electric distribution system upgrades, and an incremental \$1 million for project implementation and incentives costs, approximately \$0.5 million for project management and reporting over the life of the project. Boulder and Boulder County will leverage their joint advising and incentive program, Partners for a Clean Environment, for participating customers.

Phase I of the project will involve the identification of customers and developing customer “archetypes” for the electrification profiles of each customer, including surveys and outreach. Estimated timing is April – June 2024, or three (3) months, after Commission approval of the Company’s Clean Heat Plan.


Phase II of the project will involve customer archetype engineering, with more detailed engineering and financial analysis of impacts to the Company’s infrastructure, customer infrastructure, and operational costs. Estimated timing is June 2024 – November 2024, or six (6) months, following Phase I.

Phase III of the project will involve customer recruitment and enrollment, working directly with customers to establish non-binding commitments to the project, as well as customer outreach, resulting in an overall go or no go decision for the project. Estimated timing is December 2024 – February 2025, or three (3) months, following Phase II.

Phase IV of the project will involve implementation of electrification, shell measures, and weatherization at customer sites, upgrades to the Company’s distribution infrastructure, and the retirement of high-risk gas pipeline. Estimated timing is February 2025 – January 2027, or two (2) years, following Phase III.


Phase V of the project will involve monitoring, evaluation, and reporting. Estimated timing is February 2027 – April 2027, or three (3) months, following Phase IV.

**For Public Service Company
of Colorado:**



Name: Robert S. Kenney
Title: President, PSCo
Date: 7/28/2023

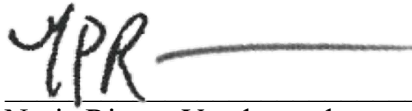
For Boulder County:



Name: Susie Strife, PhD
Title: Director of Sustainability,
Climate Action & Resilience
Date: 7/27/2023

Signatures continue on next page.

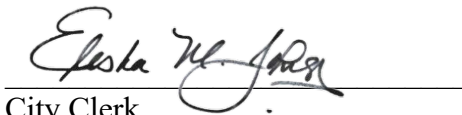
CITY OF BOULDER



Nuria Rivera-Vandermyde
City Manager

Date: July 28, 2023

ATTEST:



City Clerk

APPROVED AS TO FORM:



City Attorney's Office



Memorandum of Understanding Certified Low-Emission Natural Gas


The intent of this Memorandum of Understanding between Williams and Public Service Company of Colorado (the “Company”) is to support the Company’s inaugural Clean Heat Plan to be filed August 1, 2023, by enabling an innovative contract for certified low-emission natural gas with end-to-end emissions tracking.

The Company’s preferred Clean Heat Plan portfolio includes the purchase of Certified Natural Gas (“Certified Gas”) as a cost-effective measure to reduce emissions, and plans to purchase increasing volumes of Certified Gas as the market for Certified Gas grows and matures. Williams, through its subsidiary Sequent Energy Management LLC (“Sequent”), can provide natural gas supply with a verified emissions profile across all sectors of the value chain from production sourced in Colorado through gathering, processing, transmission, and delivery (“NextGen Gas”). Williams is leveraging block-chain secured technology via Context Labs’ Decarbonization as a Service™ platform to track and measure end-to-end emissions through the aggregation and reconciliation of multiple sources of data to provide a path-specific methane intensity certification that meets or exceeds industry leading measurement protocols, including OGMP 2.0 Level 5 and GTI Energy Veritas¹. Measurement methods include continuous methane monitoring technologies, direct measurement of on-site emissions sources, continuously ingested operational data, aerial flyovers and satellite surveillance. Each month, KPMG LLP will perform third-party verification of the methane intensity certification prepared by Context Labs and that will be delivered by Williams to the Company through the use of an environmental registry, representing the measured and attested emissions profile for the NextGen Gas pathway.

Upon approval of the Company’s Clean Heat Plan by the Colorado Public Utilities Commission, the Company intends to contract with Sequent for its NextGen Gas product, consisting of physical gas supply combined with Environmental Attributes representing the emissions intensity of such gas, inclusive of production, gathering, and processing, under an agreement subject to the terms and conditions outlined in the attached Proposal for Sale and Purchase (June 29, 2023).


The Company and Sequent anticipate contracting for 25,000 MMBtu per day of physical natural gas and the related Environmental Attributes. The delivery period will begin as early as November 1, 2023, for an initial term of 1-year.

¹The Oil & Gas Methane Partnership (OGMP) is a multi-stakeholder partnership developed by the United Nations, the Environmental Defense Fund and the Climate and Clean Air Coalition that has developed Quantification, Measurement, Reporting and Verification (QMRV) measurement standard. The Veritas protocol by research firm GTI Energy brings together scientists, academics, environmental organizations, certification organizations and industry participants to demonstrate emissions reductions in a consistent, credible, and transparent way.

