

**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 ) PROCEEDING NO. 21A-\_\_\_\_EG  
APPROVAL OF ITS 2022–2025 )  
RENEWABLE ENERGY COMPLIANCE )  
PLAN )

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**VERIFIED APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR  
APPROVAL OF ITS 2022–2025 RENEWABLE ENERGY COMPLIANCE PLAN**

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Pursuant to Colorado Public Utilities Commission (“Commission”) Rules 3002 and 3657, Code of Colorado Regulations 4 CCR 723-3-3002 and 4 CCR 723-3-3657, Public Service Company of Colorado (“Public Service” or the “Company”) hereby requests that the Commission approve the Company’s 2022–2025 Renewable Energy Compliance Plan (“2022–25 RE Plan” or “Plan”). Accompanying this Application, and incorporated by reference, are the Company’s three-volume Plan and the direct testimony and exhibits of six Company witnesses in support of the Plan.

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

**I. INTRODUCTION**

Public Service presents its 2022–25 RE Plan for approval by the Commission in this Application. Under the Plan, the Company expects to add more than 700 MW of distributed energy resources (or “DERs”) and up to 300 MW of utility-scale solar (supporting Renewable\*Connect®), through a mix of continued programs and new, expanded renewable choice offerings. Overall, the 2022–25 RE Plan will support approximately \$3 billion in new solar and energy storage investments in Colorado over

the Plan period. This is the longest compliance plan in duration that Public Service has brought under the Renewable Energy Standard (“RES”),<sup>1</sup> and Public Service is excited about the benefits this RE Plan will bring for customers, developers, and other stakeholders in terms of a wide variety of customer choice offerings, in addition to market and programming certainty over the Plan period.

Not only will the 2022–25 RE Plan offer a longer planning horizon for developers, but the Plan also implements an array of recent legislation and offers a variety of new programs to suit customer needs, including new solar plus storage offerings. For example, the Company proposes to transition its Solar\*Rewards® Small program to a new Solar\*Rewards Battery Connect offering, which will provide enhanced customer choice offerings while helping spur this nascent industry. Additionally, the Plan includes an expanded set of Renewable\*Connect offerings designed to satisfy customer demand in this popular, sold-out program. And for the first time, the Company is expanding its renewable programs into its gas utility by offering an option for Public Service gas customers who want to reduce the carbon impact associated with their natural gas use through Renewable\*Connect Natural Gas.

The Plan also includes several new concepts and programmatic changes to incorporate recent legislative mandates enacted during the 2021 session. The enactments from the 2021 session relevant to the RES include: Senate Bill 21-261 (“SB 21-261”), Senate Bill 21-272 (“SB 21-272”), House Bill 21-1266 (“HB 21-1266”), House Bill 21-1238 (“HB 21-1238”). As described in Company witness Jack W. Ihle’s Direct Testimony, these four pieces of legislation collectively require a variety of changes to

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<sup>1</sup> See *generally* § 40-2-124, C.R.S.

the Company's suite of renewable energy offerings, which Public Service has worked diligently to implement in this Plan.

In order to develop the programmatic changes necessary to implement these legislative directives, the Company was unable to develop a comprehensive Plan and file this Application in time for a final decision to be issued by January 1, 2022. Consequently, the Company filed an Unopposed Motion to Extend its 2020–21 RE Plan (“Motion to Extend 2020–21 RE Plan”) in Proceeding No. 19A-0369E on December 10, 2021. As proposed in the Motion to Extend 2020–21 RE Plan, the extension would remain in effect until the Company commences implementation of this 2022–25 RE Plan. Practically speaking, the extension should only impact the Company's Solar\*Rewards Small program (which is proposed to be transitioned to Solar\*Rewards Battery Connect in the 2022–25 RE Plan), Solar\*Rewards Medium program (which is proposed to be reformed in the 2022–25 RE Plan as Solar\*Rewards Commercial and Industrial), and Colorado Energy Office (“CEO”) Low-Income Rooftop Solar program (which has been renamed to Residential IQ On-Site Solar in the 2022-25 RE Plan). For the Solar\*Rewards Large and Solar\*Rewards Community® programs, Public Service will issue Requests for Proposal (“RFPs”) shortly after a final decision is entered in this proceeding.<sup>2</sup> Public Service will release its new Solar\*Rewards Community Standard Offer and other new offering capacity and incentives shortly after the 2022–25 RE Plan is approved. For other existing programs, such as Renewable\*Connect and

