

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

* * * * *

**IN THE MATTER OF THE VERIFIED)
APPLICATION OF PUBLIC SERVICE)
COMPANY OF COLORADO FOR APPROVAL)
TO EXTEND THE COMPANY'S PIPELINE) PROCEEDING NO. 21A-____G
SYSTEM INTEGRITY ADJUSTMENT ("PSIA"))
RIDER FOR CERTAIN PROJECTS THROUGH)
2024, WITH SUBSEQUENT WIND-DOWN OF)
THE RIDER)**

VERIFIED APPLICATION

In accordance with Colorado Public Utilities Commission ("Commission") Rules 1303 and 4002, Public Service Company of Colorado ("Public Service" or the "Company") hereby submits this Verified Application for Approval to Extend the Company's Pipeline System Integrity Adjustment ("PSIA") Rider for Certain Projects through 2024, with Subsequent Wind-Down of the Rider (the "Application"). Through this Application, Public Service respectfully requests that the Commission issue a decision:

- Extending the PSIA rider from January 1, 2022 through December 31, 2024, allowing for five specific PSIA Projects to be undertaken in those years as part of the PSIA, continuing to limit cost recovery in the PSIA to capital costs only;
- Maintaining the same scope of the PSIA in terms of program, Project, and Sub-Project eligibility (such that there is no change to eligibility criteria), as well as the same overall risk ranking approach and the existing reporting requirements, including those for both the November Filing and the April Annual Report;

- Approving the Company's proposal to wind-down PSIA cost recovery, allowing the PSIA rider mechanism itself to remain in place until PSIA costs can be transferred to base rates through a rate case, with any subsequent true-ups addressed through the Gas Cost Adjustment ("GCA") (if the Commission does not approve an extension and the PSIA is closed to new investment as of December 31, 2021, the Company requests authorization to implement the same PSIA wind-down process); and
- Removing the requirement to file a Phase I base rate case every three years so long as the PSIA remains in effect, as established by operation of a settlement approved by Decision No. R11-0743 in Proceeding No. 10AL-963G.

Typically, new rates for the PSIA go into effect on January 1 of each year. As a result, the Company also requests issuance of a Commission decision on these matters by November 1, 2021, to allow for timely filing of the November 15, 2021, advice letter filing (to be effective January 1, 2022). If a final decision is not reached by that date, alternative processes regarding that filing are proposed so that the rates going into effect on January 1, 2022 are reflective of the decisions in this case. Any required compliance tariff changes could be made within that same filing, or through a separate compliance advice letter filing on not less than two business days' notice.

This is the Company's final request to extend the PSIA. At the end of 2024, the PSIA would be closed to new costs and kept open solely to recover historical investments and manage an orderly true-up of annual PSIA costs until transition to base rates can occur. After the end of 2024, all Transmission Integrity Management Program ("TIMP") and Distribution Integrity Management Program ("DIMP") work, including former PSIA

projects that have ongoing work, will be undertaken and recovered through base rates in the ordinary course of business.

However, this extension is necessary to continue support for the Company's integrity management programs under the PSIA, which address the waves of federal regulations that have been issued and associated investments of significant size that, due to regulatory requirements, are largely outside of the Company's control. Over the course of the last ten years, the Company, the Commission, and interested intervenors have worked collaboratively to chart the best course for this work on high-risk system integrity issues. Timely recovery is an essential element of a successful safety and integrity management program because, unlike investments that connect new customers and load, replacement facilities do not lead to increased revenues that offset investment costs. Rather, these investments are ensuring the safety and reliability of our system, protecting our customers and our communities, and reducing methane emissions from our pipes and equipment.