**For Williams Field Services Group,
LLC**
Signed by:

5D76EB77AF68443...
Name: Payvand Fazel
Title: Vice President
Date: 7/21/2023

DS
BF

DS
km

**For Public Service Company
of Colorado:**

Name: Robert S. Kenney
Title: President
Date: 7/26/2023



WE MAKE CLEAN ENERGY HAPPEN®

August 1, 2023

Colorado Public Utilities Commission

1560 Broadway #250
Denver, CO 80202

RE: Clean Heat Plan and Differentiated Gas Initiative

Dear Chairman Blank, Commissioner Gilman, and Commissioner Plant

Thank you for the opportunity to submit a letter in response to the Clean Heat Rulemaking and all of your work on this process to date. With the passage of Colorado Senate Bill 21-264 by the Colorado General Assembly in 2021 and signing into law by Governor Jared Polis, stakeholders and industry in the state have been evaluating the feasible paths to achieve the ambitious goals laid out in the historic legislation. This law requires Colorado regulated gas utilities to file a Clean Heat Plan which lays out a plan to reduce greenhouse gas emissions as a part of a larger state emission reduction effort. A Clean Heat Plan may include different emissions-reduction mechanisms that replace traditional natural gas, reduce the emissions intensity of the gas system, and advance gas energy efficiency programs for customers.

Williams has engaged in extensive discussions with Xcel Energy and Public Service Company of Colorado (the “Company”) relating to their upcoming Clean Heat Plan filing and learned about their Market Transformation Initiatives – including the Company’s specific interest driving the differentiated gas market towards a more credible and defensible certification standard. We are excited about these initiatives and are ready to engage and be an anchor partner for this initiative that would demonstrate enhanced monitoring, measurement, and verification of differentiated gas as a critical tool to reduce upstream methane emissions.

Tulsa-based Williams company is proud to support projects in our operational and management footprint that furthers the reduction of harmful pollutants and assists Colorado’s goals to address the risk of climate change. As one of the largest infrastructure companies in the United States, with extensive operations in the state of Colorado, we see firsthand the critical role natural gas plays in a viable and sustainable low-carbon future.

Our path to net zero by 2050 involves a combination of immediate and long-term solutions, including investments in technology that help us identify and report emission sources in real-time to optimize our operations and direct investments in emission reduction solutions. Williams is working with Xcel Energy to develop a pilot program to prove the viability of an exciting new process for reducing and verifying lifecycle emissions related to the production, gathering, processing, and transportation of natural gas. This innovative solution provides immediate opportunities to drive greenhouse gas emission reductions while providing critical reliability to the energy needs of the

state. As noted in the filing, we are partnering with Xcel to demonstrate the capabilities of this program.

As a partner in this effort, we have discussed the general concept of a collaborative working partnership while the Colorado Public Utilities Commission (PUC) reviews the Clean Heat Plan and the initiative evolves into a written working plan. If the Clean Heat Plan is approved by the Commission, we plan to participate in this initiative from final design to execution, reporting results alongside Xcel Energy and other community and state partners. We have signed a Memorandum of Understanding to solidify this partnership.

We believe that successful implementation of these strategies through the Clean Heat Plan will provide a model for other states and utilities to learn from and follow, as well as drive value for one of the most affordable and effective emission reduction activities. We look forward to collaborating with you, the State of Colorado, Xcel Energy and other stakeholders as we innovate and scale transformational low-carbon energy products and programs for Colorado consumers.

We encourage the Commission to consider approving this set of market transformation initiatives as part of Xcel Energy's inaugural Clean Heat Plan.

Sincerely,



Brian Hlavinka
Vice President, New Energy Ventures
Williams Companies
One Williams Center
Tulsa, OK 74172



www.kuvasystems.com

Cambridge, MA – July 27, 2023

To: Colorado Public Utilities Commission:

Re: Letter of Support for Public Service Company of Colorado Clean Heat Plan and Market Transformation Initiatives

Colorado Senate Bill 21-264 requires Colorado regulated gas utilities to file a Clean Heat Plan which lays out a plan to reduce greenhouse gas emissions. A Clean Heat Plan may include different emissions-reduction mechanisms that replace traditional natural gas, reduce the emissions intensity of the gas system, and advance gas energy efficiency programs for customers.

We have had discussions with Public Service Company of Colorado relating to their upcoming Clean Heat Plan filing and learned about their Market Transformation Initiatives. We are excited about these initiatives and are writing in support for the certified natural gas initiative in partnership with Williams, a midstream oil and gas operator.

Kuva Systems is a leading provider of continuous monitoring cameras for methane detection at upstream and midstream oil and gas facilities. Continuous monitoring solutions like Kuva's provide direct evidence of the absence of emissions at critical sites and thereby underpin the performance of certified gas claims. Our cameras have been extensively tested by third parties (CSU/METEC in Fort Collins) and are currently in commercial use in Colorado.

