

2020-21 RE Plan Compliance Table

Colorado PUC E-Filings System

Decision	Requirement	Compliance
<i>Requirements for 2022-25 RE Plan</i>		
Decision No. R20-0099, ¶ 42	“The ALJ also finds that the Company’s RES and No-RES cost analysis of locked down resources as compared to a RES and No-RES analysis based on market conditions provided helpful and relevant evidence, and as such requires the Company to provide this same analysis with its next plan filing.”	See Mr. Trowbridge’s Direct Testimony, Sections III-V.
Decision No. R20-0099, ¶ 75 n.24	The Company was directed to revisit in its next RE Plan the standard timeline for CSG completion without penalty, as well as bid fees for and limitations on site relocations.	See Ms. Klemm’s Direct Testimony, Section III(B).
Decision No. R20-0099, ¶ 161	“The ALJ finds that it is in the public interest to require the Company and Staff to confer on the scope and budget for a third-party audit [of the Company’s RESA account], and if they agree, to present their proposal for the Commission to consider in the Company’s next plan, and directs them to do so. The ALJ draws no conclusion as to whether such an audit should ultimately be required.”	See Mr. Trowbridge’s Direct Testimony, Section VI(B).
Decision No. R20-0099, ¶ 164	“The ALJ directs Public Service to initiate a stakeholder outreach to further investigate low-income issues across a broad spectrum of customer needs, which should include, at minimum, CEO, the OCC and Staff. The Company is directed to present the results of this review as part of its next renewable energy standard compliance plan.”	See Mr. Ihle’s Direct Testimony, Section VII(E). Company representatives held group and business-to-business meetings in 2020 and 2021 on the subject. 2021 legislative activity tied to environmental justice and equity has been cause to refocus efforts in this area.
<i>2020-21 RE Plan follow-on filing requirements</i>		
Decision No. R20-0099, ¶ 117	“The ALJ finds that the Company’s proposal to file anonymized RFP bid response data for the On-Site Large [Solar*Rewards] offering through an informational filing 30 days after the bid deadline	The Company filed its Informational Notice Regarding its Solar*Rewards Large Program 2020 RFP on September 4, 2020, within 30 days of the bid deadline of August 5, 2020, in which it

Decision	Requirement	Compliance
	<p>provides added transparency while protecting customer privacy and directs the Company to do so.”</p>	<p>provided anonymized bid data and indicated it had engaged with stakeholders throughout the process and reviewed bid award recommendations with Staff in advance of granting awards.</p> <p>The Company filed its Informational Notice Regarding its Solar*Rewards Large Program 2021 RFP on June 30, 2021, within 30 days of the bid deadline of June 2, 2021 (as required by Decision No. R20-0099, ¶ 117), in which it provided anonymized bid data and indicated it had engaged with stakeholders throughout the process and reviewed bid award recommendations with Staff in advance of granting awards.</p> <p>The Company also filed its Informational Notice Regarding its 2020 Solar*Rewards Community Program RFP on December 16, 2020, within 30 days of the bid deadline of November 16, 2020. While this filing was not explicitly required by any Decisions, the Company nonetheless provided anonymized bid data and indicated it had engaged with stakeholders throughout the process and reviewed bid award recommendations with Staff in advance of granting awards, consistent with its proposal in testimony.</p>
<p>Decision No. C20-0289, ¶ 77</p>	<p>“We . . . direct Public Service to engage with interested stakeholders, including Staff, COSSA/SEIA, and CEO, and to propose a significant program for retail solar + storage and behind the meter storage. We order the Company to start this</p>	<p>The Company filed its Status Update Regarding Solar Plus Storage Programming on July 27, 2020, and filed a Supplemental Status Update on August 14, 2020. These filings updated the Commission on various stakeholder meetings</p>

