

NOTICE OF CONFIDENTIALITY
A PORTION OF THIS DOCKET HAS BEEN FILED UNDER SEAL

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

* * * * *

RE: IN THE MATTER OF THE)
APPLICATION OF PUBLIC SERVICE)
COMPANY OF COLORADO FOR AN)
ORDER GRANTING A CERTIFICATE)
OF PUBLIC CONVENIENCE AND)
NECESSITY FOR DISTRIBUTION GRID) PROCEEDING NO. 16A-____E
ENHANCEMENTS, INCLUDING)
ADVANCED METERING AND)
INTEGRATED VOLT-VAR)
OPTIMIZATION INFRASTRUCTURE)

DIRECT TESTIMONY AND ATTACHMENTS OF JENNIFER B. WOZNIAK

ON

BEHALF OF

PUBLIC SERVICE COMPANY OF COLORADO

NOTICE OF CONFIDENTIALITY:
PORTIONS OF THIS DOCUMENT HAVE BEEN FILED UNDER SEAL

Confidential Attachment JBW-4

August 2, 2016

**BEFORE THE PUBLIC UTILITIES COMMISSION
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SUMMARY OF THE DIRECT TESTIMONY OF JENNIFER B. WOZNIAK

1 Ms. Jennifer Wozniak is the Director, Jurisdictional Communication of Xcel
2 Energy Services Inc. In this position she is responsible for corporate communications,
3 social media, public relations and Demand Side Management (“DSM”)/Energy
4 Efficiency/Renewables marketing for Public Service Company of Colorado ("Public
5 Service" or "Company"), one of four utility operating company subsidiaries of Xcel
6 Energy, Inc. Her duties include, among other things, managing all communications
7 strategy, planning, and execution for Colorado, Texas, and New Mexico. Her team also
8 plans and executes all of the marketing campaigns for DSM, Energy Efficiency and
9 Choice/Renewables programs in the same regions cited above.

10 In her testimony, Ms. Wozniak presents information regarding customer interest
11 in advanced metering and its associated functions for customers, as well as the
12 Company’s Customer Education and Communication Plan (“Education Plan”) for the

1 implementation of advanced meters in the State of Colorado. Ms. Wozniak begins by
2 presenting the research Public Service has conducted and gathered regarding customer
3 interest in advanced metering. Ms. Wozniak explains that according to a study
4 conducted by Public Service in April of 2016, nearly 80% of customers agreed that the
5 Company should provide advanced meters, including 64% who were highly favorable
6 toward smart meters. This overall interest in advanced metering is coupled with specific
7 customer interest in the benefits of smart metering, including customer insight into and
8 control over their energy usage, greater reliability, and environmental benefits. Further,
9 independent studies illustrate higher levels of customer satisfaction with utility service
10 when the customer's utility has deployed advanced metering.

11 However, customers do not fully understand advanced metering technology or
12 how advanced meters are critical to the benefits they want. They are also sensitive to
13 the costs associated with advanced metering. Ms. Wozniak explains that Public Service
14 recognized these considerations, describes Public Service's customer education
15 strategy, and details the specific components of the Education Plan. In particular, she
16 discusses the three phases of the Education Plan and the Company's implementation
17 strategy for each phase:

Phase	Event	Timing
I	Raise Awareness	Q1 – Q4 2018
II	Support Meter installation	Q4 2018 – Q4 2020
III	Customer Engagement	Q2 2019 – Q1 2021

1 Ms. Wozniak also explains the Company's strategies for reaching and
2 communicating with all Public Service customers via multiple forms of communication
3 designed to support effective, broad-based outreach. Finally, Ms. Wozniak presents the
4 anticipated costs of customer education and explains why those costs are reasonable
5 based on Company experience, vendor information, and the overall scope of customer
6 education needs.

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LIST OF ATTACHMENTS

Attachment JBW-1	Proposed Smart Meter Customer Education and Communications Plan
Attachment JBW-2	April 2016 Customer Research Panel Report
Attachment JBW-3	October 2015 Product Interest Study
Confidential Attachment JBW-4	E-Source Rate Design Study Findings
Attachment JBW-5	January 2015 "Summary of AMI Customer Benefits Research"
Attachment JBW-6	JD Power Residential Customer Study

GLOSSARY OF ACRONYMS AND DEFINED TERMS

Acronym/Defined Term	Meaning
ADMS	Advanced Distribution Management System
AGIS	Advanced Grid Intelligence and Security
AMI	Advanced Metering Infrastructure
AMR	Automated Meter Reading
ANSI	American National Standards Institute
BPL	Broadband over Power Line
C&I	Commercial and Industrial
CAIDI	Customer Average Interruption Duration Index
CBA	Cost-Benefit Analysis
CIS	Customer Information System
CMO	Customer Minutes Out
Commission	Colorado Public Utilities Commission
Company	Public Service Company of Colorado
CPCN	Certificate of Public Convenience and Necessity
CPCN Projects	AMI, IVVO, and the components of the FAN that support these components
CPE	Customer premise equipment
CRS	Customer Resource System
CSF	Cyber Security Framework
CVR	Conservation Voltage Reduction
DA	Distribution Automation
DDOS	Distributed Denial of Service
DER	Distributed Energy Resources
DOS	Denial-of-service
DR	Demand Response
DSM	Demand Side Management
DVO	Distribution Voltage Optimization
EPRI	Electric Power Research Institute
ERT	Encoder Receiver Transmitter
ESB	Enterprise Service Bus
FAN	Field Area Network
FLISR	Fault Locate Isolation System Restoration

Acronym/Defined Term	Meaning
FLP	Fault Location Prediction
GFCI	Ground Fault Circuit Interrupter
GIS	Geospatial Information System
HAN	Home Area Networks
ICE	Interruption Cost Estimation
IDS	Intrusion Detection System
IEEE	Institute of Electrical and Electronics
IPS	Internet Provider Security
IT	Information technology
IVR	Interactive Voice Response
IVVO	Integrated Volt-VAr Optimization
kVAr	Kilovolt-amperes reactive
kVArh	Reactive power
kW	Kilowatt
kWh	Kilowatt hours
LTCs	Load Tap Changers
LTE	Long-Term Evolution
MDM	Meter Data Management
MitM	Man-in-the-Middle Attack
MPLS	Multiprotocol Label Switching
NCAR	National Center for Atmospheric Research
NOC	Network Operations Center
NPV	Net Present Value
O&M	Operations and Maintenance
OMS	Outage Management System
OT	Operational Technology
PTMP	Point-to-multipoint
Public Service	Public Service Company of Colorado
RF	Radio frequency
RFP	Request for Proposal
RFx	Request for Information and Pricing
RTU	Remote Terminal Units

