

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

* * * * *

IN THE MATTER OF ADVICE LETTER)
NO. 1928 – ELECTRIC FILED BY)
PUBLIC SERVICE COMPANY OF)
COLORADO TO REVISE ITS) PROCEEDING NO. 23AL-XXXXE
COLORADO P.U.C. NO. 8 – ELECTRIC)
TARIFF TO AMEND THE MEDICAL)
EXEMPTION PROGRAM AND)
ASSOCIATED RATES EFFECTIVE)
SEPTEMBER 1, 2023.)

DIRECT TESTIMONY AND ATTACHMENTS OF JASON J. PEUQUET

ON

BEHALF OF

PUBLIC SERVICE COMPANY OF COLORADO

July 31, 2023

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

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LIST OF ATTACHMENTS

Attachment JJP-1	Redlined Tariffs
Attachment JJP-2	Clean Tariffs

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

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Jason J. Peuquet. 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 Director of Regulatory Administration.

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 of Regulatory Administration, I am responsible for providing leadership, direction, and technical expertise related to regulatory processes and functions for

1 Public Service. A description of my qualifications, duties and responsibilities is set
2 forth in my Statement of Qualifications at the conclusion of my Direct Testimony.

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

4 A. The purpose of my Direct Testimony is to present and support the Company's
5 proposal to modify its Medical Exemption Program ("MEP") for electric residential
6 customers in order to enhance the support provided to qualifying customers in light
7 of the ongoing transition to time-varying energy rates. My Direct Testimony
8 discusses the proposed changes, the Company's timeline for implementation, and
9 the associated rationale.

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

12 A. Yes, I am sponsoring the following attachments:

- 13 • Attachment JJP-1: redlined versions of the Company's Colo PUC No. 8 –
14 Electric tariff ("Tariff") changes required as a result of the Company's
15 proposed changes to the MEP; and
- 16 • Attachment JJP-2: clean versions of the revised Tariffs.

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

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

- 20 • Approve the proposed reduction in the MEP rate from its existing levels in
21 the RE-TOU, R-OO, and R rate schedules to a flat and consistent value
22 across all of these rate schedules that is equal to the summer and winter
23 off-peak rate under Schedule RE-TOU;

- 1 • Approve the proposed expansion of the MEP rate from a seasonal-only rate
2 (in summers) to a year-round offering;
- 3 • Approve the proposed equalization of how riders are applied to base energy
4 charges for MEP participants, with riders to be applied under a percent
5 basis rather than disparate treatment across residential rate schedules for
6 MEP participants of percent-based and kwh-based riders; and
- 7 • Approve the proposed Tariff changes as reflected in Attachments JJP-1
8 (redlined) and JJP-2 (clean).

9 **Q. DID THE COMPANY WORK WITH STAKEHOLDERS ON DEVELOPING THIS**
10 **PROPOSAL?**

11 A. Yes, the Company worked collaboratively with stakeholders on both the
12 identification of the underlying problem of providing the necessary support to MEP
13 participants and the proposed solutions contained in this filing. The Company
14 worked with members from Trial Staff of the Commission, Energy Outreach
15 Colorado, the Colorado Energy Office, and the Chronic Care Collaborative on this
16 proposal and has been authorized by these organizations to state that they support
17 the recommendations contained in this filing. The Company appreciates the
18 collaborative process and time devoted by others in developing this proposal.

II. BACKGROUND ON THE COMPANY'S MEP AND THE RELEVANT STATUTE

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

A. In this section of my Direct Testimony, I discuss, from a policy perspective, the relevant state statute and Commission rules concerning the provision of a medical exemption rate for qualifying electric customers. I also provide an overview of the Company's existing MEP.

