Posting Date: April 29, 2022

➢ Summary of 60-Day Notice: Application from the City of Sheridan for the Higher Emissions Community Designation

The following 60-Day Notice summarizes Public Service Company of Colorado's ("Public Service" or "the Company") action to update Parties of the Company's review of applications to designate new higher emissions communities ("HEC") that would be eligible for enhanced incentives under certain commercial and multifamily housing programs within the Company's 2021-2023 Transportation Electrification Plan ("TEP"). This could result in new communities being identified for designation as HEC. Included in this 60-Day Notice is a detailed summary and recommendation for the application received from the City of Sheridan. This 60-Day Notice is issued in compliance with Decision No. C21-0017 in Proceeding No. 20A-0204E.

A copy of this notice will be available on our website at:
www.xcelenergy.com/company/rates_and_regulations/filings/transportation_electrification_plan

Background and Case History: Identification of Higher Emissions Communities

In Decision No. C21-0017, the Colorado Public Utilities Commission ("Commission") approved the Company's proposal to work with stakeholders to determine a methodology to be used to identify HECs and recognized the Climate Equity Framework developed by the Colorado Department of Public Health and Environment ("CDPHE") as an appropriate means of identifying these communities.

Public Service has developed an application process for projects or communities that are not within an identified HEC census block group but may be experiencing a disproportionate environmental burden within their community. The Company conducted several individual meetings with stakeholders to present the approach, receive input, and further refine the methodology. The Company also presented the developed methodology and the identified census block group areas to stakeholders at a TEP Stakeholder meeting held on April 27, 2021. As approved in Commission Decision No. C21-0017, the Company will dedicate a minimum of 15 percent of the total 2021-2023 TEP budget, 15 percent of the Advisory Services portfolio budget, and 30 percent of the Partnerships, Research, and Innovation portfolio budget to support income-qualified customers and HECs. By identifying these HECs, it allows for certain projects within the Company's Multifamily Housing and Commercial portfolios that take place within these identified communities to become eligible for enhanced rebates. The Commission recognized this process as a critical step towards achieving the public policy goals of widespread transportation electrification and providing access for low-income customers as part of Senate Bill 19-077 ("SB 19-077").

➢ Higher Emissions Communities

A. Description

In approving the Company's TEP, the Commission has authorized Public Service to offer a wide range of electric vehicle ("EV") programs designed to increase access to EVs for income-qualified communities and populations. This objective is highlighted in SB 19-077, C.R.S. § 40-5-107.

As approved through Commission Decision No. C21-0017, Public Service will dedicate at least 15 percent of the total 2021-2023 TEP budget, 15 percent of the Advisory Services portfolio budget, and 30 percent of the Partnerships, Research, and Innovation portfolio budget to support income-qualified customers and communities and HECs, Public Service's Residential, Multifamily Housing and Commercial portfolios offer enhanced rebates to customers and communities that meet certain criteria that identify them as an underserved population. [1]

Through the TEP proceeding, the Company and stakeholders proposed, and the Commission approved, the use of a broad range of eligibility criteria in order to be as inclusive as possible with these EV programs, and several of these programs offer enhanced support to HECs.

The Company's identification of HECs attempts to target the "communities most affected by emissions from the transportation sector," prioritized for special consideration and support in TEPs through Senate Bill 19-077.[2] To identify HECs, the Commission decision adopted the processes set forth in the Partial Settlement Agreement filed on November 13, 2020.

The Company's Approach to Developing the HEC Methodology

Considering the legislative and procedural history and requirements related to HECs, the Company has designed and carried out a consultative process to develop its HEC identification methodology, gather input, and build flexibility to allow for future changes to the methodology.

To initiate its work in this area, the Company reviewed the CDPHE's Climate Equity Framework draft and, more specifically, the Climate Equity Data Viewer tool. This tool is designed to visualize data to inform communities, government, and other stakeholders on how different environmental burdens are borne across Colorado. The tool draws on data from the Environmental Protection Agency's Environmental Justice Screening and Mapping Tool ("EJSCREEN Tool"). Upon reviewing the CDPHE tool and better understanding its data, the Company hosted initial conversations with a small group of stakeholders to take input on how this tool could be used.

