

**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 ATTACHMENTS OF HUMA SETH

ON

BEHALF OF

PUBLIC SERVICE COMPANY OF COLORADO

May 15, 2023

**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.)

TABLE OF CONTENTS

| <u>SECTION</u> | <u>PAGE</u> |
|--|--------------------|
| I. INTRODUCTION AND PURPOSE OF TESTIMONY | 4 |
| II. OVERVIEW OF THE STRUCTURE OF THE 2024-2026 TEP | 7 |
| III. REPORTING | 15 |
| IV. THE 2024-2026 TEP BUILDS UPON FEDERAL, STATE, AND LOCAL EFFORTS TO SUPPORT TRANSPORTATION ELECTRIFICATION | 21 |
| V. CONCLUSION | 26 |

LIST OF ATTACHMENTS

| | |
|-----------------|---|
| Attachment HS-1 | Public Service's proposed 2024-2026 Transportation Electrification Plan ("TEP") |
|-----------------|---|

**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 HUMA SETH

I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Huma Seth. 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 Xcel Energy Services, Inc. ("XES") as Director, Clean Transportation, Customer Solutions. XES is a wholly owned subsidiary of Xcel Energy Inc. ("Xcel Energy"), and it provides an array of support services to Public Service Company of Colorado ("Public Service" or the "Company") and the other utility operating company subsidiaries of Xcel Energy on a coordinated basis.

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. As Director, Clean Transportation, Customer Solutions, I am responsible for developing and implementing electric vehicle ("EV") program strategy and plans,

1 ensuring applicable programs and services meet performance targets and serve
2 customer needs, and fostering relationships with customers and stakeholders. A
3 description of my qualifications, duties and responsibilities is set forth in my
4 Statement of Qualifications at the conclusion of my testimony.

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

6 A. The purpose of my Direct Testimony is to provide a high-level overview of the
7 structure of the proposed 2024-2026 Transportation Electrification Plan ("TEP");
8 present certain requested changes to Public Service's reporting requirements; and
9 describe how the programs in Public Service's 2024-2026 TEP will interact with,
10 and build upon, other programs and incentives that are also designed to advance
11 transportation electrification.

12 **Q. ARE YOU SPONSORING ANY ATTACHMENTS AS PART OF YOUR DIRECT**
13 **TESTIMONY?**

14 A. Yes, I am sponsoring Attachment HS-1, Public Service's proposed 2024-2026
15 TEP.

16 **Q. ARE YOU THE COMPANY WITNESS SPONSORING ALL ASPECTS OF THE**
17 **TEP?**

18 A. No. My Direct Testimony does not specifically walk through each of the
19 programmatic details described in the TEP. Company witness Mr. Jack Ihle's
20 Direct Testimony describes the scope of each witness' direct testimony submitted
21 in support of Public Service's Direct Case.

1 **Q. WHAT RECOMMENDATIONS DO YOU SUPPORT THROUGH YOUR DIRECT**
2 **TESTIMONY?**

3 A. I recommend that the Colorado Public Utilities Commission (“Commission”)
4 approve: (1) Public Service’s proposed 2024-2026 TEP, filed as Attachment HS-1
5 to my Direct Testimony; and (2) Public Service’s changes to reporting
6 requirements for the 2024-2026 TEP.

1 **II. OVERVIEW OF THE STRUCTURE OF THE 2024-2026 TEP**

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

3 A. The purpose of this section of my Direct Testimony is to provide a high-level
4 overview of the structure of the proposed 2024-2026 TEP. The 2024-2026 TEP
5 document is included with my testimony as Attachment HS-1.

6 **Q. PLEASE PROVIDE A HIGH-LEVEL OVERVIEW OF THE STRUCTURE OF THE**
7 **2024-2026 TEP.**

8 A. The TEP is organized into six portfolios: (1) Advisory Services; (2) Clean Vehicles;
9 (3) Public Charging Acceleration Network; (4) Residential; (5) Commercial; and
10 (6) Innovation.

11 The purpose of the **Advisory Services portfolio** is to address information-
12 related barriers to transportation electrification for customers and communities we
13 serve.

14 The purpose of the **Clean Vehicles portfolio** is to defray the upfront costs
15 associated with purchasing, leasing, or renting EVs for our equity-eligible
16 residential customers, rideshare and delivery network drivers, and government
17 entities.