A. Background on Relevant State Statute and Commission Rules

Q. WHEN DID THE COMPANY FIRST IMPLEMENT ITS MEP?

A. The Company has had a MEP in place since 2013, following the enactment of a state statute in 2013 that called on the Commission to "adopt rules by January 31, 2014, to create an exemption from any tiered electricity rate plan based on a customer's medical condition."¹ The Commission then adopted rules via Decision No. C13-1502 in Proceeding No. 13R-0747E, and the Company subsequently implemented an MEP for qualifying customers.

Q. HAS THE REFERENCED STATUTE CHANGED SINCE 2013?

A. Yes, the Medical Exemption Statute was adjusted in 2020 through Senate Bill 20-030. In that legislative session, and as relevant to the MEP, Colorado lawmakers amended C.R.S. § 40-3-103.5 (1) and (3), and added a new subsection requiring periodic reporting on the number of customers the Company serves through its MEP rate and a description of "the efforts the utilities have made during each reporting period to facilitate the enrollment of qualified persons in their

¹ See C.R.S. §.40-3-103.5(1) (2013 version). This statute will be referred to herein as the "Medical Exemption Statute."

1 medical exemption program.”² The Company provides this reporting on an annual
2 basis and last provided this information on December 13, 2022 in Proceeding No.
3 22M-0029E.

4 **Q. WHAT ELSE DOES THE MEDICAL EXEMPTION STATUTE CALL FOR**
5 **BESIDES AN EXEMPTION FROM TIERED RATES FOR QUALIFYING**
6 **CUSTOMERS AND PERIODIC REPORTING?**

7 A. The Medical Exemption Statute also provides a recovery mechanism for costs,
8 stating that “the commission’s rules must provide a mechanism for recovery of
9 costs associated with implementing and providing the medical exemption.”³ It also
10 establishes the criteria that customers must meet in order to qualify for
11 participation, covering both medical conditions and income level, as set forth
12 below:⁴

13 (2) The commission may determine the definition of “medical
14 condition”; except that the definition must include multiple sclerosis,
15 epilepsy, quadriplegia, and paraplegia. The medical exemption is
16 for individuals who have the verification of a physician licensed in
17 Colorado of a heat-sensitive medical condition or the need for the
18 use of an essential life support device.

19
20 (3) If the commission determines that a means test is necessary
21 for the medical exemption, the commission shall use no less than
22 four hundred percent of the federal poverty level for the customer’s
23 household as the maximum income to be eligible for the medical
24 exemption.

² C.R.S. §.40-3-103.5(5).

³ Id.

⁴ C.R.S. §.40-3-103.5(2) and (3).

1 **Q. TURNING TO COMMISSION RULES, PLEASE PROVIDE AN OVERVIEW OF**
2 **THE COMMISSION'S RULES PERTAINING TO UTILITY MEPS.**

3 A. The Commission's Electric Rule 3413 discusses utility MEPs, including qualifying
4 medical and income conditions, definitions, cost recovery (including lost revenues
5 and administrative costs), and annual reporting requirements. In pertinent part,
6 Rule 3413 (a) provides as follows:

7 (I) Any electric utility that has a Commission approved Medical
8 Exemption Program shall file an advice letter and tariff, consistent
9 with 4 CCR 723-1-1210, for a rate plan for residential customers who
10 elect an alternate rate plan due to a qualifying medical condition
11 and/or use of essential medical equipment and whose household
12 income is less than or equal to 400 percent of federal poverty
13 guidelines, which may be self-certified by the customer. The effect of
14 such an exemption shall be neutral with respect to the utility's
15 revenue requirement. If a customer qualifies for the alternate rate
16 plan, that customer shall not be precluded from participating in any
17 low-income program offered by the utility.

18
19 (II) If an electric utility requests Commission approval of a tiered rate
20 plan after July 1, 2013, the utility shall include in its tiered rate plan
21 request, a rate plan for customers with a qualifying medical condition
22 and/or use of qualifying life support equipment.
23

24 Pursuant to Rule 3413(i), the Company's annual report on the MEP is due by
25 December 15th each year and contains information on the number of participants,
26 electric usage, household incomes, program costs, and an overview of the
27 Company's efforts to enroll qualified customers into the program.