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<sup>2</sup> Regarding the programs not affected by the extension, participants in those existing programs will continue their participation uninterrupted. As explained in the Motion to Extend 2020–21 RE Plan and Company witness Ms. Kerry R. Klemm's Direct Testimony, in the unlikely event that this 2022–25 RE Plan is not implemented before October 31, 2022, Solar\*Rewards Large and Solar\*Rewards Community solicitations or standard offerings would move forward according to an additional process that would enable the Company to issue the solicitations/offerings on or before October 31, 2022 at the capacity levels approved in the 2020–21 RE Plan.

Windsorce®, available capacity and enrollment do not depend on the expiration or commencement of this a Plan and these programs will not be impacted by an extension of the 2020–21 RE Plan.

**II. 2022-25 RE PLAN SOLAR PROGRAMS – OVERVIEW OF RETAIL DISTRIBUTED GENERATION PROPOSALS**

For several years, Public Service has offered an array of customer choice solar options under the umbrellas of its Solar\*Rewards and Solar\*Rewards Community offerings. Solar\*Rewards has historically been a program available to customers who install solar facilities at their own premises, which the Company is now proposing to expand to include off-site installations consistent with SB 21-261. The Company will continue to offer a net metering only option for retail residential and small commercial customers, which has been expanded to allow up to a 200 percent system size limit on eligible systems pursuant to SB 21-261. Solar\*Rewards Community enables customers to subscribe to third-party (including Company-owned) community solar gardens (“CSGs”) located off-site from the customer’s own premises. The existing offerings attract participation from both residential and non-residential customers.

Public Service is proposing a number of new and modified offerings that are responsive to recent legislative enactments, customer demand, and the Company’s decade-plus history with running renewable energy programming. Among its programming proposals, the Company is proposing a new Solar\*Rewards Battery Connect offering, a procedural framework to advance a new Solar\*Rewards Battery Connect pilot program, an Off-Site Solar offering, and new Renewable\*Connect offerings including Renewable\*Connect Natural Gas, in addition to moving from

characterizing capacity for all programs as Direct Current (“DC”) to Alternating Current (“AC”).

**A. Solar\*Rewards**

This 2022–25 RE Plan proposes several changes to the existing Solar\*Rewards program. The Company’s currently effective 2020–21 RE Plan includes the following Solar\*Rewards offerings: Solar\*Rewards Small (systems  $\leq 25$  kW), Solar\*Rewards Medium (systems between 25 kW and 500 kW), and Solar\*Rewards Large (systems  $> 500$  kW), as well as the CEO Low-Income Rooftop Solar offering. Below is a summary of the Company’s Solar\*Rewards program proposals in this Proceeding:

- **Solar\*Rewards Battery Connect**. Public Service proposes transitioning the existing Solar\*Rewards Small program into a Solar\*Rewards Battery Connect program, building on the Company’s existing Demand-Side Management Battery Connect pilot. The offering will be limited to residential and small commercial customers with a storage system paired to their solar system. This approach targets incentives at solar installations that are more beneficial in meeting peak demand because of the availability of a storage unit. The battery storage unit must be charged 100 percent by the on-site solar photovoltaic (“PV”) system.<sup>3</sup>

The Solar\*Rewards Battery Connect program will offer an incentive of \$0.005 per kWh of solar production, paid for 20 years. In addition to the \$0.005 per kWh incentive, the Company proposes an additional upfront incentive of \$125 per kW of installed battery capacity up to \$1,250 for residential customers and \$2,500 for small commercial customers, and a \$100 annual payment for meeting all but two dispatch events per

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<sup>3</sup> The program would permit very occasional deviations due to manufacturer settings for storm (i.e., outage) preparation that are likely to use nominal amounts of grid energy.

year. Public Service proposes that the Solar\*Rewards Battery Connect offering be made available to 340 solar plus storage systems each year of the Plan, for a total of 1,360 installations.

