

**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 ) PROCEEDING NO. 23A-\_\_\_\_E  
2024-2026 TRANSPORTATION )  
ELECTRIFICATION PLAN. )

**DIRECT TESTIMONY AND ATTACHMENT OF JACK W. IHLE**

**ON**

**BEHALF OF**

**PUBLIC SERVICE COMPANY OF COLORADO**

**May 15, 2023**

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**EXECUTIVE SUMMARY OF THE 2024-2026 TEP**

1           Mr. Ihle is Regional Vice President, Regulatory Policy, for Public Service  
2           Company of Colorado (“Public Service” or “Company”). He presents this Executive  
3           Summary in support of the Company’s overall 2024-2026 Transportation  
4           Electrification Plan (“TEP”). The 2024-2026 TEP is a pivotal product to support  
5           widespread transportation electrification throughout Colorado. The 2024-2026  
6           TEP follows the Company’s inaugural TEP, in which the Commission approved a  
7           robust and customer-centric framework to encourage transportation electrification.  
8           Since the launch of its first TEP, the Company has had an opportunity to gain  
9           valuable customer insights, learn from its new programming, grow its internal  
10          resources, and develop leading expertise on the multitude of issues facing  
11          customers as they embark on their adoption of electric vehicles (“EV”).

12          With our second TEP, Public Service is building upon its successes and  
13          lessons learned. As it does so, the Company is setting a course to further assist  
14          the State of Colorado to meet its goal of having 940,000 EVs on the road by 2030.  
15          The Company is also mindful of the Commission’s voiced interest in evolving the  
16          role of Public Service toward service offerings and with less focus on energy sales.

1 This TEP will move the Company to provide customer solutions by removing  
2 barriers to EV adoption, increasing awareness of the benefits of EV ownership,  
3 developing intuitive and easy-to-follow EV charging rate designs, and providing  
4 necessary infrastructure to support the rapidly increasing adoption of EVs. The  
5 Company will provide these customer solutions in a manner that ensures  
6 continued downward pressure on rates. I also note that the Company's TEP  
7 offerings enhance affordability for our residential customers by reducing their  
8 whole household energy costs. When customers make the shift to electrified  
9 transportation and take advantage of our low off-peak pricing, they are able to  
10 charge at home at a much lower price than with the ever-fluctuating commodity of  
11 gasoline.

12 The TEP is complimented by the Company's 2021 Electric Resource Plan  
13 and Clean Energy Plan (collectively, the "CEP"). The CEP will enable the  
14 Company to reduce emissions from 2005 levels by at least 80 percent by 2030 on  
15 its electric system, and move the Company toward providing 100 percent clean  
16 energy by 2050. The transition of our generation system to clean energy resources  
17 combined with increased EV adoption supported by this TEP provides the  
18 framework for the State of Colorado to tackle the emissions from the transportation  
19 sector, which is the largest source of greenhouse gas ("GHG") emissions in the  
20 State. All customers and the State of Colorado benefit from the significant  
21 reduction in emissions associated with the adoption of EVs. By 2030, those  
22 emission reductions are estimated to avoid on an annual basis approximately 1.5

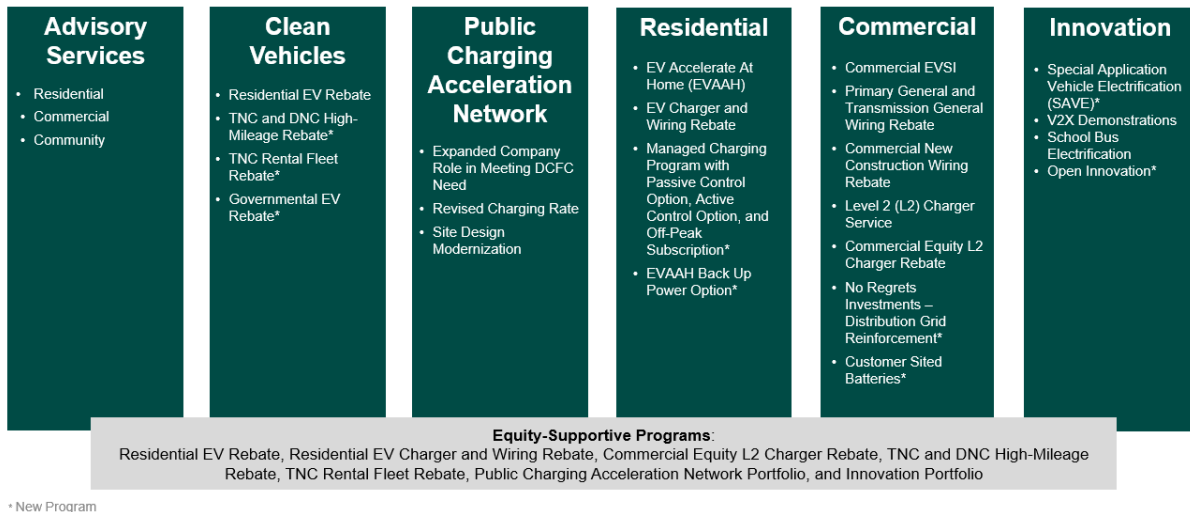
1 million metric tons of carbon dioxide from internal combustion engines in our  
2 service territory.

3 The Company is pleased to present its comprehensive 2024-2026 TEP. This  
4 TEP includes substantial new and revised programming options to harness the  
5 benefits of the rapidly evolving EV marketplace. That evolution is taking place very  
6 quickly, as influenced by new state and federal incentives to stimulate EV adoption,  
7 including the Inflation Reduction Act (“IRA”) and the Infrastructure Investment and  
8 Jobs Act (“IIJA”). With the changes to the EV marketplace, the time is ripe for  
9 Public Service’s efforts to leverage new available incentives; compliment those  
10 incentives with corresponding educational efforts, rate designs, and infrastructure  
11 investments; and ensure that all of our customers and the communities we serve  
12 can enjoy the benefits and savings of EVs.

13 To simplify customer understanding and management of the Company’s  
14 TEP, it is separated into six separate portfolios, which themselves seek to  
15 accomplish different goals with separate programming options. In the figure below,  
16 the Company provides a snapshot of these portfolios, including their high-level  
17 categories of customer programs that provide customer solutions.

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## 2024-2026 TEP Snapshot



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Through the implementation of these portfolios, the Company will continue to assist Colorado in meeting its EV goals, while also ensuring a balance with non-regulated entities, who are also necessary to invest capital to assist in achieving the State's goals. More specifically, the Company's assessment of EV growth reveals that there is a need for additional EV charging ports across all of its service territory, with room for a multitude of entities to support the infrastructure growth.

The Company's TEP budgets and programs are designed to meet that market demand and assist it in coming to fruition, all while ensuring that our equity-eligible customers are a focal point of the EV transition. Promoting equity is a lynchpin concept in the TEP. The TEP includes a reimagined scope of offerings to support equity, with new equity-eligibility criteria to ensure our various income-qualified ("IQ") customers, Disproportionately Impacted ("DI") communities, and federally recognized Tribe members benefit from transportation electrification. For our equity-eligible customers, the Company is proposing enhanced rebate

1 offerings to lower the cost of a new or used EV, and these offerings are stackable  
2 with federal and state incentives to maximize savings opportunities. Those EV  
3 rebates are backed-up with EV charging and wiring rebates, allowing equity-  
4 eligible customers options to charge at home or at multifamily residences.  
5 Moreover, we are supporting innovative projects to electrify the hard-to-reach  
6 transportation vehicles that support equity objectives, such as school buses,  
7 construction and agricultural equipment.

8 The Company also proposes to strategically increase into the future the  
9 scope of its investments in Direct Current Fast Charging (“DCFC”) stations. This  
10 proposal will reduce customer range anxiety concerns, and it will allow our  
11 customers without access to home charging the access to public charging they  
12 need, which is especially important for our equity-eligible customers. Our DCFC  
13 investments will provide EV drivers and those considering the purchase of an EV  
14 the added confidence that they will have access to reliable charging, and the DCFC  
15 infrastructure will facilitate the electrification of medium- and heavy-duty vehicles.  
16 The Company’s DCFC investments are well balanced with the non-regulated  
17 market. They address under ten percent of the overall DCFC need by 2030,  
18 meaning that over 90 percent of the DCFC need is addressable with non-regulated  
19 entity, state, and federal funding sources. Concurrently, the Company is proposing  
20 a demonstration to support battery storage co-location at non-regulated DCFC  
21 stations that when combined with the EVSI support the Company is currently  
22 offering will further reduce the cost of operating DCFC stations for non-regulated  
23 entities throughout our service territory. This effort will continue to support the

1 growth of non-regulated DCFC stations and assist in lowering cost barriers to their  
2 build out.

3 The Company's TEP is backed up with new rate designs and policies to  
4 creatively address barriers to EV adoption. Regarding managed charging, the  
5 Company is moving towards a more dynamic charging approach, allowing better  
6 alignment with the benefits of lower-cost energy and renewable resources with EV  
7 charging. The Company is also introducing a new subscription approach to  
8 residential EV charging, providing an easy-to-follow option for our customers who  
9 are interested in off-peak charging. Regarding rates at Company-owned DCFC  
10 stations, we are proposing a revised market rate so as to ensure a reasonable  
11 balance of the charging rate with the market. That revised market rate will better  
12 support affordable EV charging options. Lastly, the Company presents a new  
13 methodology to update its monthly rental products, such as for Level 2 home  
14 chargers, allowing the Commission and stakeholders more transparency into  
15 future rental rates.

16 As evidenced by the 2024-2026 TEP itself and the Company's supporting  
17 testimonies, the TEP is thoughtfully designed to support widespread transportation  
18 electrification and to meet the State's EV goals. With the approval of our 2024-  
19 2026 TEP, the Company will have the programs available to meet our customers'  
20 needs and equitably ensure the future of transportation electrification benefits all  
21 Public Service customers.

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**LIST OF ATTACHMENTS**

Attachment JWI-1	2023 Colorado EV Plan
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## DIRECT TESTIMONY AND ATTACHMENT OF JACK W. IHLE

**I. INTRODUCTION, QUALIFICATIONS, PURPOSE OF TESTIMONY, AND RECOMMENDATIONS**

**Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A. My name is Jack W. Ihle. My business address is 1800 Larimer Street, Denver, Colorado 80202.

**Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?**

A. I am employed by Public Service Company of Colorado (“Public Service” or the “Company”) as Regional Vice President of Regulatory Policy.

**Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

A. I am testifying on behalf of Public Service.

**Q. PLEASE SUMMARIZE YOUR RESPONSIBILITIES AND QUALIFICATIONS.**

A. I am responsible for overseeing the Company's regulatory filings and strategy as they pertain to resource planning, transmission planning, distribution planning, renewable energy policy, retail product policy, transportation electrification, and other policy matters. A description of my qualifications, duties and responsibilities is set forth in my Statement of Qualifications at the conclusion of my testimony.

1   **Q.    WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?**

2    A.    The purpose of my Direct Testimony is to introduce the Company's witnesses,  
3       provide an overview of the EV policy landscape, discuss the Company's inaugural  
4       TEP, and then present an overview of the 2024-2026 TEP, including on how it  
5       reflects the statutory considerations of Senate Bill 19-077 ("SB 19-077"), the  
6       State's controlling statute for utility TEPs. Specific to the TEP, I introduce certain  
7       new programs, enhancements, and modifications that the Company is proposing.  
8       I also address the importance of ensuring equity in the TEP, as it is essential that  
9       the benefits of transportation electrification support the Company's income-  
10      qualified ("IQ") customers and equity-eligible customers and communities  
11      throughout our service territory, as well as our customers who are members of  
12      federally-recognized Tribes. Further, I provide testimony on the relationship of this  
13      proceeding to other essential Commission proceedings, including on the  
14      Company's ongoing processes enabling the clean energy transition. I conclude by  
15      addressing the Company's request for deferred cost recovery of litigation and  
16      consultant expenses necessary to support this comprehensive TEP.

17   **Q.    WHAT ARE YOUR INTRODUCTORY COMMENTS ON HOW THE COMPANY'S**  
18   **2024-2026 TEP IS IN THE PUBLIC INTEREST?**

19    A.    Following the Commission's March 2021 approval of the Company's inaugural  
20       TEP, the Company worked with tremendous efforts to implement a full suite of  
21       robust programs to provide the benefits of transportation electrification to all of its  
22       customers, including launching 14 programs in 2021 alone. The implementation  
23       of those brand-new programming options was impacted by COVID-19, supply

1 chain disruptions, and overall economic inflation. Despite these challenges, the  
2 Company's inaugural TEP paved a viable path for the Company to assist the State  
3 of Colorado's efforts to achieve its ambitious goal of 940,000 EVs on Colorado  
4 roads by 2030. The inaugural TEP provided downward rate pressure for  
5 customers as presented by Company witness Mr. Derek Klingeman, and it also  
6 allowed the Company to support its objectives to continue as a leader in the clean  
7 energy transition, enhance the customer experience, and keep bills low.

8 With the 2024-2026 TEP, the Company is building on the momentum  
9 created by its initial TEP by providing offerings that will assist all Public Service  
10 customers on their journey to transportation electrification. The offerings of the  
11 2024-2026 TEP are based on successful practices, customer feedback, program  
12 interest, lessons learned, and are geared to overcome customer challenges to EV  
13 adoption. The offerings are guided by the statutory objectives of SB 19-077,  
14 including a focus on equity. They provide greater support to assist the State to  
15 achieve its goals for transportation electrification, and they push for technological  
16 and program innovation to promote the efficient operation of the electric grid.

