

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

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

**MOTION OF PUBLIC SERVICE COMPANY OF COLORADO
FOR APPROVAL OF AN ALTERNATIVE FORM OF NOTICE**

Pursuant to Colo. Rev. Stat. § 40-3-104(1)(c)(I)(E) and Rule 1207(b), 4 *Code of Colorado Regulations* (“CCR”) 723-1, Public Service Company of Colorado (“Public Service” or the “Company”) hereby moves the Colorado Public Utilities Commission (“Commission”) to approve an alternative form of notice that will apply to Public Service's contemporaneous Advice Letter and tariff filing to modify its Medical Exemption Program (“MEP”) for qualifying electric residential customers and to revise its applicable tariffs to implement the revisions to the Medical Exemption Program proposed to be effective September 1, 2023. In support of this Motion, Public Service states as follows:

1. On July 31, 2023, the Company contemporaneously filed Advice No. 1928 - Electric proposing revised MEP rates to take effect on September 1, 2023. The proposed MEP Advice Letter 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;

- that all rate riders¹ be applied on a percentage basis to the base energy charge (the off-peak RE-TOU rate) for MEP participants, rather than a combination of percent-based and consumption-based riders that currently apply to MEP participants in order to ensure MEP participants receiving service under Schedule R would receive the same percent reductions in their monthly electric bill as compared to a scenario in which they received service under either Schedule RE-TOU or Schedule R-OO;
- to make the MEP rate a year-round rate rather than a summer²-only rate. Therefore, customers that would have normally transitioned back to their normal rate schedule on October 1st of each year will continue receiving electric service under the reduced MEP rate; and
- and to modify the tariff language to provide for customer self-attestation as to the continued condition beyond one year (conforming to Rule 3413(c)); as well as to allow 30 days instead of 10 days for a written medically certified document to be sent to the Company after telephone notification, unless one is already on file with the Company.

The effect of this filing is to increase MEP costs from the roughly \$60,000 level currently to roughly \$300,000 a year. MEP costs will continue to be socialized across all customers through the Electric Commodity Adjustment and other rate riders. The expected impact on average Residential electric bills is less than 0.01%. The MEP is designed to be revenue neutral and will neither increase nor decrease the Company's revenues.

¹ Demand-Side Management Cost Adjustment, Purchased Capacity Cost Adjustment, Transmission Cost Adjustment, Transportation Electrification Programs Adjustment, and Electric Commodity Adjustment.

² Summer months are June-September.

2. By this Motion, the Company is seeking to provide the same form of notice as has been approved in the past with respect to the Company's prior Advice Letter filings. The form of notice the Company proposes to provide is set forth in Exhibit 1 attached to this Motion.

3. Due to the minimal impact of this filing as noted above, the Company requests a more limited form of notice for this filing. Specifically, by this Motion, Public Service is seeking Commission approval to use the following alternative forms of notice:

- a. Posting the customer notice on the Company's website³ pursuant to §40-3-104(1)(c)(I), C.R.S.;
- b. Posting the public filing materials on the Company's website within the first week of filing; and
- c. Publishing a legal notice, attached hereto as Exhibit 1, in *The Denver Post*, for one weekday during the first twenty days of the thirty-day period prior to the effective date of the proposed tariff revisions.

4. The Company seeks approval of these alternative forms of notice in order to avoid incurring the expense that is entailed in the other forms of statutory notice. In the event the Commission determines that additional notice is required, the Company will proceed to provide additional notice consistent with the Commission's order.

5. In order to avoid inundating its customers with electronic mail and text notifications for all filings that could potentially cause confusion, it is the Company's policy to limit electronic mail for significant filings, such as rate case proceedings.

6. The Company believes that good cause exists for the alternative form of notice requested by this Motion. The Company has worked coordinated with members from Chronic

³ https://www.xcelenergy.com/company/rates_and_regulations/filings

Care Collaborative, Colorado Energy Office, Energy Outreach Colorado, Trial Staff of the Commission and other parties on this proposal and has been authorized by these organizations to state that they support the Company's proposal. The newspaper notice will provide the required information regarding the MEP filing to the general public, including the estimated impact on qualifying Residential electric customers. The Company believes that the proposed alternative notice is sufficient to alert affected and interested parties of the changes that the Company is proposing by this Advice Letter in a timely fashion. As such, there is good cause for the alternative form of notice requested by this Motion.

WHEREFORE, Public Service Company of Colorado respectfully requests that the Commission approve the alternative forms of notice set forth in this Motion, pursuant to §40-3-104(1)(c)(I)(E), C.R.S., and Rule 1207(b).

Dated this 31st day of July 2023.

Respectfully Submitted,

By: /s/ Tana K. Simard-Pacheco

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