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 TRANSPORTATION ELECTRIFICATION PLAN.	**)** **)** **)** **)** **)**	**PROCEEDING NO. 23A-____E**

DIRECT TESTIMONY OF CONNIE L. PAOLETTI

ON

BEHALF OF

PUBLIC SERVICE COMPANY OF COLORADO

May 15, 2023

**BEFORE THE PUBLIC UTILITIES COMMISSION
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DIRECT TESTIMONY OF CONNIE L. PAOLETTI

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

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Connie L. Paoletti. My business address is 1123 West 3rd Avenue, Denver, Colorado 80223.

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

A. I am employed by Xcel Energy Services, Inc. ("XES") as Director, Transportation Strategy and Delivery for Electric Distribution Operations. XES is a wholly owned subsidiary of Xcel Energy Inc. ("Xcel Energy") and 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, Transportation Strategy and Delivery for Electric Distribution Operations, I provide an array of support services to Public Service and other utility operating company subsidiaries of Xcel Energy. I am responsible for the development, design, and implementation of strategic plans for Distribution Operations to support the electrification of transportation and ensure the readiness of the distribution grid for electrification. A description of my qualifications, duties and responsibilities is set forth in my Statement of Qualifications at the conclusion of my Direct Testimony.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

A. The purpose of my Direct Testimony in this Transportation Electrification Plan ("TEP") proceeding is twofold. First, I support the need for distribution grid reinforcement projects to proactively prepare for the rapid acceleration of transportation electrification in Colorado, especially to aid in widespread adoption of medium- and heavy-duty ("M/HD") electric vehicles ("EV"). Second, I introduce the Company's plans to support customers in future proofing their premises with EV ready infrastructure.

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

A. No.

Q. WHAT RECOMMENDATIONS ARE YOU MAKING IN YOUR DIRECT TESTIMONY?

A. I recommend that the Colorado Public Utilities Commission ("Commission") approve the following:

- the Company's undertaking of proactive grid reinforcement of its distribution system to expand capacity in anticipation of forecasted EV adoption; and
- the Company's TEP programming to allow customers to future proof their premises with reasonable levels of EV Supply Infrastructure ("EVSI").

II. SYSTEM GRID REINFORCEMENT

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

A. This section of my testimony describes the Company's proposal to address proactive grid reinforcement upgrades to promote capacity expansion projects in anticipation of projected near-term EV load increases. As evidenced from states like California that passed legislation[1] to allow utilities to conduct strategic grid planning and investment to ensure the grid is proactively prepared to accommodate transportation electrification, especially in support of M/HD EV adoption, the Company recognizes the traditional "just-in-time" approach to grid planning may result in infrastructure bottlenecks that could inhibit EV adoption. For simplicity, the Company refers to the proactive grid reinforcement projects in this context as "No Regrets Investments." This term represents activities that support the overall electric grid through proactive efforts to reduce future constraints resulting from primarily non-residential EV load growth. This is particularly pertinent today given lead times in excess of two years for critical distribution equipment and construction resources. Also in this section, I address how the Company's proposal comports with its distribution system planning efforts approved in Proceeding No. 22A-0189E.

[1] California Assembly Bill No. 2700, available at: https://legiscan.com/CA/text/AB2700/2021

A. 2024-2026 TEP Proposal

Q. WHAT IS THE COMPANY PROPOSING IN ITS 2024-2026 TEP?

A. The Company is proposing to undertake proactive grid reinforcement efforts in the form of distribution No Regrets Investments, where the Company identifies system capacity vulnerabilities based on anticipated load growth presented by EV charging.