17 This TEP is complimented by the successes of the Company's other  
18 planning efforts, most notably its approved CEP. The CEP will enable the  
19 Company to reduce emissions from 2005 levels by at least 80 percent by 2030,  
20 and assist in providing 100 percent clean energy by 2050. The transition of our  
21 generation system to clean energy resources combined with increased EV  
22 adoption supported by this TEP provides the framework for the State of Colorado

1 to tackle the emissions from the transportation sector, which is the largest source  
2 of greenhouse gas (“GHG”) emissions.

3 As supported by our Company witnesses, the 2024-2026 TEP proposals  
4 are holistic, pushing the Company to help the State of Colorado increase EV  
5 uptake and achieve statewide goals. The Company’s electrification support is  
6 further bolstered by new federal and state opportunities, ensuring the maximization  
7 of available opportunities to support widespread transportation electrification. With  
8 these opportunities, the Company proposes to ensure that the benefits of  
9 transportation electrification reach all of our customers, including our equity-  
10 eligible customers.

11 The 2024-2026 TEP is comprehensive, it promotes equity, and the  
12 Commission’s approval of the TEP will facilitate cleaner air, reduced emissions,  
13 and cost savings for the benefit of all customers.

14 **Q. ARE YOU SPONSORING ANY ATTACHMENTS AS PART OF YOUR DIRECT**  
15 **TESTIMONY?**

16 A. Yes, I am sponsoring Attachment JW1-1, providing the 2023 Colorado EV Plan.

17 **Q. PLEASE SUMMARIZE THE REQUESTS OF PUBLIC SERVICE IN THIS**  
18 **PROCEEDING.**

19 A. The Company recommends that the Colorado Public Utilities Commission  
20 (“Commission”) approve the following:

- 21 • The Company’s 2024-2026 TEP, including its six portfolios and associated  
22 programs, filed as Attachment HS-1 to the Direct Testimony of Company  
23 witness Ms. Huma Seth;

- 1 • The Company's annual TEP budgets for years 2024-2026, as presented by  
2 Mr. Jean-Baptiste Jouve;
- 3 • The Company's proposal to continue existing TEP programming until it is  
4 able to implement the Commission's final approvals for the 2024-2026 TEP,  
5 as sponsored by Mr. Ihle;
- 6 • The Company's revised budget flexibility proposal, as sponsored by Mr.  
7 Ihle;
- 8 • The continuation of existing cost and regulatory treatment for TEP rebates,  
9 as sponsored by Mr. Ihle;
- 10 • The Company's revised eligibility for participation in its equity-focused  
11 programs as proposed by Company witness Ms. Nadia El Mallakh;
- 12 • The Company's revised charging rates at Company-owned DCFC stations,  
13 as presented by Company witness Ms. Deborah Erwin;
- 14 • A depreciation rate for battery energy storage systems ("BESS"), as  
15 proposed by Company witness Ms. Kelli Duffy;
- 16 • A subscription pricing program that provides customers an option for  
17 charging their EVs during off-peak hours, as sponsored by Mr. Derek  
18 Klingeman;
- 19 • New cost methodologies to apply to the Company's calculation of monthly  
20 rental rates for charging equipment and BESS, as sponsored by Mr. Derek  
21 Klingeman;
- 22 • The revisions to the Company's tariffs, as introduced by Mr. Derek  
23 Klingeman;
- 24 • The adjustment to the Company's TEP reporting requirements, as proposed  
25 by Ms. Huma Seth;
- 26 • The Company's continuation of the Equity Performance Incentive  
27 Mechanism ("PIM"), as proposed by Ms. Deborah Erwin;
- 28 • The Company's plan to launch a full Distributed Intelligence program to  
29 support EV adoption, contingent on the results of the Company's resolution  
30 of certain pre-existing settlement commitments, as sponsored by Mr. Andre  
31 Gouin;
- 32 • The Company's tariff changes to implement the rates and programs of the  
33 2024-2026 TEP, as introduced by Mr. 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.

**Q. WHAT COMPANY REQUESTS DO YOU SPECIFICALLY SUPPORT IN YOUR DIRECT TESTIMONY?**

A. I provide support that the overall TEP and its yearly budgets are in the public interest and that they are consistent with statutory considerations. On more specific issues though, my testimony addresses the following requests that were mentioned in the above discussion:

- 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;
- The Company's revised budget flexibility proposal;
- The Company's proposal to continue the existing cost and regulatory treatment for TEP rebates;
- The Company's request for a waiver of Distribution System Plan rules, if necessary; and
- The Company's proposal to defer the expenses associated with preparing and litigating this proceeding.

**Q. WHAT ARE THE IMPLICATIONS ASSOCIATED WITH THE TIMING OF THE COMMISSION'S APPROVAL OF THE TEP?**

A. The Company understands that it is unlikely it will receive a final Commission decision before the end of 2023. Given that potential, the Company requests Commission authority to extend its existing TEP programming into 2024, pending receipt of a final Commission decision and the Company's ability to implement the

1 revised or changed programs. This request highlights the importance of the need  
2 to ensure no breaks in TEP programming that could confuse or frustrate customer  
3 expectations. Allowing the Company to temporarily extend its existing  
4 programming into 2024 will ensure the Company will continue to meet customer  
5 demands, while the Commission resolves this proceeding and the Company  
6 reflects into its programming the Commission's decisions. Similar practices have  
7 been used to ensure continuity in Demand Side Management and Renewable  
8 Energy Standard plans programs.



**II. WITNESS INTRODUCTIONS**

**Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

A. In this section of my Direct Testimony, I provide a summary of the Company's witnesses also submitting Direct Testimony in the proceeding, as well as TEP subject matter support of Company witnesses.

**Q. PLEASE INTRODUCE THE OTHER COMPANY WITNESSES.**

A. The following table provides a summary of each witness and the items their testimonies address.

<b>Public Service Witness</b>	<b>Testimony Subjects</b>
Nadia El Mallakh, Vice President of Clean Transportation, Xcel Energy Services Inc.	<ul style="list-style-type: none"><li>• The TEP's role in Colorado achieving its EV goals;</li><li>• the role of the Company's TEP in advancing the state's emissions reduction goals; and</li><li>• the equitable and affordable path to transportation electrification and long-term vision for transportation electrification</li></ul>
Huma Seth, Director, Customer Solutions, Clean Transportation	<ul style="list-style-type: none"><li>• Overview of the 2024-2026 TEP;</li><li>• ongoing stakeholder engagement;</li><li>• TEP reporting requirements; and</li><li>• the interaction of the TEP with federal, state and local efforts</li></ul>
Deborah Erwin, Director of Clean Transportation Policy and Planning	<ul style="list-style-type: none"><li>• Company-owned public fast charging proposal and the rates charged at Company-owned stations;</li><li>• the equity-focused EV Rebates, and other rebate programs for Clean Vehicles; and</li><li>• the continuation of the Company's Equity Performance Incentive Mechanism ("PIM")</li></ul>
Jean-Baptiste Jouve, Senior Director, Strategic Partnerships and New Ventures	<ul style="list-style-type: none"><li>• The 2024-2026 TEP Budget;</li></ul>

	<ul style="list-style-type: none"><li>• the Company's cost-benefit analysis conducted by The Brattle Group;</li><li>• evaluation of the social cost of carbon and methane; and</li><li>• support for the Company's EV forecast</li></ul>
Andre Gouin, Business Technology Consultant	<ul style="list-style-type: none"><li>• Managed Charging in the 2024-2026 TEP;</li><li>• the Innovation portfolio;<sup>1</sup></li><li>• the residential battery backup option; and</li><li>• the commercial battery demonstration for DCFC stations</li></ul>
Connie Paoletti, Director, Distribution Transportation Strategy & Delivery	<ul style="list-style-type: none"><li>• Distribution grid investments and considerations; and</li><li>• customer EV supply infrastructure future proofing</li></ul>
Derek Klingeman, Principal Pricing Analyst	<ul style="list-style-type: none"><li>• Off-Peak Subscription Pricing</li><li>• cost methodologies for rental rates and charging equipment;</li><li>• TEP retail rate impact;</li><li>• TEP class cost allocation; and</li><li>• tariff revisions</li></ul>
Kelli Duffy, Principal Rate Analyst	<ul style="list-style-type: none"><li>• 2024-2026 TEP revenue requirements; and</li><li>• depreciation rate for battery energy storage systems</li></ul>

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<sup>1</sup> The Company has renamed its Partnerships, Research, and Innovation portfolio as the Innovation portfolio.

### III. EV POLICY LANDSCAPE

2 Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?

3     A.     In this section of my Direct Testimony, I provide an overview of the setting of  
4           transportation electrification, both from the policy updates ongoing in the State of  
5           Colorado and at the federal level.

## 6 A. Colorado Policy Developments

7 Q. PLEASE PROVIDE A BRIEF BACKGROUND OF EV POLICY UPDATES IN  
8 COLORADO.

9 A. The State of Colorado has established an ambitious goal of reaching 940,000 light-  
10 duty passenger EVs on the road by 2030. To reach that goal, the State is in turn  
11 providing strong policy support for EVs. While there are a multitude of past,  
12 present, and proposed initiatives and rulemakings that are advancing the State's  
13 interests in the uptake of EVs, my testimony focuses on overall and significant  
14 policy initiatives that are directly aimed at EVs, as further bolstered by Company  
15 witness Ms. Nadia El Mallakh's testimony.

To start, for approximately six years now, Colorado has offered tax credits to incentivize the purchase and lease of EVs. These tax credits have been ratcheted down over time. Until recently, the State offered a \$2,000 tax credit towards the purchase of a new EV and a \$1,500 tax credit towards a two-year lease of an EV.<sup>2</sup> On May 11, 2023, Governor Polis signed in to law House Bill 23-1272, which more than doubles the previous tax credit amount to \$5,000 towards

<sup>2</sup> Additional information on the state tax credits is available from the following:  
<https://energyoffice.colorado.gov/zero-emission-vehicles/zero-emission-vehicle-tax-credits>

1 the purchase of a new EV through 2025, and these tax credits are stackable with  
2 federal and utility incentives.<sup>3</sup>

3 Beyond EV purchase tax credits, Colorado has established dedicated  
4 funding and grant mechanisms to support transportation electrification. Most  
5 notably, in 2021, through Senate Bill 21-260 (“SB 21-260”), the Colorado  
6 legislature created new and significant investment portfolios to support EVs. It  
7 created a Community Access Enterprise to support installation of EV charging  
8 stations and EV rebates for certain customers; created a Clean Fleet Enterprise to  
9 support zero-emission fleets; and created a Clean Transit Enterprise to support  
10 public transit electrification. Altogether, SB 21-260 supports investment of over  
11 \$730 million in transportation electrification over the next ten years.<sup>4</sup>

12 Another notable update involves current and anticipated rulemakings at the  
13 Air Quality Control Commission (“AQCC”). The AQCC has approved new rules to  
14 support its Advanced Clean Truck Rulemaking, requiring manufactures to sell  
15 increasing percentages of zero-emission medium and heavy-duty on-road  
16 vehicles, as well as to require heavy-duty manufactures to make cleaner vehicles.<sup>5</sup>  
17 This year, the AQCC is also expected to introduce a Colorado Clean Cars  
18 rulemaking.<sup>6</sup> That rulemaking will build on previous emission vehicle standards  
19 adopted, and it proposes to require vehicle makers to sell more zero emissions

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<sup>3</sup> A consumer’s guide to Colorado’s new climate-friendly discounts, CPR News, May 12, 2023, available at: <https://www.cpr.org/2023/05/12/colorado-climate-discounts/>

<sup>4</sup> Attachment JWI-1 at p. 4.

<sup>5</sup> An overview of the Clean Truck Rules is available at: <https://cdphe.colorado.gov/press-release/colorado-adopts-new-measures-to-increase-availability-of-zero-emission-trucks-that>.

<sup>6</sup> Additional information on this rulemaking is available here: <https://cdphe.colorado.gov/coloradocleancars>

1 vehicles ("ZEVs") starting in 2027, with new passenger ZEV sales reaching  
2 approximately 82 percent of overall vehicle sales by 2032.<sup>7</sup>

3 **Q. ARE YOU INCLUDING WITH YOUR TESTIMONY AN EV STATE POLICY**  
4 **PROGRESS REPORT UPDATE?**

5 A. Yes. As a reference point to the many Colorado EV policy updates, I am including  
6 with my testimony the 2023 Colorado EV Plan, updated in March 2023, marked as  
7 Attachment JW1-1. This helpful report references the important role of Public  
8 Service in Colorado's EV policy space. It addresses our inaugural TEP  
9 investments as a mechanism to significantly accelerate progress of EV uptake,  
10 explains the need to work with Public Service to increase EV infrastructure needed  
11 to support Colorado's 2030 EV goals, and it also references the need to support  
12 expanded investments in vehicles, charging, and other key programs in our 2024-  
13 2026 TEP.<sup>8</sup> As this attachment shows, even with the many and significant  
14 Colorado policy developments, the Company has an important part to play in  
15 helping the State of Colorado reach its 2030 EV goals.