As the PSIA has evolved and been renewed, the planning and reporting of PSIA projects have become more robust, culminating most recently in the comprehensive and global settlement reached in the Company's last PSIA proceeding (Proceeding No. 18A-0422G) ("2018 PSIA Settlement"). In the 2018 PSIA Settlement, the Company and intervening parties carefully contemplated the scope of and need for the PSIA through at least December 31, 2021, while recognizing that a final three-year extension may also be necessary (although neither approved nor foreclosed in that proceeding). Public Service continues to deliver on the important work set forth in the 2018 PSIA Settlement. But that work is not yet done -- the requests in this proceeding represent the completion of the

plan for the PSIA and the transition of all safety and integrity work into the normal course of business.

To that end, the Company also satisfies the criteria for the PSIA extension as determined by prior Commission decisions. The Company is proposing to maintain a PSIA scope that is narrowly tailored to certain existing Projects, while adhering to the Commission's established eligibility criteria. The Company likewise proposes to continue the current reporting and true-up cadence, which have served to provide regulators with extensive detail regarding work through the PSIA. These parameters, also previously approved by the Commission, further support the reasonableness of continuing the PSIA, which is in the public interest.

These matters are detailed further in this Application and the accompanying Direct Testimonies and Attachments. Specifically, with this Application, Public Service is submitting the Direct Testimonies and Attachments of the following witnesses:

- Steven P. Berman, Director, Regulatory Administration;
- Luke A. Litteken, Senior Vice-President, Gas; and
- Steven W. Wishart, Director of Pricing and Planning.

In further support of this Application, Public Service states as follows:

I. BACKGROUND

1. The PSIA is an existing, Commission-authorized rider established to provide timely cost recovery for work performed by Public Service to comply with federal mandates requiring that utilities identify and address higher-risk threats to the safety and integrity of natural gas pipeline systems. The PSIA covers certain capital costs of the Company's integrity management Programs that are not included in base rates and that are necessary to comply with the requirements of the 2002 Pipeline Safety Improvement Act and subsequent Pipeline and Hazardous Materials Safety Administration ("PHMSA") regulations, which create national requirements for the safe and reliable operation of natural gas pipelines.

2. The Company first requested approval of the PSIA rider to recover integrity program capital costs and operations and maintenance ("O&M") expense in its 2010 Phase I gas rate case, Proceeding No. 10AL-963G. In that proceeding, the Commission approved the rider for recovery of capital and O&M costs for six gas pipeline system integrity initiatives through December 31, 2014, by adopting the parties' settlement agreement in that proceeding, with slight modifications.¹ Recovery of the costs for integrity work commenced under the PSIA in 2012.

3. The Commission extended the PSIA term for one year, through December 31, 2015, in the Company's 2012 Phase I gas rate case, Proceeding No.

¹ Proceeding No. 10AL-963G (2010 Phase I gas rate case), Recommended Decision No. R11-0743, affirmed by Decision No. C11-0946. The six integrity initiatives were (1) DIMP; (2) TIMP; (3) the Accelerated Main Replacement Program (AMRP) (DIMP); (4) the Cellulose Acetate Butyrate ("CAB") Gas Service Replacement Program (DIMP); (5) the West Main Transmission Line Replacement Project ("West Main") (TIMP); and (6) the Edwards-to-Meadow Mountain Transmission Project ("Edwards") (TIMP). Additional projects were added to the PSIA between the 2010 Phase 1 and the most recent PSIA extension proceeding in 2018 (Proceeding No. 18A-0422G). Mr. Litteken discusses the completed and ongoing PSIA Projects further in his Direct Testimony.