18 The purpose of the **Public Charging Acceleration Network portfolio** is to
19 address range anxiety and accessibility barriers to transportation electrification by
20 ensuring that adequate, reliable, convenient, and affordable direct current public
21 fast charging (“DCFC”) is available throughout our service territory.

1 The purpose of the **Residential portfolio** is to address cost, equipment,
2 and logistical barriers to EV adoption for residential customers and to encourage
3 EV charging behaviors that support the efficient operation of the grid and
4 integration of renewable resources. The **Commercial portfolio** serves the same
5 general purposes for all categories of non-residential customers.

6 Finally, the purpose of the **Innovation portfolio**, formerly referred to as the
7 “Partnerships, Research and Innovation” portfolio, is to research, partner, and
8 conduct demonstration projects regarding emerging technologies and innovative
9 strategies to advance transportation electrification, and to integrate EVs more
10 effectively with other grid resources.

11 In developing each portfolio and related programs, Public Service has
12 carefully considered the need to promote equitable access and environmental
13 justice through providing enhanced support to income qualified (“IQ”) customers
14 and equity-eligible communities with dedicated programs and enhancements.
15 Company witness Nadia El Mallakh describes Public Service’s commitment to
16 advancing equitable and affordable transportation electrification for all customers
17 and communities we serve in her Direct Testimony.

18 **Q. WHAT ARE THE GENERAL CATEGORIES OF PROGRAMS INCLUDED IN THE**
19 **2024-2026 TEP?**

20 **A.** Apart from the Innovation portfolio, which targets specific categories of projects
21 given its groundbreaking nature, TEP programs generally fall into one of six
22 categories:

- 1 • First, the TEP includes a variety of **rebates** that help cover up-front costs
2 associated with customer investment in EV chargers and wiring upgrades,
3 with enhanced support through equity programs. The TEP also offers
4 rebates to defray the up-front costs for certain customers of purchasing,
5 leasing, or renting an EV.
- 6 • Second, the TEP includes **direct Company investment in EV supply**
7 **infrastructure (“EVSI”) and related future proofing** through the
8 Commercial portfolio to help customers and communities address cost and
9 logistical barriers related to transportation electrification and ensure the
10 necessary infrastructure is in place to pave the way for seamless and cost-
11 effective EV adoption consistent with Colorado’s vision for transportation
12 electrification and economy-wide emissions reductions.
- 13 • Third, the TEP includes a variety of **subscription-based rental programs**
14 **for EV chargers and related equipment**, which are generally designed to
15 be self-funded through the rental charges paid by participating customers.
16 Equipment rental programs provide a convenient, turnkey solution for
17 customers that do not want the hassle of purchasing and coordinating the
18 installation and maintenance of their own EV-related equipment and can
19 also provide an affordable pathway to equipment procurement for
20 customers who are not in a financial position to procure their equipment
21 outright.
- 22 • Fourth, the TEP includes **managed charging programs and rates** to
23 encourage EV charging practices that support the efficient operation of the

1 grid and integration of renewable energy. As EV penetration increases,
2 managed charging through rate design and passive and active control
3 programs provides an opportunity for utilities to mitigate the need for
4 infrastructure investments in generation and distribution by shifting EV
5 charging into periods of relatively low demand, as well as lowering
6 curtailment of renewable generation.

- 7 • Fifth, the TEP includes **advisory services** to educate customers and
8 communities about the benefits of EV adoption and opportunities available
9 through the TEP as well as federal, state, and local programs to support
10 their clean transportation goals. Through the Advisory Services portfolio,
11 Public Service also provides targeted expert advice to help customers and
12 communities plan and implement transportation electrification initiatives in
13 a comprehensive, streamlined, and cost-effective manner.

- 14 • Finally, the TEP includes **direct Company investment in public charging**
15 **DCFC hubs** designed to address range anxiety and ensure equitable
16 access to reliable, affordable, and convenient public charging for customers
17 and communities throughout our service territory, which is critical to meet
18 Colorado's EV adoption goals.