28 **B. The Company's Current MEP**

29 **Q. PLEASE DESCRIBE THE COMPANY'S CURRENT MEP**

30 A. As part of Proceeding No. 19AL-0687E (the RE-TOU Proceeding), the
31 Commission approved implementation of a MEP rate for Schedules RE-TOU and

1 R-OO. Similarly, with the restructuring of Schedule R as part of Proceeding No.
2 20AL-0432E (the Company's 2020 Electric Phase II Rate Case), the Commission
3 approved continuation of a MEP rate. As a consequence, the Company currently
4 has an MEP that provides for a modest reduction in per-kWh energy charges for
5 residential customers receiving service on the RE-TOU, R-OO, and R rates. The
6 program currently charges customers an energy rate of \$0.07596/kWh during the
7 summer months of June-September, with the rate reflecting the overall average
8 rate of the Residential customer class. In the non-summer months, MEP
9 participants currently default back onto the normal rate schedule through which
10 they receive service and face the same energy charges as all other residential
11 customers on those particular rate schedules.

12 **Q. HOW MANY CUSTOMERS PARTICIPATE IN THE COMPANY'S CURRENT**
13 **MEP, AND WHAT ARE THE COSTS FROM THE REDUCED ENERGY**
14 **CHARGES IN SUMMER MONTHS?**

15 A. Currently there are 1,612 customers enrolled in the Company's MEP. This is up
16 from 1,059 in the summer of 2022 and 670 in the summer of 2021. The Company
17 works with an implementation partner to help identify and enroll eligible customers
18 into the program. In the summer of 2022, the MEP resulted in about \$30,000 in
19 reduced electric bills.

III. THE COMPANY'S PROPOSED ADJUSTMENTS TO THE MEP

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

A. In this section of my Direct Testimony, I discuss the Company's proposal to adjust the rate level charged to MEP participants, the seasonality of the program, and to equalize the treatment of riders for MEP participants so that the same benefit is provided to participants regardless of whether they receive service under Schedule R, Schedule RE-TOU, or Schedule R-OO.