12AL-1268G.² The Commission granted a second PSIA extension for an additional three years, through December 31, 2018, in the Company's next Phase I gas rate case, Proceeding No. 15AL-0135G.³ In the 2015 Gas Phase I, the Commission moved two of the original six PSIA Projects, which were then being completed, to base rates,⁴ moved O&M costs to base rates and excluded O&M from future rider recovery, and established certain requirements for any future requests to extend the term of the rider. Specifically, the Commission ordered that any plan for additional PSIA extensions would need to include a plan for how the PSIA will be terminated in the future and:

- A thorough analysis of all projects to be included in an ongoing PSIA;
- The criteria used to determine whether future projects qualify for PSIA treatment;
- A timeline for all PSIA projects to be completed, including a quantitative risk assessment system; and
- A plan stating how remaining projects in the PSIA and other future pipeline replacements or significant safety expenditures will be addressed through the ordinary course of business when the PSIA is terminated.⁵

4. In April of 2018, Public Service initiated an application proceeding to extend the PSIA through 2020, seeking a two-year extension at that time. In Decision No. C18-0407, the Commission determined that the application was not complete and dismissed it without prejudice, enabling Public Service to re-file at its convenience.

² Proceeding No. 12AL-1268G ("2012 Gas Phase I"), Recommended Decision No. R13-1307, affirmed by Decision No. C13-1568.

³ Proceeding No. 15AL-0135G ("2015 Gas Phase I"), Recommended Decision No. R15-1204, affirmed by Decision No. C16-0123.

⁴ The CAB Gas Service Replacement Program and the Edwards Project. Public Service completed these projects in 2015 and 2012, respectively.

⁵ Proceeding No. 15AL-0135G, Recommended Decision No. R15-1204 at ¶ 111, affirmed by Decision No. C16-0123 at 29, Ordering ¶ 6. The Company's specific manner of compliance with these criteria is detailed in Section III of this Application and in the accompanying Direct Testimonies and Attachments provided in support of the Application.

5. On June 27, 2018, in Proceeding No. 18A-0422G, Public Service filed a new application for approval to extend the PSIA through 2020 and to terminate the PSIA no later than 2024. The application sought to continue the PSIA to recover capital costs for 11 specifically-identified projects encompassed by two of the original PSIA initiatives – DIMP and TIMP. A global and comprehensive settlement of the application was entered into on October 1, 2018 (previously referred to as the “2018 PSIA Settlement”), by which the Settling Parties agreed to extend the PSIA for three years (through December 31, 2021), established criteria for ongoing PSIA scope and management through the extended term, and recognized that Public Service may seek an additional PSIA extension through December 31, 2024. By Decision No. C18-0983 (mailed date November 6, 2018), the Commission found that the application and 2018 PSIA Settlement provided adequate information for the Commission to thoroughly explain and justify the three-year extension of the PSIA and to address each issue of interest to the Commission. The Commission therefore approved the 2018 PSIA Settlement, finding the settlement terms to be just and reasonable.⁶ Company witness Mr. Steven Berman discusses the intricacies of the 2018 PSIA Settlement in his Direct Testimony.

6. Public Service has considered the construct of the 2018 PSIA Settlement in formulating its requests in this proceeding. The Company is mindful of not only the articulated PSIA extension criteria that precipitated the 2018 PSIA extension, discussed throughout this Application and in the Direct Testimonies of Mr. Berman and Mr. Litteken, but also of the requirement that the PSIA be closed to new investment after December

⁶ Proceeding No. 18A-0422G, Decision No. C18-0983 (mailed date Nov. 6, 2018).

31, 2024, if the rider is extended. Consistent with its commitment to wind down the PSIA, Public Service is not seeking to expand the scope of the rider through this filing; instead, the Company is choosing to limit this extension request to five identified projects the Commission previously determined to be appropriately included in the PSIA. Additionally, Public Service is not seeking to change either the scope or the mechanics of the PSIA, and proposes to maintain the current Project and Sub-Project eligibility criteria and reporting requirements. These mechanics and eligibility criteria are discussed in the Direct Testimonies of Mr. Berman and Mr. Litteken. Further elaboration on the Company's request in this proceeding is provided below.