- **Solar\*Rewards Commercial and Industrial.** Public Service has also redesigned its existing Solar\*Rewards Medium offering and renamed the offering Commercial and Industrial, to better reflect the target audience of the offering. The offering will be available to demand-billed commercial and industrial customers.

Public Service proposes for the Solar\*Rewards Commercial and Industrial offering to implement a variety of changes as compared with the existing Medium offering. The maximum project size for an individual system will increase from 500 kW<sub>DC</sub> to 1 MW<sub>AC</sub>. The Company is proposing a tiered incentive, to be paid over 20 years, based on project size, with a larger incentive for smaller systems. And the total capacity for the program will be 15 MW<sub>AC</sub> annually over the term of the Plan, for a total of 60 MW<sub>AC</sub>. The Commercial and Industrial offering will also include a \$0.15 per kW upfront Standard Offer incentive adder that can be applied to any of the Commercial and Industrial Standard Offers, which would be paid to qualifying customers covering IQ customers and Disproportionately Impacted Communities. Public Service plans to earmark \$700,000 in RESA funds annually to support this incentive, with funds allocated on a first-come, first-allocated basis.

- **Solar\*Rewards Large.** Turning to the Company's Solar\*Rewards Large offering, the Company proposes to continue the RFP competitive solicitation for this offering with a few adjustments. For instance, the system size will not be capped at a uniform number across the program, but solar systems must be sized not to exceed 200

percent of the customer's reasonably expected annual electric consumption interconnected at the customer premise, however, the Company proposes to incentivize Solar\*Rewards Large RFP bids up to the first 100 percent of their reasonably expected annual energy use. The Company proposes reducing the total capacity of this program from 20 MW<sub>DC</sub> to 15 MW<sub>AC</sub>. The Company proposes a bid cap of \$0.03 per kWh for incentives under this offering.

- **Solar\*Rewards Residential IQ On-Site Solar**. Public Service proposes continuing the CEO Low-Income Rooftop Solar offering under the new name of Residential IQ On-Site Solar. The Company proposes to retain CEO as the exclusive administrative agent for this offering. The Company also proposes to change the offering capacity to 0.25 MW<sub>AC</sub> and accordingly adjust the offering budget to \$513,000 per year for each of the next four years, while increasing the allowed capacity per system to 7 kW<sub>AC</sub>. Additionally, the Company supports considering intermediate changes to apply the budget more efficiently for this offering to other types of IQ customer renewable options.

## **B. Other Retail Distributed Generation Program Proposals**

The Company proposes to offer other retail distributed generation programs that do not fall under Solar\*Rewards. Below is a summary of these proposals:

- **Net Metering Only**. Net metering remains an open option for customers. Availability for this option is not capped. Net metering only customers do not receive direct incentives.

- **Off-Site Solar Proposal**. Consistent with SB 21-261, the Company is also proposing a new Off-Site Solar program to allow for a single customer to locate a solar

facility at one premise located within the Company's service territory that would provide virtual net metering credits to other premises under the same account that are non-contiguous properties. Public Service proposes making 41 MW<sub>AC</sub> of capacity available annually in 2022 and 2023, with any unallocated or cancelled capacity carrying forward into the remaining years of the Plan. Public Service proposes limiting the size of a single-meter off-site installation to 500 kW (only one off-site location of the same customer account) and limiting the size of a multi-meter off-site installation (to multiple off-site locations of the same customer account) to 300 kW per meter.

**C. Solar\*Rewards Community**

Since the implementation of the Company's 2020–21 RE Plan, new legislation and new Commission Rules have impacted the CSG landscape in Colorado. Specifically, changes from the Commission's recent CSG Rulemaking in Proceeding No. 19R-0608E include: changing the identification of the maximum capacity of CSGs from DC to AC; addressing ways to achieve greater participation by residential, small commercial, agricultural, and eligible IQ customers; and, allowing for contribution of a subscriber's CSG bill credits to IQ energy assistance.