16 **Q. PLEASE EXPLAIN THE STATE'S UTILITY-SPECIFIC LEGISLATION**  
17 **FACILITATING TRANSPORTATION ELECTRIFICATION.**

18 A. In 2019, the Colorado General Assembly enacted SB 19-077, recognizing that  
19 utilities have a critical role in bringing Colorado's transportation electrification goals  
20 to fruition. This law requires Public Service to submit TEPs for Commission  
21 approval on a rolling, three-year basis, with the Company's next TEP due by May

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<sup>7</sup> See AQCC March 26, 2023 Presentation, at Slide 19, available at:  
<https://drive.google.com/file/d/191hNNLU4bo6UuXj80xjSAqax7zGQNAcY/view>

<sup>8</sup> Attachment JW1-1 at 4, 36

1 15, 2023. See C.R.S. § 40-5-107(1)(a). I provide a greater discussion on SB 19-  
2 077 and how it relates to our 2024-2026 TEP further below.

3 **Q. IS THE COMPANY A STRONG SUPPORTER OF COLORADO'S EV GOALS?**

4 A. Yes, without a doubt, the Company is an advocate for the State's goals and efforts  
5 to electrify the transportation sector. These Colorado efforts are consistent with  
6 our own Company vision to be a net-zero energy provider by 2050 and enabling  
7 one out of five vehicles in our service territories (*i.e.*, at least 1.5 million vehicles)  
8 to be electric by 2030. The Company's transportation vision also seeks to electrify  
9 sedans and light-duty trucks in our fleet by 2030 and 30 percent of medium and  
10 heavy-duty Company vehicles by 2030. The Company also sees convenient  
11 access to reliable public charging as essential to support the growth of the EV  
12 market. With the clean energy transition of our electric generation fleet and the  
13 Company's support for transportation electrification, the State of Colorado is well  
14 positioned to bring the benefits associated with cleaner air and reduced emissions  
15 to its residents.

16 **B. Federal Policy Developments**

17 **Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

18 A. In this section of my Direct Testimony, I provide a brief overview of the IRA and  
19 the IIJA enacted by the United States Congress. While I provide introductory  
20 comments on the impact of these pieces of legislation on the Company's 2024-  
21 2026 TEP, Company witness Mr. Jouve further addresses the impact.

1   **Q.    CAN YOU BRIEFLY DESCRIBE THE IRA?**

2    A.    Approved by Congress in August 2022, the IRA makes available approximately  
3       \$370 billion in energy investments. This funding level represents the single  
4       greatest investment by the nation to upgrade and modernize its energy system  
5       and address climate issues. Investment opportunities include incentives for  
6       increasing the development of transmission infrastructure for electricity; incentives  
7       for the increased development of clean energy technologies; and expanded  
8       incentives to support the transition to electrified transportation.

9       The IRA primarily offers tax incentives or credits for clean energy  
10       investments such as wind and solar generation, electrified appliances, and electric  
11       vehicles. At this time, the formal requirements and precise tax incentives  
12       associated with many IRA clean transportation opportunities are still under  
13       development by the federal agencies administering those programs. Until those  
14       rules are released, and the Company has had time to consider them, it is  
15       premature to estimate how those programs may be utilized by Public Service in its  
16       TEP. Nonetheless, Public Service will engage with state and federal entities as  
17       appropriate to ensure programming in Colorado is supported and communicate  
18       with our customers, trade partners, and communities to ensure they are aware of  
19       the benefits.

20   **Q.    PLEASE DISCUSS EV-RELATED BENEFITS STEMMING FROM THE IRA.**

21    A.    The Company's customers may be able to use tax credits in the IRA for the  
22       purchase or lease of new or used cars, as well as a tax credit for residential  
23       charging equipment. The EV purchase and lease tax credits included in the IRA

1 provide a \$7,500 credit for new vehicle purchases and leases (subject to certain  
2 critical material, domestic assembly, MSRP, and income requirements). The IRA  
3 has also removed the previous 200,000-vehicle cap for tax credit eligibility,  
4 allowing manufacturers like Tesla to offer vehicles with eligibility support for EV  
5 offerings by the most successful EV manufacturers. The IRA also supports the  
6 used EV market, with tax credits of \$4,000 or 30 percent of the sale price,  
7 depending on the vehicle's price and age and the purchaser's income.

8 The IRA provides tax credits for alternative fuel refueling property, which  
9 includes EV chargers. For commercial EV charging equipment, the tax credit is  
10 up to 30 percent of the total cost of equipment and installation on business  
11 property, provided the prevailing wage and registered apprenticeship requirements  
12 are met along with location requirements, with up to \$100,000 of tax credit  
13 available per station.<sup>9</sup>

14 **Q. CAN YOU BRIEFLY DESCRIBE THE IIJA?**

15 A. Passed by Congress in November 2021, the IIJA is a \$1.2 trillion infrastructure  
16 package that provides \$550 billion for new initiatives that seek to address issues  
17 facing the nation's infrastructure. The IIJA is aimed at rebuilding the nation's roads  
18 and bridges, addressing drinking water contamination and environmental  
19 remediation, allowing for improvements to public transit, preparing for expanded  
20 EV adoption, expanding access to high-speed internet, and more. More  
21 specifically to utilities, the IIJA earmarks approximately \$73 billion for power and

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<sup>9</sup> Information on the Alternative Fuel Infrastructure Tax Credit is available here:  
<https://afdc.energy.gov/laws/10513>



1 grid infrastructure upgrades.<sup>10</sup> This funding is being made available to support grid  
2 resiliency and reliability efforts, transmission projects, and the increased use of  
3 clean energy resources, funding for the build out of EV infrastructure, energy  
4 efficiency programs, and cyber security.

5 The National Electric Vehicle Infrastructure (“NEVI”) program, established  
6 under the IIJA, primarily supports public charging located in specific travel corridors  
7 throughout the nation. These travel corridors have been designated as alternative  
8 fuel corridors (“AFC”) and are located along interstates and highways. The IIJA  
9 also established a \$2.5 billion discretionary nationally competitive grant program  
10 that is meant to complement the NEVI funds. This competitive funding has the  
11 potential to fund EV charging in communities and along corridors other than AFCs  
12 and interstate highways.

13 **Q. DOES THE IRA OR IIJA HAVE IMPACTS ON THE COMPANY’S 2024-2026**  
14 **TEP?**

15 A. Company witness Mr. Jouve provides information on the impacts of these federal  
16 acts on the TEP budget, which in turn reflects our programming assumptions. That  
17 said, I have more high-level feedback on the TEP relationship to the acts.

18 For the IRA, with the new EV tax credits, along with state tax credits, there  
19 is potential for complementary Company EV rebates to greatly bring down the price  
20 of EVs and make them accessible to our equity-eligible customer groups. Also  
21 related to the IRA, there is potential for the Company’s receipt of tax credits in

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<sup>10</sup> See Commission Decision No. C23-0066 in Proceeding No. 23M-0053ALL at p. 2.

1 developing EV charging stations (as well as third-party developer receipt of such  
2 tax credits), but further guidance and understanding is still necessary from the  
3 Internal Revenue Service and the U.S. Treasury, as well as the Company's internal  
4 resources. More broadly on the IRA, it will lead to an increase in EV adoption.  
5 That adoption growth can be greatly assisted with Company TEP programming,  
6 such as wiring assistance, public charging infrastructure, and managed charging  
7 programs.

8 Turning to the IIJA, the Company expects the IIJA to work in concert with  
9 TEP program offerings to assist greater EV adoption, supporting the build out of  
10 the infrastructure needed to support a growing EV market, providing funding to  
11 communities as they look to make EV charging more readily available, and  
12 promoting the shift to clean transportation. More specifically, the Company  
13 understands that through the NEVI program Colorado will receive an allocation of  
14 funding in the amount of \$56.5 million over the next five years to support the  
15 construction of DCFC stations along designated EV corridors<sup>11</sup>. The Company  
16 intends to apply for state and federal grant funding as appropriate, as well as  
17 support state agencies and communities in their applications for funding.

18 The IRA and IIJA offer opportunities to the Company to develop  
19 complementary programming to leverage and maximize opportunities to promote  
20 widespread adoption of transportation electrification. The Company has designed  
21 its TEP programming with these opportunities in mind.

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<sup>11</sup> Attachment JWI-1 at 6. See *a/so* Colorado's NEVI Plan, available at:  
<https://www.codot.gov/programs/innovativemobility/electrification/nevi-plan>

1   **Q.    IF THE COMPANY IS AWARDED FUNDING GRANTS FROM THE IRA OR THE**  
2       **IIJA, HOW WILL THOSE GRANTS IMPACT THE COMPANY’S TEP BUDGETS?**

3    A.    The Company’s receipt of grants and new funding opportunities may lower the  
4       Company’s actual TEP costs as collected through the Transportation  
5       Electrification Programs Adjustment (“TEPA”) rider, or may increase participation  
6       while maintaining the budgets we have proposed. The Company’s updates to the  
7       TEPA rider will reflect and show the cost associated with applicable IRA or IIJA  
8       funding received by the Company, as well as State of Colorado funding  
9       opportunities.

**IV. INAUGURAL TEP**

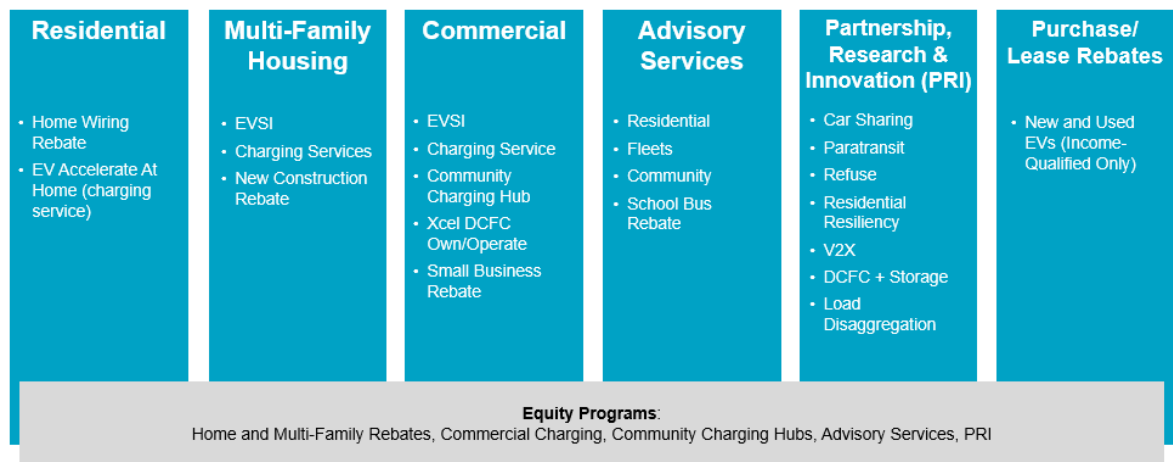
**Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

A. This section addresses our first TEP, covering years 2021-2023, its results, and how the Company is building upon the initial set of lessons learned.

**Q. HOW DID THE COMPANY'S 2021-2023 TEP SUPPORT THE EV GOALS OF THE STATE OF COLORADO?**

A. The 2021-2023 TEP, as approved by the Commission, was designed with six portfolios, shown below, to address all sectors of the EV market and to help stimulate the shift to increasing levels of EVs on Colorado roads.

**Figure JW1-D-1 2021-2023 TEP Snapshot**



The Residential portfolio included wiring and charger rebates and a home charging service to address home charging needs, while our managed charging programs helped customers manage their bills and support the grid. Our MFH and Commercial portfolios provided Company-owned EV Supply Infrastructure (“EVSI”) for projects, optional charger services, and rebate support for small businesses and new construction. Commercial programs also promoted the

1 development of Community Charging Hubs and the deployment of Company-  
2 owned DCFC charging stations.<sup>12</sup> The Advisory Services portfolio assisted all  
3 customers on their journey to transportation electrification. The Innovation portfolio  
4 created the opportunity for research and piloting of emerging technologies and  
5 innovative strategies to advance transportation electrification and to integrate EVs  
6 more effectively with other grid resources. Lastly, the Company's EV Purchase  
7 and Lease Rebates for IQ customers aimed at making the shift to EVs more  
8 affordable and approachable for Public Service's IQ customers. The Company's  
9 approved portfolios worked to remove barriers to EV adoption, increased  
10 awareness of the benefits of the transition to transportation electrification, and  
11 helped the State achieve its EV goals.

12 **Q. HOW HAS THE COMPANY'S FIRST TEP PERFORMED?**

13 A. Through the first TEP, the Company was able to launch all of its first-of-their-kind  
14 programs. It has also now achieved participation in all 22 programs and has  
15 launched seven additional projects through the Innovation portfolio. The  
16 implementation of all Company programming involved herculean efforts. The  
17 Company diligently worked to grow its internal transportation expertise,  
18 implemented cutting-edge programming, and responded in real time to enormous  
19 and unforeseeable challenges. These challenges include, but are not limited to,  
20 delays in program implementation due to the timing of receipt of a final  
21 Commission decision and the time necessary to stand up new programming;

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<sup>12</sup> The Company currently has two signed agreements to develop Community Charging Hubs, which are currently under development.

1 impacts from COVID-19; supply chain disruptions (such as microchip shortages)  
2 that have fundamentally altered the EV marketplace; and inflationary pressures  
3 that have stressed the ability of the Company's TEP incentives to convince  
4 customers to use our programming.