Q. PLEASE DISCUSS THE TEP PROPOSAL.

A. In the 2024-2026 TEP, the Company will commence limited distribution upgrade projects and fund those projects with its TEP budget, as recoverable through the Transportation Electrification Programs Adjustment ("TEPA") rider. We are identifying areas on our system that are anticipated to experience substantial future load growth due to normal economic development and future M/HD EV charging. We are then performing capacity checks for these areas to determine where grid reinforcement projects such as upgrading feeders and substation transformers can be done proactively. These types of capacity expansion projects are in locations where general development and demand growth are higher than other locations on the distribution system, supporting the concept that these projects are No Regrets Investments. By completing the distribution projects in a proactive fashion, the Company will ready portions of its distribution grid in advance of customer demands. Those future customer demands are anticipated to particularly involve the electrification of fleets of M/HD EVs. The Company's completion of the projects ahead of the demand could help limit potential delays in

providing service to customers as they electrify their fleets and bring their EV loads online.

Q. WHAT DOES THE COMPANY MEAN BY NO REGRET INVESTMENTS?

A. No Regrets Investments are the result of proactive grid reinforcement analyses to identify capacity expansion projects in anticipation of projected EV load increases. The term implies a holistic approach to the prioritization of projects that support the overall electric grid, including proactive efforts to address future constraints primarily resulting from non-residential EV load growth.

Q. WHAT IS THE COMPANY'S BUDGET PROPOSAL TO SUPPORT THE PROACTIVE GRID REINFORCEMENT PROJECTS?

A. The Company proposes a limited budget over a three-year period of $50 million.

Q. WHY DOES THIS BUDGET SUPPORT THE PUBLIC INTEREST?

A. This budget is reasonable, appropriate, and in the public interest because it is narrowly tailored to allow the Company to engage in a relatively limited amount of proactive No Regrets Investments supporting grid reinforcement projects. The Company expects the budget may reasonably support the undertaking of multiple distribution projects, allowing the Company to prepare its distribution system in advance of EV load requirements in a measured, yet useful, manner.

Q. PLEASE DESCRIBE THE METHODOLOGY THE COMPANY WILL USE FOR PROJECT SELECTION.

A. The Company will identify distribution projects to undertake using the following methodology. First, the Company will focus on identifying geographical areas where current fleets with traditional Internal Combustion Engine ("ICE") vehicles

are located. The Company will also consider where these vehicles are likely to dwell or stop during transit and hence where charging infrastructure can support fleet electrification adoption. The Company will identify those areas using multiple sources of data, including: (1) registered vehicle locations, (2) telematics data from Class 8 truck Original Equipment Manufacturers ("OEM"), (3) manual identification of locations with commercial activity indicating large fleets, and (4) touch points with customers on areas where the Company has received preliminary capacity availability requests to support EV charging infrastructure.

Second, the Company will determine aggregated demand. In this process, the Company will determine the current ICE fleet size (number of vehicles) and assign a vehicle class based on business type, registration data, or visual inspection at the identified locations. The Company then determines an EV adoption rate over the period of 2024-2030, based on the vehicles' class, their market readiness, and industry type. The Company will assign specific EV characteristics for efficiency (kWh/mile), typical miles driven, stoppage time, battery size, range, and charging requirements for those vehicles. Using the assumed EV adoption rates and vehicle characteristics, the Company will calculate the vehicles' energy needs for their daily usage, the most likely charger size to provide the energy needed and derive a load demand for that application at each of the identified locations.[2]

[2] The recent adoption of the Large Entity Reporting ("LER") Rule in Colorado will provide the opportunity to better validate our efforts and improve this part of our process with actual information from large M/HD fleet owners beginning in 2025. Additional information on this rule is available here: https://cdphe.colorado.gov/press-release/colorado-adopts-new-measures-to-increase-availability-of-zero-emission-trucks-that