Following these initial conversations, the Company further developed its methodology and began conducting an analysis using the data in the Climate Equity Data Viewer. This analysis allowed the Company to identify census block groups that could be selected as HECs. With these census block groups identified, the Company conducted additional outreach to stakeholders through a formal stakeholder meeting and additional informal sessions with stakeholders. Throughout the process, the Company listened closely to stakeholders and incorporated input it has received. The "Stakeholder Involvement" section of the July 2021 HEC 60-Day Notice lists each stakeholder

[1] See Commission Decision No. C21-0017, ¶121.
[2] C.R.S. § 40-5-107.

meeting and describes any salient elements from these meetings that were incorporated into the Company's proposed methodology.

The Current HEC Identification Methodology

In order to identify HECs, the Company developed a more refined definition for these communities as presented in the final 60-Day Notice filed in Proceeding No. 20A-0204E on July 16, 2021.[3] The Company outlines that an HEC should have two attributes:

1. The people that live in the community face an environmental burden that may be caused by transportation emissions and/or other environmental burdens; and
2. The people that are affected belong to a disproportionately impacted ("DI") population, identified by one or more of the following attributes:

    a. Income qualified; or
    b. Status as a community of color; or
    c. History of environmental racism (e.g., through redlining, anti-indigenous, anti-immigrant, anti-Hispanic, or anti-Black laws); or
    d. Multiple factors exist together that when combined create an enhanced vulnerability to environmental burdens. [4]

The Company has been using this definition to guide the identification of HECs through two mechanisms:

1. Analysis using CDPHE's Climate Equity Data Viewer, and
2. Application process for projects not identified through the first mechanism.

Initial Identification: Analysis Using CDPHE Climate Equity Data Viewer

Last year, the Company used the Climate Equity Data Viewer to identify census block groups in its service territory that are HECs. The step-by-step process is described in further detail below.

- **Step 1:** The first step in the process is to separate out counties in the Company's service territory into rural, frontier, and urban counties. CDPHE defines "Urban" communities as those areas with 50,000 people or more or clusters of at least 2,500 and less than 50,000. "Frontier" communities are those areas with six or fewer people per square mile that typically reside at the edges of the state. And "Rural" includes communities not identified as urban or frontier.[5] By segmenting counties, the Company ensures that communities in various types of population categories will be selected. The Company uses designations already provided for within the tool to perform this segmentation. Without this segmentation, the tool primarily identifies communities in the Denver Metropolitan area as HECs.

[3] Also available at www.xcelenergy.com/company/rates_and_regulations/filings/transportation_electrification_plan
[4] The list of attributes incorporates the structure described in and enacted into Colorado statute following the passage of HB21-1266 in July of 2021.
[5] CDPHE defines these terms within the Climate Equity Data Viewer, at https://storymaps.arcgis.com/stories/be558ce8cb1f49f98a18d35d36d8156b

- **Step 2:** The second step is to calculate the Transportation Impacts score and gather the Climate Equity Framework score. To calculate the Transportation Impacts score, the Company multiplies Transportation Proximity by Population Characteristic. Transportation Proximity is a percentile ranking for count of vehicles or the average annual daily traffic ("AADT"), at major roads within 500 meters, divided by distance in meters. The Company has used this metric as a proxy for transportation emissions. Population Characteristic incorporates numerous factors from the data set including population under four years old and over 65 years old, cancer risk, respiratory hazard risk, percent minority, percent low-income, linguistic isolation, and less than high school education. The tool calculates the Population Characteristic, and the Company uses this calculated value. The tool also calculates the Climate Equity Framework score, which is meant to be an all-encompassing value that considers total environmental burden and population risk factors. The Climate Equity Framework score is calculated by multiplying Pollution Burden by Population Characteristic. The Pollution Burden is a metric that incorporates several different types of pollution and pollution related aspects including superfund proximity, wastewater discharge proximity, transportation storage and disposal facility ("TSDF") proximity, risk management plan, diesel particulates, traffic proximity, ozone, particulate matter 2.5 and lead paint. Subject to the additional subsequent steps, the Company utilizes either a Transportation Impacts score or Climate Equity Framework score to identify HECs.[6]
- **Step 3:** The third step is to rank order each census block group by their Transportation Impacts score and separately by their Climate Equity Framework score. Using this rank order, the Company calculates the score at the 95th percentile and any census block group with either a Transportation Impacts score or Climate Equity Framework score equal to or above the 95th percentile is selected as an HEC, subject to the additional steps detailed below.
- **Step 4:** Using the list of potential HECs identified in Step 3, the Company reviews the Population Characteristic for each census block group and removes any HEC that has a Population Characteristic that is not in the 80th percentile for its location type (i.e., urban census blocks are only compared against urban census blocks). Given that Transportation Impact scores are the product of Transportation Proximity and Population Characteristic ranks, there is the potential that certain identified communities might have high scores for Transportation Impact but might not have particularly at-risk or underserved populations. This result could occur if a community scored high enough on Transportation Proximity to outweigh a lower score on Population Characteristics, meaning that a community was heavily impacted but less underserved on other aspects. By adding this step of ensuring census block groups have a Population Characteristic that is at least in the 80th percentile, the Company believes it is more likely that the selected census block group meets the criteria described in the definition for DI communities. If a census block group is removed based on this criterion, the Company replaces it with the community with the next highest Transportation Impact or Climate Equity score that has a Population Characteristic in the 80th percentile.