The Company developed its Solar\*Rewards Community program for the 2022–25 RE Plan to accommodate these changes in addition to other recent legislative enactments. The table below shows Public Service's proposed Solar\*Rewards Community capacity levels for the 2022–25 RE Plan.

**2022-2025 Proposed Solar\*Rewards Community Capacities (MW<sub>AC</sub>)**

All Capacity in MW AC	2022	2023	2024	2025	Total RE Plan
General Solar*Rewards Community RFP	35	35	35	35	140
Solar*Rewards Community Standard Offer	30	30	30	30	120
Xcel Energy IQ Solar*Rewards Community	10	10	10	10	40
<b>TOTAL SOLAR*REWARDS COMMUNITY</b>	<b>75</b>	<b>75</b>	<b>75</b>	<b>75</b>	<b>300</b>

Although Public Service has reallocated capacity among the Solar\*Rewards Community offerings, the total program capacity is consistent with historical capacity available under previous RE Plans.

The Company proposes reducing the portion of program capacity that is awarded and priced using an annual Request for Proposals solicitation and increasing the portion that is allocated through Standard Offers. The Company will offer 35 MW<sub>AC</sub> of Solar\*Rewards Community capacity annually via a general RFP. Individual projects can be sized up to 5 MW<sub>AC</sub>, and up to 10 MW<sub>AC</sub> after July 2023.

The Company proposes increasing Standard Offer Capacity to 30 MW per year. New incentives and capacity targets for Standard Offer CSGs will focus on subscriber diversity and IQ / Disproportionally Impacted Community impacts, as explained in more detail in the Direct Testimony of Company witness Ms. Kerry R. Klemm. The Company proposes to offer a \$0.00 baseline incentive, with stackable incentive adders for: projects smaller than 1 MW, IQ or Disproportionately Impacted Communities, Residential direct-billed customers, and community redevelopment projects. Incentive adders are subject to a cumulative \$0.065 maximum. Public Service will allocate 75

percent of Standard Offer capacity (22.5 MW each year) to projects 100 percent dedicated to IQ and/or Disproportionately Impacted Community requirements as defined by legislation and Rules. The remaining 25 percent of Standard Offer capacity (7.5 MW each year) will be awarded on a first-applied, first-awarded basis to projects that do not need to identify as IQ / Disproportionately Impacted Community eligible, but these projects would also not be prohibited from doing so for all or a portion of the CSG.

The Company also proposes increasing the capacity of its own Solar\*Rewards Community CSGs that are exclusively and uniquely available for IQ customers to 10 MW each year while continuing to use a collaborative labor partnership to help transition labor union members into the clean-energy economy.

Public Service is also proposing a procedural framework to advance a CSG with battery energy storage system (“BESS”) pilot program. Specifically, the Company is planning to develop a pilot which would seek to deploy 10 MW of DC-coupled BESS paired with CSGs. The Company proposes to develop a payment structure, which would compensate the firm capacity provided by the battery at a value closely aligned to our capacity costs. Unlike the residential battery program, the Company expects developers or operators to be capable of self-dispatching their batteries to meet performance requirements like those that we require for bulk-scale capacity resources.

While the Company is not proposing specific approval of the pilot at this time, Public Service has included this procedural framework as part of its filing to preview the concept with the Commission and parties so that it might streamline future approval, as discussed in Mr. Jack W. Ihle’s Direct Testimony.

### III. NON-DISTRIBUTED GENERATION AND WHOLESALE PROGRAMS

#### A. Renewable\*Connect

As part of this Plan, Public Service proposes to expand its Renewable\*Connect brand. The existing Renewable\*Connect program (or “R\*C”) will be re-named Renewable\*Connect 1.0 (“R\*C-1.0”), and the existing Windsource program will be expanded and brought under the Renewable\*Connect branding with the new name Renewable\*Connect Month-to-Month (“R\*C-MTM”). Public Service also proposes three other new Renewable\*Connect offerings: Renewable\*Connect 2.0 (“R\*C-2.0”), Renewable\*Connect Community (“R\*C-C”), and Renewable\*Connect Natural Gas (“R\*C-NG”).