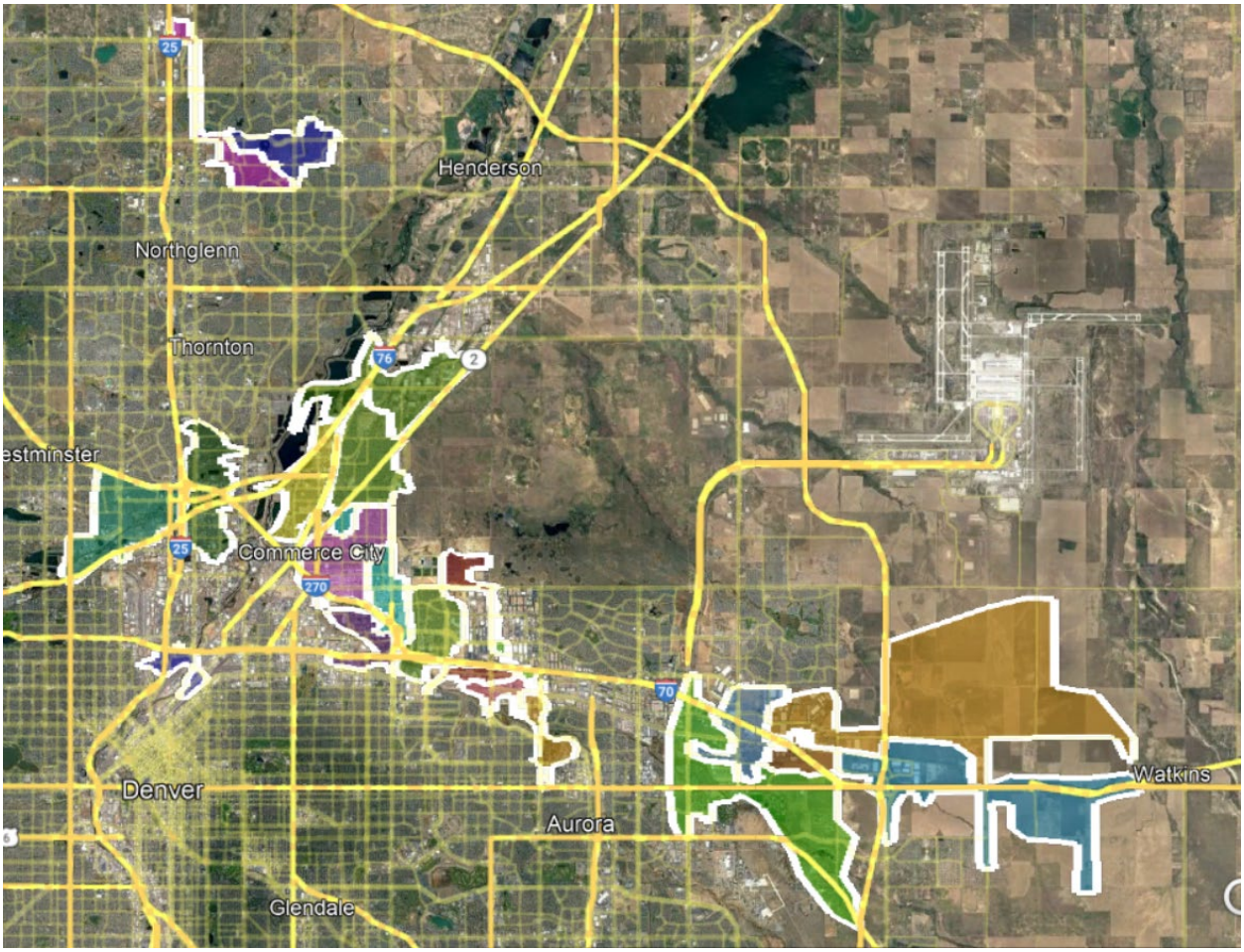
Third, the Company will examine the distribution system impacts of the potential aggregated demand identified in step two in the geographic areas identified in step one. This examination allows the Company to determine where proactive grid reinforcements are most necessary through 2030.

In total, this process provides an appropriate level of rigor in identifying geographic areas that will benefit from proactive distribution upgrades, while also including sufficient flexibility for the Company in assessing the dynamic demands of the distribution system.