While Kuva is not part of the proposed Market Transformation Initiatives in Colorado, we are part of a similar upcoming project outside of Colorado. We are supporting the Public Service Company of Colorado proposal as we see certified gas as a crucial element in further reducing greenhouse gas emissions beyond regulatory compliance and in a cost effective way. If the Public Utility Commission were to approve the market transformation initiative, Colorado would again lead the nation in innovative rulemaking and in reducing greenhouse gas and methane emissions, building on nearly a decade of leadership in methane emissions inspection rulemaking by the Colorado Energy and Carbon Management Commission (formerly the Colorado Oil & Gas Conservation Commission) and the Colorado Air Quality Control Commission. A successful implementation of the Market Transformation Initiative will provide a model for other states and utilities to learn from and follow.

We encourage the Commission to consider approving this set of Market Transformation Initiatives as part of the Public Service Company of Colorado's inaugural Clean Heat Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "Stefan Bokaemper".

Stefan Bokaemper
CEO – Kuva Systems



DENVER INTERNATIONAL AIRPORT
8500 Peña Blvd. | Denver, Colorado 80249-6340 | (303) 342-2000

July 21, 2023

Colorado Public Utilities Commission
1560 Broadway, Suite 250
Denver, CO 80202

Re: Public Service Company of Colorado Clean Heat Plan and Market Transformation Initiatives

Please accept this letter as confirmation of Denver International Airport's (DEN) support for the "Market Transformation Initiatives" included in the Public Service Company of Colorado's (the "Company") Clean Heat Plan filing. As one of the largest energy consumers within the Colorado service territory, DEN shares the Company's commitment to reduce greenhouse gas emissions and is working to reduce the emissions associated with heating our facilities as part of the City of Denver's 2040 net zero goal.

Scope 1 heating emissions are among the most challenging for facilities at DEN's scale to abate, and we were excited to have recent discussions with the Company related to their upcoming filing and the proposed Market Transformation Initiatives (MTI). DEN is ready to engage and partner on MTI, which may include projects such as fuel switching natural gas boilers that heat DEN facilities and electrifying back-up sources for mission-critical power needs. In addition to the greenhouse gas emissions reductions that would result from these projects, there are also important co-benefits for local air quality as our region transitions to "severe" ozone non-attainment status.

We have discussed a collaborative working partnership with the Company while the Colorado PUC reviews the Clean Heat Plan and the initiative evolves into a written working plan. If the Clean Heat Plan is approved by the Commission and includes the Market Transformation Initiatives identified above, DEN hopes to participate from final design through execution and reporting results alongside the Company and other community and state partners.

DEN believes that successful implementation of these initiatives through the Clean Heat Plan will provide a model for other states, utilities, and large energy users to learn from and follow. We look forward to collaborating with the PUC, the State of Colorado, the Company, and other stakeholders as we innovate and scale transformational energy products and programs for Colorado consumers. We encourage the Commission to approve this set of Market Transformation Initiatives as part of the Company's inaugural Clean Heat Plan.

Sincerely,

Scott Morrissey
Scott Morrissey

Senior Vice President, Sustainability
Denver International Airport



Kroenke Sports & Entertainment

July 28, 2023

To: Colorado Public Utilities Commission:

Re: Public Service Company of Colorado Clean Heat Plan and Market Transformation Initiatives

Colorado Senate Bill 21-264 was a historic bill passed by the Colorado General Assembly and signed into law by Governor Jared Polis. This law requires Colorado regulated gas utilities to file a Clean Heat Plan that lays out a plan to reduce greenhouse gas emissions. A Clean Heat Plan may include different emissions-reduction mechanisms that replace traditional natural gas, reduce the emissions intensity of the gas system, and advance gas energy efficiency programs for customers.

We have had discussions with Public Service Company of Colorado (the “Company”) relating to their upcoming Clean Heat Plan filing and learned about their Market Transformation Initiatives. We support the Company’s Plan and are excited about the Market Transformation Initiatives and the Company’s Innovation Fund. In particular, Ball Arena is a strong candidate to be a partner for the flue gas carbon capture initiative.

As a partner in this initiative, we have discussed the general concept of a collaborative working partnership while the Colorado Public Utilities Commission reviews the Clean Heat Plan and the initiative evolves into a written working plan. If the Clean Heat Plan is approved by the Commission and includes the flue gas carbon capture Market Transformation Initiative, we may participate in this initiative as a candidate site, and if selected would partner with the Company from final design to execution, and reporting results alongside the Company and other community and state partners.

We believe that successful implementation of these initiatives through the Clean Heat Plan will provide a model for other states and utilities to learn from and follow. We look forward to collaborating with you, the State of Colorado, the Company, and other stakeholders as we innovate and scale transformational energy products and programs for Colorado consumers.

We encourage the Commission to consider approving the Market Transformation Initiatives as part of the Company’s inaugural Clean Heat Plan.

Sincerely,
DocuSigned by:

Matthew R Bell

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Matthew Bell,
SVP Venue Operations