Decision	Requirement	Compliance
	<p>engagement immediately and to file either an application for approval of a proposed pilot or other programs or a status update to the Commission within 90 days[.]”</p>	<p>held by the Company to work toward development of a storage program proposal, and specifically on changes to the Company’s DSM Residential Battery Demand Response Pilot program intended to further increase residential storage deployment on its system. The Company further stated that it believed it would be well-positioned to include a solar plus storage program in a broader future filing, such as its next RE Plan filing.</p>
<p>Decision No. C20-0289, ¶ 90</p>	<p>“We . . . require Public Service to work with CEO to identify a solution to the current incentive structure that reduces CEO’s administrative burden [for the CEO Low-Income Rooftop Solar program]. We direct the parties to come back to the Commission within 60 days from the effective date of this Decision with a status update indicating the progress they have made to resolve this issue.”</p>	<p>The Company and CEO filed their Joint Notice of Resolution on June 29, 2020, stating that they had arrived at a mutually agreeable outcome regarding administration of the CEO Low-Income Rooftop Solar program.</p>
<p>Decision No. C20-0289, ¶ 108</p>	<p>“We order . . . Public Service to: (1) perform its review [of the cost drivers, amounts, and resulting final REC incentive for the Company-owned Low-Income CSG offering] with Staff within 30 days after the effective date of this Decision on exceptions; and (2) make a filing establishing this review is complete and identifying the agreed-upon REC incentive within 30 days after completing its review with Staff.”</p>	<p>The Company filed its Notice of Compliance Regarding Company-Owned CSGs on June 18, 2020. It stated that the Company had completed the required review with Staff, provided the results, and indicated that the Company and Staff would continue similar reviews and conferral on CSG projects going forward.</p>
<p>Decision No. C20-0289, ¶ 59</p>	<p>“We note . . . that revisions to the Commission’s CSG rules are currently being considered in ongoing rulemaking Proceeding No. 19R-0608E, including revisions to implement HB 19-1003. We direct Public Service to make appropriate filings to implement any</p>	<p>The 2020 and 2021 RFPs contain most provisions resulting from Proceeding No. 19R-0608E, aside from donations and customer REC retention that require a new RE Plan filing.</p>

Decision	Requirement	Compliance
	rule change adopted in that rulemaking concerning [the treatment of CSG RECs and energy as a bundled product].”	
Decision No. C20-0431, ¶¶ 14-16	Granted the Company’s limited ARRR and directed the Company to file a petition within 30 days for any waivers and/or variances necessary to transition from the use of production meters to PV Watts for on-site solar systems of 10 kW or less, supported by bill impacts and identifying whether the Company had conferred with Staff or other parties in preparing the petition.	The Company filed its Verified Petition for Issuance of Waivers to Implement Commission Directives Regarding Production Meters in Proceeding No. 20V-0297E on July 15, 2020. The Company’s Petition requesting temporary waivers from Rule 3402(a)(IV) and certain of its tariffs was granted by Decision No. C20-0606 on August 19, 2020, which further directed the Company to notify the Commission of any changes to the proposed implementation schedule. The Company subsequently filed such a notice on July 12, 2021, updating its transition timeline but retaining the initial milestone of August 2021 for completing implementation of the production meter requirements.
<i>Other requirements</i>		
Decision No. C20-0289, ¶ 35	“This RE Plan is approved based on the rules now in effect. We appreciate the Company’s commitment to make an informational filing regarding modified criteria [for evaluating Solar*Rewards Community bids] but clarify that the Company should make a more substantive filing and that the filing should be made sooner than 15 days prior to its RFP, allowing sufficient time for Commission review. The Company shall either file a request to amend its RE Plan based on the rule change [impacting the Solar*Rewards Community program] or explain why such amendment is not appropriate.”	Motions to Modify Solar*Rewards Community Bid Evaluation Criteria and Amend 2020-21 RE Plan were filed on September 21, 2020 and September 14, 2021, and were approved by Decision No. C20-0708 on October 6, 2020 and Decision No. C21-0602 on September 24, 2021, respectively.
Decision No. C20-0289, ¶¶ 46-47	“[T]he Commission’s existing rules require the use of PV Watts rather than a production meter to calculate	The Company made the required transition on June 8, 2020 and issued its first annual incentive

Decision	Requirement	Compliance
	<p>the annual expected production for all incentivized on-site solar systems that are 10 kW or less. . . . We uphold the ALJ’s finding that the evidence in this Proceeding does not justify the cost of the production meters and directing the Company to follow existing rules.”</p>	<p>payment to Solar*Rewards Small customers on July 1, 2021; see below and Notice in Proceeding No. 20V-0297E.</p>
<p>Decision No. C20-0289, ¶¶ 109-110</p>	<p>“The Commission orders that [the costs of previously locked down eligible energy resources] shall be reset and locked down during the 2020-21 RE Plan period, and until such resources are reevaluated in a subsequent RE Plan or ERP filing.”</p>	<p>See Mr. Trowbridge’s Direct Testimony, Sections III-V.</p>
<p>Decision No. C20-0289, ¶ 112</p>	<p>“We . . . require Public Service to make a filing with the Commission, no later than 60 days after the receipt of [Solar*Rewards Large] bids, describing its proposal not to fill the full approved amounts because of insufficient reasonably priced bids. . . . The Commission can then take up the matter in an expedited manner and determine whether to approve the proposed amendment.”</p>	<p>N/A. The Company has awarded the maximum capacity in both its S*R Large RFPs for 2020 and 2021.</p>