Q. DO YOU HAVE INDICATIVE RESULTS OF HOW THIS METHODOLOGY WILL SUPPORT IDENTIFICATION OF APPROPRIATE DISTRIBUTION PROJECTS?

A. Yes. In Figure CLP-D-1 below, portions of our system are identified that are potentially good candidates for No Regrets Investments. Areas shaded in color generally represent individual and different feeder areas where two or more feeders are impacted. Although the Company is not currently seeking to limit the No Regrets Investments to these particular areas, Figure CLP-D-1 does provide a snapshot of the areas that are potentially good candidates for the distribution projects.

Figure CLP-D-1: Area Map of Potential Project Sites



Q. WHAT DOES THE COMPANY SEEK TO RESULT FROM ITS UNDERTAKING OF THE PROACTIVE GRID REINFORCEMENTS?

A. The Company is attempting to avoid issues that have hampered widespread M/HD EV adoption. As mentioned earlier as a leading example on addressing this issue, California passed Assembly Bill 2700 (2021) to direct utilities to conduct strategic grid planning and investment to ensure the grid is proactively prepared to accommodate the new electric cars and trucks coming over the next decade.

California recognizes that the current "just-in-time" approach for building grid upgrades has caused delays in infrastructure readiness for the M/HD EV sector.

The Company's proposal builds off the California concept and will result in the completion of No Regrets Investments to increase options for customers to electrify their commercial fleets in a timely manner, contingent upon capacity availability when their request is received. The feeder and transformer projects that will be undertaken are No Regrets Investments because they will support the distribution grid in areas where capacity availability is already limited. In other words, even though there is a level of variability stemming from EV load forecasts, the overall distribution system will ultimately benefit from the completion of these grid upgrades. By undertaking these No Regrets Investments now, the Company's overall distribution system will be strengthened and available to better support changing customer needs. These investments are increasingly important as we are experiencing lead times in excess of two years for critical distribution equipment and construction resources.

Q. WHY IS THE COMPANY NOT CURRENTLY ADDRESSING THESE GRID UPGRADES AS PART OF ITS ROUTINE EFFORTS TO PROVIDE SAFE AND RELIABLE SERVICE?

A. These issues were explored in the Company's Distribution System Plan ("DSP") filing in Proceeding No. 22A-0189E. Summarized briefly here, the Company's load forecasts have traditionally included known load growth (*e.g.*, applications for new service, long-term economic development opportunities, capacity checks) and a growth rate based on historical trends specific to feeders or substation

transformers. The Company used the load forecasts to identify both existing and forecasted vulnerabilities on the distribution system. Prior to 2021, the Company's forecasting tools were somewhat limited in identifying areas experiencing electrification, as the tools primarily relied on fixed growth rates to assess potential impacts.

In 2021, the Company began to transition away from its fixed growth rate methodology by utilizing the LoadSEER™ forecasting tool. With the use of LoadSEER™, the Company is working toward refining its distribution planning forecasting methodology to allow for more sophisticated forecasting of beneficial electrification and to inform more agile electrification planning efforts on the distribution system. In its future DSP filings, the Company will work to ensure necessary distribution projects are inclusive of those projects that are identified as necessary to support EV load. It is thus appropriate to consider the distribution projects to be undertaken through the 2024-2026 TEP as interim distribution projects necessary to support EV adoption, pending the identification of additional projects in future DSP filings. Note that I will also address the most recent DSP proceeding in more detail in the following section.

B. Distribution System Planning

Q. PLEASE PROVIDE A SUMMARY OF THE RECENT DSP PROCEEDING.

A. On February 2, 2023, in Proceeding No. 22A-0189E, Decision No. R23-0080, the Commission approved the Company's inaugural DSP filing and related settlement agreement. At a high level, the Company's DSP presented a detailed discussion and transparent view into how we plan our distribution system to safely, reliably,

and cost-effectively deliver power to our existing customers and ensure we are prepared to meet the energy needs of our future customers. The DSP filing used distribution load forecasting from observed 2020 demand, and it included the Company's associated 2022-2026 capital budget. EV adoption in Colorado has increased substantially between 2020 and today. Further, Colorado finalized its Clean Trucks Strategy[3] in May 2022, announcing its goal to increase adoption of M/HD EVs to at least 30 percent of new sales by 2030 equating to 35,000 vehicles.

