

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

\* \* \* \* \*

IN THE MATTER OF THE )  
APPLICATION OF PUBLIC SERVICE )  
COMPANY OF COLORADO FOR )  
APPROVAL OF ITS 2022-2025 ) PROCEEDING NO. 21A-\_\_\_\_EG  
RENEWABLE ENERGY COMPLIANCE )  
PLAN )

**DIRECT TESTIMONY OF TARA FOWLER**

**ON**

**BEHALF OF**

**PUBLIC SERVICE COMPANY OF COLORADO**

**December 20, 2021**

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**DIRECT TESTIMONY OF TARA FOWLER**

1 I. **INTRODUCTION, QUALIFICATIONS, PURPOSE OF TESTIMONY**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Tara Fowler. My business address is 1800 Larimer Street, Denver,  
4 Colorado 80202.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?**

6 A. I am employed by Xcel Energy Services Inc. (“XES”) as the Director of Purchased  
7 Power. XES is a wholly owned subsidiary of Xcel Energy Inc. (“Xcel Energy”) and  
8 provides an array of support services to Public Service Company of Colorado  
9 (“Public Service” or the “Company”) and the other utility operating company  
10 subsidiaries of Xcel Energy on a coordinated basis.

11 **Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THE PROCEEDING?**

12 A. I am testifying on behalf of Public Service.

1 **Q. PLEASE SUMMARIZE YOUR RESPONSIBILITIES AND QUALIFICATIONS.**

2 A. As the Director of Purchased Power for Xcel Energy Services, I am responsible for  
3 the negotiation and administration of purchased power agreements for the Xcel  
4 Energy utility operating companies, including Public Service. My team is  
5 responsible for the administration of approximately 250 long-term power purchase  
6 agreements (“PPAs”), totaling in excess of 13,000 megawatts (“MW”) of installed  
7 capacity and including a variety of different technology types such as wind, hydro,  
8 solar, solar plus storage, and gas projects. Further, my team is responsible for the  
9 overall management of Xcel Energy’s Renewable Energy Credit (“REC”) portfolio.  
10 A description of my qualifications, duties, and responsibilities is set forth in my  
11 Statement of Qualifications at the conclusion of my Direct Testimony.

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

13 A. The purpose of my Direct Testimony is to support the sections of the Company’s  
14 2022-2025 Renewable Energy Compliance Plan (“2022-25 RE Plan” or “Plan”)  
15 relating to RECs. I am responsible for managing the Company’s internal REC  
16 Tracking System (utilized for RECs generated from less-than-1-MW solar  
17 resources on our system) and the Company’s involvement in the Western  
18 Renewable Energy Generation Information System (“WREGIS”).

19 **Q. ARE YOU SPONSORING ANY ATTACHMENTS AS PART OF YOUR DIRECT**  
20 **TESTIMONY?**

21 A. I am sponsoring Tables 4-1 through 4-5 in Volume 2 of the Company’s 2022-25  
22 RE Plan, Attachment JWI-2 in this proceeding, which were prepared by me or  
23 under my direct supervision.

1 **Q. WHAT SECTION OF THE 2022-25 RE PLAN ARE YOU RESPONSIBLE FOR**  
2 **PREPARING?**

3 A. I was responsible for the preparation of Attachment JWI-1, Section 4 in this  
4 proceeding, describing estimates of existing and forecasted RECs.



1 **Q. PLEASE BRIEFLY DESCRIBE TABLE 4-2 IN ATTACHMENT JWI-2.**

2 A. Table 4-2 provides information about the RECs and type of RECs Public Service  
3 plans to acquire in the 2022 through 2025 Compliance Years, and the RECs that  
4 Public Service expects to retire to comply with the requirements set forth for years  
5 2022 through 2025. Year 2021 is being provided as the foundation for presenting  
6 years 2022 through 2025.