19 **Q. HOW HAS PUBLIC SERVICE UPDATED THE STRUCTURE OF THE 2024-2026**
20 **TEP COMPARED TO THE INAUGURAL 2021-2023 TEP?**

21 A. The six portfolios for the 2024-2026 TEP are generally consistent with the portfolio
22 approach taken in the first TEP, with some exceptions. To increase efficiency and
23 streamline program delivery, the Company has brought the Multifamily Housing

1 portfolio from the first TEP under the umbrella of the Commercial portfolio, and the
2 budget to support multifamily housing is now included in the budget for the
3 consolidated Commercial portfolio. The Company is also eliminating program
4 distinctions within the Commercial portfolio from the first TEP between charging
5 use cases (e.g., fleet, workplace, community charging, etc.). To provide an
6 intuitive and streamlined customer experience, the Commercial portfolio for the
7 2024-2026 TEP includes standardized rebate and EVSI programs that are
8 available to all qualifying customers, regardless of charging use case.

9 Additionally, while our inaugural TEP only provided a new construction
10 wiring rebate for multifamily housing, our 2024-2026 TEP will extend this support
11 to all qualifying non-residential customers, regardless of sector. As a result, with
12 limited exceptions, Public Service will no longer have dedicated EVSI programs
13 and rebates to serve specific segments of Commercial customers or use-cases,
14 and participation in the broader Commercial EVSI and rebate programs will be
15 open to all segments of non-residential customers in need of such support.

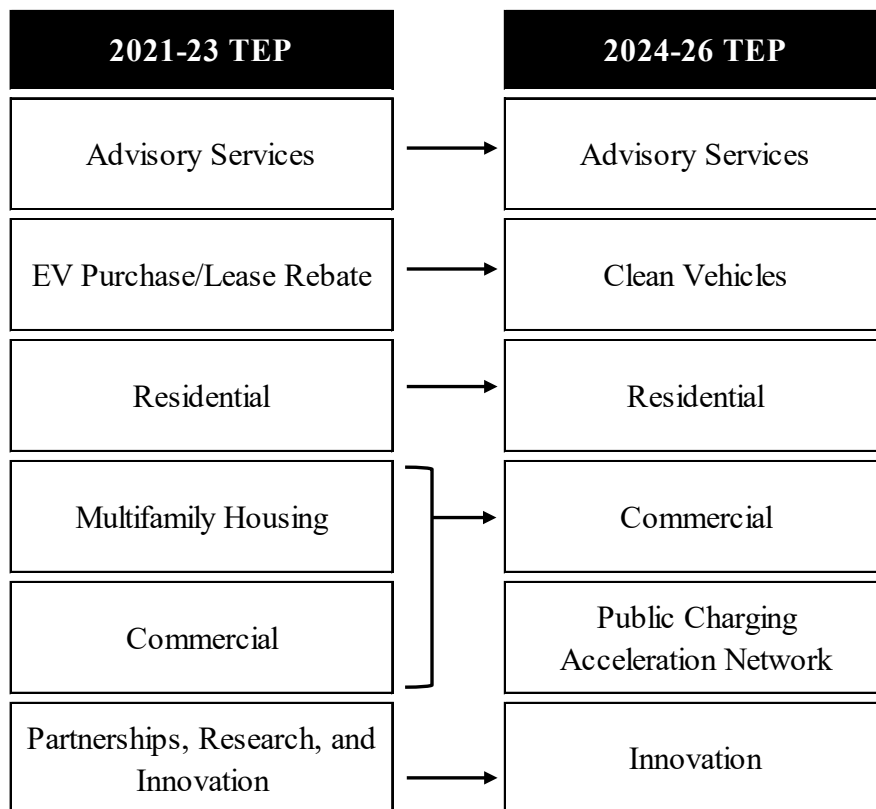
16 We believe these consolidating updates will help our Commercial programs
17 and related customer qualification and enrollment processes operate in a more
18 intuitive, streamlined, and efficient manner. However, the consolidated
19 Commercial portfolio maintains some customized programming for multifamily
20 housing, government entities, communities, and fleets when warranted based on
21 the unique circumstances and needs of the particular customer segment.