Q. DOES THE SETTLEMENT THAT RESOLVED THE DSP PROCEEDING INCLUDE PROVISIONS RELATED TO EVS?

A. Yes, in part. The settlement in the DSP proceeding generally included a forecasting section that directs the Company to continue its deployment of LoadSEER™ and for the Company to report on insights gained from that tool, including with regard to location-specific forecasting of beneficial electrification ("BE"), such as EV adoption.[4] In addition, there is a section in the settlement that is specific to Distributed Energy Resources ("DERs") and BE upgrade costs.[5] In that section, the Company and the settling parties requested the Commission open a proceeding to investigate policies, programs, and changes needed to further support state policy goals related to DER and BE adoption. Company witness Mr. Jack Ihle further addresses this settlement in his Direct Testimony.

[3] Information on this strategy is available here: https://freight.colorado.gov/sites/freight/files/documents/CleanTruckStrategy.pdf
[4] Proceeding No. 22A-0189E, Decision No. 22A-0189E, Attachment A – Settlement Agreement, at p. 6, Section III.5.
[5] *Id.* at p. 15, Section IX.

Q. WILL THE COMPANY'S UNDERTAKING OF ITS TEP GRID REINFORCEMENT PROPOSAL BUILD UPON AND SUPPORT ITS DSP ACTIVITIES?

A. Yes. As I explained previously, the Company is working on its forecasting methodology and use of LoadSEER™ to enable greater location-specific identification of distribution projects necessary to support increases in load that correspond to EV adoption. The settlement in the DSP proceeding recognizes that ongoing effort, and it generally supports actions to facilitate state policy goals related to BE and EV adoption. The Company's plan to identify and develop proactive distribution upgrade projects in advance of its next DSP filing supports the ability to bring new EV loads online. Altogether, the Company's TEP builds upon and strengthens the work undertaken in the first DSP proceeding. The Company will continue its efforts to improve EV forecasting and distribution planning in its next DSP application.

III. EVSI CUSTOMER FUTURE PROOFING

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

A. In this section, I introduce the concept of EVSI Customer Future Proofing, and I explain its importance, including as a strategy to lower overall customer and utility costs. I address how the Company is proposing to launch through its Commercial portfolio a new program option to enhance a customer's ability to future proof their properties, allowing customers to avoid certain aspects of the duplicative undertaking of multiple EV construction projects that otherwise could be performed in one upfront manner. I also address the target marketplace for this program offering, budgetary impacts, and eligibility requirements.

Q. PLEASE EXPLAIN WHAT THE CONCEPT OF EVSI CUSTOMER FUTURE PROOFING MEANS IN TERMS OF EVS AND EV ADOPTION.

A. Future proofing in this context refers to the ability of customers and the Company to develop infrastructure in a manner that incorporates reasonable, expected increases in future EV load. While a customer's initial EV infrastructure need may dictate one outcome, EVSI Customer Future Proofing recognizes that those needs may continue to grow, along with the ever-growing adoption of EVs.

Q. DOES THE COMPANY PROVIDE EVSI CUSTOMER FUTURE PROOFING OFFERINGS CURRENTLY IN ITS PROGRAMS?

A. No, it does not. Today, should a customer desire to future proof its premises proactively for foreseeable upticks of EV adoption, the customer will have the full obligation to pay for all costs resulting from the future proofing.