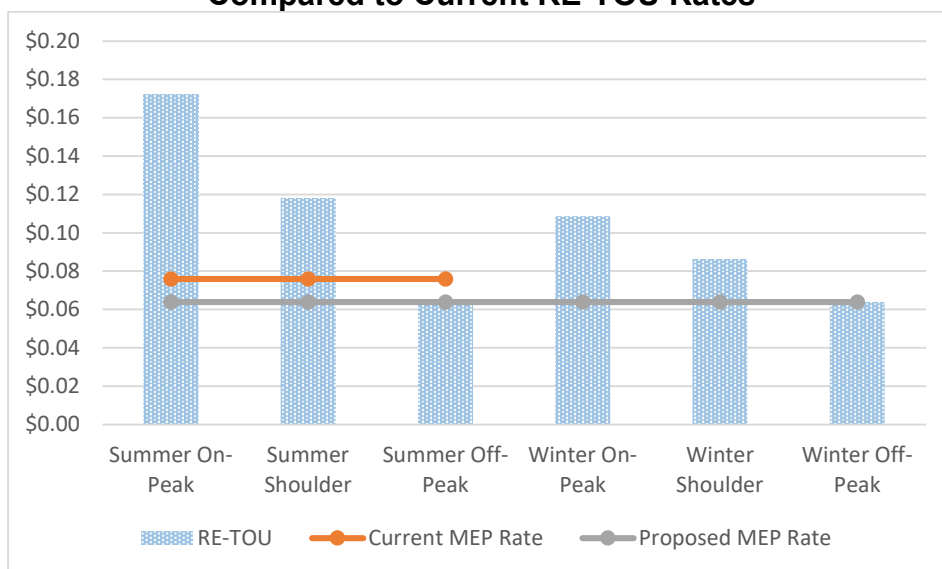
A. MEP Rate Level

Q. PLEASE DISCUSS THE COMPANY'S FIRST PROPOSED CHANGE – THE RATE LEVEL FOR MEP PARTICIPANTS.

A. The Company proposes to adjust the rate level for MEP participants to the off-peak energy rate in the RE-TOU rate schedule. Currently, the off-peak base energy rate is approximately \$0.064/kWh, though the Company's pending Phase I and Phase II electric rate cases would each lead to small adjustments to this exact rate level. Incorporating rate adjustment clauses,⁵ or riders, to the base energy charge, the total off-peak energy rate rises to about \$0.107/kWh. This compares to the base energy charge of \$0.076/kWh that MEP participants currently pay. Incorporating adjustment clauses, the total energy rate MEP participants currently pay is approximately \$0.125/kWh.

⁵ Rate adjustments include any General Rate Schedule Adjustments (GRSA or GRSA-E), the Purchased Capacity Cost Adjustment (PCCA), the Demand Side Management Cost Adjustment (DSMCA), the Electric Commodity Adjustment (ECA), the Transmission Cost Adjustment (TCA), the Extraordinary Gas Cost Recovery Rider (EGCRR), the Transportation Electrification Programs Adjustment (TEPA), Revenue Decoupling Adjustment (RDA) pilot, Renewable Energy Standard Adjustment (RESA), and Colorado Energy Plan Adjustment (CEPA).

FIGURE JJP-D-1: Current and Proposed MEP Rate Compared to Current RE-TOU Rates



Q. HOW WOULD THE PROPOSED CHANGE TO THE MEP RATES IMPACT THE AVERAGE MONTHLY BILLS FOR PARTICIPATING CUSTOMERS?

A. To answer this question, the Company prepared average monthly bills under Schedules R, RE-TOU, and R-OO. The assumed monthly usage is based on the average usage of MEP participants of 910 kWh, which is substantially higher than the average of 606 kWh for the entire Residential customer class. The Company first compared the current standard summer rates to the current discounted summer MEP rate. This analysis shows that the current summer-only discounts range from about \$7 to \$11 per month with an average of \$9.50 for MEP participants. Next, we evaluated the Company's proposed year-round MEP discount based on the off-peak Schedule RE-TOU rate. This analysis showed that average monthly discounts are expected to be about \$16 in each month. As a result of the Company's proposal in this case, MEP participants will go from receiving a \$9.50 discount on average across each of the four summer months to

a \$16 discount on average for each month across a full year. The following table summarizes the Company's estimated bill impact analysis.

**Table JJP-D-1: Average Monthly Discounts
under Current and Proposed MEP Rates**

Current MEP Average Monthly Discount Summer Only			
	Current Full Rate Average Bill	Current MEP Bill	Current MEP Discount
Schedule R	\$129.68	\$122.62	(\$7.06)
Schedule RE-TOU	\$133.97	\$122.70	(\$11.27)
Schedule R-OO	\$132.88	\$122.70	(\$10.18)

Proposed MEP Average Monthly Discount Year Round			
	Current Full Rate Average Bill	Proposed MEP Bill	Proposed MEP Discount
Schedule R	\$122.44	\$106.51	(\$15.93)
Schedule RE-TOU	\$122.44	\$106.51	(\$15.93)
Schedule R-OO	\$122.44	\$106.51	(\$15.93)

**Q. DOES THIS PROPOSAL COMPORT WITH THE STATUTORY DIRECTIVE TO
“TO CREATE AN EXEMPTION FROM ANY TIERED ELECTRICITY RATE
PLAN”?**

A. While I am not a lawyer, yes, I believe that the Company's proposal is in compliance with the statutory directives. First, the Medical Exemption Statute does not define “tiered electricity rate plan”⁶, and the Company believes that removing the time-based and seasonal-based tiers in electricity rates under schedules RE-

⁶ Rule 3413(a) provides further guidance regarding implementation of an MEP. That rule states (in part): “[a]ny electric utility that has a Commission approved Medical Exemption Program shall file an advice letter and tariff, consistent with 4 CCR 723-1-1210, for a rate plan for residential customers who elect an alternate rate plan due to a qualifying medical condition and/or use of essential medical equipment.”