II. REQUEST TO EXTEND THE PSIA RIDER, CLOSING IT TO NEW INVESTMENT AFTER 2024, WITH SUBSEQUENT WIND-DOWN PROCESS

7. As detailed by Mr. Berman and Mr. Litteken in their Direct Testimonies, the PSIA has provided a supportive recovery mechanism allowing the Company to focus on required critical pipeline safety and integrity work, enabling further advancement of PSIA-targeted investments in the most effective, programmatic manner. While the important safety work on the Public Service system has been valuable and considerably enhanced public safety, it is not yet complete. These ongoing efforts require additional capital expenditures to comply with federal mandates requiring that utilities identify and address high-risk threats to the safety and integrity of natural gas pipeline systems, and the Company must be able to recover the prudently-incurred pipeline system integrity management costs through the PSIA rider. The Company is, therefore, requesting to extend the PSIA, from January 1, 2022, through December 31, 2024, closing it to new investment after 2024, with a subsequent rider wind-down process. This allows for certain

safety and integrity projects currently included in the rider to continue to be undertaken in the next three years as part of the PSIA.

8. Consistent with the current PSIA rider, cost recovery for the PSIA would continue to be limited to capital costs only and to the following five DIMP and TIMP projects that are currently included in the PSIA. Each of these projects has been previously identified as involving important work necessary to address key risks on Public Service's system and to fulfill the mandates set forth in federal PHMSA regulations:

- DIMP Accelerated Main Replacement Program ("AMRP");
- DIMP Programmatic Risk-based Pipe Replacement Program ("PPRP");
- TIMP Automatic Shut-off Valves/Remotely Controlled Valves ("ASV/RCV");
- TIMP Maximum Allowable Operating Pressure ("MAOP"); and
- TIMP In-Line-Inspections ("ILI")/Pipeline Assessments and Repairs ("ILI Assessments/Repairs").

As discussed by Mr. Berman, with the exception of the TIMP-ASV/RCV Project, which will be closed to new investment in the PSIA at the end of 2022, all of these projects will have continued investment in the PSIA through 2024. A thorough analysis of these projects and discussion of why these projects should remain in the PSIA are provided in Mr. Litteken's Direct Testimony. Both Mr. Litteken and Mr. Berman further elaborate on the continued need for inclusion of these projects in Public Service's PSIA.

9. Mr. Litteken provides support for the current estimated PSIA project budgets for 2022-2024, and Mr. Berman summarizes the forecasted revenue requirements for the PSIA in the years over which the extension is being sought. Although the Company is not requesting Commission approval of these budgets *per se*, they are provided for

illustrative purposes. The estimated PSIA revenue requirements during the requested extension period are \$122.3 million for 2022; \$137.2 million for 2023, and \$151.5 million for 2024. Mr. Litteken explains that the work the Company proposes to continue through the PSIA represents roughly 35 percent of Public Service's annual Gas Operations capital budget; therefore, this important safety work requires considerable ongoing attention and capital investment. Finally, while Mr. Berman and Mr. Litteken explain that these sizeable investments are federally mandated and require continuation of the PSIA, Mr. Wishart explains the associated incremental, reasonable estimated bill impacts for customers.

10. Notably, the requested PSIA Extension will be the last, and while safety and integrity work will continue to generally consist of non-revenue producing investments, the Company currently plans that safety and integrity work after 2024 will be performed in the ordinary course of business and recovered through base rates. The PSIA Extension provides a reasonable time period in which to transition from rider to base rate cost recovery for system integrity work, consistent with the Company's identified plan noted in the 2018 PSIA Settlement.

11. In addition to the requested PSIA extension, the Company also proposes to eliminate the requirement to file a Phase I base rate case every three years so long as the PSIA remains in effect; requests approval of Public Service's proposal to wind-down PSIA cost recovery; and requests that the Commission issue a final decision in this case by November 1, 2021.