- **Renewable\*Connect 1.0 (R\*C-1.0)**. R\*C is an existing program that enables Public Service’s customers to meet their energy needs and renewable energy goals by purchasing the electric output and renewable energy attributes of a dedicated 50 MW solar facility. R\*C capacity has been fully subscribed since the program launched in 2018 and the Company maintains a waiting list, from which capacity made available from departing customers is immediately filled. The Company will continue the R\*C program but will not add additional capacity to the existing program. To accommodate interest in programs like the existing R\*C, and to meet other customer needs and demands, Public Service proposes the additional R\*C offerings through this Plan. To avoid confusion, the existing R\*C offering will be re-branded as R\*C-1.0.

- **Renewable\*Connect 2.0 (R\*C-2.0)**. R\*C-2.0 builds on the success of R\*C-1.0. R\*C-2.0 will offer greater capacity to interested customers, will introduce updated program policies to benefit participating customers while also achieving administrative efficiencies, and it will offer an IQ option to enable the program to benefit more

customers. The R\*C-2.0 offering will have a capacity of up to 300 MW, supported by one or more dedicated, incremental solar resource(s) secured under a 15-year power purchase agreement(s) (“PPA”). The offering will not detrimentally affect non-participating customers’ rates. R\*C-2.0 is a long-term program for non-IQ subscribers and will include only a 15-year option for these long-term customers with financial commitments. Subscribers will also have the option of purchasing additional capacity that will fund donated subscriptions for IQ customers. Participating IQ customers will not be obligated to subscribe for any particular term. Similar to R\*C-1.0, revenue collected from this offering will be used to offset the costs of delivering the offering, as further described in the Direct Testimony of Company witness Mr. R. Neil Cowan.

- **Renewable\*Connect Month-to-Month (R\*C-MTM)**. The R\*C-MTM offering will replace the Company’s existing Windsource green pricing program, and the replacement program will continue to offer a simple way for customers to participate in a voluntary renewable energy option without entering into a long-term contract. The offering is a voluntary month-to-month program structured like the Windsource offering, but R\*C-MTM will also include energy produced from solar resources. Customers who are currently participating in Windsource will automatically be migrated to R\*C-MTM. Like the existing Windsource offering, R\*C-MTM will: (1) provide the opportunity for customers to purchase renewable energy (through the purchase of Renewable Energy Credits or “RECs”) in excess of the Company’s RES requirements, thereby offsetting their energy usage with the purchase of green energy; (2) offer renewable energy at rates that are competitively priced; and (3) ensure that non-participants are not economically impacted by R\*C-MTM. The offering will be available to all Public Service

customers, and as its name suggests, there is no long-term commitment. Revenue collected from this offering will be deposited into the RESA deferred account to support ongoing renewable energy efforts.

- **Renewable\*Connect Community (R\*C-C)**. R\*C-C is a new offering that will allow interested municipalities and counties within Public Service's territory to purchase available RECs from Public Service to meet community-wide clean energy goals. Public Service developed this offering in recognition of many communities' interest in the purchase of RECs on behalf of their local residential customers to meet the community's clean energy goals. RECs retired or transferred to communities under the R\*C-C offering will not be used for the Company's compliance with the RES and will not be used in calculating the Company's Certified Renewable Percentage. Public Service will work with communities to determine the suitable number of RECs to purchase, and communities will be invoiced on a predetermined schedule to be developed between Public Service and the community. The RECs retired or transferred to the community customers will be sourced the same as RECs for the R\*C-MTM offering, and the contract duration will be one year.