Acronym/Defined Term	Meaning
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SCADA	Supervisory Control and Data Acquisition
SGCC	Smart Grid Consumer Collaborative
SGIG	Smart grid investment grants
SIEM	Security Incident and Event Management
SVC	Secondary static VAR compensators
TOU	Time-of-use
USEIA	United States Energy Information Administration
WACC	Weighted Average Costs of Capital
WAN	Wide Area Network
WiMAX	Worldwide Interoperability for Microwave Access
WiSUN	802.15.4g Standard
Xcel Energy Inc.	Xcel Energy
XES	Xcel Energy Services Inc.

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

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

3 A. My name is Jennifer B. Wozniak. My business address is 1800 Larimer Street
4 Suite 1600, Denver 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 Director, Jurisdictional
7 Communications for Public Service in Colorado, and the Company’s affiliate
8 Southwestern Public Service Company in Texas and New Mexico. XES is a
9 wholly-owned subsidiary of Xcel Energy Inc. (“Xcel Energy”), and provides an
10 array of support services to Public Service Company of Colorado (“Public
11 Service” or “Company”) and the other utility operating company subsidiaries of
12 Xcel Energy on a coordinated basis.

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

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

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

4 A. As the Director, Jurisdictional Communications. I am responsible for corporate
5 communications, social media, public relations and DSM/Energy
6 Efficiency/Renewables marketing for Public Service Company of Colorado and
7 Southwestern Public Service. My duties include managing all communications
8 strategy, planning, and execution for the two Companies in Colorado, Texas, and
9 New Mexico. My team also plans and executes all of the marketing campaigns
10 for Demand Side Management, Energy Efficiency and Choice/Renewables
11 programs in the same regions cited above. Choice/Renewables programs
12 include Windsource, Solar*Rewards, and other Public Service programs that
13 enable customers to choose and utilize renewable energy resources for their
14 service. The advertising element of those campaigns is managed by another
15 department under the communications function. A full description of my
16 qualifications, duties, and responsibilities is set forth after the conclusion of my
17 testimony in my Statement of Qualifications.

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

19 A. The purpose of my Direct Testimony is to discuss (i) customers' desire for and
20 understanding of advanced metering infrastructure ("AMI") and the associated
21 functions; and (ii) our customer education strategy regarding AMI and the
22 associated functions. AMI is a component of the Company's Advanced Grid
23 Intelligence and Security ("AGIS") initiative that is discussed in more detail in the

1 Direct Testimonies of Company Witnesses Ms. Alice K. Jackson and Mr. John D.
2 Lee. As part of the AGIS initiative the Company is seeking approval of a
3 Certificate of Public Convenience and Necessity that includes AMI and other
4 technologies (collectively, the “CPCN Projects”). The Customer Education and
5 Communication Plan (“the Education Plan”), which I present in my testimony as
6 Attachment JBW-1, focuses on educating customers on AMI and the Company’s
7 grid advancement effort.

8 First, I discuss research Public Service conducted into customers’ interest
9 in advanced meters, as well as customer understanding of the terms and goals of
10 metering functions. This research was used in the development of this Education
11 Plan. I also discuss other related studies, including customer satisfaction survey
12 results regarding current and future advanced meter technologies.

13 I then address why a customer education strategy is necessary for this
14 project, and present the Company’s Education Plan. I explain how the
15 Company’s Education Plan was developed and address how it complies with the
16 Commission’s general directives for customer education plans, as well as
17 specific findings regarding the need for customer education on advanced
18 metering efforts. I also discuss the strategies the Company intends to use to
19 disseminate the plan, and why it is important to do so through multiple
20 communications channels.

21 Next, I detail the specific components of the Education Plan, including
22 data management, special customer groups, and how the AGIS initiative will
23 support customers’ requests for more control over their energy usage, greater

1 reliability, energy conservation improvements, and more energy generation
2 choices. I describe the three phases of the Education Plan and illustrate the
3 purposes behind those education strategies. I also explain the proposed
4 timelines for implementing each phase of the Education Plan. Finally, I address
5 the anticipated costs of implementing the Education Plan.

6 **Q. ARE YOU SPONSORING ANY ATTACHMENTS AS PART OF YOUR DIRECT**
7 **TESTIMONY?**

8 A. Yes, I am sponsoring the following:

- 9 • Attachment JBW-1: Proposed Smart Meter Customer Education and
10 Communications Plan
- 11 • Attachment JBW-2: April 2016 Customer Research Panel Report
- 12 • Attachment JBW-3: October 2015 Product Interest Study
- 13 • Confidential Attachment JBW-4: E-Source Rate Design Study Findings
- 14 • Attachment JBW-5: JD Power Residential Customer Study
- 15 • Attachment JBW-6: January 2015 “Summary of AMI Customer Benefits
16 Research”

17

1 noted that such plans should be supported by “thorough consumer segmentation
2 studies.” Our goal with the April 2016 Survey identified above was to identify
3 customer understanding of, and interest in, advanced metering and the
4 customer-focused functions associated with metering. As I discuss in more detail
5 below, the April 2016 Survey also addressed the extent to which there were
6 variances in customer interest and understanding. This Survey, along with
7 others identified later in my testimony, help inform our customer education
8 planning.

9 **Q. HOW WAS THE STUDY CONDUCTED?**

10 A. A third party vendor, Vision Critical, manages an online panel of 1,032 Colorado
11 Xcel Energy customers that agree to be surveyed by the Company throughout
12 the year. When research needs arise, the Company develops questions that are
13 administered by Vision Critical on behalf of the Company. For the April 2016
14 Survey, Vision Critical sent electronic invitations to the 1,032 Colorado customers
15 requesting their participation in an online panel survey, and 596 customers
16 complied.