7 **Q. CAN YOU LEAD US THROUGH TABLE 4-2 IN GREATER DETAIL?**

8 A. Certainly. More specifically, Table 4-2 contains by REC type the amount of RECs  
9 the Company expects to have available and anticipates retiring for RES  
10 Compliance Years 2022 through 2025.<sup>1</sup> These RECs are provided by fuel type  
11 within each REC category. For example, Row 9 presents the subtotal for all eligible  
12 Wholesale-distributed generation (“DG”) wind resources and Row 11 presents the  
13 subtotal for all eligible Wholesale-DG resources.

14 Column “Renewables Resources” describes the REC category. Column  
15 “Capacity (MW)” shows the resource capacity. Column “RECs Carried Forward  
16 After RES Compliance” identifies the quantity of RECs that were carried forward.  
17 Column “CY RECs Available less Transfers” identifies the quantity of RECs  
18 generated from the various sources, less transfers obligated to wholesale  
19 customers or sold. The remaining columns in Table 4-2 detail REC Bonus, REC  
20 compliance requirements, and REC balances without bonus that are carried  
21 forward.

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<sup>1</sup> Projected 2021 REC production is included in the Plan tables to provide additional detail for the REC production and illustrate how the banked RECs are carried forward for the 2022-25 RE Plan.

1 **Q. WHAT REC BONUSES ARE BEING APPLIED?**

2 A. Rules 3654(g) and (h) provide for bonuses for each kilowatt-hour (“kWh”) of eligible  
3 energy generated from a resource in Colorado or from a Community-Based  
4 project. The Company typically measures in megawatt-hours (“MWh”), which is  
5 1000 kWh. For RES compliance, the rules allow a Qualifying Retail Utility (“QRU”)  
6 to count an in-state REC as 1.25 RECs or a Community-based project as 1.5  
7 RECs. The in-state bonus for Retail DG resources applies only to purchase  
8 transactions contracted prior to August 11, 2010. Columns “Bonus Credits  
9 Available” and “Additional Community REC Bonus Available” in Table 4-2 reflect  
10 these rule provisions.

11 **Q. DID THE PASSAGE OF SENATE BILL (“SB”) 13-252 AFFECT THE REC  
12 BONUS APPLIED?**

13 A. Yes. SB 13-252 allows for a 1.25 (25 percent) REC bonus on all renewable  
14 resources placed in service prior to January 1, 2015 (i.e., less than or equal to  
15 December 31, 2014), with the exception of retail DG. The Company assumes that  
16 all incremental renewable resources placed in service prior to January 1, 2015 will  
17 retain the REC bonus. Consequently, this law affects new energy resources that  
18 come online after this date by making them ineligible for the bonus.

19 **Q. WHY IS THE COMPANY TRANSFERRING RECS TO OTHER PARTIES?**

20 A. If the wholesale customer agrees to pay the full costs associated with the  
21 acquisition of the eligible energy, Rule 3660(l) requires that Public Service transfer  
22 RECs to the wholesale customer based on the wholesale customer’s load ratio  
23 share of Public Service’s total retail and wholesale energy deliveries. Row 109 of



1 Table 4-3 demonstrates “Total Renewable Resources” and the entitled column  
2 “Wholesale REC Allocation” reflects the Company’s anticipated REC transfer  
3 obligations under Rule 3660(I).

1 **III. REC TRACKING**

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

3 A. In this section of my testimony, I discuss the Company's method for tracking RECs  
4 for compliance with the RES.

5 **Q. PLEASE SUMMARIZE TABLE 4-4.**

6 A. Table 4-4 presents the projected DG RECs that Public Service expects will be  
7 generated by existing resources in each category and resources acquired through  
8 the Company's Solar\*Rewards® and Solar\*Rewards Community® programs.  
9 Table 4-4 does not show the impact of RECs carried over from the previous  
10 year(s).

11 **Q. PLEASE SUMMARIZE TABLE 4-5.**

12 A. Table 4-5 presents the projected RECs from the 50 MW Titan Solar facility to  
13 supply the Company's Renewable\*Connect® program ("R\*C"). The Company  
14 plans to retire 100 percent of the RECs from the facility on behalf of the customers  
15 participating in the program. The RECs for R\*C are tracked in WREGIS under a  
16 separate sub-account which only collects RECs produced from Titan Solar. The  
17 Company retires RECs from Titan Solar specifically from this sub-account.