- **Renewable\*Connect Natural Gas (R\*C-NG)**. R\*C-NG is a new voluntary retail program that will enable the Company's natural gas customers to reduce their carbon impact of their natural gas usage through a combination of renewable natural gas ("RNG") and carbon offsets. The Company developed the R\*C-NG offering to provide greater customer choice for natural gas customers and to further the Company's goal of reducing emissions from the natural gas system. Under the proposed R\*C-NG offering, natural gas customers will be able to pay a flat rate of \$5 per month to avoid a block of

approximately 0.0912 short tons of carbon emissions, which represents approximately one quarter of an average residential customer's carbon emissions from natural gas. The Company selected a block unit for the offering because consumption of natural gas varies considerably over a calendar year and a block-based product allows customers to levelize their spending, in contrast to a product based on a price per unit consumed. The R\*C-NG program will not have any adverse impacts on non-participating customers, and the program will be open to all residential and commercial natural gas customers in Public Service's service territory. All program costs will be paid for from revenue collected from participating customers, and the Company is not proposing any earnings mechanism for this offering, as explained in the Direct Testimony of Company witness Mr. Cowan.

**B. Recycled Energy Program**

Public Service's Recycled Energy program provides financial incentives to customers who deploy recycled energy electric generating resources, which turn waste heat into energy. Customers participating in this program would utilize Tariff Schedule RE, and the Company proposes to continue the program without changes.

**IV. EXTENSION OF THE RENEWABLE ENERGY STANDARD ADJUSTMENT PAST DECEMBER 31, 2022**

The Renewable Energy Standard Adjustment ("RESA") is currently set at one percent, consistent with Decision No. C18-0762 in Proceeding No. 17A-0797E and Decision No. C20-0700 in Proceeding No. 20AL-0191E. Under Decision No. C20-0700, the RESA is set to expire on December 31, 2022. Public Service proposes extending

the RESA at the one percent collection level.<sup>4</sup> The RESA will continue to provide an important source of support to managing customer bill impacts as Public Service continues on its path to 100 percent carbon reductions by 2050. Company witness Mr. Alexander G. Trowbridge discusses the Company's proposed implementation of the RESA if extended by the Commission. He also presents and supports the revenue requirements justifying continuation of the RESA at the proposed level, as required by Decision No. C20-0700.

#### V. INFORMATION REQUIRED BY RULE 3002

1. Rule 3002(b)(I): Public Service is an operating public utility subject to the jurisdiction of this Commission, engaged, *inter alia*, in the transmission, distribution, and purchase of electricity and 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 1400  
Denver, Colorado 80202

2. Rule 3002(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.

3. Rule 3002(b)(III): Please send copies of all inquiries, notices, pleadings, correspondence, and other documents regarding this Application to:

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<sup>4</sup> Paragraph 21 of Decision No. C20-0700 provides, in relevant part that "Public Service may file an advice letter to continue the RESA after December 31, 2022, where such filing will trigger a holistic examination of the RESA surcharge." Public Service requests the Commission treat this Application and associated follow-on Compliance Advice Letter as the appropriate filing referenced in Paragraph 21 of Decision No. C20-0700. Additionally, Public Service's concurrently-filed Motion for Waivers and Variances necessary to implement the 2022-25 RE Plan seeks a waiver, to the extent necessary, of Decision No. C20-0700's requirement that Public Service file an advice letter to continue the RESA after December 31, 2022, so that the Company's request to continue the RESA may be considered in this proceeding.

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4. Rule 3002(b)(IV)–(VII): In lieu of the separate statements required by subparagraphs (b)(IV) through (VI) of this rule, Public Service states that it has read, and agrees to abide by, the provisions of subparagraphs (b)(IV) through (VI) of this rule.

5. Rule 3002(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.

6. Rule 3002(b)(IX) and Rule 3002(c): Pursuant to 3002(b)(IX) and Rule 3002(c), Public Service hereby incorporates by reference the following information required by Rule 1310, which is on file with the Commission in Proceeding 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, 2021;
- c. The names and addresses of affiliated companies that conduct business with Public Service, which was last filed on March 31, 2021;
- d. The name and address of Public Service's agent for service of process, which was last filed on March 31, 2021;
- e. A copy of Public Service's most recent audited balance sheet, income statement, and statement of retained earnings which was last filed on March 31, 2021.