17 **Q. CAN YOU GENERALLY DESCRIBE MARKET SEGMENTATION?**

18 A. Yes. Market segmentation is a marketing strategy which involves dividing a
19 broad target market into subsets of consumers and businesses that have, or are
20 perceived to have, common needs, interests and priorities, and then designing
21 and implementing strategies to target them.

1 **Q. DOES THE COMPANY PERFORM MARKET SEGMENTATION STUDIES IN**
2 **ITS SERVICE TERRITORIES?**

3 A. No. The Company has purchased segmentation codes from a third party vendor
4 that has access to market segmentation studies and applied those codes to the
5 residential customers in the Company's service territory. The segmentation
6 codes the Company purchased distinguish between demographically and
7 behaviorally distinct customer types to help discern those particular customers'
8 likes, dislikes, lifestyles and purchase behaviors. This information will assist us
9 in developing materials for the Education Plan.

10 **Q. WERE THE SEGMENTATION CODES USED IN THE APRIL 2016 SURVEY?**

11 A. No. The CPCN Projects are targeted at all Colorado customers, so using
12 segmentation codes to identify those most likely to use an advanced meter is not
13 necessary at this stage. If the CPCN Projects are approved by the Commission,
14 the Company will use the segmentation codes to develop Education Plan
15 material to disseminate closer to when meters are being deployed because it will
16 enable the development of more customized communication. For instance, if a
17 direct mail communication piece includes a photograph of people viewing
18 advanced meter data, we can customize the photo to the demographic segment.
19 In addition, as the Company conducts future research of its customers in relation
20 to the Education Plan, segmentation codes may be used to track the level of
21 understanding, satisfaction, and participation relative to demographic and socio-
22 economic segmentation.

1 **Q. DID THE APRIL 2016 SURVEY SHOW THAT THERE IS CUSTOMER**
2 **INTEREST IN ADVANCED METERS?**

3 A. Yes. Nearly 80% of customers agreed that the Company should provide
4 advanced meters, including 64% who were highly favorable toward smart meters.
5 Less than one in five customers (19%) was not in favor of advanced meters. The
6 top three reasons customers gave for not favoring advanced meters were
7 concerns about energy bill increases, the need for more information, and data
8 security.

9 **Q. HOW WELL DO CUSTOMERS UNDERSTAND THE CONCEPTS**
10 **SURROUNDING AMI OR ADVANCED METERS?**

11 A. Not surprisingly, customers did not have a clear understanding of the technical
12 terminology. More than half of the customers surveyed had not heard the term
13 “AMI” or “Advanced Metering Infrastructure.” More than half of the customers,
14 however, did have a basic or fairly complete understanding of the terms “smart
15 grid” and “smart meter.” Based on these results, we focused our customer
16 education materials on the terms customers do understand in an effort to make
17 the information more accessible to them. Accordingly, we use “smart meter” in
18 our Education Plan, whereas “AMI” is used throughout this CPCN Projects filing
19 because it is the more correct technical and industry term.

20 The results of the April 2016 Study indicates that customers
21 overwhelmingly had a basic, or fairly complete, understanding of terms such as
22 “outage,” “time of use rates,” “peak demand,” “kW,” and “kWh.” In addition,
23 customers expressed high levels of interest (almost 70% were interested) in

1 certain services directly enabled by advanced metering, including outage alerts,
2 mobile or online energy management tools, high bill alerts, and peak pricing or
3 demand response programs. Further, 47% of surveyed customers were
4 interested in time of use rates.

5 **Q. WERE CUSTOMERS ALSO INTERESTED IN OTHER BENEFITS OF**
6 **ADVANCED METERING?**

7 A. Yes. Customers were asked whether indirect benefits of advanced metering
8 such as reliability (allowing utilities to detect and prevent outages, reduce outage
9 length, and provide immediate notification to customers); economic benefits
10 (helping customers save money by providing real time energy usage information
11 and better control/reduction of energy use); and environmental benefits (allowing
12 customers to optimize their energy use and also enable the power grid to run
13 more efficiently, thus reducing emissions) were important, not important, or
14 unknown. The large majority of customers expressed that these benefits were
15 important.

16 That said, customers were also asked whether these benefits of advanced
17 metering were “important, but at no additional cost,” “important, and I am willing
18 to pay more for it, or “important, and I’m willing to pay more for it, but not at this
19 time.” Again, it is not surprising that given the binary choice between the
20 importance of these indirect benefits at no cost or their importance with costs,
21 most customers chose “important, but at no additional cost.” Specifically,
22 approximately one-quarter (27%) of customers would pay more for environmental
23 benefits, 22% for economic, and 18% for reliability. Of the customers that were

1 willing to pay more for the benefits, the majority thought that reliability benefits
2 were most important, followed by economic benefits, and finally environmental
3 benefits. In other words, the drivers of customers' willingness to pay for these
4 benefits did not fully align with the level of importance they assigned to each
5 benefit.

6 **Q. WHY WERE CUSTOMERS ASKED GENERALLY IF THEY WERE WILLING**
7 **TO PAY FOR BENEFITS INSTEAD OF BEING GIVEN A RANGE OF**
8 **POTENTIAL COSTS?**

9 A. It is premature to present customers with a range of potential costs or estimates
10 of bill increases that may incur for certain benefits for several reasons. First, AMI
11 and the CPCN Projects are not yet approved by the Commission. Additionally,
12 the Company is still in the process of selecting an AMI vendor and does not have
13 exact costs to present to customers at this time. Further, many customers do not
14 have a complete understanding of what advanced meters are and without that
15 understanding there is limited value in determining what amount they might be
16 willing to pay if given a range of options above zero. Therefore, given the
17 limitations of the April 2016 Survey in this respect, the high level of interest
18 customers showed in the benefits associated with advanced meters could be
19 more meaningful than the low expressions of willingness to pay.

20 **Q. DID THE APRIL 2016 SURVEY ASK ABOUT WILLINGNESS TO PAY FOR**
21 **DIRECT BENEFITS?**

22 A. No. The Survey did not ask about customer willingness to pay for specific direct
23 benefits. Since the implementation of AMI had not yet been approved by the

1 Commission, we were reluctant to give customers the impression that specific
2 AMI functions or benefits are guaranteed.

