
**RE: In the Matter of the Application
of Public Service Company of Colorado
for Approval of its Solar*Connect Program**

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**Second Discovery Request
of Staff
Served on Public Service Company**

PROCEEDING NO. 16A-0055E

April 14, 2016

DISCOVERY REQUEST CPUC2-25:

Public Service witness Steve Wishart in Direct Testimony, page 22, lines 10 through 12, states “When renewable resources are added to the Public Service system, it reduces the number of times that our fossil fuel plants need to run.” Over the first 5 years of Solar*Connect commercial operation, please provide the expected change in number and costs annual fossil fuel generator starts and cycling costs with the proposed Solar*Connect resource.

OBJECTION:

Public Service objects to this data request on the grounds that it would require a special study to produce such information. Public Service also objects to the special study requested as being one that is overly broad and unduly burdensome.

Sponsor: Andrew Crain

Date: April 25, 2016

RESPONSE:

Subject to and without waiving the objection, Public Service states as follows:

Mr. Wishart was referring to a generally accepted concept that with additional renewable resources a power system’s reliance on fossil fueled generation decreases.

Sponsor: Steve Wishart

Date: April 25, 2016