Q. HAS THE COMPANY RECEIVED CUSTOMER REQUESTS FOR ADDITIONAL EVSI CUSTOMER FUTURE PROOFING OPTIONS?

A. Yes, I understand that many customers have asked about how the Company can assist their plans to address future EV needs. The Company has received this customer feedback through multiple channels, including customer service calls and one-on-one stakeholder engagement forums.

Q. WHAT EXAMPLES ARE THERE OF EVSI CUSTOMER FUTURE PROOFING ALREADY BEING UNDERTAKEN IN COLORADO?

A. A notable effort on future proofing exists within the Colorado Energy Office's ("CEO") Direct Current Fast Charging ("DCFC") Plazas Grant program. Generally, this program provides funding to encourage DCFC developments, including as facilitated by the National Electric Vehicle Infrastructure ("NEVI") program. In the Plazas Grant program, CEO specifically encourages projects to future proof by enabling the sites for future upgrades, such as by including future proofing strategies like larger or additional concrete pads, transformers and other utility-related equipment, and larger and/or additional conduit to avoid having additional construction and conduit costs in the future.

Q. WHAT IS THE TARGET MARKET FOR THE COMPANY'S OFFERING OF EVSI CUSTOMER FUTURE PROOFING SERVICES?

A. The target market for EVSI Customer Future Proofing services includes fleet operators with light-, medium-, and/or heavy-duty vehicles who are seeking to convert their fleets to electric; non-residential customers seeking to support employees with workplace charging; multifamily housing customers providing

charging to residents; communities supporting charging hubs; and site hosts and developers for public charging.

Q. ACROSS WHAT PROGRAMS WILL THE COMPANY SPECIFICALLY OFFER A FUTURE PROOFING OPTION?

A. The future proofing option will be made available to Commercial EVSI Program participants, which are customers requesting Company-owned, installed, and maintained infrastructure for a new, dedicated EV service.

Q. WHAT EQUIPMENT DOES THE COMPANY PROPOSE TO FUTURE PROOF?

A. The Company proposes to future proof EVSI equipment that includes switchgear, panels, and conduit to accommodate the future build-out of EV charging. The Company is not proposing to future proof distribution equipment from the transformer back through the loop, feeder, and substation transformer.

Q. WHAT BENEFITS CAN FUTURE PROOFING PROVIDE TO CUSTOMERS?

A. EVSI Customer Future Proofing has the potential to maximize development efforts up-front to lower customer costs. From a customer perspective, undertaking separate efforts to develop EV charging infrastructure is inefficient, as it may require multiple projects to dig land, lay wiring, mobilize construction crews, obtain permits and essentially disrupt normal business operations. By future proofing a site, a customer can seek to lower these costs, as the same activities can be undertaken in only one project.

Q. WHAT BENEFITS CAN FUTURE PROOFING PROVIDE TO THE COMPANY?

The Company can achieve greater cost efficiencies through EVSI Customer Future Proofing by avoiding separate and multiple projects at the same customer site. For

example, research has shown that future proofing EV electrical equipment can save up to four to six times the installation cost of charging stations when compared to retrofit costs.[6]

Q. PLEASE EXPLAIN THE PROCESS THE COMPANY WILL EMPLOY TO OFFER TO EVSI CUSTOMERS FUTURE PROOFING SERVICES?

A. During service meetings with customers, they will be asked about future EV charging plans to further assess their interest in future proofing the EVSI beyond the initial service request. Advisors will inform interested customers of the option to future proof the EVSI up to a maximum 300 kVA transformer per site total capacity.

Q. WHY DID THE COMPANY SELECT A MAXIMUM OF 300 KVA TRANSFORMER PER SITE?

The Company's current capacity check process requires customers to notify the Company anytime new load is being added to the system. This allows Distribution System Planning to develop an accurate load forecast and risk analysis. With the introduction of future proofing customer service equipment, there is a risk that the Company will not be notified as these new loads come online. This result can occur because the infrastructure, with the exception of the branch circuit conductor, will already be in place for customers to expand their EV infrastructure. The Company's concern with this risk is that it seeks to account for the load growth in its distribution forecast to manage impacted facilities and general reliability. The

[6] Southwest Energy Efficiency Project, EV Infrastructure Building Codes: Adoption Toolkit, available at: https://archive.swenergy.org/transportation/electric-vehicles/building-codes.