18 **Q. HOW DOES THE COMPANY TRACK RECS FOR COMPLIANCE?**

19 A. The Company internally tracks RECs generated from less-than-1-MW solar  
20 resources on its internal tracking system. For this purpose, the Company  
21 developed a REC Tracking System which became operational in 2007. The  
22 internal database creates, tracks, and counts all RECs by type of renewable  
23 resource, date of generation, identification of the generator, and generation

1 location. The REC Tracking System issues one REC for each MWh of renewable  
2 energy Public Service produces or purchases through PPAs.

3 To ensure RECs are not double counted or retired for multiple purposes,  
4 the system assigns a unique serial number to each REC. Similarly, WREGIS  
5 assigns unique serial numbers to each REC to protect against double-counting  
6 and to increase credibility and consumer confidence. All Non-DG and Wholesale-  
7 DG generators are registered in WREGIS and RECs from these generators have  
8 been issued and tracked in WREGIS since January 2009. Retail-DG generators  
9 greater than 1 MW (large Retail-DG) are registered in WREGIS and RECs from  
10 this generation have been issued in WREGIS since Nov 2010.

11 **Q. WHY ARE NOT ALL RETAIL DG SOLAR RECS TRACKED IN WREGIS?**

12 A. Pursuant to Rule 3659(j), effective December 30, 2010, retail DG generators less  
13 than 1 MW are exempt from registration in WREGIS. Therefore, at this time the  
14 Company uses the REC Tracker system for retail DG REC tracking under 1 MW.

15 **Q. DOES SB 19-236 ADDRESS THE ROLE OF RECS?**

16 A. Yes. A utility is required to retire RECs in the year they are generated by any  
17 eligible energy resources used to comply with the clean energy targets. The  
18 Company interprets this part of the statute to mean that it must retire, or cause to  
19 be retired, RECs from eligible energy resources in the year generated starting in  
20 2030, the year of the first compliance requirement of the section. The Company  
21 understands that the Commission seeks comment and analysis as to when the  
22 current year REC retirement provision applies, and the Company's position is that  
23 it applies in 2030 based on the plain language of the statute. The legal analysis

1 was previously filed in Proceeding No. 19R-0096E, and again as Attachment JWI-  
2 1 to the Direct Testimony of Jack W. Ihle in Proceeding No. 21A-0141E in support  
3 of that interpretation.

1           **IV. RENEWABLE\*CONNECT MONTH-TO-MONTH PROGRAM**

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

3   A. In this section of my testimony, I detail how the Company proposes to retire RECs  
4       associated with the Renewable\*Connect Month-to-Month (“R\*C-MTM”) program,  
5       formerly known as the Windsource® program, for the purposes of the 2022–25 RE  
6       Plan. Company witness Mr. Neil Cowan discusses in more detail the purpose,  
7       program features, and pricing for the R\*C-MTM program.

8   **Q. PLEASE DESCRIBE HOW THE COMPANY WILL RETIRE RECS FOR THE R\*C-**  
9       **MTM PROGRAM TO COMPLY WITH THE DECISIONS IN PROCEEDING NO.**  
10       **13A-0836E?**

11   A. The Company will retire RECs for the R\*C-MTM program generated from the  
12       portfolio of wind and solar generation on the Company’s system. The RECs retired  
13       will be on behalf of the customers who subscribe and participate in the program  
14       and will be equivalent to the aggregated consumption over the course of the  
15       reporting year. RECs eligible to be retired for R\*C-MTM may have a generation  
16       date from the last half of the prior year, or current year. Once these RECs are  
17       retired for R\*C-MTM, they cannot be used for REC transfers, RES compliance, or  
18       sold to a third party. The R\*C-MTM REC retirements are from Non-DG renewable  
19       resources and are detailed in the RES Compliance Reports.

20   **Q. IS THE R\*C-MTM PROGRAM THIRD-PARTY CERTIFIED?**

21   A. Yes. Green-e currently certifies the R\*C-MTM program and the Company plans  
22       to continue to use Green-e to certify its R\*C-MTM program.