[6] For additional information regarding Population Characteristic, Pollution Burden, Traffic Proximity or other variables used in the Climate Equity Data Viewer, see https://storymaps.arcgis.com/stories/be558ce8cb1f49f98a18d35d36d8156b

- **Step 5:** The Company takes the proposed list of HECs and overlays these census block groups with a map of its service territory. This step is necessary to remove any census block group that the Company does not serve. Similar to Step 4, if a census block group is removed because it is not in the Company's service territory, it will be replaced by the census block group that has the next highest Transportation Impacts or Climate Equity Framework score.

Application Process to Designate Additional HECs

Since the initial identification of these HECs in May 2021, the Company has been using an application process to allow for projects or communities that are not in an identified HEC to make the case that they are in fact located in an HEC even though they were not identified by the Climate Equity Data Viewer. The Company believes this added flexibility is appropriate because there may be valid cases that meet the definition and intent of an HEC, but for which the tool is not well-suited to identify. For example, an area and population may face a disproportionate environmental burden that is not characterized in the specific metrics the Climate Equity Data Viewer utilizes or there may be an island within a larger census block group that faces a disproportionate burden but is surrounded by a community that does not have similar population characteristics, thereby lowering its Transportation Impacts or Climate Equity Framework score below the 95th percentile. The Company's expectation has been that the application pathway will drive a small number of projects seeking HEC treatment each quarterly application period.

In order to apply for HEC designation, a project applicant or community stakeholder must complete an application that will be available on the Company's website. The applicant may compose their application in Spanish or English. The Company includes the following questions in the application, which is offered on the website in Spanish and English:

1. Choose and respond to one of the two options below. Please be as specific as possible in describing the geographic boundaries of the location, including how the area falls within an identifiable legal boundary outlined by property lines or governmental jurisdiction.
    a. The location of the potential transportation electrification project you believe is in an HEC.
    b. The location of the community you believe should be designated as HEC.
2. If applying for a HEC designation for a specific transportation electrification project, please confirm if you have submitted an application for an Xcel Energy-provided rebate which requires an HEC designation for the rebate.
3. Describe the environmental burden(s) that affect the population in or around this location. The description may be up to (1) page and the applicant may include additional pages of pictures or other visuals that may help describe the environmental burden.
4. Identify the population or populations that bear(s) a disproportionate environmental impact in this location. Please select relevant attributes from the definition of disproportionally impacted populations that apply to the project or community:
    a. Income-qualified on a community basis
    b. Status as a community of Color
    c. History of environmental racism (e.g. though redlining, anti-indigenous, anti-immigrant, anti-Hispanic, or anti-black laws)

Please describe the prominence of the above attribute(s) or provide other details that explain your selection. You may use data or provide other anecdotes to substantiate your claim. Please do not include an individual customer's income qualification; Xcel Energy requests income information at an aggregated, community level.

5. Describe how the transportation electrification project or community that will utilize enhanced rebates from Xcel Energy to support the buildout of charging infrastructure will benefit the disproportionately impacted population described in question 3.

The Company originally agreed to review applications at the end of each quarterly application period, to correspond to when projects are reviewed for other multifamily housing and commercial TEP programs. Since the finalization of this process, the multifamily housing and commercial TEP programs application period became rolling. The Company currently accepts applications for new HECs on a rolling basis but is still reviewing them quarterly to align with the 60-Day Notice filing period. The Company's review focuses on confirming that the applicants' claims in response to questions two and three above are accurate by finding data, communicating with relevant non-profit groups, engaging directly with community members, or using other qualitative and quantitative methods. Additionally, the Company validates the applicant's claims in response to question four by considering whether the project increases EV access for DI populations or provides another related benefit to these populations (e.g., reduces noise pollution by electrifying fleets adjacent to locations with a high density of disproportionately impacted residents).