22 The 2024-2026 TEP also expands the EV Purchase/Lease Rebate portfolio
23 to support additional customer segments in acquiring Clean Vehicles and as such

has been renamed. Moreover, this TEP incorporates the addition of the Public Charging Acceleration Network portfolio, and Public Service witness Ms. Deborah Erwin supports both the Clean Vehicles and Public Charging Acceleration Network portfolios through her Direct Testimony. We have also changed the name of the Partnerships, Research, and Innovation portfolio from our inaugural TEP to the Innovation portfolio—but the portfolio still serves the same overarching purposes.

Figure HS-D-1 below is a diagram comparing the structure of the 2021-2023 TEP with the structure of the inaugural TEP.

Figure HS-D-1: Diagram Comparing the Structure of the 2021-2023 TEP with the Proposed 2024-2026 TEP



1 **Q. ARE THERE ANY MODIFICATIONS TO EXISTING PROGRAMS THAT ARE**
2 **NOT PRESENTED IN OTHER WITNESSES' DIRECT TESTIMONY THAT YOU**
3 **WOULD LIKE TO HIGHLIGHT FOR THE COMMISSION?**

4 A. Yes. I would note that Public Service is proposing the following modifications: (1)
5 adjusting rebate amounts to account for updated cost information and provide
6 enhanced support through equity-based rebates; (2) expanding customer options
7 for the receipt of residential TEP rebates; and (3) expanding certain offerings to
8 address market gaps.

9 First, Public Service is proposing to increase the financial incentive level
10 associated with certain rebates, particularly for equity-based programs. As
11 described in the TEP, these adjustments are driven by inflation and cost increases
12 since 2020, when many of the rebate levels were initially established for the 2021-
13 2023 TEP. We are proposing enhanced rebate levels for certain equity-based
14 programs because we have determined that our current rebate levels are not
15 sufficient to bring EVs and related equipment within reach for customers and
16 communities that face heightened barriers to EV adoption. Table HS-D-1 below
17 shows the rebates we are proposing to increase:

18 **Table HS-D-1: Proposed Rebate Increases**

| Program | TEP 2021-2023 | TEP 2024-2026 |
|---|-----------------------|---|
| Residential Charger and Wiring Rebate | \$500 | \$500; or \$700 for Energy Star certified |
| Equity Residential Charger and Wiring Rebate | \$1,300 | \$1,700 |
| Commercial Equity (L2 Charger) Rebates (per port) | Up to \$2,000-\$2,200 | \$2,500 |

1 Second, we are proposing to expand customer options for the receipt of
2 residential TEP rebates in the form of a bill credit, Automated Clearing House
3 transfer, rebate check, or instant rebates. Public Service is required to report
4 rebate checks totaling \$600 or more in a calendar year to the Internal Revenue
5 Service by issuing a Form 1099-MISC. Because customer bill credits do not trigger
6 the same requirements, providing customers the bill credit option will enable Public
7 Service to issue rebates to our residential customers in a more efficient and
8 streamlined manner than providing checks and allow customers to avoid
9 potentially unanticipated tax liability due to receiving TEP rebates.

10 Third, we have expanded on several of our existing TEP programs to
11 address market gaps we have identified in implementing our inaugural TEP,
12 including: (1) working with fleet operators and fleet drivers with take-home vehicles
13 owned by their employer to enroll in our EV Accelerate At Home Program,
14 (2) decreasing the four-port minimum that currently applies under our EVSI
15 programs to a two-port minimum, and (3) removing the 50-kW minimum equipment
16 charging capacity requirement to ensure that EVSI support is accessible to smaller
17 businesses.

18 **Q. DOES PUBLIC SERVICE PLAN TO UPDATE THE TEP TO INCORPORATE THE**
19 **FINAL OUTCOME OF THIS PROCEEDING?**

20 A. Yes. Consistent with the process we followed in Proceeding No. 20A-0204E,
21 Public Service commits to filing an updated TEP into this proceeding within 60
22 days of receiving a final Commission decision to ensure that our TEP aligns with
23 the Commission's final decision in this proceeding.

III. REPORTING

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

A. The purpose of this section of my Direct Testimony is to address Public Service's commitment to continue the current stakeholder processes that apply under our TEP and proposed modifications to its current TEP reporting requirements for purposes of this 2024-2026 TEP.

Q. PLEASE DESCRIBE HOW REPORTING CURRENTLY WORKS UNDER THE 2021-2023 TEP.

A. Public Service reports on the progress of the TEP through quarterly stakeholder meetings and through semi-annual reports. Quarterly stakeholder meetings are hosted by Public Service during the months of April, June, September, and December. Semi-annual TEP compliance reports are filed on April 1st and October 1st of each year.