5 Nevertheless, recent upticks in program enrollments are encouraging and  
6 set the stage for growth, especially as new state and federal incentives begin to  
7 enter the marketplace. Also note that the share of EVs sold in Colorado have  
8 grown from approximate levels of 4.5 percent of overall sales in the start of 2021  
9 to 10.5 percent by the end of 2022, showing the significant and continued interest  
10 Colorado residents have in adopting EVs.<sup>13</sup>

11 As shown in the table below, the Company's program participation numbers  
12 have grown year over year.

13 **Table JWI-D-1: 2021-2023 TEP Participation Growth**

	Charging Station Ports/Rebates Awarded by Program (as of 9/1/2021)	Charging Station Ports/Rebates Awarded by Program (as of 3/1/2022)	Charging Station Ports/Rebates Awarded by Program (as of 9/1/2022)	Charging Station Ports/Rebates Awarded by Program (as of 3/1/2023)
<b>Total</b>	20	1733	3296	4240

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<sup>13</sup> Information on historical EV growth trends can be found from the Colorado Automobile Dealers Association outlook archive, available here: <https://www.colorado.auto/colorado-auto-outlook-archive>.

**Q. HOW DID THE COMPANY'S TEP BUDGET PERFORM DURING 2021 THROUGH MARCH 2023?**

A. Generally, because program participation levels have, in aggregate, been lower than initially estimated, the Company has not had needs to spend close to its approved Commission budgets. In the following table, I show the percent of budget that the Company has used through March 1, 2023 by portfolio.

**Table JWI-D-2: TEP Budget Spend**

<b>Portfolio</b>	<b>2021-2023 TEP Approved Budget</b>	<b>Actual Spend</b>	<b>Percent of Approved Budget</b>	<b>Equity Actual Spend</b>	<b>Equity Percent of Actual Spend</b>
<b>Residential</b>	\$18,199,000	\$8,845,373	49%	\$876,383	10%
<b>Multifamily Housing</b>	\$8,269,000	\$3,334,901	40%	\$17,600	1%
<b>Commercial</b>	\$50,110,000	\$6,624,096	13%	\$149,575	2%
<b>Innovation</b>	\$10,000,000	\$7,094,754	71%	\$5,198,774	73%
<b>Advisory Services</b>	\$13,102,000	\$2,913,756	22%	\$1,656,076	57%
<b>EV Purchase and Lease Rebates</b>	\$4,986,000	\$571,500	11%	\$571,500	100%
<b>Total<sup>14</sup></b>	\$108,366,000	\$28,944,144	27%	\$8,469,908	29%

From the above, a key takeaway is that the budget spend has matched market demand, regardless of the budget maximums approved by the Commission. In this manner, customers have funded the amount of TEP participation that has existed, and they were not negatively impacted by the

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<sup>14</sup> The total reflected in the table includes all IT costs for the entire TEP.

1 Commission's establishing of larger overall budgets than were necessary to  
2 support demand. Also relevant, Company witness Mr. Klingeman explains that  
3 across the inaugural TEP, the Company's programming placed overall downward  
4 pressure on rates, allowing all customers to benefit from the TEP expenditures  
5 incurred.

6 **Q. BASED ON ITS IMPLEMENTATION OF ITS INAUGURAL TEP, WHAT IS THE**  
7 **COMPANY'S GENERAL APPROACH ON ITS EFFORTS NECESSARY TO**  
8 **SUPPORT ITS NEXT TEP?**

9 A. Stated simply, now is not time to scale back our efforts. The 2024-2026 TEP is a  
10 crucial opportunity to accelerate the momentum we have assisted in building  
11 towards transportation electrification. We have successfully managed significant  
12 headwinds in implementing one of the most robust sets of EV offerings in the  
13 nation. Going forward, as Colorado and the federal government implement new  
14 EV supporting policies, the Company can leverage its experiences, customer  
15 feedback, and programming to support large-scale expansion of the EV market.  
16 The Company is committed to its efforts to drive widespread adoption of EVs. We  
17 are primed and ready to help lead efforts to make Colorado's EV goals a reality.



**V. THE COMPANY'S 2024-2026 TEP**

**Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

A. In this section of my Direct Testimony, I provide an overview of the Company's 2024-2026 TEP in light of the statutory considerations of SB 19-077, the treatment and recovery of costs of the TEP, and the continued need for budgetary and administrative flexibility. I also highlight some of the new programs and key enhancements proposed, including the Company's proposed expansion of its DCFC network of stations. While my testimony is an introduction on these issues, other Company witnesses and our 2024-2026 TEP itself (Attachment HS-1) address these topics in further detail.

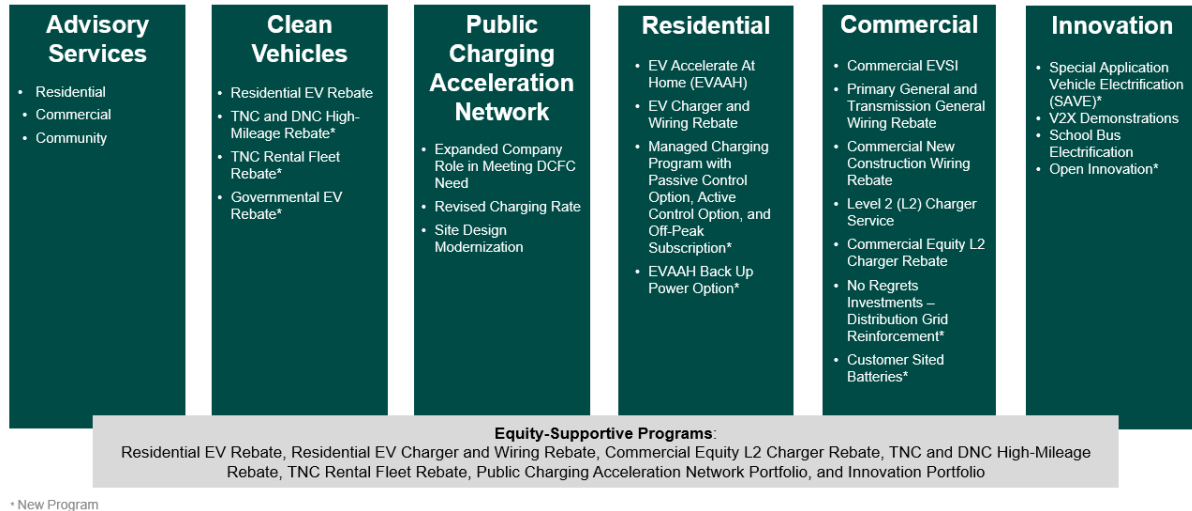
**Q. PLEASE PROVIDE A BRIEF INTRODUCTION OF THE COMPANY'S PROPOSED TEP OFFERINGS FOR THE PLAN YEARS 2024-2026?**

A. The Company brings forward its 2024-2026 TEP with the intent of addressing three key policy and customer goals that are critical to increase the momentum of the first TEP and maintain progress to support Colorado in achieving its EV goals. The 2024-2026 TEP will: (1) accelerate the pace of EV adoption in Colorado, (2) assist in providing benefits of transportation electrification to all Public Service customers, and (3) provide tools to help optimize the use of the grid for EV charging.

Similar to the initial TEP, the 2024-2026 TEP addresses several sectors of the EV market. The Company is proposing six select portfolios, including Advisory Services, Clean Vehicles, Public Charging Acceleration Network, Residential, Commercial, and the Innovation portfolios, as shown in the figure below.

1

**Figure JW1-D-2: 2024-2026 TEP Snapshot**



2 Together, these offerings build upon the successes of the first TEP and  
3 adapt to lessons learned. The 2024-2026 TEP acknowledges the needs of our  
4 customers, provides the State support on its journey to 940,000 EVs on Colorado  
5 roads by 2030, and addresses the public charging needs that are necessary to  
6 fully support this growth in the EV market. Company witness Huma Seth sponsors  
7 the TEP document (Attachment HS-1). The TEP document itself is a helpful tool  
8 in discussing specific modifications and enhancements to current TEP programs.

9 **Q. HOW IS THE REMAINDER OF THIS SECTION OF YOUR TESTIMONY**  
10 **ORGANIZED?**

11 A. I begin by addressing SB 19-077, the controlling statute on the TEP. I provide  
12 testimony on how the 2024-2026 TEP is consistent with SB 19-077. I then address  
13 the Company's proposed continuation of the cost recovery treatment for the TEP.  
14 Next, I testify on the budget and flexibility provisions necessary to support the TEP,

1 followed by a discussion on notable TEP programs and enhancements. Lastly, I  
2 introduce the Company's bold vision for supporting public charging networks.

3 **A. Statutory Considerations**

4 **Q. CAN YOU PROVIDE SOME MORE DETAIL ON SB 19-077 AND THE**  
5 **OBJECTIVES OUTLINED IN THAT LEGISLATION?**

6 A. Yes. SB 19-077 was a groundbreaking law that provided clear direction to Public  
7 Service to become a foundational partner in the transportation electrification  
8 space. Prior to the passage of SB 19-077, there were considerable questions on  
9 the role investor-owned utilities should have in making investments to support the  
10 EV market. However, with enactment of SB 19-077, the legislature not only  
11 welcomed utility investment in the EV space, but directed it through the filing of  
12 three-year TEPs, assisting the market and continuing its evolution and growth.  
13 The requirements of SB 19-077 are premised on the law's intent to result in  
14 "[w]idespread adoption of electric vehicles . . . to diversify the transportation fuel  
15 mix, improve national security, and protect air quality."<sup>15</sup>

16 **Q. WHAT FACTORS DOES SB 19-077 DIRECT THE COMMISSION TO CONSIDER**  
17 **AS IT EVALUATES A TEP?**

18 A. The Commission must consider whether the application seeks to "minimize overall  
19 costs and maximize overall benefits."<sup>16</sup> The statute also provides factors for the  
20 Commission's consideration when evaluating TEPs,<sup>17</sup> including whether the  
21 investments are:

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<sup>15</sup> SB19-077, Section (1)(a).

<sup>16</sup> C.R.S. § 40-5-107(1)(b).

<sup>17</sup> C.R.S. § 40-5-107(2)

- 1 1. Reasonably expected to improve the use of the electric grid, including  
2 improved integration of renewable energy;
- 3 2. Reasonably expected to increase access to the use of electricity as a  
4 transportation fuel;
- 5 3. Designed to ensure system safety and reliability;
- 6 4. Reasonably expected to contribute to meeting air quality standards, improving  
7 air quality in communities most affected by emissions from the transportation  
8 sector, and reducing statewide emissions of greenhouse gases by forty  
9 percent below 2005 levels by 2030 and eighty percent below 2005 levels by  
10 2050;
- 11 5. Reasonably expected to stimulate innovation, competition, and increased  
12 consumer choices in electric vehicle charging and related infrastructure and  
13 services; attract private capital investments; and utility high-quality jobs and  
14 skilled worker training programs as defined in C.R.S. § 8-83-303;
- 15 6. Transparent, incorporating public reporting requirements to inform design and  
16 Commission policy; and
- 17 7. Reasonably expected to provide access to low-income customers, in the  
18 totality of the utility's transportation electrification programs, which may  
19 include community-based and multi-family charging infrastructure, car share  
20 programs, and electrification of public transit, while giving due consideration  
21 to the effect on low-income customers.

22 **Q. IS THE COMPANY'S 2024-2026 TEP ALIGNED WITH THE STATUTORY**  
23 **CONSIDERATIONS OF SB 19-077?**

24 A. Yes. I am not an attorney, and the Company's Statement of Position can address  
25 issues of statutory compliance. However, from my perspective, the  
26 comprehensive nature of our TEP and its build out from our inaugural TEP align it

1 well with the considerations of SB 19-077. The TEP document speaks for itself on  
2 these issues. In addition, other Company witnesses in turn address programming  
3 decisions consistent with SB 19-077. Nevertheless, I will address in the below  
4 section of my testimony examples and high-level factors showing how the TEP is  
5 consistent with statute.

6 **Q. HOW DOES THE TEP SEEK TO MINIMIZE OVERALL COSTS AND MAXIMIZE**  
7 **OVERALL BENEFITS?**

8 A. The 2024-2026 TEP minimizes overall costs and maximizes overall benefits.  
9 Similar to our prior TEP, the 2024-2026 TEP and associated EV growth will  
10 continue placing downward pressure on rates, providing benefits to both TEP  
11 participants and non-participants. In addition, the Company had a third party  
12 conduct a cost-benefit analysis of transportation electrification that incorporates  
13 the TEP. That analysis was conducted by the Brattle Group, and it is provided as  
14 Attachment JLJ-2 to the Direct Testimony of Mr. Jean-Baptiste Jouve. Among the  
15 notable findings of the analysis are that the benefits of EV adoption in our service  
16 territory in accordance with Colorado's 2030 EV goal will lead to approximately 1.5  
17 million metric tons of avoided carbon from internal combustion engines on an  
18 annual basis by 2030. Over the long term of 20 years, transportation electrification  
19 reduces carbon dioxide emissions by approximately 26 million metric tons. Mr.  
20 Jouve provides that the societal benefit of transportation electrification over this  
21 time period results in \$6.4 billion of net benefits.

