

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

**IN THE MATTER OF THE APPLICATION
OF PUBLIC SERVICE COMPANY OF
COLORADO FOR APPROVAL OF ITS
2024-2026 TRANSPORTATION
ELECTRIFICATION PLAN**

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PROCEEDING NO. 23A-____E

VERIFIED APPLICATION

Pursuant to C.R.S. § 40-5-107 and Colorado Public Utilities Commission (“Commission”) Rule 3002, 4 CCR 723-3, Public Service Company of Colorado (“Public Service” or the “Company”), by its undersigned counsel, respectfully submits for Commission approval its 2024-2026 Transportation Electrification Plan (“TEP”). In support, Public Service states as follows:

I. BACKGROUND

1. In 2019, Colorado enacted Senate Bill (“SB”) 19-077, establishing new requirements for electric public utilities to file with the Commission TEP applications “to support widespread transportation electrification.”¹ SB 19-077 offers a wide variety of regulated activities a utility can undertake to support its TEP. These activities include “investments or incentives to facilitate the deployment of customer-owned or utility-owned charging infrastructure, including charging facilities, make-ready infrastructure, and associated equipment that support transportation electrification;” “investments or

¹ C.R.S. § 40-5-107(1)(a).

incentives to facilitate the electrification of public transit and other vehicle fleets;” “rate designs, or programs that encourage vehicle charging that supports the operation of the grid;” and “customer education, outreach, and incentive programs that increase awareness of the programs and benefits of transportation electrification and encourage greater adoption of electric vehicles.”

2. Consistent with its statutory requirements, the Company is pleased to submit its second TEP to the Commission. The Company’s 2024-2026 TEP builds off of the practices and lessons learned through implementation of the inaugural TEP, and it is also designed to support the State of Colorado in meeting its 2030 goal of having 940,000 electric vehicles (“EVs”) on the road by 2030. The 2024-2026 TEP includes robust EV programming to comprehensively assist the Company’s various customer segments. To assist review and administration, the programming is specifically divided into the following six portfolios: (1) Residential; (2) Commercial; (3) Clean Vehicles; (4) Public Charging Acceleration Network; (5) Advisory Services; and (6) Innovation. Through these portfolios and their programming options, Public Service is promoting equitable EV access and environmental justice with enhanced support to Income-Qualified (“IQ”) customers, Disproportionately Impacted (“DI”) communities, and federally recognized tribal members.

3. The Company’s 2024-2026 TEP, as supported by nine Company Direct Testimonies, complies with the requirements of SB 19-077. These requirements include the statute’s retail rate cap, as well as the requirement to seek to minimize

overall costs and maximize overall benefits.² In addition, the TEP is guided by statutory considerations on whether the investments are:

- a. Reasonably expected to improve the use of the electric grid, including improved integration of renewable energy;
- b. Reasonably expected to increase access to the use of electricity as a transportation fuel;
- c. Designed to ensure system safety and reliability;
- d. Reasonably expected to contribute to meeting air quality standards, improving air quality in communities most affected by emissions from the transportation sector, and reducing statewide emissions of greenhouse gases by forty percent below 2005 levels by 2030 and eighty percent below 2005 levels by 2050;
- e. Reasonably expected to stimulate innovation, competition, and increased consumer choices in electric vehicle charging and related infrastructure and services; attract private capital investments; and utilize high-quality jobs and skilled worker training programs;
- f. Transparent, incorporating public reporting requirements to inform design and commission policy; and
- g. Reasonably expected to provide access for low-income customers, in the totality of the utility's transportation electrification programs, which may include community-based and multi-family charging infrastructure, car share programs, and electrification of public transit, while giving due consideration to the [e]ffect on low-income customers.

4. In support of this Application and the Company's 2024-2026 TEP, the Company is providing the Direct Testimony and Attachments of the following witnesses and selected topics:

² C.R.S. §§ 40-1-103.3(6), 40-5-107(1)(b).

Witness	Testimony Topics
Jack W. Ihle	Witness introductions, existing EV policy landscape, inaugural TEP, statutory considerations, cost recovery, budget and flexibility, equity outreach, other Commission proceedings, and case expenses
Nadia I. El Mallakh	Colorado's EV goals, equity in the TEP, and emission benefits
Huma Seth	Overview of the TEP, reporting requirements, interaction with state and local efforts
Deborah E. Erwin	Company-owned public charging, EV purchase and lease rebates, and performance incentive mechanism
Jean-Baptiste L. Jouve	Budget, cost-benefit analysis, and social cost of emissions
C. Andre Gouin	Managed Charging, innovation, backup battery power, and batteries at customer public charging facilities
Connie L. Paoletti	Distribution grid investments and customer future proofing
Derek S. Klingeman	Subscription pricing rate, cost methodologies for rental rates, the retail rate impact, and tariff revisions
Kelli Duffy	Revenue requirements and depreciation for battery energy storage systems

II. REQUESTED APPROVALS AND FINDINGS

5. By this Application, the Company requests that the Commission approve the Company's 2024-2026 TEP and make the following specific approvals, findings, and determinations, as discussed in the Company's Direct Testimony:

- The Company's 2024-2026 TEP, including its six portfolios and associated programs, filed as Attachment HS-1 to the Direct Testimony of Company witness Huma Seth;
- The Company's annual TEP budgets for years 2024-2026, as presented by Jean-Baptiste Jouve;
- The Company's proposal to continue existing TEP programming until it is able to implement the Commission's final approvals for the 2024-2026 TEP, as sponsored by Mr. Ihle;
- The Company's revised budget flexibility proposal, as sponsored by Mr. Ihle;
- The continuation of existing cost and regulatory treatment for TEP rebates, as sponsored by Mr. Ihle;
- The Company's revised eligibility for participation in its equity-focused programs as proposed by Company witness Nadia El Mallakh;
- The Company's revised charging rates at Company-owned DCFC stations, as presented by Company witness Deborah Erwin;

- A depreciation rate for battery energy storage systems ("BESS"), as proposed by Company witness Kelli Duffy;
- A subscription pricing program that provides customers an option for charging their EVs during off-peak hours, as sponsored by Derek Klingeman;
- New cost methodologies to apply to the Company's calculation of monthly rental rates for charging equipment and BESS, as sponsored by Derek Klingeman;
- The revisions to the Company's tariffs, as introduced by Derek Klingeman;
- The adjustment to the Company's TEP reporting requirements, as proposed by Huma Seth;
- The Company's continuation of the Equity Performance Incentive Mechanism ("PIM"), as proposed by Deborah Erwin;
- The Company's plan to launch a full Distributed Intelligence program to support EV adoption, contingent on the results of the Company's resolution of certain pre-existing settlement commitments, as sponsored by C. Andre Gouin;
- The Company's tariff changes to implement the rates and programs of the 2024-2026 TEP, as introduced by Derek Klingeman;
- The waiver of the Commission's Distribution System Plan rules, if necessary; and

- The deferral of expenses associated with preparing and litigating this proceeding.

6. Additionally, Public Service requests that the Commission's order issued in this Proceeding direct the Company to file, on not less than two days' notice, revised tariff sheets as part of its Colorado PUC No. 8 Electric tariff in substantially identical form to the pro forma tariff sheets contained in Attachment DSK-5 to Mr. Klingeman's Direct Testimony.

III. INFORMATION REQUIRED BY COMMISSION RULES

7. In support hereof and in accordance with 4 CCR 723-3 Rule, 3002(b), Public Service respectfully states as follows:

8. The Name and Address of Applicant required by Rule 3002(b)(I). 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

9. Name Under Which Applicant Provides Service in Colorado required by Rule 3002(b)(II). 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.

10. Representatives to Whom Inquiries Concerning the Applicant Should be made required by Rule 3002(b)(III). Please send copies of all notices, pleadings, correspondence, and other documents regarding this filing to:

Jack Ihle
Regional Vice President, Regulatory and Strategic Analysis
Xcel Energy Services Inc.
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and

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and

Tyler E. Mansholt
Assistant General Counsel
Xcel Energy Services Inc.
1800 Larimer Street, Suite 1400
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Email: tyler.e.mansholt@xcelenergy.com

11. Agreement to Comply with Rule 3002(b)(IV)-(VI). Public Service has read and agrees to abide by the provisions of subparagraphs (b)(IV) through (VI) of Commission Rule 3002(b)

12. Description of Existing Operations and General Colorado Service Area required by Rule 3002(b)(VIII). Public Service's existing operations and general service areas in Colorado are set forth in the Company's tariffs on file with the Commission.

13. Location of Hearing required by Rule 3002(b)(X). If the Commission sets this application for a hearing is held, Public Service requests that it be held in Denver, Colorado.

14. Acknowledgment required by Rule 3002(b)(XI)(D). Public Service acknowledges that the Company has read and agrees to abide by the provisions of Rules 3002(b)(XI)(A) through (C).

15. Statement Under Oath required by Rule 3002(b)(XII). Jack Ihle, Regional Vice President, Regulatory and Strategic Analysis, 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.

16. Information Required by Rule 3002(c). Pursuant to Rules 1310(a) and 3002(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. CONCLUSION

WHEREFORE, Public Service respectfully requests that the Commission issue an order approving its 2024-2026 TEP, including the specific approvals, findings, and determinations, as set forth herein.

Dated this 15th Day of May, 2023.

Respectfully submitted,

/s/ Tyler E. Mansholt

Tyler E. Mansholt, #51979
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**ATTORNEYS FOR PUBLIC SERVICE
COMPANY OF COLORADO**

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

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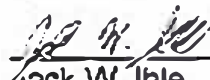
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AFFIDAVIT OF JACK W. IHLE
ON BEHALF OF
PUBLIC SERVICE COMPANY OF COLORADO

STATE OF COLORADO)
CITY AND COUNTY OF DENVER) SS:

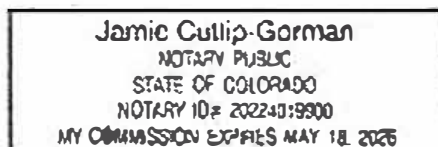
I, Jack W. Ihle, being duly sworn, do hereby depose and state that I am the Regional Vice President of Regulatory Policy at Xcel Energy Services Inc., and am an authorized agent for Public Service Company of Colorado. I have read the foregoing Application for the 2024-2026 Transportation Electrification Plan. The facts set forth therein are true, accurate, and correct to the best of my knowledge, information, and belief.

Dated at Denver, Colorado, this 15 day of May, 2023.



Jack W. Ihle
Regional Vice President, Regulatory Policy
1800 Larimer Street, Suite 1100
Denver, Colorado 80202

Subscribed and sworn to before me this 15 day of May, 2023.





Notary Public

My Commission expires May 18, 2026