Q. WHO PARTICIPATES IN QUARTERLY STAKEHOLDER MEETINGS?

A. Stakeholder meetings are open to all interested stakeholders and members of the public who desire to attend, and some of our meetings have seen more than 100 participants that represent a diverse set of interests including; government agencies, municipalities, consumer representatives, non-profit organizations, auto dealers, original equipment manufacturers, public charging companies, and utilities. Collectively, the TEP stakeholder group has more than 250 individuals.

1 **Q. WHAT ARE THE GOALS OF THE QUARTERLY TEP STAKEHOLDER**
2 **MEETINGS?**

3 A. The general goals of quarterly TEP stakeholder meetings are for Public Service to
4 provide updates on the implementation of the TEP, to foster discussion about TEP
5 programs that are currently underway, gather ideas for continuing to improve the
6 programs and portfolios, and discuss whether changes or additional projects and
7 programs are necessary to support transportation electrification in Colorado.
8 Public Service also presents updates on expenditures, and milestones achieved,
9 60-Day Notices, as well as specific topical areas that participants have expressed
10 interest in exploring further.

11 **Q. IS THE COMPANY PROPOSING CHANGES TO THE STAKEHOLDER**
12 **MEETINGS?**

13 A. No. The Company appreciates the opportunity to work with the many stakeholders
14 interested in matters relating to the TEP and remains committed to continuing the
15 current stakeholder processes throughout the 2024-2026 TEP. Public Service
16 takes the input received seriously, and we find great value in working with
17 stakeholders to craft strategies, programming changes, and budgetary decisions
18 to support the public interest.

19 **Q. WHAT INFORMATION IS THE COMPANY REQUIRED TO INCLUDE IN SEMI-**
20 **ANNUAL REPORTS FOR THE 2021-2023 TEP?**

21 A. Under Public Service's current TEP, the Company provides extensive semi-annual
22 reporting on the following metrics:

- 1 • Estimated number of EVs in service territory, by type (e.g., light-, medium-,
2 heavy-duty), where possible;
- 3 • Estimated number and capacity of known charging stations and ports in
4 service territory;
- 5 • Number of participants in TEP programs;
- 6 • TEP spending, broken out by portfolio and program category;
- 7 • TEP revenue, broken out by portfolio and program category;
- 8 • Estimated consumption of electricity (in kilowatt-hours) by EVs;
- 9 • Estimated level of demand (in kilowatts) resulting from EVs;
- 10 • Estimates for the amount of energy sold to program participants during on-
11 peak and off-peak time periods, where feasible;
- 12 • Average costs for charging installations, including EV supply infrastructure
13 and charging equipment;
- 14 • Geographical distribution of program participants and infrastructure
15 investments;
- 16 • Reduced carbon emissions resulting from EVs and TEP programs;
- 17 • Reduced NOx emissions resulting from EVs and TEP programs;
- 18 • Insights drawn from customer experience and program performance,
19 including customer surveys and Customer Effort Score results;
- 20 • A summary of ongoing EV pilots and programs from other Xcel Energy
21 service territories;
- 22 • Specific rate schedules under which participating customers take service
23 (aggregated at the program level);
- 24 • Progress of EV sales toward meeting the State's EV goals and the
25 proportion of the State's goal for the Company's service territory;
- 26 • Average cost of a line extension for MFH and Commercial portfolios;
- 27 • Average cost of a line extension for a utility-owned DCFC station;

- Number and dollar amounts of rebates given by type and by program, with equity rebates differentiated;
- Updates and progress made in quarterly stakeholder meetings;
- Aggregated and anonymized data via third parties for information from MFH site hosts and Commercial program participants detailing site-specific data (start and stop times of charging, peak kW per charging session, number of charging sessions daily, amount of time each vehicle charge per session daily, whether station owner provides charging for free or if there are usage fees, operating costs, any technologies being used to manage demand);
- Aggregated and anonymized data on energy sales during on-peak and off-peak periods and aggregated customer load profiles;
- Number of small MFH sites, where a four-port minimum may not be cost-effective to support, express interest in participating in MFH programs;
- Number of customer sites that express interest in TEP programs but do not qualify for either Residential or MFH programs; and
- Information specific to the EV purchase and lease rebate program, including demographic data (aggregated income and zip codes for participants), make and model of EVs purchased, age of EVs purchased, purchase prices, whether EV rebate impacted the participants' decisions to purchase or lease an EV, and how customers heard about the rebate program.