22 The Company also is proposing enhancements to its inaugural TEP  
23 programming to strengthen the benefits and minimize costs. As an example, the

1 Company is proposing to expand its eligibility criteria for its EV Purchase and  
2 Lease rebates to be inclusive of customers that reside in equity-eligible  
3 communities throughout our service territory. Expanding eligibility to these  
4 residents will reduce the costs of EV ownership for these customers while also  
5 allowing for increased benefits, including from pollution reduction in these  
6 communities.

7 **Q. HOW DOES THE 2024-2026 TEP REASONABLY “IMPROVE THE USE OF THE**  
8 **ELECTRIC GRID, INCLUDING IMPROVED INTEGRATION OF RENEWABLE**  
9 **ENERGY?”**

10 A. Improved and expanded managed charging offerings are critical to support the  
11 efficient operation of the grid, including to support the shifting of customers’ EV  
12 charging to times of high renewable penetration. With the Company’s electric  
13 generation continuing its clean energy transition, especially with the  
14 implementation of our CEP, the Company can leverage managed charging to  
15 support renewable integration and reduce renewable curtailment. Towards this  
16 end, the Company is proposing to harness the full benefits of active control  
17 managed charging through its Charging Perks offering and is planning for the  
18 retirement of its current passive control charging program (Optimize Your Charge).  
19 Charging Perks is designed to actively support our electric grid by charging EVs  
20 when renewable production is high and also when demand on the grid is low.  
21 Through our focus on Charging Perks, the Company is maximizing the potential  
22 benefits of EVs to complement the transition of our generation resources to clean  
23 and zero-emission resources. The Company is also planning a Charging Perks

1 pilot for commercial customers, allowing us to further assess how a comprehensive  
2 active control managed charging program can encourage our fleet customers to  
3 charge their EVs at times that maximize the benefits for the grid's operation.

4 The Company is preparing for the future through its Innovation portfolio.  
5 This portfolio is advancing efforts to understand the capabilities and possible grid  
6 benefits of Vehicle-To-Everything ("V2X") technology. V2X technology  
7 encompasses our efforts to promote Vehicle-To-Home, Vehicle-To-Building,  
8 Vehicle-to-Grid, and other similar technologies. These technologies are still early  
9 in development. However, the Company is expanding its efforts to support V2X,  
10 including with investments in demonstration projects and operational tools.<sup>18</sup>

11 **Q. HOW DOES THE 2024-2026 TEP REASONABLY "INCREASE ACCESS TO**  
12 **THE USE OF ELECTRICITY AS A TRANSPORTATION FUEL?"**

13 A. The Company's 2024-2026 TEP builds off the successes of the 2021-2023 TEP  
14 by enhancing and adjusting programs that are already in market to address the  
15 needs of our customers and further support transportation electrification. The  
16 2024-2026 TEP offers new programs and enhances existing programs to  
17 accelerate the momentum of the shift to using electricity as a transportation fuel.  
18 Across six portfolios, the Company brings forward a TEP that seeks to address all  
19 portions of the EV market, paving the way for greater EV adoption and making the  
20 benefits of EVs available to all Public Service customers. The TEP programs are  
21 specifically designed to encourage and support the increased adoption of EVs in

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<sup>18</sup> Company witness Mr. Gouin discusses the Company's managed charging and V2X proposals in greater depth in his Direct Testimony.

1 Colorado, and in turn support increased access to electricity as a transportation  
2 fuel.

3 From a vehicle perspective, our TEP offers multiple EV rebate options to  
4 support a wide range of customer segments, including transportation network  
5 companies (“TNC”), delivery network companies (“DNC”), rental car companies  
6 offering EVs to TNC drivers at a discounted rate, state and local governments, and  
7 both income-qualified and customers in disproportionately impacted communities.  
8 We are also pursuing the electrification of hard-to-electrify vehicles, including those  
9 used to support agriculture, farming, and ranching.

10 From a charging infrastructure perspective, the Company is continuing and  
11 enhancing its TEP programming. For residential customers, we are updating our  
12 incentives and expanding our offerings, including with new infrastructure options  
13 to facilitate Vehicle-To-Home EV integration. For commercial customers, we are  
14 simplifying and consolidating programming to reduce customer confusion and  
15 allow for better program marketing. We are also updating our incentives and are  
16 expanding equipment options to facilitate curbside capable EVSI, allowing the  
17 Company to assist municipalities in the development of charging solutions on city  
18 streets, and are proposing a new rental option for BESS to pair with third-party  
19 owned DCFC stations.

20 Moreover, the Company’s Public Charging Acceleration Network aims to  
21 fulfill a need for public charging that is essential to support the continued growth of  
22 EVs on Colorado roads and increase the availability of fast charging for all EV



1 drivers. This program will greatly expand the access to electricity as a  
2 transportation fuel for all EV drivers, consistent with SB 19-077.

3 **Q. HOW DOES THE 2024-2026 TEP “ENSURE SYSTEM SAFETY AND**  
4 **RELIABILITY?”**

5 A. Public Service always plans to ensure safety and reliability. Specific to the TEP,  
6 the Company is committed to the labor requirements of section 40-5-107(3),  
7 C.R.S. These requirements help ensure that infrastructure work on the customer  
8 side of the meter is undertaken with appropriate experience, expertise, and training  
9 opportunities. They also ensure that the Company's own charging stations  
10 continue to use qualified employees and qualified contractors.

11 The Company is continuing its TEP programming opportunities that support  
12 investments in safe and reliable charging facilities and necessary wiring. Our  
13 residential customers can continue to take advantage of the EV Charger and  
14 Wiring Rebate to offset the costs of home wiring necessary to better ensure that  
15 EV charging is undertaken in a safe and reliable manner. Commercial customers  
16 can also continue to use our Commercial EVSI program, where the Company will  
17 own, install, and maintain necessary infrastructure to ensure safe and reliable  
18 dedicated EV service at no cost to the customer.

19 As a new enhancement in this TEP, the Company is proposing new  
20 customer and grid enhancement programs. These seek to prepare the grid and  
21 customers for future growth in EV adoption. Our proposed No Regrets distribution  
22 investments will identify projects that are needed to support the growth in load from  
23 EV adoption and maintain the safe and reliable operation of the grid. The customer

1 EVSI future proofing proposal will prepare customers now for the future growth in  
2 EVs, allow for more efficient installation of EVSI, and make certain that the EVSI  
3 in place for future charging is done in alignment with the Company's safety  
4 standards and commitment to reliability.

5 **Q. HOW DOES THE 2024-2026 TEP REASONABLY “CONTRIBUTE TO MEETING**  
6 **AIR QUALITY STANDARDS, IMPROVING AIR QUALITY IN COMMUNITIES**  
7 **MOST AFFECTED BY EMISSIONS FROM THE TRANSPORTATION SECTOR,**  
8 **AND REDUCING STATEWIDE EMISSIONS OF GREENHOUSE GASES BY**  
9 **FORTY PERCENT BELOW 2005 LEVELS BY 2030 AND EIGHTY PERCENT**  
10 **BELOW 2005 LEVELS BY 2050”?**

11 A. The 2024-2026 TEP is designed to support and accelerate the adoption of EVs  
12 throughout Colorado, including to achieve Colorado's goal of 940,000 EVs by  
13 2030. The transportation sector is currently responsible for the largest portion of  
14 the State's greenhouse gas emissions.<sup>19</sup> With that contribution of GHGs, the  
15 Company's TEP has great potential to facilitate large reductions in emissions  
16 through transportation electrification. As complimented by the TEP, the  
17 Company's third-party, cost-benefit analysis finds that EVs will reduce over a 20-  
18 year period approximately 26 million metric tons of carbon dioxide from internal  
19 combustion engines.

20 Regarding communities most affected by transportation emissions, the  
21 Company is expanding an enhanced incentive model to a broader set of equity-

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<sup>19</sup> Attachment JWI-1 at p. 3.

1 eligible communities. Providing robust support for equity-eligible communities will  
2 begin to assist in addressing the historical inequity faced by these communities,  
3 including those due to air quality impacts from the transportation sector. Through  
4 the Innovation portfolio the Company also plans to work with school districts to  
5 electrify school buses to reduce emissions from this sector, assist these customers  
6 in shifting to an electrified school bus fleet, and reduce exposure to emissions for  
7 students.

8 **Q. HOW DOES THE 2024-2026 TEP REASONABLY “STIMULATE INNOVATION,**  
9 **COMPETITION, AND INCREASED CONSUMER CHOICES IN ELECTRIC**  
10 **VEHICLE CHARGING AND RELATED INFRASTRUCTURE AND SERVICES;**  
11 **ATTRACT PRIVATE CAPITAL INVESTMENTS; AND UTILIZE HIGH-QUALITY**  
12 **JOBS AND SKILLED WORKER TRAINING PROGRAMS?”**

13 A. Our Innovation portfolio addresses innovation by supporting and enhancing  
14 innovative projects in their early stages. These projects include those that:  
15 (1) involve special vehicle types; (2) promote a better understanding of V2X;  
16 (3) accelerate school bus electrification; and (4) address rapidly evolving needs.  
17 The Innovation portfolio is essential to promote the next wave of the Company’s  
18 TEP programs and support the overall transportation electrification market.

19 Competition and increased consumer choices are key themes and goals  
20 reflected through the sum of the TEP. The Company’s TEP reasonably balances  
21 Company ownership opportunities with rebate and rental opportunities. The TEP  
22 also provides a pathway for the Company to engage in market areas where there  
23 is not enough competition or infrastructure buildout to support the State’s needs,

1 such as in DCFC stations. Moreover, customer programming opportunities, such  
2 as EV Accelerate At Home and EVSI rebates for our Primary General (“PG”) and  
3 Transmission General (“TG”) customers, offer our customers choices in selecting  
4 their charging equipment and electrician. The breadth and robustness of the TEP  
5 ensure competition and consumer choices are reasonably enhanced.

6 Buttredding our programming, the Advisory Services portfolio promotes EV  
7 awareness through multi-faceted efforts and numerous communication channels.  
8 This portfolio is continuing its efforts to grow trade ally support, it spends  
9 advertising dollars where we have seen the greatest successes, and it improves  
10 customer-facing tools to ease difficulties in navigating the many EV options that  
11 now exist and our related programming support.

12 Lastly, as I’ve already addressed, our TEP ensures the use of high-quality  
13 jobs and skilled worker training programs.

14 **Q. DO YOU HAVE ANYTHING TO ADD REGARDING THE COMPANY’S USE OF**  
15 **ORGANIZED LABOR IN THIS TEP?**

16 A. Yes, as was the case in its inaugural TEP, the Company maintains its commitment  
17 to use external contract labor for Company-owned infrastructure investments. The  
18 Company intends to continue to work with IBEW Signatory electrical contractors  
19 for this work. As mentioned previously, the Company’s residential and PG and TG  
20 offerings do allow the customer to choose their electricians, but for Company-  
21 owned infrastructure projects the Company will maintain the approach it has  
22 employed for both its initial TEP offerings and the EVSI projects approved in  
23 Proceeding No. 19A-0471E.

1   **Q.   HOW IS THE 2024-2026 TEP “TRANSPARENT, INCORPORATING PUBLIC**  
2       **REPORTING REQUIREMENTS TO INFORM DESIGN AND COMMISSION**  
3       **POLICY”?**

4   **A.**   The Company has provided semi-annual reporting covering dozens of metrics on  
5       its initial TEP since October 2021. The reporting metrics were approved through  
6       Decision No. C21-0017 in Proceeding No. 20A-0204E and were based upon what  
7       the Company proposed as well as several metrics put forward by intervenors. As  
8       directed through Decision No. C21-0117, the Company worked with stakeholders  
9       to design and refine the siting approach related to its owned DCFC stations and  
10      filed a report with the Commission regarding that process in December 2021.  
11      Similarly for the Equity PIM that was agreed to in principle in Proceeding No. 20A-  
12      0204E, the Company worked with stakeholders to further develop that PIM and  
13      filed an August 2021 report to inform the Commission on the stakeholder process,  
14      the potential goals, metrics, and structure of a PIM. The Company’s reporting  
15      requirements have also continued to grow to now include reporting metrics around  
16      the approved Schedule S-EV rate, Schedule S-EV-CPP rate, the Company’s  
17      owned and operated DCFC stations, and the Equity PIM as approved in  
18      Proceeding No. 21AL-0494E.

19           The Company’s reporting has provided a transparent view of the progress  
20      made through implementation of its first TEP, our engagement with stakeholders  
21      to further refine elements of the TEP, opportunities to learn and refocus efforts as  
22      we designed our 2024-2026 TEP, and robust information for the Commission to  
23      consider when it is evaluating proposed TEPs and EV policy in general.

1 With the 2024-2026 TEP, the Company is proposing natural refinements to  
2 its reporting requirements. In particular, it is now appropriate to shift to an annual  
3 reporting requirement, as opposed to the current semi-annual requirement. For  
4 the inaugural TEP, semi-annual reporting was helpful, given the brand new TEP  
5 undertakings. However, now with the establishment of the Company's  
6 programming and activities, TEP reporting should follow an annual reporting cycle,  
7 such as aligned with the Company's other reporting requirements, including for its  
8 Renewable Energy Plans, Electric Resource Plans, and Demand Side  
9 Management Plans. Company witness Ms. Huma Seth discusses the Company's  
10 reporting proposal in more detail in her Direct Testimony.