3 **Q. WHAT DO YOU CONCLUDE FROM THESE FINDINGS?**

4 A. I conclude that many customers think advanced meters are generally a good
5 idea, and are very interested in benefits such as control over their energy usage,
6 more information about their energy usage, greater reliability, and environmental
7 benefits. However, customers do not fully understand the technology or how
8 advanced meters are critical to the benefits that customers want. Company
9 witnesses Ms. Jackson, Mr. Lee, and Mr. Russell E. Borchardt explain in their
10 Direct Testimony why AMI metering is necessary to provide these benefits
11 customers are seeking.

12 The April 2016 Survey also underscores two issues Public Service
13 considered heavily when designing AGIS and our Customer Education Plan:
14 First, it is important for the costs of AMI, and the overall AGIS initiative, to be
15 reasonable. Second, customer education is needed for customers to understand
16 AMI metering and how it relates to the needed technology and associated
17 benefits. Company witnesses Ms. Jackson, Mr. Lee, and Mr. Borchardt describe
18 our design of the advanced metering program and the associated costs. I outline
19 our customer education strategy and plan later in my Direct Testimony.

20 **Q. HAS PUBLIC SERVICE CONDUCTED ANY OTHER RESEARCH THAT**
21 **SUPPORTS THESE FINDINGS?**

22 A. Yes. The Company conducted a product interest study in October 2015 of both
23 residential and commercial customers, and many of these earlier results are

1 comparable to the April 2016 Survey. The October 2015 study is included as
2 Attachment JBW-3, and shows that a majority of both residential and commercial
3 customers are interested in advanced meter-enabled products and services
4 including proactive notifications, online management tools, and special rates:

Table JBW-1

Service	Residential Support	Commercial Support
Outage and other emergency alerts	63%	63%
High bill alert	60%	51%
Online energy usage management	56%	51%
Time-of-use ("TOU") rates	52%	57%
Special rates and consumption reduction	59%	49%

5 **Q. WHAT OTHER RESEARCH HAS PUBLIC SERVICE USED TO UNDERSTAND**
6 **CUSTOMER INTEREST IN GRID ADVANCEMENT GENERALLY?**

7 A. The Company subscribed to an E Source study in 2015 addressing, among other
8 issues, national customer interest in grid intelligence, advanced meters, and
9 energy management. Similar to the April 2016 Survey, the majority of the E
10 Source study participants were interested in proactively managing their energy
11 use: 53% of those with advanced meters at their primary residence have visited
12 their utility website to see their energy usage; 52% were interested in peak
13 pricing/demand response programs, and 40% were interested in time of use
14 pricing. The E Source study has been provided as Confidential Attachment JBW-
15 4.

1 Customer research studies on advanced meter interest and understanding
2 have become more common as the industry has increased penetration of
3 advanced meters and related infrastructure, and taken additional steps to
4 advance the electric grid. Attachment JBW-5 summarizes findings from seven
5 third party studies between 2011 and 2015 that show corollary results to the April
6 2016 Public Service Survey.

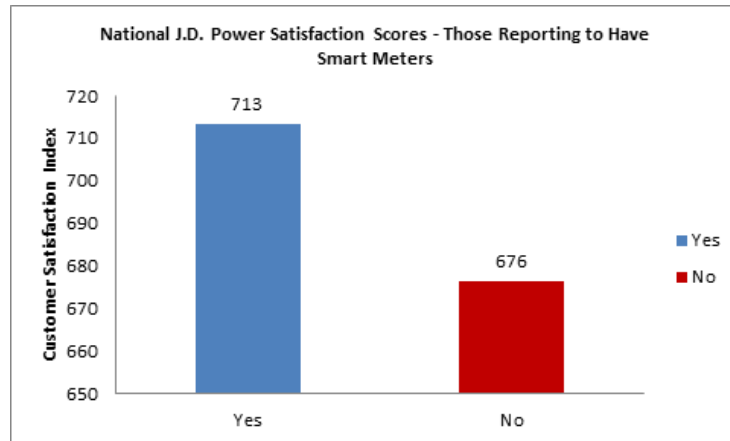
7 **Q. DID ANY OF THE RESEARCH ADDRESS CUSTOMER SATISFACTION WITH**
8 **ADVANCED GRID TECHNOLOGIES ONCE THEY ARE IMPLEMENTED?**

9 A. Yes, a national 2016 J.D. Power study did. A summary of the relevant portions
10 of that study is attached to my testimony as Attachment JBW-6.

11 **Q. WHAT DID THE J.D. POWER STUDY ILLUSTRATE REGARDING**
12 **CUSTOMER SATISFACTION WITH ADVANCED GRID TECHNOLOGIES?**

13 A. The J.D. Power study showed that customers are more satisfied with products
14 and services enabled by advanced meters, even if they are only aware of some
15 of the choices but do not personally participate in them. Attachment JBW-5
16 shows above-average satisfaction levels for both awareness of and participation
17 in advanced meter and grid-enabled offerings such as online energy
18 management portals, time of use pricing, and energy use/spend alerts. As
19 illustrated in Figure 1 below, customers who reported that they have advanced
20 meters were significantly more satisfied (37-point increase) than customers who
21 reported that they do not.

Figure 1: Improved National J.D. Power Satisfaction Scores



1 **Q. IS THIS INCREASE IN CUSTOMER SATISFACTION ASSOCIATED WITH**
2 **ADVANCED METERING BORNE OUT BY OTHER RESEARCH IN THE**
3 **INDUSTRY?**

4 A. Yes. As noted in Attachment JBW-6 to my Direct Testimony, “[a]ccording to an
5 October 2015 article in Fortnightly, ‘Commonwealth Edison in Chicago reported a
6 rise in customer satisfaction as a result of its high-touch approach to engaging
7 and educating its customers on smart meters as it rolls them out...’”¹ Other
8 utilities, such as Baltimore Gas & Electric, Pepco, and Sacramento Municipal
9 Utility District have had similar customer engagement success stories according
10 to the Smart Grid Consumer Collaborative’s (“SGCC”) 2016 Customer
11 Engagement Success Stories Case Studies.²