Within 45 days of the deadline for quarterly applications, the Company has agreed to file a 60-Day Notice with its recommendation to either accept or reject an application as an HEC and the logic supporting its recommendation. In response to any stakeholder feedback, the Company will consider such feedback and adjust its recommendations as appropriate. This quarter, Public Service received applications to designate new HECs. As such, this 60-Day Notice is fulfilling that regulatory requirement.

B. Application Discussion

Overview

The Company received applications to designate new HECs from two parties. Public Service received an application to designate several HECs from the Colorado Department of Human Services ("CDHS") as well as one application from the City of Sheridan. The application from CDHS, which was submitted with the intention of receiving the Fleet/Workplace HEC rebate, was initially deemed incomplete. It was later determined that CDHS was eligible for this rebate without an HEC designation. As such, CDHS decided to withdraw its application to designate new HECs. Given this withdrawal, the Company is only including in this 60-Day Notice a detailed summary and recommendation for the application it received from the City of Sheridan.

Application Summary – City of Sheridan

Sheridan, Colorado is located southwest of Denver, and bordered by Denver, Englewood, and Littleton. The city area takes up approximately two square miles and has a population of 6,100 residents. However, due to its location near Denver as well as the numerous businesses within the

city district, Sheridan sees its population rise to 19,000 every workday from the influx of commuters. Abutting the city are three state highways: US 285, US 85 (entitled Santa Fe Drive), and Highway 88 (entitled Federal Blvd.). Additionally, the BNSF #5 heavy rail line runs through the metro area.

As requested on question 1 of the HEC designation application, the City of Sheridan stated it sought to designate the entirety of the City of Sheridan as an HEC.

The combination of highways and railroad causes significant emissions, greatly affecting the air quality within the city of Sheridan. Currently, Sheridan is partnering with the Tri-County Health Department to set up air quality monitors throughout the city. These monitors measure $PM_{2.5}$ around the city. Additionally, reports made by CDPHE find the city of Sheridan as having higher rates of asthma than the state average.

The racial and financial demographics of the City of Sheridan also provide evidence for its status as an HEC, Sheridan states. The City of Sheridan has a median household income of $44,335, compared to the State of Colorado at $72,331. Sheridan's median household income is only 61 percent of that of the State of Colorado. The Census Bureau shows 9 percent of the population of the State of Colorado in poverty, compared to 19.2 percent of the population of the City of Sheridan. Additionally, according to the Census Bureau, 31 percent of Sheridan residents identified as Hispanic or Latino, while only 22 percent of the State of Colorado identified as Hispanic or Latino.

C. The Company's Recommendations for New HECs

The Company recommends designation for the majority of the geographic area making up the City of Sheridan. Specifically, the Company recommends designation of the following census block groups that reside within Sheridan. The following table summarizes the Company's designation recommendations for these census block groups. The forthcoming discussion explains in further detail the Company's considerations for making these recommendations.

Table 1: Summary of Recommendations for New HECs

Block Group Federal Information Processing Standard ("FIPS") (from 2010 Census)	HEC Designation Recommendation
80050055512	Approve
80050057002	Approve
80050055522	Approve
80050055521	Approve
80050060001	Approve
80050055533	Approve
80050055531	Deny
80050062004	Approve

Discussion

The Company conducted a rigorous process to validate the claims stated by the City of Sheridan on the submitted documentation. As described earlier, the Company needed to validate if the proposed areas sufficiently met the definition of an HEC of demonstrating an environmental burden exists at the location, that the location houses DI communities, and that the HEC designation could be reasonably expected to increase EV access for DI populations or provide another related benefit to these populations. Additionally, the Company had requested that applicants indicate whether they had submitted any program incentive applications related to potential HEC designation as requested in question 2 of the HEC designation application.