12. In his Direct Testimony, Mr. Berman explains why it is appropriate to eliminate the rate case filing requirement. The requirement to file a base rate case every three years while the PSIA is in effect was established in 2012 along with the inception of

the PSIA. In the 2018 PSIA Settlement, the parties acknowledged that the Company could request elimination of this requirement, which it is choosing to do in this case.⁷ In 2020, Public Service filed a combined Phase I and II gas rate case, which is still in the process of being fully implemented. Given this recent filing and the proposal to close the PSIA to new project costs at the end of 2024, the rate case filing requirement is no longer necessary. Moreover, it is very unlikely that the Company will over-earn either during the extension period or thereafter, given that the test year approved in the most recent gas rate case (Proceeding No. 20AL-0049G) relied predominately on historical data, as well as annual report history demonstrating the Company has earned below its authorized return in every year the PSIA has been in place. Continued imposition of the requirement to file a rate case when one may not be necessary is not in the Company's customers' best interest and does not promote regulatory efficiency.

13. Mr. Berman also elaborates on the Company's proposed wind-down process in his Direct Testimony. If the requested PSIA extension is approved by the Commission, Public Service proposes to continue the rider (albeit closed to new costs) until PSIA costs can be transferred into base rates through a rate case. This process is intended to ensure there is not a lapse in recovery for investment approved under the PSIA and to avoid multiple changes to base rates to capture the correct level of recovery and true-up of prior years' PSIA costs. Public Service proposes to continue the November and April filings until PSIA costs are fully trued up and ultimately transferred to base rates.

⁷ 2018 PSIA Settlement at 18.

There would be no new investment included in the revenue requirement and true-ups would continue as they had throughout the extension period.

14. When a rate case is filed after conclusion of the PSIA in 2024, any costs remaining in the PSIA would be transferred to base rates in that rate case, subject to true-up, at the applicable test year level. When new base rates become effective, PSIA collection of the costs transferred to base rates will terminate but any remaining true-ups will need to be collected or refunded to customers. To ensure that remaining true-ups are collected or refunded, and to avoid continuation of the PSIA or a temporary General Rate Schedule Adjustment for what would likely be an immaterial true-up amount, the Company proposes to calculate the exact amount of the true-up and include it in the deferred account with the GCA.

15. In the event the Commission does not approve an extension and the PSIA is closed to new investment as of December 31, 2021, Public Service would propose the same process discussed above but with the dates adjusted accordingly.

16. Mr. Berman further discusses the Company's request that the Commission issue a final decision in this case by November 1, 2021 to allow for a further adjustment to the PSIA rate effective January 1, 2022, consistent with current PSIA timelines. If the Commission is able to issue a final decision by that date, then the Company expects it will be able to make the November 15, 2021, filing on schedule, with new rates to go into effect on January 1, 2022. If, however, a final decision issues later than November 1, 2021, it would not be possible for the Company to incorporate decisions of the Commission. Public Service proposes that it still make the November filing on schedule, incorporating therein any April 2021 true-up amounts as well as forecasted PSIA

investment for 2022. The Company would thereafter amend its November filing, if required, so that the rates going into effect on January 1, 2022, are reflective of the decisions in this case. Any required compliance tariff changes could be made within that same filing, or through a separate compliance advice letter filing on not less than two business days' notice.

III. COMMISSION CRITERIA FOR REQUESTED PSIA EXTENSION

17. By adopting Decision No. R15-1204 in the Company's 2015 Gas Phase I, the Commission established specific requirements for any future requests to extend the term of the PSIA rider, including a plan for how the PSIA will be terminated in the future. More specifically, the following requirements were established for a subsequent PSIA extension:

Any such request for further extension of the PSIA is to include a plan stating how the PSIA will be terminated in the future, including: 1) a thorough analysis of all projects to be included in an ongoing PSIA; 2) the criteria used to determine whether future projects qualify for PSIA treatment; 3) a timeline for all PSIA projects to be completed; and, 4) a plan stating how remaining projects in the PSIA and other future pipeline replacements or significant safety expenditures will be addressed through the ordinary course of business when the PSIA is terminated.⁸

18. The Commission also provided guidance in Decision No. C18-0407 (Proceeding No. 18A-0247G) as to items that should be addressed in a future filing, and further elaborated on the requirements determined in the 2015 Gas Phase I. Specifically, the Commission required that a complete application must include:

- An adequate plan to terminate the PSIA, including a timeline for all PSIA projects to be completed;

⁸ Proceeding No. 15AL-0135G, Decision No. R15-1204 at ¶ 111 (mailed date Nov. 16, 2015).