11 **Q. HOW DOES THE 2024-2026 TEP REASONABLY “PROVIDE ACCESS FOR**  
12 **LOW-INCOME CUSTOMERS, IN THE TOTALITY OF THE UTILITY’S**  
13 **TRANSPORTATION ELECTRIFICATION PROGRAMS, WHICH MAY INCLUDE**  
14 **COMMUNITY-BASED AND MULTI-FAMILY CHARGING INFRASTRUCTURE,**  
15 **CAR SHARE PROGRAMS, AND ELECTRIFICATION OF PUBLIC TRANSIT,**  
16 **WHILE GIVING DUE CONSIDERATION TO THE EFFECT ON LOW-INCOME**  
17 **CUSTOMERS?”**

18 A. The Company was committed to making the benefits of transportation  
19 electrification available to all customers in its first TEP, and it maintains that  
20 commitment in its 2024-2026 TEP offerings. As we developed this TEP, we  
21 consistently heard from stakeholders a desire for a continued and strengthened  
22 focus on equity. With that in mind, the Company is aiming to address equity across  
23 all its TEP portfolios, make access to transportation electrification and its benefits

1 available to all in an easy to attain manner, and continue to embrace and  
2 accelerate innovative projects that seek to further electrify all sectors of  
3 transportation. Through this TEP, the Company is proposing a budget that  
4 provides estimated funding support to equity objectives that is based on market  
5 demand and reflects a range of approximately 20-30 percent of budget depending  
6 on customer participation in programs and other variables, as addressed by Mr.  
7 Jouve. The Innovation portfolio also includes a spending commitment of at least  
8 30 percent of its budget to advance equity.

9 A central component of our revised approach to providing equity involves  
10 the focus on increasing access to the benefits of EVs for customers in equity-  
11 eligible communities. We are specifically undertaking a strategy shift to ensure  
12 that our current IQ programming options are expanded to serve a wider base of  
13 customers, including those in DI communities as defined by HB 21-1266 and  
14 documented in EnviroScreen,<sup>20</sup> those located in a Justice40 Disadvantaged  
15 Community, or those enrolled in federally recognized Tribes. Building off of this  
16 strategy, in the below, I provide additional examples of how the Company is  
17 addressing equity:

- 18 • The Company is enhancing the EV Purchase and Lease Rebate to make it  
19 more widely available with the aim of reducing barriers to the adoption of  
20 EVs, streamlining processes, and increasing the number of EVs on  
21 Colorado roads;

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<sup>20</sup> This definition is described in further detail in the Company's 2024-2026 TEP, Attachment HS-1 to the Direct Testimony of Company Witness Huma Seth.

- 1 • Our Innovation portfolio continues to focus on equity-driven projects by  
2 proposing pilots aimed at the agricultural sector, hard to electrify fleets, and  
3 electric school buses;
- 4 • The Company is enhancing its Advisory Services portfolio to make  
5 customers more aware of TEP offerings and the benefits of transportation  
6 electrification; and
- 7 • The Company is maintaining the Equity PIM, which incentivizes the  
8 Company to focus its efforts towards greater participation in its equity driven  
9 program offerings.

10 More details on how the Company is addressing equity and creating  
11 pathways for all Public Service customers to realize the benefits of transportation  
12 electrification can be found in the Direct Testimony of Company witness Ms. Nadia  
13 El Mallakh.

14 **B. TEP Cost Treatment and Recovery**

15 **Q. DOES SB 19-077 ALLOW THE COMPANY TO EARN A RETURN ON TEP**  
16 **INVESTMENTS AND REBATES?**

17 A. Yes, section 40-3-116(1)(a), C.R.S., allows the Company to earn a return on TEP  
18 investments, including rebates, at the weighted average cost of capital (“WACC”).  
19 In approving the Company’s inaugural TEP, the Commission in Decision No. C21-  
20 0017 at Paragraph 80, stated that allowing the Company to earn a return on its  
21 investments and rebates at WACC is expressly allowed by section 40-3-116(1)(a),  
22 C.R.S., and “this approach is consistent with commission decisions in other  
23 jurisdictions.” The Commission also found in Paragraph 82 that a ten-year period



1 for amortization of rebates is appropriate in part because “the assets associated  
2 with these rebates are expected to provide system benefits for years to come.”

3 **Q. IS THE COMPANY PROPOSING CHANGES TO THE RECOVERY AND**  
4 **AMORTIZATION OF INVESTMENTS AND REBATES AS A PART OF ITS TEP?**

5 A. Generally, no, the Company is not proposing to deviate from the approved  
6 treatment of its investments and rebates, where the Company earns its WACC and  
7 uses the previously approved amortization periods. This treatment allows the  
8 Company to make investments now to support our customers and the State’s EV  
9 goals, while also spreading the costs out over a longer period of time to lessen the  
10 impact to all Public Service customers. This treatment is comparable to the  
11 manner in which the Company makes other investments in the distribution grid, as  
12 directed by section 40-1-103.3(6), C.R.S. In addition, the Company’s WACC  
13 represents its true financing cost, and it is appropriate to reflect that cost for the  
14 Company’s investments.

15 I also note that Colorado is still in the early days of the shift to transportation  
16 electrification. The Company is well positioned to continue its market support, but  
17 it requires cost treatment of its investments and rebates on a comparable basis as  
18 it makes its other investments. That similarity of cost treatment provides an  
19 incentive to the Company to make its TEP a central component of its business  
20 operations, allowing it to deploy its capital to support the further growth of  
21 transportation electrification and its associated needs.

22 As for a new issue to this TEP, the Company is proposing a cost treatment  
23 for batteries, as addressed by Company witness Ms. Kelli Duffy.

1 **Q. WHY DOES THE COMPANY BELIEVE IT IS APPROPRIATE TO MAINTAIN THE**  
2 **CURRENT TREATMENT OF UTILITY INVESTMENTS AND REBATE**  
3 **OFFERINGS FOR ITS TEP PROGRAMS?**

4 A. Incentivizing the Company to expand its TEP offerings with WACC treatment and  
5 amortizing rebates strikes the appropriate balance to encourage continued utility  
6 investment in transportation electrification and providing robust support to the  
7 State to help it achieve its EV goals and its emission reduction requirements. If  
8 the Commission were to alter the treatment of utility investments by reducing the  
9 Company's potential return, such treatment may have the undesired effect of  
10 discouraging the Company from continuing its aggressive transportation  
11 electrification support. Now is not the time to slow down investments and growth  
12 opportunities in the EV marketplace. In this TEP, the Company is seeking to  
13 significantly build on the momentum it has achieved. The Commission's support  
14 to that end is enabled with stability in the approved treatment of TEP investments  
15 and rebates.

16 **C. TEP Budget and Administration Flexibility**

17 **Q. WHAT IS THE BUDGET PROPOSED FOR THE 2024-2026 TEP?**

18 A. The Company's proposed budget for the 2024-2026 TEP is \$439 million.

19 **Q. ARE THE BUDGET LEVELS AS PROPOSED STILL PROVIDING FOR**  
20 **DOWNWARD PRESSURE ON RATES FOR ALL CUSTOMERS?**

21 A. Yes, as addressed by Mr. Klingeman, even with our increased TEP budgets, EV  
22 load growth still puts downward pressure on customer rates, benefiting all  
23 customers.

1 **Q. DID THE COMPANY REQUEST AND THE COMMISSION APPROVE BUDGET**  
2 **FLEXIBILITY IN THE 2021-2023 TEP?**

3 A. Yes. The Commission approved flexibility of budgets between and within the  
4 portfolios as well as for the overall TEP budget on an annual basis. Specifically,  
5 the Commission approved the budget flexibility to move dollars between the  
6 approved portfolios, subject to a cap of 150 percent, and the ability to increase the  
7 overall TEP budget to up to 125 percent of the annual estimated budget.<sup>21</sup>

8 **Q. IS THE COMPANY PROPOSING ANY CHANGES TO THE BUDGET**  
9 **FLEXIBILITY APPROVED BY THE COMMISSION IN DECISION NO. C21-0017?**

10 A. The Company is proposing one modification to the previously approved budget  
11 flexibility provisions. Generally, as we have implemented TEP programs, budget  
12 flexibility can be a helpful tool to shift dollars appropriately to meet customer  
13 interest and demand. The flexibility in budgets allows the Company to respond to  
14 customer needs and programmatic interests in real time, and budget flexibility will  
15 continue to be essential as we move forward with implementation of our 2024-  
16 2026 TEP.

17 Concerning the one modification, the Company proposes to replace the  
18 annual flexibility cap structure (*i.e.*, existing annual cap of 125 percent) with one  
19 that applies across the TEP three-year period. As the Company has implemented  
20 programs in its initial TEP and has gathered insight from this implementation  
21 process, in particular the time that it takes to scope, source, and execute projects,

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<sup>21</sup> Decision No. C21-0017 at ¶ 52.

1 it has found that the annual cap may be too restrictive and may have the  
2 unintended consequence of creating a lack of funding due to timing constraints.  
3 The Company is actively working to identify ways to address project timing issues  
4 and is looking to streamline processes, but having budget flexibility for the overall  
5 plan—rather than only on an annual basis—will help to make sure that projects  
6 that face obstacles in one program year can move forward in the next. The  
7 Company does not want to impede the progress being made towards achieving  
8 the State’s EV goals due to restraints in the structure of budget flexibility.

9 **Q. CHANGING GEARS, CAN YOU DESCRIBE THE 60/90 DAY NOTICE PROCESS**  
10 **THAT THE COMMISSION APPROVED IN THE COMPANY’S 2021-2023 TEP?**

11 A. The Commission approved a 60/90 Day Notice process that was similar to the  
12 process used for the Company’s Demand Side Management programs. The 60-  
13 Day Notice Process allows the Company to undertake efficient changes to TEP  
14 portfolios, introduce programs, and make needed adjustments. The 90-Day Notice  
15 Process governs proposals to discontinue a program or product offering. Through  
16 the 60-Day Notice Process, the Company issues the notice to stakeholders who  
17 then have 30 days to provide comments to the Company. After the initial 30 days,  
18 the Company then has 30 days to consider the comments and respond to them  
19 accordingly. The Company then files a summary report in the appropriate TEP  
20 proceeding that summarizes the comments received and why they were  
21 incorporated into the final notice or justification of why comments were not  
22 incorporated. Upon filing the summary report, Commission Staff have 10 business  
23 days to file a Notice of Deficiency. If no Notice of Deficiency is filed, the Company

1 moves forward with the noticed proposal consistent with the summary report. If a  
2 Notice of Deficiency is filed, the Company and stakeholders have the opportunity  
3 to respond and the Commission ultimately decides the path forward for changes  
4 proposed through the Notice (*e.g.*, file an application, move forward with the  
5 change as proposed, deny the change). For a 90-Day Notice, the process is  
6 relatively similar. Stakeholders have 30 days to provide comments, and then the  
7 Company has 60 days to consider the comments before the Company makes a  
8 final decision on the proposed discontinuance.

9 **Q. HAS THE 60-DAY NOTICE PROCESS BEEN A HELPFUL INSTRUMENT**  
10 **WHILE IMPLEMENTING THE INAUGURAL TEP?**

11 A. Yes, the Company has found the process to be very helpful to establish processes  
12 for new offerings, introduce pilot projects through our Innovation portfolio, and to  
13 make adjustments to program offerings as needed with changing market  
14 conditions. Table JWI-D-3 below provides a summary of the notices issued during  
15 the Company's 2021-2023 TEP. The Company notes that across the several uses  
16 of the 60-Day Notice Process thus far, no Staff notices of deficiency have been  
17 filed.

1

**Table JWI-D-3: 60-Day Notice Summary**

Higher Emission Communities (“HEC”)	<ul style="list-style-type: none"><li>• Created a process for identifying HECs in the Company’s service territory</li><li>• Projects in HECs qualify to receive enhanced incentives from the Company</li></ul>
Electric School Bus Program	<ul style="list-style-type: none"><li>• Provided a program description</li><li>• Created scoring considerations used to review and evaluate applications</li><li>• Provided reporting metrics</li></ul>
Small Commercial Program	<ul style="list-style-type: none"><li>• Established both the standard and enhanced rebate levels and program budget</li><li>• Provided the eligibility and reporting requirements</li></ul>
Innovation	<ul style="list-style-type: none"><li>• Electric Car Sharing for Underserved Communities Pilot</li><li>• Electrify Paratransit Mobility Pilot</li><li>• Municipal Refuse Fleet Electrification Pilot</li><li>• Residential Resiliency and Managed Charging Project</li><li>• V2X and Resilience Project</li><li>• DCFC Charging + Storage Demonstration Project</li><li>• EV Load Disaggregation Project</li></ul>
Multifamily Housing Charger rebate	<ul style="list-style-type: none"><li>• Adjusted rebate levels to align with market pricing more accurately</li><li>• Combined the Assigned and Shared Parking Rebate into one rebate supporting multifamily housing</li></ul>

2 **Q. IS THE COMPANY PROPOSING ANY CHANGES TO THE 60/90 DAY NOTICE**  
3 **PROCESS IN ITS 2024-2026 TEP?**

4 A. The Company is proposing to maintain the 60/90 Day Notice process. The  
5 Company views this process as beneficial to stakeholders, customers, and the  
6 Company. The process as it is designed allows the Company the flexibility to make  
7 changes to its TEP programs with stakeholder input, provides proper bounds, and  
8 helps avoid the need for a fully litigated proceeding that causes unnecessary

1 litigation costs to customers, the Company, and intervenors alike. The 60/90 Day  
2 Notice process is an efficient and transparent mechanism with proper checks that  
3 allow for adjustments in a timely manner. It has been the Company's experience  
4 that the preview of contemplated notices to stakeholders and receiving initial  
5 feedback has helped to inform Company proposals and has helped to construct  
6 more insightful notices based upon that initial feedback. The 30-day comment  
7 period for stakeholders to provide feedback has also helped to further refine  
8 proposed changes and improve offerings.