Q. PLEASE DESCRIBE PUBLIC SERVICE'S PROPOSED MODIFICATIONS TO THESE REPORTING REQUIREMENTS FOR PURPOSES OF THE 2024-2026 TEP.

A. Public Service proposes to transition to an annual reporting structure (vs. semi-annual) that will include reporting on the same metrics addressed in our current reports¹ except for removing (1) TEP revenue, broken out by portfolio and program category; and (2) number of small MFH sites, that express interest in participating in MFH programs where a four-port minimum may not be cost-effective to support.

¹ Additional reporting requirements have been established through Proceeding No. 21AL-0494E.

1 Under this updated approach, we propose to file annual reports into this TEP
2 proceeding on October 1st each year, commencing in 2024. We are also
3 proposing some additional reporting metrics for the Company's Public Charging
4 Acceleration Network, which are specifically detailed in Ms. Erwin's Direct
5 Testimony.

6 **Q. WHY DOES PUBLIC SERVICE SUPPORT THESE ADJUSTMENTS?**

7 A. Regarding timing, Public Service proposes to transition from semi-annual to annual
8 reporting to ensure that we have adequate data to provide the Commission and
9 interested stakeholders a comprehensive and useful picture of the progress of our
10 TEP over the entire year, rather than piecemeal data that may not accurately
11 reflect the progress and status of our TEP due to program ramp-up periods,
12 seasonal fluctuations, or other temporary variables. While we can understand why
13 semi-annual reporting was important and valuable for the inaugural years of our
14 TEP, shifting to an annual reporting framework is also consistent with the approach
15 the Commission has approved for our other regulated programs, including
16 Demand-Side Management Plans, Electric Resource Plans, and Renewable
17 Energy Standard Plans. Annual reporting requirements also lower the burden and
18 labor hours imposed on Company employees, allowing them to focus greater time
19 and effort on implementing the TEP, which supports the public interest.

20 Regarding the two proposed modifications to reporting metrics, because
21 Public Service can only track revenues that are captured through dedicated
22 charges and rates, we propose adjusting current reporting on TEP revenue, broken
23 out by portfolio and program category, to TEP revenues received through

1 dedicated TEP program charges and rates. We also propose removing the
2 reporting metric: number of small MFH sites that have expressed interest in
3 participating in MFH programs, but where a four-port minimum may not be cost-
4 effective to support. Because Public Service is proposing a reduction of the four-
5 port minimum down to two-ports, this metric will no longer serve its intended
6 purpose.

1 **IV. THE 2024-2026 TEP BUILDS UPON FEDERAL, STATE, AND LOCAL**
2 **EFFORTS TO SUPPORT TRANSPORTATION ELECTRIFICATION**

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

4 A. The purpose of this section of my Direct Testimony is to describe how the programs
5 in Public Service’s 2024-2026 TEP will interact with and build upon other programs
6 that are also designed to advance transportation electrification. Company witness
7 Ms. Nadia El Mallakh’s Direct Testimony explains the critical role of this and future
8 TEPs in helping the State of Colorado reach its emissions reduction goals. Mr.
9 Ihle’s Direct Testimony describes how the Company has considered recently
10 enacted federal legislation in developing the TEP.

11 **Q. PLEASE DESCRIBE THE STATE AND FEDERAL PROGRAMS PUBLIC**
12 **SERVICE IS AWARE OF THAT ARE DESIGNED TO ADVANCE**
13 **TRANSPORTATION ELECTRIFICATION.**

14 A. While it is not practical to thoroughly describe all state and federal programs
15 designed to advance EV adoption, the State of Colorado administers fleet and
16 community advisory programs through the Community Access Enterprise (“CAE”),
17 Clean Fleet Enterprise (“CFE”), and the Clean Transit Enterprise (“CTE”), which
18 are state-owned entities created pursuant to Senate Bill 21-260 that promote clean
19 transportation.² The Colorado Energy Office also runs the ReCharge Colorado
20 Coaches program to “help consumers, local governments, workplaces and multi-

² Colorado Energy Office, Community Access Enterprise, <https://energyoffice.colorado.gov/about-us/boards-commissions/community-access-enterprise>.