1 **Q. WHAT IS GREEN-E CERTIFICATION?**

2 The Green-e certification program is a consumer protection program administered  
3 by the Center for Resource Solutions (“CRS”), a third-party certifying organization  
4 that ensures validity and verifies clean energy products. Green-e certification is  
5 designed to provide confidence in purchases of renewable energy through the  
6 product information, assurance of product quality, and verification of product  
7 ownership.<sup>2</sup> Renewable energy can be eligible for Green-e certification if it is  
8 generated from facilities that are less than 15 years old and meet the high  
9 standards required by CRS for environmental quality, which is marketed with  
10 transparency and accuracy. Public Service ensures the R\*C-MTM program is  
11 verified and Green-e certified.

12 **Q. HAS THE COMMISSION PREVIOUSLY APPROVED THE COMPANY TO**  
13 **RETIRE SPECIFIC TYPES OF RECS ON BEHALF OF R\*C-MTM CUSTOMERS?**

14 A. Yes. In Decision Nos. R14-0902 and C14-1505 in Proceeding No. 13A-0836E, the  
15 Commission approved the Company to retire non-DG RECs on behalf of  
16 customers. Consistent with those decisions, the Company has been retiring only  
17 non-DG RECs on behalf of customers.

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<sup>2</sup> <https://www.green-e.org/faq>.

1 **Q. SINCE THE R\*C-MTM PROGRAM IS SOURCED FROM THE COMPANY'S**  
2 **RENEWABLE PORTFOLIO, HOW DOES THE COMPANY ACCOUNT FOR THE**  
3 **FACT THAT CUSTOMERS PURCHASING 100 PERCENT OF THEIR ENERGY**  
4 **FROM R\*C-MTM ARE PURCHASING ENERGY FROM A PORTFOLIO OF**  
5 **RENEWABLE ENERGY REQUIRED FOR THE COLORADO RES?**

6 **Q. THE COMPANY'S RENEWABLE PORTFOLIO PROCURES AND TRACKS**  
7 **RECS PRODUCED BY VARIOUS SOURCES. RECS ASSOCIATED WITH THE**  
8 **R\*C-MTM PROGRAM GO THROUGH THE GREEN-E CERTIFICATION**  
9 **PROCESS. THE COMPANY ENSURES THAT RECS RETIRED ON BEHALF OF**  
10 **R\*C-MTM CUSTOMERS ARE NOT USED FOR ANY OTHER COMPLIANCE**  
11 **PURPOSES.HAVE R\*C-MTM CUSTOMERS BEEN NOTIFIED THAT A**  
12 **PORTION OF THE RECS ASSOCIATED WITH R\*C-MTM SALES WILL BE**  
13 **RETIRED FOR RES COMPLIANCE?**

14 **A.** Yes. On the program page on the Company's website,<sup>3</sup> the Company explains  
15 this special retirement provision for 100 percent subscription. There is also an  
16 annual notification provided in the R\*C-MTM customer bill that includes the product  
17 content label approved by Green-e.

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<sup>3</sup> <https://co.my.xcelenergy.com/s/renewable/windsource>.

**V. WREGIS**

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

A. In this section of my testimony, I provide information related to the Company's participation in WREGIS and the process for registering and tracking RECs within this regional system.

**Q. CAN YOU PLEASE PROVIDE MORE BACKGROUND ON WREGIS?**

A. WREGIS is an independent, renewable energy registry and credit tracking system for electricity generation located within the western states, including Colorado. WREGIS was developed through a collaborative effort between the Western Governors Association, the Western Regional Air Partnership, and the California Energy Commission. WREGIS is operated by the Western Electricity Coordinating Council ("WECC"), of which Public Service is a member.

**Q. IS PARTICIPATION IN WREGIS MANDATORY?**

A. Yes. Pursuant to Rule 3659(j), effective December 30, 2010, all renewable energy resources located in the region covered by the WECC that generate RECs used by the Company for RES compliance are to be registered in WREGIS, and the RECs from these resources are to be recorded in WREGIS, with the exception for small retail DG.