**D. Company Owned Public Charging Stations**

**Q. DID THE COMPANY RECEIVE APPROVAL TO OWN AND OPERATE DCFC STATIONS IN THE 2021-2023 TEP?**

A. Yes. In Proceeding No. 20A-0204E, the Company was granted approval to own and operate up to 25 DCFC stations throughout its service territory. The Company then worked with stakeholders to develop a process for siting the Company's approved "market" and "connector" stations, which it filed through a siting report on December 13, 2021.<sup>22</sup> In August 2022, in Decision No. C22-0485, Proceeding No. 21AL-0494E, the Commission also approved rates for the Company-owned DCFC stations. Following these necessary Commission decision points, the Company began its DCFC station development and has several sites under construction now, with anticipated openings in Q2 through the end of this year.

**Q. HAS THE COMPANY REASSESSED ITS ROLE IN THE DEVELOPMENT OF DCFC STATIONS?**

A. Yes. While the Company is still in the early stages of its DCFC developments, it has conducted an analysis of the current state of Colorado's public charging station build out as necessary to meet Colorado's 2030 EV goals. That analysis is presented by Company witness Mr. Jouve, in Attachment JLJ-1. Summarized here, that analysis finds that a considerable need in public charging infrastructure exists to ensure successful accomplishment of Colorado's EV goals. The Company is thus undertaking a strategy shift in its approach to DCFC

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<sup>22</sup> The Commission addressed a Petition for Declaratory Order filed by EVgo Services, LLC on the Company's siting report in Decision No. C22-0255, Proceeding No. 22D-0069E.



1 developments. That shift involves a strong and active Company role in developing  
2 DCFC stations in our service territory. The Company aims to build upon the  
3 stations that will be provided by the non-regulated market and further expand upon  
4 the access to public charging through Company-owned stations. Company  
5 witness Ms. Erwin provides the details of this proposal.

6 **Q. WHY DOES THE COMPANY BELIEVE IT IS APPROPRIATE TO EXPAND ITS**  
7 **DCFC PROGRAM?**

8 A. The Company is in a unique position to support the State's EV goals. The  
9 Company has the resources and expertise to build out a charging network at scale  
10 needed to support a portion of the State's EV goals. Providing a sufficient charging  
11 network is essential to overcome customer concerns regarding range anxiety and  
12 provide a future state where our customers can easily locate and charge their EVs  
13 without sparse distribution or considerable waiting times that could otherwise  
14 frustrate widespread customer adoption of EVs. The Company is also in the  
15 unique position of being able to educate our customers on EVs and continue our  
16 role as a trusted resource for EV needs. We can provide EV drivers the comfort  
17 that reliable charging is available for their needs. Further, the Company seeks to  
18 engage stakeholders regarding opportunities to address barriers to public fast  
19 charging for IQ customers at its DCFC stations as part of the outreach efforts I  
20 discuss further below. Lastly, as the Commission retains jurisdiction and oversight,  
21 approval of our DCFC expansion will help reduce the risks the State will fall short  
22 of the public charging infrastructure it needs to support EV adoption goals.

1 Company witness Ms. Erwin discusses the Company's proposal for its DCFC  
2 network in her Direct Testimony.

3 **Q. WHAT ARE YOUR CONCLUDING THOUGHTS ON THE COMPANY'S DCFC**  
4 **STATION PROPOSAL?**

5 A. The Company understands that its proposal represents a large increase in DCFC  
6 station investment. When considering its proposal, the Commission should  
7 consider that the Company is recommending approval to continue this DCFC  
8 station investment into future TEP filings beyond that for plan years 2024-2026,  
9 meaning it may require the Company additional years beyond 2026 to develop the  
10 entirety of the DCFC station investment level sought in this TEP, as Ms. Erwin  
11 addresses. In this manner, the Commission's approval of the Company's DCFC  
12 proposal will set the Company on a pathway to support public charging into the  
13 future.

14 In addition, the Commission should consider the proposal in light of the  
15 totality of the 2024-2026 TEP, where the Company is addressing in a  
16 comprehensive manner the programming necessary to promote widespread  
17 transportation electrification. It is notable that even with the Company's  
18 significantly increased investments for DCFC stations, the TEP and associated EV  
19 growth will still continue to put downward pressure on rates. This result indicates  
20 that the Company's EV-related investments can and will harness the benefits of  
21 EVs for the long term, for the benefit of all customers. It is also necessary to stress  
22 that the Company is offering programming to support non-regulated DCFC  
23 stations, including through infrastructure investments and the BESS rental option.

1       The Company's DCFC stations are but one part of a much broader effort to balance  
2       the need for competition with the simultaneous need to ensure Colorado is on track  
3       to meet its EV goals.

4               To conclude, the Company stands behind its DCFC proposal because it will  
5       assist in providing access to public charging throughout our service territory into  
6       the future, help to alleviate EV drivers' concerns over range anxiety, provide  
7       access to charging for those that do not have the option to charge at home, provide  
8       the necessary support to achieve the State's EV goals, and provide an efficient  
9       and affordable charging option to drivers.

1                                   **VI.    OUTREACH TO SUPPORT TEP EQUITY**

2   **Q.    WHAT IS THE PURPOSE OF THIS SECTION OF YOUR TESTIMONY?**

3   A.    In this section of my Direct Testimony, I discuss the issue of equity and how equity  
4           is being addressed through the Company's other planning efforts, specifically its  
5           Renewable Energy Compliance Plan ("RE Plan") and Demand Side Management  
6           ("DSM") Plans. I address how the Company can combine efforts for community  
7           outreach to promote its programs, especially those focused on equity, across its  
8           planning efforts and make information clear, understandable, and available to all  
9           our customers. Given the importance of equity in the TEP, Company witness  
10          Nadia El Mallakh also addresses equity, and her testimony is focused on TEP  
11          programming issues, while my testimony focuses on our outreach efforts.

12   **Q.    PLEASE DISCUSS THE COMMISSION'S ONGOING WORK TO IMPLEMENT**  
13   **STATUTORY REQUIREMENTS TO CONSIDER EQUITY.**

14   A.    Senate Bill 21-272 ("SB 21-272") directs the Commission to consider how to  
15          provide equity in all of its work.<sup>23</sup> Through Decision No. C22-0239, the  
16          Commission opened a miscellaneous proceeding, Proceeding No. 22M-0171ALL,  
17          to receive input from stakeholders as the Commission considers how to implement  
18          SB 21-272. The Commission is actively coordinating with stakeholders on issues  
19          that include the definition of DI communities, understanding how other state  
20          agencies are approaching that question, and considering mapping tools to assist  
21          in identifying DI communities. The Company is a participant in that proceeding,

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<sup>23</sup> See Decision No. 22-0239 at p.1 in Proceeding No. 22M-0171ALL.

1 and the Company supports the Commission's active efforts to implement SB 21-  
2 272.

3 **Q. CAN YOU DISCUSS SOME OF PUBLIC SERVICE'S PROCEEDINGS WHERE**  
4 **THE COMPANY IS WORKING TO COMPREHENSIVELY ADDRESS EQUITY?**

5 A. Yes. The importance of equity is a common theme not only in the Company's  
6 inaugural TEP, but also in its recent programming efforts, such as those  
7 undertaken in the RE Plan (21A-0625EG) and Strategic Issues for Demand Side  
8 Management and Beneficial Electrification (Proceeding No. 22A-0309EG). The  
9 State, the Commission, stakeholders and the Company desire that the benefits of  
10 the Company's programs, including those supporting renewable energy, energy  
11 efficiency, and transportation electrification, are developed and administered with  
12 a central focus on equity. Towards that end, the Company has been working on a  
13 new strategy to ensure effective outreach with IQ customers and DI communities.  
14 Ensuring collaboration with IQ customers and DI communities is a necessary  
15 measure to receive valuable input, allow the Company to explain its compressive  
16 offerings, and improve its communication strategies to best serve these unique  
17 customer segments.

18 **Q. PLEASE ADDRESS THE COMPANY'S NEW OUTREACH STRATEGY TO**  
19 **SUPPORT EQUITY.**

20 A. Starting with our RE Plan, the Company agreed to develop and execute a  
21 comprehensive IQ/DI Community Engagement and Outreach Plan. That outreach  
22 plan entails the Company working with stakeholders, such as community-based  
23 organizations, to develop lists of organizations that serve IQ customers and DI

1 communities, ensuring support for community engagement, outreach, and  
2 program implementation. Identified organizations would then be contracted to  
3 support the development, education, and outreach of programs.

4 Similarly, in our Strategic Issues proceeding, the Company committed to  
5 including outreach on its DSM proposals within the IQ/DI Community Engagement  
6 and Outreach Plan. The Company explained in that proceeding its intent is to  
7 coordinate in the outreach plan the Company's multiple program offerings,  
8 including DSM, renewable energy, and transportation electrification. Leveraging  
9 the engagement plan across several of the Company's customer-benefiting  
10 programs will provide a more efficient process to acquire community feedback and  
11 deliver program information holistically.

12 **Q. DOES THE COMPANY COMMIT TO INCLUDE ITS TEP PROGRAMMING**  
13 **WITHIN THE IQ/DI COMMUNITY ENGAGEMENT AND OUTREACH PLAN?**

14 A. Yes, that is our intent. It is most effective and efficient to coordinate with our DI  
15 communities and IQ customers in a comprehensive manner, where we can  
16 address our full suite of offerings across program areas to provide critically  
17 necessary benefits to our customers, and maximize community engagement and  
18 feedback.

19 **Q. WHAT IS THE CURRENT STATUS OF THE COMPANY'S IQ/DI COMMUNITY**  
20 **ENGAGEMENT AND OUTREACH PLAN?**

21 A. Currently, the Company is actively engaging with a variety of stakeholders,  
22 including community-based organizations and foundations that serve our IQ  
23 customers and disadvantaged communities. We are expanding our newly

1 developed partnerships with organizations or member associations that have  
2 existing practices or outreach models that are proven to be effective in an identified  
3 community or with a group of people. The Company is currently working through  
4 two channels of outreach and plans.

5 The first channel of outreach focuses on and directly engages with  
6 customers to educate and assist them in signing up for the various program  
7 offerings the Company has available through its DSM, TEP, and RE Plans. The  
8 Company currently has partnerships with non-profit organizations and community-  
9 based organizations that host neighborhood and community events. Some recent  
10 examples where the Company had the opportunity to engage directly include the  
11 NewsEd Cinco de Mayo Festival and the Biennial of the Americas Cities Summit  
12 and Fabrica de Arte Americana.

13 In the second channel of outreach, the Company is continuing its formal  
14 partnerships and working with organizations who in turn organize community  
15 leader and customer meetings to help educate and promote specific customer  
16 offerings. As an example, the Company has been engaging with the African  
17 American Energy Advisory Committee, which was established in partnership with  
18 the Colorado Black Chamber of Commerce in July 2022. The committee generally  
19 meets bi-monthly and at those meetings the Company has discussed our EV  
20 programs and rebates, workforce pathway opportunities, supplier diversity  
21 opportunities, renewable energy programs, and options for customers and  
22 communities. We also recently engaged the Latino Community Foundation of  
23 Colorado and are currently working on an agreement for the organization to assist

1 in identifying non-profit organizations in targeted communities, while also working  
2 to help educate and promote the variety of Company offerings to its communities.  
3 The Latino Community Foundation of Colorado supports nearly 100 different non-  
4 profits across our service territory and can enable and support local community  
5 non-profits and formalize our partnership with them to enhance the Company's  
6 community engagement efforts.

7 As the Company has been working with organizations and customers in  
8 disadvantaged communities, we have received feedback for increased intentional  
9 outreach focused on workforce pathways and supplier diversity opportunities. We  
10 agree and going forward, in addition to our outreach and engagement efforts to  
11 promote our customer programs, the Company will be expanding its efforts to  
12 partner with organizations and directly support training and educational efforts  
13 targeted toward economic growth, workforce pathways, and increased supplier  
14 diversity opportunities, including in the EV industry.



**VII. IMPORTANT OTHER COMMISSION PROCEEDINGS**

**Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR DIRECT TESTIMONY?**

A. In this section of my Direct Testimony, I provide an overview of how the Company's TEP overlaps with some of the other processes the Company undertakes, specifically its Electric Resource Planning and Distribution System Planning efforts.

**Q. IN THE COMPANY'S MOST RECENTLY APPROVED 2021 ELECTRIC RESOURCE PLAN AND CLEAN ENERGY PLAN ("CEP"), IS IT ACCURATE THAT THE COMPANY'S PREFERRED PLAN ESTIMATES A CARBON REDUCTION OF OVER 80 PERCENT BY 2030?**

A. That is accurate. The Company's preferred plan in the CEP estimates that the Company will reduce carbon emissions from 2005 levels by over 80 percent in 2030 in line with the Company's stated goals for carbon reductions and importantly in compliance with the requirements of Senate Bill 19-236 and House Bill 19-1261.