1 unit housing developments identify monetary savings, grant opportunities and
2 other advantages related to deploying EVs and charging infrastructure.”³

3 Also, as described in Ms. Erwin’s Direct Testimony, the State helps
4 customers address vehicle-related cost barriers to EV adoption through the
5 Innovative Motor Vehicle and Innovative Truck Credit Program and runs several
6 programs to support the deployment of public charging throughout the State. The
7 State of Colorado is additionally planning to launch its Vehicle Exchange Colorado,
8 which provides low- and moderate-income Coloradans an instant \$6,000 point-of-
9 sale rebate on a new electric or plug-in hybrid vehicle, and a \$4,000 rebate for a
10 used electric or plug-in vehicle.⁴

11 The State and its agencies administer multiple grant programs and
12 partnerships that support the deployment of public charging throughout the State,
13 one of which leverages federal funding available under the Bipartisan
14 Infrastructure Law, as described in detail in Ms. Erwin’s Direct Testimony. Federal
15 grant funding to support public charging investments is generally dispersed
16 through the State.

17 There are also a number of federal tax credits that support EV adoption and
18 infrastructure investments. Federal tax credits for EV purchases include the
19 Section 30D⁵ clean vehicle tax credit for qualifying new EVs, the Section 25E tax
20 credit for qualifying used EVs, and the Section 45W tax credit for qualifying

³ Colorado Energy Office, ReCharge Colorado, <https://energyoffice.colorado.gov/transportation/ev-education-resources/recharge-colorado>.

⁴ Colorado Public Radio, *Got an old gas guzzler lying around? Colorado might pay you \$6K to dump it for an EV*, Nathaniel Minor (March 7, 2023), <https://www.cpr.org/2023/03/07/colorado-ev-car-trade-in/>.

⁵ References to sections refer to the Internal Revenue Code, which is Title 26 of the United States Code.

1 commercial EVs. There is also a federal Alternative Fuel Vehicle Refueling
2 Property tax credit (Section 30C) for investments in “electric fueling property” (e.g.,
3 charging equipment), which is limited to qualifying census tracts and non-urban
4 areas.⁶ Finally, there is a federal storage investment tax credit (Section 48)
5 applicable to battery energy storage systems (“BESS”), which can be used in
6 conjunction with EV charging.

7 **Q. HOW DO THESE PROGRAMS INTERACT WITH THE PROPOSED TEP?**

8 A. Because TEP programs are designed to build upon and maximize the potential of
9 parallel programs and incentives that are designed to advance EV adoption, the
10 programs in our 2024-2026 TEP are fully stackable with other available State,
11 federal, and local incentives. As an example, customers receiving a grant through
12 Charge Ahead Colorado can leverage TEP EV charger rebates to help meet
13 remaining project costs provided they meet applicable program eligibility
14 requirements under the TEP.

15 **Q. ARE THERE EXAMPLES OF PROGRAMS RUN BY LOCAL GOVERNMENTS**
16 **THAT INTERACT WITH TEP PROGRAMS?**

17 A. While it is not practicable to describe all the various local programs that may touch
18 upon EV adoption throughout our service territory, as an illustrative example, the
19 City of Denver offers a Level 2 Home Wiring EV Charger Rebate that provides 80
20 percent of the cost (up to \$1,000) of the wiring and/or the Level 2 charger, and a
21 Vehicle to Building (bi-directional) EV Charger Rebate that provides 80 percent of

⁶ As defined by the Secretary of Commerce for the U.S. Census.

1 the cost (up to \$2,000) of the wiring and/or equipment cost for a bi-directional
2 charger. Public Service residential customers can combine these rebates with the
3 TEP residential EV Charger and Wiring rebate.