1 TOU, R, and R-OO for MEP customers complies with the statute. Second, as I
2 noted above, the Commission has already approved implementation of an MEP
3 rate for currently-effective Schedules R, RE-TOU, and R-OO, albeit limited to the
4 summer season of June through September. Third, consistent with the intent of
5 the Medical Exemption Statute, Commission rules, and the needs of our
6 customers, the MEP rate should provide relief to our qualifying customers for more
7 than just the summer months. Fourth, the Company is merely seeking to further
8 equalize the rates for MEP participants under these rate schedules for which the
9 Commission has already approved an MEP rate.

10 Fundamentally, the Company's proposal appropriately shields qualifying
11 MEP participants from time-based/season-based electricity tiers under Schedules
12 R, RE-TOU, and R-OO, which continues to align with the statutory directives and
13 policy intent of not only the Medical Exemption Statute but also Commission rules.

14 **Q. CAN YOU FURTHER ELABORATE ON WHY THE COMPANY PROPOSES**
15 **THIS CHANGE, AND WHY IT IS IN THE PUBLIC INTEREST?**

16 A. Yes. As stated previously, the change to default Schedule RE-TOU rates for
17 residential customers, away from the previous Schedule R rate structure, has
18 meant that MEP participants stand to benefit less under the program than
19 previously. Furthermore, given that the MEP rate is above the off-peak rate under
20 Schedule RE-TOU, this proposed change to have the MEP rate reflect the off-peak
21 rate would ensure that each MEP participant stands to benefit from participating in
22 the program, rather than just MEP participants on average.

1 Given the relatively small participant base within the MEP program and the
2 very real impact that electricity costs have for the Company's customers who have
3 either temporary or long-term medical conditions that require access to consistent
4 electricity use for cooling, essential medical devices, or otherwise qualify them for
5 MEP participation – the Company thinks that an increased level of benefit is
6 appropriate at this time for these customers. Importantly, MEP participants must
7 also meet a certain income threshold of 400 percent or less of the applicable
8 federal poverty level. Like the changes proposed and approved this past Spring to
9 the Company's energy affordability programs for qualifying electric and gas
10 customers, which was also the product of collaborative work with stakeholders, the
11 Company brings forward this MEP proposal to strike a balance between providing
12 real and meaningful support to customers that need it while being cognizant of the
13 costs that such changes could create for the rest of the customer base that does
14 not qualify. This proposal achieves that balance.

15 **B. MEP Seasonality**

16 **Q. WHAT DOES THE COMPANY PROPOSE REGARDING SEASONALITY FOR**
17 **THE MEP RATE?**

18 A. The Company proposes to make the MEP rate a permanent or year-long rate
19 rather than a seasonal-only rate that is in place in the summer months from June
20 through September. Therefore, customers that would have normally transitioned
21 back to their normal rate schedule on October 1st of each year will be able to
22 continue receiving electric service under the reduced MEP rate.

1 **Q. WHY DOES THE COMPANY PROPOSE THIS CHANGE AND WHY IS IT IN THE**
2 **PUBLIC INTEREST?**

3 A. The Company proposes this change in order to more fully achieve the intent of the
4 statute, which is “to create an exemption from any tiered electricity rate plan based
5 on a customer’s medical condition”.⁷ As discussed previously, the elimination of
6 consumption-based electricity tiers in rate design for the Company’s residential
7 customers, which were in place only during summer months, means that MEP
8 participants would stand to appropriately benefit from changing the MEP rate from
9 a seasonal-only rate to a year-round rate. The Company’s time-based electricity
10 tiers (on-peak, shoulder, and off-peak) for Schedule RE-TOU are in place year-
11 round, albeit at varying levels, while Schedules R and R-OO have seasonal-
12 varying rates. Adjusting the MEP rates to treat residential customers under these
13 rate schedules equally regardless of the time-of-day or season is in the public
14 interest.