Company also cannot reserve the increased service future proofing capacity at the feeder and substation level. The Company thus needs to have a reasonable means to limit this visibility-based risk to the distribution system.

The Company selected a 300 kVA transformer as the maximum allowable future proofing capacity. The demand increase between the initial equipment and the future expansion is limited to the 300 kVA transformer, which is a manageable risk to the Company. The next larger transformer is 500 kVA, which allows for a much larger demand increase in the future. Energizing a demand of this magnitude without being reviewed by the Company's system planning team poses, at this time, an unacceptable risk to the current distribution system. As the future proofing option moves forward, the Company will continue to consider the risk associated with a larger transformer for future programming changes.

Q. WHAT IS THE BUDGET FOR THE EVSI CUSTOMER FUTURE PROOFING OPTION?

A. The Company is not creating a stand-alone budget for this customer option, but will instead fund EVSI future proofing through the overall budget for its Commercial EVSI program.

IV. CONCLUSION

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.

A. I recommend the Commission approve the following:

- the Company's completion of No Regrets Investments to support the distribution infrastructure associated with EV load additions; and
- the Company's proposal to support EVSI Customer Future Proofing.

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

A. Yes, it does.

Statement of Qualifications

Connie L. Paoletti

Connie L. Paoletti is the Director of Transportation Strategy & Delivery, Electric Distribution Operations, for Xcel Energy. Ms. Paoletti's role includes providing an array of support services to Public Service and other utility operating company subsidiaries of Xcel Energy. Ms. Paoletti is responsible for the development, design and implementation of strategic plans for Distribution Operations to support the electrification of transportation and ensure the readiness of the distribution grid for electrification.

Ms. Paoletti joined Xcel Energy in 2002. Prior to assuming her current position in September 2022, she was the Manager of Transmission Planning for Public Service from 2020 through August 2022. In this position, she was responsible for overseeing the engineering group responsible for planning the transmission system and for the development of Transmission budgets, regulatory compliance and stakeholder outreach of Public Service's transmission system. From early 2015 through the end of 2020, Ms. Paoletti was the Manager of Strategic Transmission Initiatives. In that role, she worked on transmission policy and projects involving participation with other utilities, including conducting strategic analyses for potential transmission projects, evaluating and negotiating joint agreements, and engaging in stakeholder outreach.

From early 2002 through the end of 2014, Ms. Paoletti was a Senior Originator in the Commercial Operations group. In that role, she worked on long-term structured transactions within the Midwest and West regions. From 1998 to 2001, she was employed by the Princeton Energy Programme as an instructor on energy risk

management. Between 1986 and 1998, she was employed by Dow Chemical, Phillips Petroleum, and Reliant Energy in Technical Sales, Trading and Origination roles.

Ms. Paoletti graduated from the Illinois Institute of Technology in 1986 with a Bachelor of Science degree in Chemical Engineering.

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AFFIDAVIT OF CONNIE L. PAOLETTI
ON BEHALF OF
PUBLIC SERVICE COMPANY OF COLORADO

I, Connie L. Paoletti, being duly sworn, state that the Direct Testimony was prepared by me or under my supervision, control, and direction; that the Direct Testimony is true and correct to the best of my information, knowledge and belief; and that I would give the same testimony orally if asked under oath.

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

Connie L Paoletti
Connie L. Paoletti
Transportation Strategy & Delivery, Director

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

Jamie Cutlip-Gorman
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID# 20224019900
MY COMMISSION EXPIRES MAY 18, 2026

Connie L Cutlip-Gorman
Notary Public

My Commission expires May 18, 2026