Environmental Burden

As requested in question 3 of the HEC designation application, the City of Sheridan summarizes the environmental burdens affecting Sheridan. The City notes that the area proposed for designation has historically had a high number of unregulated landfills that discharge methane. The area proposed for designation is said to include heavy industrial uses such as concrete and asphalt recycling, scrap metal recycling, automotive salvage uses, and the application further notes that the area has environmental issues from abandoned gas station tanks and former dry-cleaning facilities. While there is no single indicator to succinctly quantify these impacts, data from the EPA's EJ Screen help support these claims as the Proximity to Risk Management Plan (RMP) Facilities score (count of potential chemical accident management plan facilities within 5 km) ranges from the 85th to 98th percentile for the census block groups in the proposed designation area (and 87th percentile for the City as a whole).

The City also notes that the location abutting three highways (US 285, US 85, and SH 88), the volume of vehicles into and through the city, and the presence of a heavy rail line (BNSF) that runs through the city generate significant emissions and impacts the air quality in the proposed designation area. Data from the EJ Screen substantiates these claims, in that the diesel particulate matter emissions range from the 88th to 91st percentile for the census block groups in the proposed designation area (and 88th percentile for the City as a whole). The EJ Screen traffic proximity and volume values range from the 63rd to 98th percentile for the census block groups in the proposed designation area (and 87th percentile for the City as a whole).

Finally, the City's application explains that the population in the proposed area for designation has higher rates of asthma than the state average. The City cites state data reported through CDPHE to support these statements and the data appears to be accurate and reliable.

Review of the CDPHE Climate Equity Data Viewer tool for the proposed area for designation shows environmental burden scores ranging from 77.4 to 93.54. This score represents how many environmental burdens, such as air pollution and climate impact, are present relative to the rest of the state. The score is a weighted average of the environmental exposure, environmental effects, and climate results. These fourth quartile scores for the proposed area help to demonstrate the City's claims about pollution exposure and other environmental impacts.

For these reasons, the Company concludes that this application demonstrates that environmental burdens exist at the proposed designation area. These environmental burdens include exposure to traffic, diesel particulate matter, industrial activities, and emissions and chemicals associated

with former landfills, gas stations, and dry-cleaning facilities. Impacts that may be associated with the exposure to these environmental burdens include asthma rates that are higher than the state average.

Presence of Disproportionately Impacted Communities

As requested in question 4 of the HEC designation application, the City describes the presence of disproportionately impacted populations in Sheridan. The City notes that the area proposed for designation has a median household income that is 61 percent of that of the State of Colorado, and that 19.2 percent of the area's population lives in poverty. Data from the EPA EJ Screen helps validate these claims as the low-income values range from the 43rd to 83rd percentile for the census block groups in the proposed designation area (and 62nd percentile for the City as a whole). For a summary of these metrics by census block group, please see Table 2 below.

The City notes that the area proposed for designation has 31 percent of residents that identify as Hispanic or Latino. All but one of the census block groups in the proposed area for designation are identified as DI communities in Colorado based on factors identified in the Environmental Justice Act (Colorado House Bill 21-1266)[7]. Data from EPA EJ Screen help validate these claims as the Persons of Color values range from the 42nd to 83rd percentile in the proposed designation area (and 62nd percentile for the City as a whole). Furthermore, the EPA EJ Screen tool shows low-income values ranging from 43rd to 83rd percentile for the census block groups in the proposed designation area (and 78th percentile for the City as a whole).

Review of the CDPHE Climate Equity Data Viewer tool for the proposed area for designation shows Population Characteristics scores ranging from 46.33 to 92.1. This score represents a community's sensitivity to environmental burdens and other social determinants of health. It is a combination of socioeconomic and sensitive population results. The score tabulates from 0 to 100, with the higher score representing communities that may be hit hardest by climate change. These scores, especially the higher values, help illustrate that there are populations in the proposed designation area that are sensitive to environmental exposures (from a health perspective).

For these reasons, the Company concludes that the City of Sheridan's application sufficiently identifies population(s) that bear a disproportionate environmental impact in this location.

The Company notes that Census Block Group 80050055531 is not designated as a Colorado DI community and therefore may not meet the minimum requirements for designation alone. However, it is a small portion of the entire proposed area for designation by the applicant.

The following table summarizes the metrics the Company reviewed related to disproportionately impacted communities for these census block groups.

[7] The Company notes that this legislation was enacted on July 2, 2021 following the proposal of the Company's own HEC identification process. These DI metrics were used in this validation process to provide supporting data to validate the claims on Sheridan's application. As discussed earlier, they also guided the initial HEC framework.