15 **C. Rate Adjustment Clauses for MEP Participants**

16 **Q. WHAT DOES THE COMPANY PROPOSE REGARDING THE APPLICATION OF**
17 **RATE ADJUSTMENT CLAUSES, OR RIDERS, FOR THE MEP RATE?**

18 A. The Company proposes that all rate riders be applied on a percentage basis to the
19 base energy charge (the off-peak RE-TOU rate) for MEP participants, rather than
20 a combination of percent-based and consumption-based riders that currently apply
21 to MEP participants. As discussed previously, the Company applies rate riders on

⁷ C.R.S. 40-3-103.5.

1 a percent basis for Schedules RE-TOU and R-OO, but there are still consumption-
2 based riders under Schedule R. As a result, MEP participants receiving service
3 under Schedule R would not face the same percent reductions in their monthly
4 electric bill as compared to a scenario in which they received service under either
5 Schedule RE-TOU or Schedule R-OO.

6 **Q. WHY DOES THE COMPANY PROPOSE THIS CHANGE AND WHY IS IT IN THE**
7 **PUBLIC INTEREST?**

8 A. The Company proposes to equalize the treatment of rate riders across all MEP
9 participants so that they all stand the benefit equally from the reduction in the base
10 energy charge proposed in this Advice Letter. By applying percent-based riders to
11 a lower base energy charge, the riders will then add relatively smaller components
12 to a customer's bill compared to if the riders stayed as consumption-based riders.
13 The Company believes this proposal is reasonable and promotes the public
14 interest by ensuring that all MEP participants have equal opportunities to have the
15 reduction in the base energy charge flow through to reductions in the amounts that
16 riders collect from them on a monthly basis.

17 **Q. HOW WILL THE COMPANY ACCOUNT FOR FOREGONE REVENUES**
18 **ACROSS ALL THE RELEVANT RIDERS ON AN MEP CUSTOMER'S BILL?**

19 A. The Company proposes that each individual rider will have to account for the
20 foregone revenues from MEP participants as part of the annual true-up process
21 applicable to each rider. For instance, reduced collections for fuel costs through
22 the TEPA rider will be accounted for a trued-up in subsequent periods through that
23 same rider. These proposals are reflected in the accompanying Tariff revisions.

D. Estimated Costs of the Proposal

Q. WHAT IS THE COMPANY'S EXPECTATION FOR THE COSTS OF THIS PROPOSAL IN A GIVEN YEAR?

A. The Company estimates that the proposals in this filing would increase annual MEP costs from the roughly \$60,000 level currently to roughly \$300,000 a year. This estimate is based on the current enrollment of about 1,600 MEP customers and the average monthly bill impact analysis discussed earlier in my testimony. Table JJP-D-2 below provides a breakdown of these estimated costs.

Table JJP-D-2: Breakdown of Estimated MEP Costs

	Current MEP	Proposed MEP
Number of Participants	1,600	1,600
Average Monthly Discount	(\$9.50)	(\$15.93)
<u>Months</u>	<u>4</u>	<u>12</u>
Total	\$60,814	\$305,940

The Company estimates that the proposed MEP costs summarized above would equate to a 0.01 percent average monthly bill impact for residential customers. The approximate \$300,000 cost of the Company's proposal is very small in the context of the overall \$3 billion revenue requirement of the Company's electric system.