4 Public Service's residential EV Charger and Wiring Rebate, which is
5 currently \$500 and is proposed to increase to \$700 for Energy Star certified
6 chargers, is applied to the customer's charger and wiring costs first, and then the
7 Denver rebate provides 80 percent of the charger and wiring costs (calculated on
8 the original amount, without the Public Service rebate amount factored in), up to a
9 maximum of \$1,000. If a customer's Energy Star certified charger and wiring costs
10 total \$1,200, the customer would receive \$700 from Public Service (the amount of
11 the Public Service EV Charger and Wiring Rebate), and \$500 from the City of
12 Denver.⁷

13 **Q. HOW WILL THE PROGRAMS IN PUBLIC SERVICE'S 2024-2026 TEP BUILD**
14 **UPON THESE PARALLEL EFFORTS?**

15 A. Comprehensive transportation electrification will require a significant investment
16 and a great deal of planning for many of our customers and communities, and
17 collaborative support through TEPs, State, local, and federal programs will be
18 instrumental in achieving this ultimate goal.

19 Public Service has worked in close partnership with Colorado State
20 agencies, local governments, and other key community partners to ensure that our
21 TEP programs will complement state and local efforts that are already underway

⁷ 80 percent of \$1,200 is \$960. In this scenario, the customer would have \$500 remaining to be rebated from the City of Denver.

1 to advance transportation electrification. Below, I provide more context and some
2 examples.

3 As one example, a commercial customer may potentially leverage state and
4 federal tax credits or other incentives to purchase EVs while using our TEP
5 programs to support the other necessary components of EV adoption, such as
6 charging equipment, fleet advisory services, and/or EVSI. A customer may also
7 receive EVSI through the TEP to develop a privately-owned public charging
8 station. As another example, a governmental customer could simultaneously
9 benefit from federal EV tax credits and a TEP EV rebate, while additionally
10 receiving EVSI support through the TEP.

11 Some of the TEP's rebate programs address the same categories of
12 investments that are also supported through federal, state, and/or local programs
13 when the ability to stack incentives through multiple sources of funding is
14 necessary to move the needle in driving EV adoption. For example, one of the
15 most significant barriers to EV adoption is the up-front costs associated with
16 purchasing an EV. In implementing our initial EV purchase and lease rebate
17 program, which required customers to choose between the TEP rebate or the state
18 EV tax credit, we quickly learned that the TEP rebate was insufficient to drive
19 substantial EV adoption without the ability to leverage the corresponding state tax
20 credit. In developing the programs for our 2024-2026 TEP, we have been careful
21 to consider the availability of potentially overlapping programs or funding in
22 determining the incremental support needed to drive desired results.

1

V. CONCLUSION

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

3 A. I recommend that the Commission approve Public Service's proposed 2024-2026
4 TEP, filed as Attachment HS-1 to my Direct Testimony; and approve Public
5 Service's changes to reporting requirements for the 2024-2026 TEP, as described
6 in my Direct Testimony.

7 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

8 A. Yes, it does.

Statement of Qualifications

Huma Seth

Director, Clean Transportation, Customer Solutions

Ms. Huma Seth currently serves as the Director of Clean Transportation, Customer Solutions, at Xcel Energy Services, Inc., and is responsible for the successful deployment of the Clean Transportation programs in market for all of Xcel Energy's four operating companies. Ms. Seth has over 15 years of experience in the energy industry in various roles, including the past five years focused on electric mobility.

Prior to Xcel Energy, Ms. Seth was a U.S. Electric Mobility, Market Entry Analyst and Global Electric Mobility, Venture Capitalist at British Petroleum (BP) from 2018-2021, a Strategic Planning Analyst for EP Energy, from 2013-2015 and a Senior Auditor for Ernst & Young, from 2008- 2013.

Ms. Seth has a Master of Science degree in Mineral and Energy Economics from the Colorado School of Mines, a Master of Science and Bachelor of Business Administration degrees in Accountancy, from the University of Houston.

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

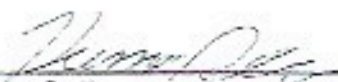
* * * * *

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.)

AFFIDAVIT OF HUMA SETH
ON BEHALF OF
PUBLIC SERVICE COMPANY OF COLORADO

I, Huma Seth, 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 9th day of May, 2023.


Huma Seth
Clean Transportation Director

Subscribed and sworn to before me this 9th day of May, 2023.

Jamie Cutlip-Gorman
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID# 20024019900
MY COMMISSION EXPIRES MAY 18, 2026


Notary Public
My Commission expires May 18, 2026