¹ Patty Durand, *Customer Connection*, FORTNIGHTLY, Oct. 2015, <http://mag.fortnightly.com/iphone/article.php?id=2291463&font=searchResults3>

² SGCC Smart Grid Customer Engagement Case Studies, <http://smartgridcc.org/sgcc-smart-grid-customer-engagement-case-studies/>

1 **Q. HOW DO THESE STUDIES COMPLEMENT OR CONTRAST WITH THE**
2 **STUDY PUBLIC SERVICE CONDUCTED IN APRIL 2016?**

3 A. The Public Service Study does not focus on customer satisfaction, since Xcel
4 Energy has not yet implemented AMI metering on its systems. However, the fact
5 that utilities are experiencing increased customer satisfaction when advanced
6 metering is deployed highlights the conclusion that customers are looking for the
7 benefits advanced metering offers. They are also increasingly satisfied with their
8 utility service when the investments are made and they receive those benefits.
9 These studies further underscore that customers are not likely to fully understand
10 the benefits of advanced metering until they experience these benefits,
11 demonstrating that customer education is very important. Therefore, in the next
12 segment of my testimony I discuss Public Service's customer education strategy.

1 **III. CUSTOMER EDUCATION STRATEGY**

2 **Q. WHY DO CUSTOMERS NEED TO BE EDUCATED ON ADVANCED GRID**
3 **INTELLIGENCE AND SECURITY?**

4 A. Customer education is necessary for this initiative for multiple reasons. First, in
5 Decision No. C11-0406, issued in Proceeding Number 10I-099EG, the
6 Commission recognized the importance of customer education for advanced
7 meters. Decision No. C11-0406 states, “[s]ince the cost justification for smart
8 meters will likely rely, at least in part, on benefits resulting from expected shifts in
9 consumer behavior, we note that significant consumer education efforts are
10 critical. Consumer education is necessary to mitigate the risk that these benefits
11 will not be realized due to lack of consumer awareness, knowledge, or interest.”

12 The Commission further noted in Decision No. C11-0406 that “detailed
13 consumer education plans should be filed in the smart meter applications
14 developed via formal rulemaking as discussed in paragraphs 10 and 11. These
15 plans should determine the most effective, cost-controlled consumer
16 engagement methods and strategies to achieve minimum participation necessary
17 to realize expected benefits. Thorough consumer segmentation studies need to
18 underlie these consumer education plans. Consumer education plans should
19 also involve a plan for stakeholder collaboration and propose multiple channels
20 for consumer engagement.”

21 Second, as described in Section II above, customers’ understanding of the
22 terms and functionalities associated with advanced meters and advanced grids is
23 inconsistent and incomplete, as shown in the April 2016 Survey report in

1 Attachment JBW-2. In order to be fully informed about changes in their metering,
2 customers need to be educated on the terminology and basic operations of the
3 advanced grid equipment and benefits. It is the Company's goal to educate
4 customers on these issues so they can get the most benefit and satisfaction from
5 the new technologies we are proposing.

6 **Q. HOW DID THE STUDIES OF CUSTOMERS' LEVELS OF UNDERSTANDING**
7 **CONTRIBUTE TO PUBLIC SERVICE'S DEVELOPMENT OF A CUSTOMER**
8 **EDUCATION STRATEGY?**

9 A. These studies played a key role in the development of the Education Plan. First,
10 in conjunction with requirements set by the Commission, we gained additional
11 intelligence on the gaps of customer understanding so that they may take full
12 advantage of advanced meters and related grid-enabled technologies, starting by
13 defining and clarifying the relevant language. Second, we will tailor education
14 planning with the knowledge that customers have varying degrees of
15 understanding and interest. While a lack of knowledge of key terms can be a
16 roadblock to customer understanding of our services and technologies, we
17 tailored the Education Plan to help address these issues.

18 **Q. HAS THE PUBLIC UTILITIES COMMISSION GIVEN ANY DIRECTION**
19 **REGARDING DEVELOPMENT AND/OR CONTENT OF CUSTOMER**
20 **EDUCATION PLANS?**

21 A. Yes. In paragraph 19 of Decision No. C10-1077 in Proceeding No. 10I-099EG,
22 the Commission noted that advanced metering applications should include "the
23 utility's proposal to implement a substantial and comprehensive customer

1 education program ...” In compliance with this expectation, I present Public
2 Service’s customer education plan in the next section of my testimony.

3 Additionally, in paragraph 32 of Decision No. R13-0096 in Proceeding No.
4 11A-1001E, the Commission envisioned “[the Company] developing performance
5 metrics specifically tied to consumer education and engagement which would
6 include qualifications of consumer awareness, understanding, interest,
7 participation, and satisfaction.”

8 **Q. DID THE COMPANY LEARN OTHER LESSONS REGARDING CUSTOMER**
9 **EDUCATION FROM SMARTGRIDCITY?**

10 A. Yes. Engaging with customers early in the process is a key component of any
11 successful customer education plan. A sound plan with communication touch
12 points prior to installation enables a customized approach, with relevant
13 messages that fit different audiences. Customer concerns can be fully addressed
14 and managed for a successful roll out of any initiative. Best practices and lessons
15 learned from SmartGridCity and the other research we considered are
16 collectively listed in a section of the Education Plan, Attachment JBW-1.

17 **Q. HAS PUBLIC SERVICE ALSO EVALUATED OTHER CUSTOMER**
18 **EDUCATION PLAN CRITERIA?**

19 A. Yes. We also considered industry best practices.

20 **Q. HOW DID PUBLIC SERVICE EVALUATE INDUSTRY BEST PRACTICES TO**
21 **CREATE A CUSTOMER EDUCATION STRATEGY?**

22 A. In addition to utilizing the results of our own study, the Education Plan was
23 developed using best practices learned from research of advanced meter

1 customer education from other utilities, and from community outreach available
2 from the U.S. Department of Energy on SmartGrid.gov.