- A plan showing how future pipeline replacements or significant safety expenditures can be addressed through the ordinary course of business when the PSIA is terminated; and
- The risk ranking must establish necessary criteria to determine whether future projects qualify for PSIA treatment.⁹

The requirements from the 2015 Gas Phase I are addressed, in turn, below and are elaborated on in Mr. Litteken's and Mr. Berman's respective Direct Testimonies. Likewise, the discussion below and these witnesses' testimony encompasses the plans for PSIA termination and PSIA project completion; for addressing future integrity work in the ordinary course of business; and for ongoing risk ranking processes consistent with previously-approved mechanisms.

A. Termination Date of the PSIA

19. The Company proposes to terminate the PSIA mechanism for collecting new costs after 2024, as discussed in the Direct Testimony of Mr. Berman. The proposal to close the PSIA to new costs at the end of 2024 is not intended to foreclose requests for other special cost recovery needs that may arise in the future due to PHMSA's continued rulemaking activity or other unforeseen causes, but at this time, cost recovery for new work on new or ongoing PSIA projects after the end of 2024 is expected to occur in the ordinary course of business (i.e., through base rates).

B. Thorough Analysis of Projects Included in the PSIA

20. Mr. Litteken thoroughly explains the Projects to be included in the PSIA, including that they are a subset of those previously approved due to their significance, high-risk factors, and need to comply with federal mandates. Mr. Litteken describes the

⁹ Proceeding No. 18A-0247G, Decision No. C18-0407 at ¶¶ 12, 13, and 16.

work conducted within each Project to date, as well as the necessity for and scope of work to be completed during the requested PSIA extension. Further, of the five ongoing projects, additional work for one will be closed to the PSIA in 2022; the remainder will have continued investment under the PSIA through its closure to new costs at the end of 2024.

C. Criteria for Inclusion of Projects in PSIA

21. Mr. Litteken identifies the criteria for Projects and Sub-Projects to be eligible for PSIA recovery during the extension period, following previous Commission-approved methods, including:

- First, the only Projects eligible for PSIA recovery are the five continuing Projects specifically identified by Mr. Berman and Mr. Litteken.
- Second, PSIA recovery may continue for Sub-Projects that have been previously approved for PSIA recovery, to the extent they fall under a continuing PSIA Project and continue to meet the existing risk ranking criteria.
- Third, new Sub-Projects must (1) fall within the scope of an ongoing PSIA Project, and (2) have a risk ranking of moderate to high risk, or not require a risk ranking, consistent with previously-approved and well-established risk ranking criteria.
- Fourth, no new Project or Sub-Project costs will be eligible for PSIA recovery after December 31, 2024.

D. Timeline for PSIA Project Completion

22. Mr. Litteken discusses the timeline, to the extent the Company can predict, for PSIA completion, as well as the Company's established risk-assessment system for PSIA work. Mr. Litteken also explains the work that will be ongoing for the foreseeable future due to new PHMSA requirements (as with Mega-Rule requirements relating to MAOP assessments); due to existing PHMSA requirements that require longer-term work

(as with ILI Assessment/Repairs); or due to areas of work where the Company has made extensive progress but requires additional system integrity management work.