Table 2: Disproportionately Impacted Community Metrics for Census Block Groups in Sheridan

Block Group FIPS (2010 Census)	Colorado DI	DI Community Reason[8]	Percent Low Income[9]	Percent People of Color[10]	Population Characteristics Score[11]
80050055512	Yes	More than one category	36% (74%ile)	54% (83%ile)	76.78
80050057002	Yes	Housing burden	34% (70%ile)	24% (46%ile)	50.52
80050055522	Yes	Housing burden	40% (79%ile)	25% (48%ile)	92.1
80050055521	Yes	Low income	43% (82%ile)	31% (59%ile)	55.11
80050060001	Yes	Housing burden	36% (74%ile)	24% (46%ile)	65.28
80050055533	Yes	More than one category	46% (86%ile)	38% (68%ile)	89.12
80050055531	No	n/a	18% (43%ile)	22% (42%ile)	48.46
80050062004	Yes	Housing burden	22% (50%ile)	31% (59%ile)	46.33

Anticipated EV Benefits to Disproportionately Impacted Communities

As requested on question 5 of the application, the City of Sheridan describes how EV infrastructure will benefit residents. The City notes that the area proposed for designation suffers from poor air quality and that the build out of EV infrastructure will help reduce emissions and benefit residents. The City further notes plans to start building out EV infrastructure near City Hall as well as other locations in the future.

For these reasons, the Company concludes that the City of Sheridan's application adequately demonstrates that HEC designation will help support transportation electrification adoption, and that the benefits of transportation electrification may benefit all residents in the proposed designation area through incremental improvements to air quality.

Project Application Status

Pertaining to question number two on the application, ("If applying for a HEC designation for a specific transportation electrification project, please confirm if you have submitted an application for an Xcel Energy-provided rebate which requires an HEC designation for the rebate"), the City indicates that it has not submitted any project applications at the time of submission.

[8] These reasons are sourced directly from the "Data Viewer for Disproportionately Impacted Communities in Colorado," available at the following link: https://cohealthviz.dphe.state.co.us/t/EnvironmentalEpidemiologyPublic/views/EJActDICommunities-Public/HB21-1266DICommunities?%3AshowAppBanner=false&%3Adisplay_count=n&%3AshowVizHome=n&%3Aorigin=viz_share_link&%3AisGuestRedirectFromVizportal=y&%3Aembed=y