**Q. ARE THERE COSTS ASSOCIATED WITH PARTICIPATION IN WREGIS?**

A. Yes. Public Service does incur costs for participating in WREGIS. WREGIS charges an annual account holder fee of \$125. In addition, WREGIS charges a fee when a renewable energy credit or certificate is issued, transferred, or retired. The WREGIS issuance, transfer, and retiring fee is \$0.004 per certificate. There



1 is also a \$212 monthly fee for being an e-Tag user. The Company anticipates its  
2 2022–2025 expenses associated with participation in WREGIS, net of wholesale  
3 costs, will be approximately \$100,000 to \$120,000 each year.

4 **Q. ARE ANY ADDITIONAL REC TRACKING EXPENSES ASSOCIATED WITH**  
5 **WREGIS EXPECTED?**

6 A. No.

7 **Q. HOW IS PUBLIC SERVICE PLANNING TO RETIRE RECS FOR COMPLIANCE**  
8 **WITH THE RES?**

9 A. For compliance years 2022-2025, Public Service plans to retire Non-DG and  
10 Wholesale-DG RECs for RES compliance in WREGIS. All generation from Retail-  
11 DG systems smaller than 1 MW will continue to be tracked through the  
12 Solar\*Rewards® system and the RECs will be reported and retired in the REC  
13 Tracking System for all vintages.

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

15 A. Yes.

## **Statement of Qualifications**

### **Tara Fowler**

I received a dual bachelor's degree in Management and Marketing from the University of Iowa in 2001 and a Master of Science in Global Energy Management from the University of Colorado in 2015.

I began my professional career with Aquila in 2001 as an Energy Trader. In 2003, I accepted a position as a Transmission Accountant with Xcel Energy and four months later transitioned to an Energy Trader position. In that position, I was responsible for maximizing revenues, reducing Operating Company system costs, and ensuring reliable system operations.

In 2015, I was promoted to Manager, Renewable Energy Power Purchases, where I managed a team of Purchased Power Consultants, Renewable Portfolio Consultants, and a Contract Analyst. The Renewable Purchased Power team is responsible for the negotiation of renewable energy purchases and the administration of over 200 long-term renewable PPAs, totaling in excess of 9,000 megawatts ("MW") of installed capacity from wind, hydro, photovoltaic ("PV") solar, and solar plus storage projects. I am also responsible for the overall management of Xcel Energy's Renewable Energy Credits portfolio including managing all activities to meet corporate compliance objectives for Renewable Energy Portfolio Standards for each state jurisdiction.

In 2021, I was promoted to Director, Purchased Power. In addition to my responsibilities as the Manager, Renewable Power Purchases, I am now responsible for the negotiation and administration of the entire portfolio of utility scale purchased power agreements including the administration of approximately 250 long-term power purchase

agreements (“PPAs”), totaling in excess of 13,000 MW of installed capacity including a variety of different technology types such as wind, hydro, solar, solar plus storage and gas projects.

Since September 2018, I have testified on behalf of Xcel Energy’s Colorado, Texas, and New Mexico operating companies. I previously testified to request authorization to establish the voluntary Solar\*Connect Community Program and to enter into a purchased power agreement for the purchase of 1.98 MW of nominal capacity and associated energy for Solar\*Connect. In December 2019, I testified on behalf of Public Service for the approval of its 2020-2021 Renewable Energy Compliance Plan. I am also a witness in the Company’s 2021 Electric Resource Plan and Clean Energy Plan.

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AFFIDAVIT OF TARA FOWLER ON BEHALF OF  
PUBLIC SERVICE COMPANY OF COLORADO

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I, Tara Fowler, being duly sworn, state that the Direct Testimony was prepared by me or under my supervision, control, and direction; that the Direct Testimony is 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 17<sup>th</sup> day of Dec., 2021

Tara R. Fowler  
Tara Fowler  
Director of Purchased Power

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

Amanda Clark  
Notary Public

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

My Commission expires 3/25/2024