**Q. WHAT IS THE CURRENT STATUS OF THE CEP?**

A. The Company is actively involved in Phase II of the CEP, in which it is evaluating the bids it has received and preparing a report to the Commission on the Company's recommendations on the resources and contracts necessary to support our carbon reduction proposals and to maintain reliability of service to our customers. I expect the Company's recommendations to the Commission will be filed during the pendency of this TEP proceeding.

1    **Q.    WHAT IS THE RELEVANCE OF THE CEP TO THIS TEP PROCEEDING?**

2    A.    The reduced emission benefits of transportation electrification are in large part tied  
3        to the system emissions of the Company's electric generation resources. The  
4        Company has already made substantial progress in its clean energy transition of  
5        its generation resources, and the CEP will assist the Company in meeting or  
6        exceeding our statutory requirements to reduce carbon emissions. As the TEP  
7        helps to accelerate the adoption of EVs in the Company's service territory, we will  
8        achieve significant emission reductions from the transportation sector and when  
9        combined with the resources approved through the CEP will achieve even greater  
10       emission reduction benefits as the system providing fuel for those EVs integrates  
11       increasing levels of renewable energy. With the CEP and the conversion of our  
12       electric generation system to a clean energy system, the Company is working  
13       towards a future where net zero emission vehicles are possible.

14   **Q.    CAN THE COMPANY'S TEP ASSIST IN ACHIEVING EMISSIONS**  
15   **REDUCTIONS?**

16   A.    Yes. Even outside the important emission reductions from the transportation  
17        sector the TEP supports, the TEP can also assist the Company in achieving its  
18        CEP emission reductions. Specifically, in the future as technology evolves, EVs  
19        have the potential to act as system resources, allowing for the storing and  
20        discharging of excess renewable generation when necessary to support the  
21        efficient operation of the grid. Our proposed managed charging programs are a  
22        step towards that future, as supported by our Innovation portfolio and its many pilot  
23        projects that are intended to more completely understand the full potential of EVs.

1 **Q. HOW DOES THE COMMISSION'S DISTRIBUTION SYSTEM PLANNING**  
2 **RULES SUPPORT THE COMPANY'S EFFORTS TO ADDRESS EV-RELATED**  
3 **GROWTH?**

4 A. In Proceeding No. 22A-0189E, the Commission approved the resolution of the  
5 Company's first compliance with the Distribution System Planning ("DSP") rules.  
6 The Commission specifically approved a settlement in that proceeding, and it in  
7 turn recognized the need for continued Company efforts to deploy and use its  
8 LoadSEER tool, so as to assist in the locational-specific forecasting of beneficial  
9 electrification, such as additional load growth driven by EVs. The Company's  
10 improved distribution system forecasting will help it in its development of future  
11 identification of distribution system projects necessary to meet anticipated EV load  
12 growth.

13 **Q. IS THE COMPANY IN THIS PROCEEDING PROPOSING TO BUILD UPON ITS**  
14 **DSP EFFORTS FROM PROCEEDING NO. 22A-0189E?**

15 A. Yes. As addressed by Company witness Ms. Paoletti, the Company is proposing  
16 the limited funding of "No Regrets Investments" towards distribution projects on a  
17 proactive basis to ensure the grid is ready for EV load, especially from medium-  
18 and heavy-duty fleets.

19 **Q. HOW DOES THE COMPANY'S UNDERTAKING OF THOSE DISTRIBUTION**  
20 **PROJECTS COMPORT WITH THE COMMISSION'S DSP RULES?**

21 A. At this time, the Company is not proposing specific distribution projects to  
22 undertake through the TEP. Instead, the Company will identify those projects at a  
23 later date pursuant to a methodology proposed by Ms. Paoletti. To mitigate any

1 potential concerns on DSP rule compliance, the Company is seeking a limited  
2 waiver of the DSP rules as applicable to the TEP distribution investments. In  
3 particular, the Company is requesting waiver of the non-wires alternative screening  
4 process, as included in Rule 3534. This waiver request is being made on a  
5 conservative basis to ensure transparency and clarity on the Company's  
6 undertaking of the limited TEP distribution investments. There is good cause for  
7 the waiver and undertaking the TEP investments during 2024-2026 because the  
8 distribution investments are generally in the spirit of the terms of the Settlement  
9 Agreement in Proceeding No. 22A-0189E. That settlement encouraged the  
10 Company to explore means for funding distribution upgrades to support Distributed  
11 Energy Resources ("DERs"), as well as the establishment of Commission  
12 proceedings/processes to support state policy goals on DERs and beneficial  
13 electrification.<sup>24</sup> The Company's undertaking of limited TEP distribution  
14 investments pursuant to a screening methodology outlined in this proceeding  
15 promotes and advances the settlement. The Commission should therefore grant  
16 the Company a limited waiver of the DSP rules to support the TEP distribution  
17 investment, to the extent necessary.

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<sup>24</sup> Proceeding No. 22A-0189E, Decision No. R23-0080, Appendix A – Settlement Agreement, at Section IX, pages 15-16.

1           **VIII.    DEFERRAL OF LITIGATION/CONSULTANT COSTS**

2   **Q.    WHAT IS THE PURPOSE OF THIS SECTION OF YOUR DIRECT TESTIMONY?**

3   A.    In this section, I support the Company's request to defer consultant and legal  
4        expenses associated with preparing and litigating this proceeding into a non-  
5        interest-bearing regulatory asset to be reviewed for recovery purposes in a future  
6        rate proceeding.

7   **Q.    PLEASE LIST AND GENERALLY DESCRIBE THE MAJOR EXPENSE**  
8        **CATEGORIES YOU ARE PRESENTING FOR DEFERRAL.**

9   A.    The major categories of expenses for the 2024-2026 TEP are listed below.

10        Consultants: Consultants were necessary for the preparation of the TEP  
11        for a number of reasons. They provided subject matter expertise, performed  
12        specific analyses, provided review of the TEP itself and testimonies, and may  
13        assist in responding or consulting on discovery.

14        Transcripts/Hearing Costs: During the course of a proceeding, a court  
15        reporter will be necessary to transcribe depositions and hearings before the  
16        Commission. There is a cost of having court reporters record and transcribe these  
17        proceedings. This fee increases or decreases based upon the timeframe by which  
18        the reporter is asked to prepare the transcript.

19        Legal Counsel: The Company has an in-house legal department whose  
20        regulatory team works on the matters that we have before the Commission.  
21        However, the Company has more Commission-related work than can be handled  
22        by our in-house attorneys, so we also rely on outside attorneys for this work. As

1       this TEP represents a complex and innovative filing, the Company has not staffed  
2       its legal department in preparation of its filing, but we do assign in-house attorneys  
3       to the filing. Our ability to rely on our inside counsel is dependent upon other  
4       pending matters. Outside counsel assistance is thus necessary.

5       **Q.   WHAT ARE THE SPECIFIC CONSULTANT COSTS THE COMPANY IS**  
6       **PROJECTING TO INCUR FOR THIS TEP?**

7       A.   Guidehouse, Inc. (“Guidehouse”) and The Brattle Group, Inc. (“Brattle”) have been  
8       engaged to support the TEP. Guidehouse is assisting the TEP in the development  
9       of TEP programming to benefit all customers, including for the Residential,  
10       Commercial, Innovation, Clean Vehicles, and Advisory Services portfolios.  
11       Guidehouse is also engaged to support analysis regarding forecasted EV adoption  
12       and the public fast charging needs in the Company’s service territory. The  
13       estimate of the costs of these services by Guidehouse are \$846,000.

14               Should Guidehouse need to support discovery and rebuttal testimony, the  
15       Company reasonably estimates those costs to add an additional \$355,000.

16               Brattle is assisting by undertaking the creation, modeling, and reporting  
17       necessary to create a comprehensive benefit-cost analysis, including with  
18       application of the impact of the social cost of emissions. The estimated costs of  
19       Brattle’s services are \$384,000.

20               Together, the Company thus estimates consultant costs of approximately  
21       \$1,201,000 (or \$1,556,000 should Guidehouse need to support discovery and  
22       rebuttal).

1 **Q. WHAT ARE THE SPECIFIC TRANSCRIPT AND HEARING COSTS THE**  
2 **COMPANY IS PROJECTING TO INCUR FOR THIS TEP?**

3 A. The Company anticipates incurring an approximate cost of \$30,000 for the  
4 purchase of transcripts of the hearings and other hearing costs.

5 **Q. PLEASE DISCUSS THE OUTSIDE LEGAL FEES THAT THE COMPANY IS**  
6 **PROJECTING TO INCUR AS PART OF THE TEP PROCEEDING.**

7 A. Outside legal costs are estimated to be \$903,900 for the legal services provided  
8 by Wilkinson Barker Knauer LLP ("WBK"). WBK was retained for its expertise and  
9 specific knowledge of Public Service and other Xcel Energy operating companies.  
10 The firm provided, or will provide, assistance in assembling testimony and  
11 attachments, witness preparation, responding to discovery, and generally  
12 processing the case. I would also add that the Company's internal legal team  
13 works hard to ensure that duties are appropriately assigned to outside legal  
14 counsel and to ensure that work efforts are not duplicative. The internal and  
15 external legal teams work as a unit and are in constant coordination to be as  
16 efficient as possible.

17 **Q. DO YOU HAVE CONCLUDING THOUGHTS ON THE REQUEST TO TRACK**  
18 **AND DEFER THESE EXPENSES?**

19 A. Yes. It is important to understand that the Company is not seeking recovery of  
20 these amounts in this proceeding, but instead to allow the parties and the  
21 Commission to review the actual costs incurred in support of the TEP in a future  
22 rate case proceeding.

1 **IX. CONCLUSION**

2 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

3 A. I recommend that the Commission approve the 2024-2026 TEP, including its  
4 programs and budgets. I also recommend the Commission approve the following:

- 5 • the Company's proposal to continue existing TEP programming until it is  
6 able to implement the Commission's final approvals for the 2024-2026 TEP;
- 7 • the Company's revised budget flexibility proposal;
- 8 • the Company's proposal to continue the existing cost and regulatory  
9 treatment for TEP rebates;
- 10 • the Company's request for a waiver of Distribution System Plan rules, if  
11 necessary; and
- 12 • the Company's proposal to defer the expenses associated with preparing  
13 and litigating this proceeding.

14 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

15 A. Yes, it does.



**Statement of Qualifications**

**Jack W. Ihle**

Jack Ihle is Regional Vice President of Regulatory & Strategy Analysis for Xcel Energy – Colorado. He leads a team responsible for regulatory aspects of resource planning, renewable energy planning, electric vehicles and other policy issues. He has testified before the Colorado Public Utilities Commission, the Colorado Legislature, the Minnesota Legislature and the New Mexico Environmental Improvement Board.

Mr. Ihle previously worked in environmental policy for ten years, most recently serving as Director of Environmental Policy while leading Xcel Energy's climate policy, environmental policy and environmental communications efforts across the eight states in which the Company operates. Mr. Ihle has also served in energy consulting roles with IHS and Platts, focusing on renewable energy, climate policy and forecasting engagements.

Mr. Ihle has a Master of Science degree in Energy & Resources from the University of California at Berkeley, and a Bachelor of Arts degree in Political Science from Bowling Green State University. He serves on the boards of directors for the Regional Air Quality Council, and Volunteers for Outdoor Colorado, and has previously served on the boards of XPAC, the Solar Technology Acceleration Center and WEST Associates.

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

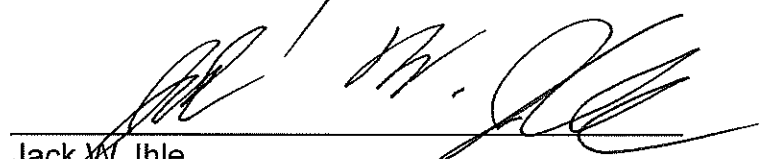
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IN THE MATTER OF [THE )  
APPLICATION OF PUBLIC SERVICE )  
COMPANY OF COLORADO FOR )  
APPROVAL OF ITS 2024-2026 ) PROCEEDING NO. 23A-XXXXE  
TRANSPORTATION ELECTRIFICATION )  
PLAN. )

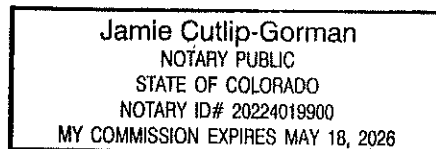
AFFIDAVIT OF JACK W. IHLE  
ON BEHALF OF  
PUBLIC SERVICE COMPANY OF COLORADO

I, Jack W. Ihle, being duly sworn, state that the Direct Testimony and attachments were prepared by me or under my supervision, control, and direction; that the Direct Testimony and attachments are true and correct to the best of my information, knowledge and belief; and that I would give the same testimony orally and would present the same attachments if asked under oath.

Dated at Denver, Colorado, this 15<sup>th</sup> day of May, 2023.

  
\_\_\_\_\_  
Jack W. Ihle  
Regional Vice President, Regulatory Policy

Subscribed and sworn to before me this 15<sup>th</sup> day of May, 2023.



  
\_\_\_\_\_  
Notary Public

My Commission expires May 18, 2026