E. Plan Stating How Remaining PSIA Projects and Other Future Pipeline Replacements or Significant Safety Expenditures Will Be Addressed Through the Ordinary Course of Business When the PSIA is Terminated

23. Mr. Litteken explains that as certain work is ongoing after the end of the PSIA extension, the Company anticipates decreased investments and managing the work in the ordinary course of business. Mr. Litteken also discusses in his Direct Testimony the Company's anticipated work and planned integrity management capital budget through 2025, including capital investment under the PSIA.

24. Mr. Berman discusses what cost recovery for post-PSIA integrity work might look like in his Direct Testimony. Absent the PSIA, all of these costs are anticipated to be recovered through future rate cases. While the Company cannot rule out changes in federal law or other circumstances that cause the Company and Commission to determine a different approach becomes warranted, Public Service currently intends to transition recovery of the costs of integrity work to base rates after the conclusion of this extension.

IV. NOTICING

25. In addition to the formal notice of this Application provided by the Commission pursuant to Rule 1206, the Company is providing formal legal notice in compliance with the notice requirements of C.R.S. §40-3-104 and Rule 4002(d). The Company is providing notice to its customers by filing with the Commission this Application, along with the supporting testimony and attachments, keeping it open for inspection, posting notice on the Company's website, including a bill message on each

customer's bill, and providing notice of this filing via email to all natural gas customers for whom the Company has an email address and who have elected to receive email notifications for the Company. The Company is simultaneously filing a Motion for Approval of Alternative Form of Notice pursuant to C.R.S. §40-3-104(1)(c)(I)(E) that more specifically sets forth the forms of notice the Company is seeking to provide.

V. ADDITIONAL INFORMATION REQUIRED BY COMMISSION RULES 4002(b) AND 4002(c)

In support hereof and in accordance with 4 CCR 723-4, Rules 4002(b) and 4002(c), Public Service provides the following information:

26. The Name and Address of Applicant (Rule 4002(b)(I)): Public Service is an operating public utility subject to the jurisdiction of this Commission, engaged, *inter alia*, in the transmission, distribution, purchase, and sale of natural gas in various areas in the State of Colorado. The name and address of the Applicant is:

Public Service Company of Colorado
1800 Larimer Street, Suite 1100
Denver, CO 80202-5533

27. Name Under Which Applicant Provides Service in Colorado (Rule 4002(b)(II)): All operations conducted by the Company in Colorado are conducted under the name of Public Service Company of Colorado, under the trade name of Xcel Energy.

28. Representatives to Whom Inquiries Concerning the Applicant Should Be Made (Rule 4002(b)(III)): Please send copies of all inquiries, notices, pleadings, correspondence, and other documents regarding this filing to the undersigned counsel, as well as the following:

Steven P. Berman
Director, regulatory Administration, Public Service Company of Colorado
Xcel Energy Services Inc.
1800 Larimer Street, Suite 1100
Denver, CO 80202-5533
Phone: 303-294-2124
Fax: 303-294-2329
Email: steven.p.berman@xcelenergy.com

and

Meghann Corrigan
Case Specialist II, Public Service Regulatory Administration
Xcel Energy Services Inc.
1800 Larimer Street, Suite 1100
Denver, CO 80202-5533
Phone: 303-294-2718
Fax: 303-294-2329
Email: meghann.c.corrigan@xcelenergy.com

and

Amanda Clark
Regulatory Administrator, Public Service Regulatory Administration
Xcel Energy Services Inc.
1800 Larimer Street, Suite 1100
Denver, CO 80202-5533
Phone: 303-571-7736
Fax: 303-294-2329
Email: amanda.c.clark@xcelenergy.com

29. Agreement to Comply with Rule 4002(b)(IV)-(VI) (Rule 4002(b)(VII)): In lieu of the separate statements required by subparagraphs (b)(IV) through (VI) of Rule 4002, Public Service states that it has read, and agrees to abide by, the provisions of subparagraphs (b)(IV) through (VI) of this Rule.