1 **Q. HOW ARE THE COSTS OF THE COMPANY'S MEP RECOVERED IN A GIVEN**
2 **YEAR?**

3 A. Given the statutory language that the "Commission's rules must provide a
4 mechanism for the recovery of costs associated with implementing and providing
5 the medical exemption"⁸ and the associated Rule 3413 language stating that "such
6 an exemption shall be neutral with respect to the utility's revenue requirement" and
7 that "each utility shall address in its filing how costs of the alternative rate plan will
8 be recovered,"⁹ the Company has included the costs of the MEP in the ECA and
9 proposes to continue doing so. This process ensures that MEP discounts are
10 revenue neutral because the discounts provided to MEP participants are recovered
11 on a one-to-one basis through the ECA. Furthermore, the Company proposes that
12 any lost revenues for riders be addressed in the true-up process for those
13 associated riders, as mentioned earlier.

14 **E. Other Tariff Revisions**

15 **Q. PLEASE DESCRIBE THE TARIFF CHANGES THE COMPANY IS MAKING TO**
16 **ALLOW MEP CUSTOMERS FURTHER PROGRAM FLEXIBILITY.**

17 A. In addition to tariff changes needed in order to reflect the MEP changes discussed
18 earlier in my Direct Testimony, the Company is proposing to modify the MEP tariff
19 language to provide for customer self-attestation as to the continued condition
20 beyond one year (conforming to Rule 3413(c)); as well as to allow 30 days instead
21 of 10 days for a written medically certified document to be sent to the Company

⁸ See. C.R.S. 40-3.103.5(1).

⁹ 4 CCR 723-3-3413(a)(I) and 3413(h)(I)

1 after telephone notification, unless one is already on file with the Company. The
2 intent of these changes is to provide flexibility to MEP customers and streamline
3 program participation. The proposed Tariff changes are reflected in Attachments
4 JJP-1 (redlined) and JJP-2 (clean).

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

6 **A.** Yes, it does.

Statement of Qualifications

Jason J. Peuquet

Jason Peuquet is a Director of Regulatory Administration. In this role, he is responsible for providing leadership, direction, and technical expertise related to regulatory processes and functions for Public Service Company of Colorado. In his prior role with Xcel Energy, as Strategy and Policy Manager for the Clean Transportation team, he focused on policy and program development to expand clean transportation opportunities for customers throughout the eight midwestern and western states in which Xcel Energy operates. He has testified before the Colorado Public Utilities Commission and the New Mexico Public Regulation Commission.

Mr. Peuquet previously worked as a Policy Advisor to the Mike Bloomberg 2020 campaign and as a Senior Economist at the Colorado Public Utilities Commission, where he focused on energy, financial, and environmental policy analysis. He also served as the Research Director for a non-partisan think tank in Washington, DC – the Committee for a Responsible Federal Budget. Jason has Bachelor of Arts degrees in Economics and International Affairs from the George Washington University, where he graduated summa cum laude, and a Master in Public Policy degree from Harvard University's Kennedy School of Government.

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SEPTEMBER 1, 2023.

AFFIDAVIT OF JASON J. PEUQUET
ON BEHALF OF
PUBLIC SERVICE COMPANY OF COLORADO

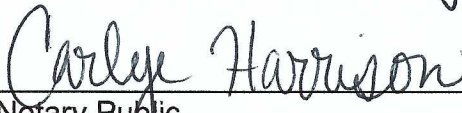
I, Jason J. Peuquet, being duly sworn, state that the Direct Testimony and attachments were prepared by me or under my supervision, control, and direction; that the Direct Testimony and attachments are true and correct to the best of my information, knowledge and belief; and that I would give the same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

Dated at Denver, Colorado, this 31st day of July 2023.



Jason J. Peuquet
Director, Regulatory Administration

Subscribed and sworn to before me this 31 day of July, 2023



Notary Public

My Commission expires July 26, 2026

CARLYE HARRISON
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20224029216
MY COMMISSION EXPIRES JULY 26, 2026