3 In-depth research performed by the communications team at Baltimore
4 Gas and Electric Company (“BGE”) in late 2010 was particularly helpful in
5 developing the Education Plan. BGE conducted interviews with and gathered
6 best practices from communications chiefs of four investor-owned U.S. utilities,
7 who outlined their experiences in smart meter customer education and
8 community outreach. The BGE communications team also gathered best
9 practices from smart meter contractor Silver Spring Networks (“Silver Springs”),
10 which developed best practices through implementing smart grid programs with
11 other utilities throughout the United States. The BGE team also conducted
12 interviews with and gathered perspectives from representatives of nonprofit and
13 advocacy organizations to help reach and engage a wide spectrum of customers
14 including, including but not limited to, seniors, low-income customers, and non-
15 English-speaking audiences.

16 Other best practice resources that contributed to the development of smart
17 meter customer education included information available via the web from: Smart
18 Grid Consumer Collaborative, Oncor, Duke Energy, Electric Power Research
19 Enstitute, PG&E, OG&E, and GE. All of the best practices and lessons learned
20 are included on page 3 of Attachment JBW-1.

1 **Q. WHAT STRATEGIES DO YOU ANTICIPATE USING TO REACH**
2 **CUSTOMERS?**

3 A. Taking into consideration customer need, regulatory requirements, and best
4 practices, I expect to launch the Education Plan in three phases: (1) raising
5 awareness, (2) targeting affected customers in geographic areas to educate and
6 minimize confusion, and (3) customer engagement. I describe these phases in
7 more detail in Section IV of my testimony.

8 Overall we intend to educate customers through a variety of
9 communications channels including, but not limited to, website updates,
10 stakeholder outreach meetings, media outreach, social media, blogs, direct mail,
11 e-mail, outbound calls, door hangers, community events, bill onserts, targeted
12 advertising, fact sheets, video, and customer testimonials.

13 **Q. WHY DISSEMINATE THE PLAN THROUGH MULTIPLE COMMUNICATIONS**
14 **CHANNELS?**

15 A. It is important to use a diverse set of communications channels to reach
16 customers in their channel of preference because approximately half of Colorado
17 customers are not aware of the basic terms associated with advanced metering
18 or this project. In paragraph 32 of Decision No. C11-0406, in Proceeding No.
19 10I-099EG, the Commission noted the importance of implementing multi-channel
20 strategies for disseminating education plans. Multiple communication channels
21 improve the extent to which Public Service can provide information to varying
22 customer groups.

1 In particular, not all customers have access to the same communication
2 channels. For example, about 75% of surveyed customers said they would prefer
3 to hear about smart meter options via email, but as of April 2016, 848,255 Public
4 Service customers have provided email addresses: this represents only about
5 46% of all customer premises in Colorado. If we used email as the only
6 communication channel for disseminating customer education, a majority of
7 customers would not have access to it. We need to use diversified
8 communications channels to help ensure that all customers receive adequate
9 information and education.

10 **Q. HAS PUBLIC SERVICE PREVIOUSLY UTILIZED THESE MULTI-CHANNEL**
11 **COMMUNICATION STRATEGIES?**

12 A. Yes, we have previously used a similar multi-phase approach via multiple
13 communication channels in communications plans for introducing new programs
14 or initiatives. Such an approach has successfully educated customers and driven
15 enrollments in energy efficiency programs, as evidenced by annual goal
16 achievement in the state of Colorado. Each communications strategy is different
17 and based on the unique challenges and specifics of each plan's objectives.
18 Given the unique and novel nature of the AGIS initiative in Public Service's
19 history, we have not previously created customer education plans that we can
20 use as an exact template for this project; we can and will, however, translate and
21 expand many of the strategic elements we have previously utilized in other plans.

1 **Q. ARE THESE STRATEGIES EFFECTIVE FOR EDUCATING CUSTOMERS?**

2 A. Yes, these strategies are effective for educating customers because they provide
3 information over a period of time, and each phase builds upon the previous one.
4 Phases I through III increase the complexity of information being provided to
5 customers, and each will be modified based on customer feedback as time
6 progresses. These strategies also use almost every possible communications
7 channel so that each customer can be reached through the channel that they
8 prefer (e.g., e-mail, direct mail, bill messaging, etc.).

1 **IV. CUSTOMER EDUCATION PLAN**

2 **Q. HAS PUBLIC SERVICE DEVELOPED A CUSTOMER EDUCATION PLAN FOR**
3 **THE AGIS INITIATIVE?**

4 A. Yes. We have created a three-phase Advanced Meter Education Plan to educate
5 customers on the AGIS initiative and accompanying products and services. The
6 Plan is included as Attachment JBW-1. Given that the Company proposes to
7 begin AMI deployment in 2018, pending approval of this CPCN Projects
8 Application, the Education Plan is focused on education subject matter, the
9 means of customer education, and the costs of customer education, rather than
10 on specific talking points. The specific content of Public Service's messaging
11 program will be developed as the CPCN Projects get closer to implementation.

12 **Q: PLEASE EXPAND ON THE THREE PHASES OF THE EDUCATION PLAN.**

13 A: Phase I is designed to raise awareness of AGIS and advanced meters among
14 customers and other community members prior to installation; this will be an
15 introductory and wide-reaching effort to inform customers about advanced meter
16 installations and educate them on the overall benefits of grid intelligence. Phase
17 II will directly target affected customers by geographic area to provide meter-
18 specific informational support just before and during installation to minimize
19 confusion during that process. Phase III will be an ongoing effort after meter
20 installation to engage customers and provide additional information about how
21 they can take advantage of their newly-installed meters and accompanying
22 features.

1 **Q. WHAT IS PUBLIC SERVICE'S STRATEGY REGARDING THE TIMELINES**
2 **FOR LAUNCHING EACH CUSTOMER EDUCATION INITIATIVE?**

3 A. The timelines for each phase are as follows: Phase I – Raising Awareness would
4 take place from Q1-Q4 of 2018; Phase II – Supporting Meter Installation would
5 happen from Q4 of 2018 through Q4 of 2020; Phase III – Customer Engagement
6 would take place from Q2 of 2019 through Q1 of 2021.

Table JBW-2

Phase	Event	Timing
I	Raise Awareness	Q1 – Q4 2018
II	Support Meter Installation	Q4 2018 – Q4 2020
III	Customer Engagement	Q2 2019 – Q1 2021

7 This is in conjunction with the planned timing for AMI meter installation
8 commencing in the fourth quarter of 2018. This timeline of the Education Plan is
9 subject to the timing of the AMI deployment, and any changes to the deployment
10 schedule will impact the timing of the Education Plan. Additionally, there is
11 flexibility in the timing of these phases based on customer feedback that the
12 Company receives throughout the implementation of the Education Plan.