30. Description of Existing Operations and General Colorado Service Area (Rule 4002(b)(VIII)): Public Service's existing operations and general service areas in Colorado are set forth in the Company's tariffs on file with the Commission. A map of the

Company's service territory is also attached to Mr. Litteken's Direct Testimony as Attachment LAL-1.

31. Location of Hearing (Rule 4002(b)(X)): Public Service requests that this Application be granted without a hearing pursuant to Commission Rule 1403. However, if a hearing is held, Public Service requests that it be held in Denver, Colorado.

32. Acknowledgement (Rule 4002(b)(XI)(D)): Public Service acknowledges that the Company has read and agrees to abide by the provisions of Rules 4002(b)(XI)(A) through (C).

33. Attestation Under Oath (Rule 4002(b)(XII)): An attestation signed by an officer, partner, owner, employee, agent, or attorney who is authorized to act on behalf of Public Service, stating that the contents of the Application are true, accurate, and correct, is attached to this Application.

34. Information Required by Rule 4002(c): Pursuant to Rules 1310(a) and 4002(c), Public Service hereby incorporates by reference the following information, which is on file with the Commission in Proceeding No. 06M-525EG:

- a. A copy of Public Service's Amended Articles of Incorporation, which was last filed on October 3, 2006.
- b. The name, business address, and title of each of Public Service's officers and directors, which was last filed on March 31, 2020.
- c. The names and addresses of affiliated companies that conduct business with Public Service, which was last filed on March 31, 2020.
- d. The name and address of Public Service's agent for service of process, which was last filed on March 31, 2020.

- e. A copy of Public Service's most recent audited balance sheet, income statement, and statement of retained earnings was last filed on March 31, 2020.

VI. CONCLUSION

WHEREFORE, Public Service respectfully requests that the Commission issue an order granting its Application and the requested relief as described herein and in its concurrently-filed Direct Testimony and attachments.

Dated this 9th day of February, 2021.

Respectfully submitted,

By: /s/ Tana K. Simard-Pacheco

Tana K. Simard-Pacheco, #17051
Assistant General Counsel
Xcel Energy Services Inc.
1800 Larimer Street, Suite 1400
Denver, CO 80202-5533
Phone: 303-571-2958
Fax: 303-294-2988
Email: tana.k.simard-pacheco@xcelenergy.com

Elizabeth M. Brama, #48634
Taft Stettinius & Hollister LLP
1331 17th Street, Suite 520
Denver, CO 80202-1566
Phone: 720-778-5480
Fax: 612-977-8650
Email: ebrama@taftlaw.com

**ATTORNEYS FOR PUBLIC SERVICE
COMPANY OF COLORADO**

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

IN THE MATTER OF THE VERIFIED)
APPLICATION OF PUBLIC SERVICE)
COMPANY OF COLORADO FOR APPROVAL)
TO EXTEND THE COMPANY'S PIPELINE) PROCEEDING NO. 21A-___G
SYSTEM INTEGRITY ADJUSTMENT ("PSIA"))
RIDER FOR CERTAIN PROJECTS THROUGH)
2024, WITH SUBSEQUENT WIND-DOWN OF)
THE RIDER)

VERIFICATION

STATE OF COLORADO)
CITY AND) SS: VERIFICATION
COUNTY OF DENVER)

I, Steven P. Berman, being duly sworn, do hereby depose and state that I am Director, Regulatory Administration, Xcel Energy Services Inc., agent for Public Service Company of Colorado, Applicant in the foregoing Application; that I am appointed alternate Attorney in fact and Agent; that I have read the foregoing Application; and that the facts set forth therein are true and correct to the best of my knowledge, information and belief.



Steve P. Berman
Director, Regulatory Administration

Subscribed and sworn to before me this 9th day of Feb., 2021

AMANDA CLARK
Notary Public
State of Colorado
Notary ID # 20164004880
My Commission Expires 03-25-2024

My Commission expires:

3/25/2024

Amanda Clark
Notary Public