[9] Source: EJ Screen

[10] Source: EJ Screen

[11] Source: CDPHE Climate Equity Data Viewer

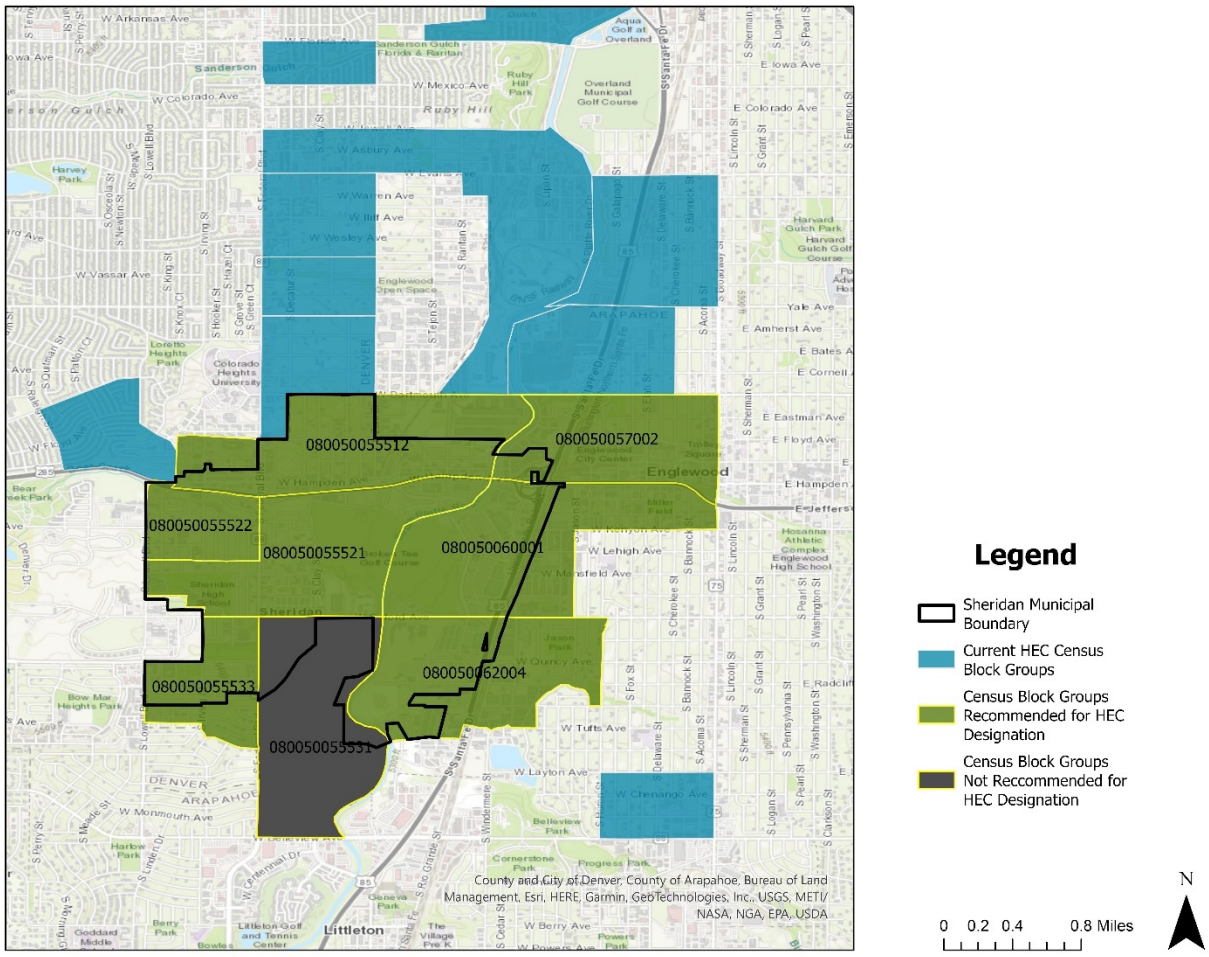
Full Recommendation

The Company recommends the approval of the application for HEC designation submitted by the City of Sheridan. However, Public Service recommends that the Sheridan geography be designated using different geographic boundaries than initially proposed.

While the application identified the City of Sheridan municipal boundary as the proposed area for designation, the Company recommends consideration of the census block groups within and intersecting with the City of Sheridan's boundary as an alternative geographic area for designation. The Company suggests using the 2010 census block groups, because they align with most of the data evaluation tools used to support and review the application. The Company hopes that designating the majority of the City of Sheridan along these boundaries will meet the City's future EV plans while also reducing administrative burden for the Company. Where possible, the Company wishes to continue to designate future HECs at the census block group level, given that the majority of the supporting environmental and demographic data exists at this specific geographic designation. This approach also allows the Company to streamline its HEC mapping efforts. Figure 1 below provides a map view of the Company's recommended designations in comparison with the municipal boundaries of Sheridan and existing HECs.

In examining the data at the census block group level, there is one census block group (80050055531) that does not meet all of the considerations for qualifying as an HEC. This is the only block group that is not designated as DI by the State of Colorado and has below state average percentages for low-income and person of color populations. In isolation, the justification for this census block group seems to adequately demonstrate an Environmental Burden but does not have the level of DI populations as defined by the State of Colorado for the DI community classification based on factors identified in the Environmental Justice Act. As such, the Company is recommending that this census block group not be designated. However, Public Service is open to stakeholder feedback to help inform a final recommendation on this issue.

Figure 1: Summary of Census Block Group Recommendations for Sheridan and Adjacent to Current HECs



D. Stakeholder Involvement

The Company has been receiving support from Partners in Energy in conducting community outreach to HECs and communities who may be interested in the designation in order to be eligible for the Company's enhanced TEP program offerings. Their outreach to customers and communities in the HEC designation process has included informational webinars, individual customer and community meetings and email correspondence, presentations at local events, and informational meetings with partners such as the Colorado Energy Office's ReCharge coaches and the Regional Air Quality Control Council's Local Government Committee. Partners in Energy has also provided technical assistance to stakeholders seeking an HEC designation. Once the Company received these applications to designate new HECs, the Partners in Energy team assisted the Company with conducting an initial review of the applications.

In addition, the Company has discussed the new HEC topic in the quarterly TEP stakeholder meetings, including the 2022 Quarter 1 and 2021 Quarter 2 and Quarter 3 meetings.