13 **Q. HOW DID PUBLIC SERVICE DETERMINE WHAT CONTENT TO INCLUDE IN**
14 **THE EDUCATION PLAN?**

15 A. The content of the Education Plan is driven by our customer education strategy
16 described above, including incorporation of Commission directions, past
17 Company experience with customer education, and industry best practices.

1 Overall, the Education Plan draft (Attachment JBW-1) thus far is based on gaps
2 in customer awareness and understanding we discovered in the research in
3 Attachment JBW-2 as described above. As the customer-facing details of the
4 advanced meter implementation and data portal of tools provided to the customer
5 are further developed, we will update the Education Plan to reflect those
6 additional educational elements. Further, we presently anticipate focusing on the
7 “smart meter” language customers tend to understand better than “AMI.” As
8 customer education progresses, it may be appropriate to transition to utilizing
9 more technical terminology.

10 **Q. DO YOU CONSIDER THE EDUCATION PLAN COMPLETE AT THIS TIME?**

11 A. No. As I have described throughout my testimony the Education Plan will
12 continue to evolve as we move closer to meter deployment and throughout the
13 entire process as we gain further customer insight into their understanding of AMI
14 and advanced grids. It is important for the Education Plan to be flexible in this
15 respect because we are at such an early stage in the customer education
16 process. Typically we develop Education Plans closer in time to the event that
17 we are educating them on however, given the Commission’s expectations we
18 engaged in through research efforts to develop this Education Plan. With that
19 said, we look forward to input on the Education Plan from our stakeholders.

20 **Q. HOW DOES THE EDUCATION PLAN ADDRESS RAISING CUSTOMER AND**
21 **COMMUNITY AWARENESS IN PHASE I?**

22 A: We will raise awareness on multiple levels, including informing them that we will
23 be installing advanced meters, explaining why doing so is important to advancing

1 the distribution grid, and discussing the customer benefits of the installation. In
2 order to raise awareness effectively, we will focus on educating customers on
3 key terms relevant to energy service in general and the AGIS initiative in
4 particular.

5 **Q: WILL THE PLAN EXPLAIN WHAT CUSTOMERS CAN EXPECT WHEN THEIR**
6 **METERS ARE INSTALLED IN PHASE II?**

7 A: Yes, Phase II of the Plan will focus on educational information supporting meter
8 installation. This portion of the Education Plan will be developed more fully when
9 we are closer in time to the AMI meter deployment.

10 **Q: HOW DOES THE PLAN APPROACH ENGAGING CUSTOMERS IN PHASE III?**

11 A: In general, Phase III will target customers who have received an advanced meter
12 to get their feedback, ensure their satisfaction, and let them know how to best
13 take advantage of the features of their new meters. As with Phases I and II, we
14 will finalize this approach during and after AMI meter deployment. The content of
15 this Phase of the Education Plan will be impacted by the feedback we get from
16 customers in the first two Phases of the Education Plan.

17 **Q. HOW DOES THE EDUCATION PLAN ADDRESS THE COMMISSION'S**
18 **EXPECTATIONS FOR CUSTOMER EDUCATION PLANS?**

19 A. This Education Plan was developed in accordance with the Commission's
20 expectations for customer education plans, which I discussed earlier. That
21 includes evaluating current consumer awareness, understanding, and interest
22 based on customer feedback on those elements. The Education Plan includes
23 plans to measure these elements as directed by the Commission, in addition to

1 customer participation and satisfaction, after each of the three phases of the
2 Education Plan is executed. As I discuss above, the specific content of the
3 Education Plan will evolve as the Company moves closer to deployment and
4 gains more insight into customers understanding of AMI and advanced grids.
5 With that said, based on our experience developing education plans and the
6 results of the April 2016 Survey, we anticipate that customers will want to
7 understand all of the benefits available to them and how to get the most out of
8 them.

9 **Q. WHAT ANTICIPATED BENEFITS OF THE CPCN PROJECTS DOES PUBLIC**
10 **SERVICE COVER IN THE EDUCATION PLAN?**

11 A. The Education Plan will cover three key indirect benefits of advanced distribution
12 grids and meters: economic, environmental, and reliability. There are economic
13 benefits to customers because this technology helps consumers save money by
14 having access to real-time energy usage information, and as a result they can
15 manage their energy use to reduce their bill. There are environmental benefits
16 as the technology enables the connection of more renewable energy sources to
17 the grid. The technology also enables more reliability, as an advanced grid can
18 sense problems and re-route power, prevent outages and reduce the duration of
19 those that occur. Customers have different preferences and these three benefit
20 themes will appeal differently to different customers.

21 The Education Plan does not currently address specific direct benefits of
22 advanced meters; rather, this portion of our customer education efforts will be

1 developed further once a meter vendor has been selected and we are closer in
2 time to deployment activities.

3 **Q: HOW DOES THE PLAN ADDRESS CUSTOMERS' ABILITY TO MANAGE**
4 **THEIR ENERGY USAGE DATA?**

5 A. The Education Plan will address the specifics of data management in Phase III.
6 This Phase will provide customers with information on how to access their data
7 through available platforms, and how they can actively use that information to
8 manage their energy use. The specifics of data management and the way in
9 which customers can access their data are still being planned as a part of this
10 overall effort, and will be incorporated into the Education Plan when available.
11 Some of this information will rely on the particular advanced meters ultimately
12 selected, and we will develop specific educational language to roll out in Phase
13 III based on the ultimate meter selection.

14 **Q. DOES THE PLAN ADDRESS CUSTOMERS' ABILITY TO OPT OUT OF THE**
15 **AMI PROGRAM?**

16 A. Yes. The possibility that customers will ask about "opt-out" options is one of the
17 questions Public Service anticipates in the Education Plan. Company witnesses
18 Ms. Jackson and Mr. Borchardt discuss how the Company intends to approach
19 customers' ability to opt out of AMI metering. Depending on whether this opt-out
20 approach is approved by the Commission, we intend to develop the specific
21 answer to the opt-out question. Our customer Education Plan will explain the
22 benefits of AMI and the cost of opting out so that customers can make a well-

1 informed choice and will be encouraged to take advantage of advanced meters
2 and their associated benefits.