7. Rule 3002(b)(X): If the Commission determines that a hearing on this Application is necessary, Public Service requests that it be held at the Commission's offices in Denver, Colorado, or through videoconferencing if still necessary.

8. Rule 3002(b)(XI): Public Service acknowledges that the Company has read and agrees to abide by the provisions of 4 CCR 723-3-3002(b)(XI)(A)–(C).

9. Rule 3002(b)(XII): Jack Ihle, Director—Regulatory and Strategic Analysis, an employee of Xcel Energy Services Inc. who is authorized to act on behalf of the Company, states under penalty of perjury that the contents of this Application are true, accurate, and correct to the best of his knowledge. Mr. Ihle's affidavit is attached to this Application.

## **VI. REQUESTED APPROVALS**

Wherefore, Public Service Company of Colorado respectfully requests that the Commission approve the Company's 2022–25 RE Plan as set forth herein and in the supporting testimony of the Company's witnesses. Specifically, Public Service requests that the Commission approve the Plan, including, without limitation:

- The Company's proposed acquisition/capacity levels, incentive levels, and programming proposals for its Solar\*Rewards, Solar\*Rewards Community, and Solar\*Rewards Residential IQ On-Site Solar programs, including the Company's proposal to transition the Solar\*Rewards Small offering to a Solar\*Rewards Battery Connect offering;
- The Company's proposal to develop and own an additional 40 MW of Company-owned CSG capacity using a project labor agreement ("PLA");
- The Company's proposed Off-Site Solar capacity and programming proposals, including the Company's proposed methodology for calculating the net metering credit minus a reasonable charge for delivery;
- The Company's proposed Renewable\*Connect capacity and programming proposals, including its Renewable\*Connect 1.0 and new Renewable\*Connect 2.0, Renewable\*Connect Month-to-Month (formerly known as Windsource), Renewable\*Connect Community, and Renewable\*Connect Natural Gas proposals, inclusive of the Company's proposed acquisition plan;
- The Company's request to maintain RESA collections at the current rate of one percent;
- The Company's request to defer expenses associated with preparing and litigating this proceeding;
- All requests for waivers and variances set forth in the contemporaneously-filed Motion for Waivers and Variances, along with any other waivers or variances to the extent the Commission deems them necessary to implement the Company's proposed and/or ultimately approved Plan, as set forth in the Company's contemporaneously-filed Motion for Waivers and Variances;
- The Company's request for alternative forms of notice for the 2022-25 RE Plan, as set forth in the Company's contemporaneously-filed Motion for Alternative Forms of Notice; and,

- All other requested approvals and proposals set forth in the Company's Direct Case, in addition to any other approvals or relief necessary to implement the Company's proposed 2022-25 RE Plan.

DATED this 20th day of December, 2021.

Respectfully submitted,

By: /s/ Elizabeth C. Stevens  
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**ATTORNEYS FOR PUBLIC SERVICE  
COMPANY OF COLORADO**

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 2022- ) PROCEEDING NO. 21A-\_\_\_\_ EG  
2025 RENEWABLE ENERGY COMPLIANCE )  
PLAN )

VERIFICATION

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

I, Jack Ihle, being duly sworn, do hereby depose and state that I am Director, Regulatory and Strategic Analysis, Xcel Energy Services Inc.; that I am an authorized agent for Public Service Company of Colorado, Applicant in the foregoing Application; that I have read the foregoing Application; and that the facts set forth therein are true, accurate, and correct to the best of my knowledge, information, and belief.

  
\_\_\_\_\_  
Jack Ihle  
Director, Regulatory and Strategic Analysis

Subscribed and sworn to before me this 17<sup>th</sup> day of Dec 2021.

Witness my hand and official seal.

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

  
\_\_\_\_\_  
Notary Public

My Commission expires:  
3/25/2024