3 **Q. DOES THE PLAN ADDRESS CONCERNS OF LOW INCOME AND OTHER**
4 **CUSTOMER GROUPS WITH RESPECT TO ADVANCED METERS?**

5 A. Yes, this is already included in the Plan draft as Attachment JBW-1. Low
6 income and other customer groups will have access to advanced meters and the
7 benefits of the CPCN Projects, as well as to education that may be helpful to
8 them.

9 **Q. HOW WILL THE COMPANY EVALUATE THE SUCCESS OF THE**
10 **EDUCATION PLAN?**

11 A. The Company will evaluate the success of the Education Plan by conducting
12 market research studies prior to the launch of the Plan to set a baseline, and
13 then after each of the three phases to measure progress against a goal. Overall,
14 the studies will assess the customer's understanding of communications and
15 satisfaction with each phase of the Education Plan. Data collected in the baseline
16 study will enable specific satisfaction goals and measurements to be determined.

V. COSTS

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Q. HAVE YOU DEVELOPED AN ESTIMATED COST FOR THE EDUCATION PLAN?

A. Yes, the estimated costs for the Education Plan are set forth in Attachment JBW-1. Overall, we estimate that the customer education effort as proposed will cost approximately \$3 million. However, as I identified above, the content of this Education Plan will evolve over time and we look forward to stakeholder input. Therefore it is possible that this estimate may change.

Q. WHAT IS THE BASIS FOR THIS COST ESTIMATE?

A. As previously noted, we determined that the purposes of the Education Plan are to (1) raise general awareness about the need to advance the distribution grid and enhance our metering structure, and (2) support individual customers before and after implementation of their advanced meters. Further, this education effort is large in scope, as it affects all of the Company's Colorado electric customers, and the Company will need to touch every customer with AMI education material multiple times. Therefore, the Education Plan includes multiple communications channels throughout the phases of the education effort.

Q: BASED ON THESE CONSIDERATIONS, HOW DID YOU DEVELOP THE COSTS IN THIS PROPOSAL?

A: Public Service has created multiple customer education plans and corresponding budgets. I relied on my past experience creating other large scale plans to create the cost estimates for this Education Plan.

1 Additionally, given the scope of this Education Plan I obtained estimates
2 from third-party vendors for some of the specific outreach methods we propose.
3 While many of the outreach methods will be completed internally and will not give
4 rise to incremental costs, information from third-party vendors helped to scope
5 third-party costs and to validate our estimates.

6 Finally, we organized costs around two outreach tactics that generally
7 align with the phases of our customer education.. The first outreach tactic is
8 developing general customer awareness about AGIS benefits. The second
9 outreach tactic is customer implementation and customer service, with the goal
10 of supporting individual customers before and after their advanced meter
11 installation.

12 **Q. WHY HAVE YOU INCLUDED COSTS FOR MULTIPLE OUTREACH**
13 **METHODS?**

14 A. As I discussed in Section III of my testimony, it is important to use multiple
15 communication channels in order to reach all affected customers. We have
16 learned through research and previous experience that some customers prefer
17 certain methods of outreach and others do not engage with those same
18 channels. For example, advertising to market is a very effective method when it
19 is necessary to reach all of the Company's electric service customers in
20 Colorado, which is critical for this customer education effort. This strategy is
21 compliant with Commission Decision No. C11-0406 (¶18) in Proceeding No. 10I-
22 099EG, in which the Commission stated the Company should use multiple
23 channels for consumer engagement in future advanced meter initiatives.

1 **Q. WHAT ARE THE LARGEST DRIVERS OF THE COSTS OF IMPLEMENTING A**
2 **CUSTOMER EDUCATION PLAN?**

3 A. Potential plan costs are driven primarily by the frequency and channel of
4 communication. Electronic channels, such as blogs and social media, are
5 relatively inexpensive, while advertising and direct mail are more expensive. In
6 order to achieve the Company's goals for each outreach tactic and ultimately
7 succeed in educating customers, it is important to use multiple channels to
8 ensure we contact each customer multiple times. Based on known project
9 parameters thus far, those channels and estimated costs have been developed,
10 as can be seen in Attachment JBW-1.

11 **Q. HOW DID YOU DETERMINE THAT THE ESTIMATED EDUCATION PLAN**
12 **COSTS ARE REASONABLE?**

13 A. In addition to Public Service's experience in developing education plans, the
14 Company secured quotes from third party vendors that are regularly used by the
15 Company for printing, social media (pricing on set social media channels), and
16 our contracted advertising agency. Any vendors that we regularly use have
17 already been vetted in a thorough Request for Proposal ("RFP") and sourcing
18 process to secure the best work at the best price. Through these processes, as
19 well as the overall development of the Education Plan and our efforts to balance
20 effective outreach with efforts to contain costs, we believe this cost estimate is
21 reasonable.

22 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

23 A. Yes, it does.

Statement of Qualifications

Jennifer B. Wozniak

As the Director, Jurisdictional Communications, I am responsible for corporate communications, social media, public relations and DSM/Energy Efficiency/Renewables marketing for Public Service Company of Colorado and Southwestern Public Service. My specific job duties include managing all communications strategy, planning, and execution for Colorado, Texas and New Mexico. This includes developing and executing communications and outreach strategies using multiple channels that explain company business initiatives. I also lead crisis communications efforts in coordination with Operations, Media Relations, Enterprise Continuity and other key stakeholders in order to communicate with customers and the media. My team also plans and executes upon all of the marketing campaigns for Demand Side Management, Energy Efficiency and Choice/Renewables programs in the same regions cited above.

Formerly at Xcel Energy, I worked in the Marketing department, serving in both project management and as the Director of Marketing and Customer Strategy. My past experience includes working in many competitive industries such as banking, retail grocery, office supplies, and sports management. I have held multiple leadership roles in these industries covering the areas of marketing, customer strategy, risk management, strategic planning, human resources and finance. I earned a Bachelor of Arts degree in English and an MBA in Marketing from the University at Buffalo in Buffalo, NY. My MBA was focused upon the discipline of Market Research.