

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

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**IN THE MATTER OF ADVICE NO. 1828-)
ELECTRIC OF PUBLIC SERVICE)
COMPANY OF COLORADO TO REVISE)
ITS COLORADO P.U.C. NO. 8 - ELECTRIC) PROCEEDING NO. 20AL-XXXXE
TARIFF TO IMPLEMENT AN ADVANCED)
GRID RIDER TO BE EFFECTIVE ON)
AUGUST 17, 2020.)**

**MOTION OF PUBLIC SERVICE COMPANY OF COLORADO
FOR COMMISSION APPROVAL OF AN ALTERNATIVE FORM OF NOTICE**

Public Service Company of Colorado (“Public Service” or the “Company”), through its undersigned counsel and pursuant to Colo. Rev. Stat. § 40-3-104(1)(c)(l)(E) and Rule 1207(b), 4 Code of Colorado Regulations 723-1, hereby requests that the Colorado Public Utilities Commission (“Commission”) approve alternative forms of notice that will apply to Public Service's filing to implement an Advance Grid Rider (“AGR”) and related tariff changes, applicable to all electric rate schedules. In support of this Motion, Public Service states as follows:

1. On July 17, 2020, the Company filed Advice No. 1828 - Electric proposing the AGR and related tariff changes, to be effective August 17, 2020, all as further detailed within the filing and supporting testimony (the “AGR Filing”). Pursuant to § 40-3-104(1)(a), C.R.S., Public Service has assumed an August 17, 2020 effective date for rates and tariff changes in this proceeding.

2. The Company seeks authority to provide alternative forms of notice of the AGR Filing.

4. The legal notice the Company proposes to provide is set forth in Attachment A to this motion. In addition to posting the legal notice on its website¹ and keeping the file open for public inspection as mandated by § 40-3-104 (1)(c)(I), C.R.S., Public Service is seeking Commission approval to use the following alternative forms of notice:

- a. Publishing a legal notice, in the form attached hereto as Attachment A, in *The Denver Post*, for two (2) consecutive weeks, including one Sunday, consistent with §40-3-104(1)(c)(I)(A), C.R.S.;
- b. Posting a copy of the AGR Rider Filing in its entirety on the Company's website;
- c. Providing a bill onsert attached as Attachment B incorporated with Public Service's residential electric customers bills, including mailed and e-billed, during a regular billing cycle over the course of approximately five (5) weeks commencing approximately two weeks after this filing; and
- d. Providing an email to all residential electric customers for whom the Company has an email address and who have elected to receive email notifications from the Company, in the form shown as Attachment C to this Motion, within 20 days of the 30-day noticing period.²

¹https://www.xcelenergy.com/company/rates_and_regulations/filings at the "Recently Filed Notices" section.

² Due to formatting issues, particularly on mobile devices, the email will not include the graphics from the bill onsert, nor will it contain the toll free contact number from the bill onsert because it is best practice to keep a customer in the communications channel they prefer or are using.

- e. Providing electronic notification to parties included within the certificate of service for the Advanced Grid Intelligence and Security (“AGIS”) Proceeding (Proceeding No. 16A-0588E).

5. By this Motion, the Company seeks authority under § 40-3-104 (1)(c)(I)(E), C.R.S., to provide alternative forms of notice for the AGR Filing to its electric customers and other stakeholders as set forth above. The Company is requesting Commission authorization to provide notice of proposed tariff changes through publication in the Legal Classified Section of *The Denver Post*, a newspaper of general circulation, consistent with §40-3-104(1)(c)(I)(A), C.R.S. This notice procedure is less costly than the procedures prescribed by statute. Newspaper notice is a reasonable form of notice for this filing because it provides nearly all customers the opportunity to obtain notice of the filing during the first twenty (20) days of the thirty (30) day period prior to the proposed August 17, 2020 effective date.

6. It is also reasonable because this alternative form of notice is in addition to notice that will be provided via bill onserts, which is permitted by § 40-3-104(1)(c)(I)(C), C.R.S. The notice that the Company proposes will be sufficient to notify parties that may be interested in reviewing the Company’s AGR Filing and proposed rates.

7. The Company also believes these alternative forms of notice are reasonable given its desire to avoid inundating its customers with e-mail and text notifications for all filings in a manner that could potential cause confusion. Nonetheless, the Company is adding as an additional form of alternative notice emails, in the form of Attachment C, to all electric customers for whom it has an email address and who have elected to receive email notifications from the Company, as this is a large impacting

project that will affect all electric sales customers. The Company is concerned that sending frequent emails or texts to customers for noticing or regulatory messages will drive customers to unsubscribe or opt out from receiving emails or texts. The Company notes that text messaging is primarily used for outage and restoration information and not for noticing purposes.

8. The Company plans to move forward with these alternative forms of notice. Should the Commission deny this Motion, the Company will proceed to provide additional notice consistent with the Commission's order.

9. The Company believes that the alternative forms of notice listed above will provide the required information concerning the AGR Filing to the general public and stakeholders, including the estimated impact on average electric residential customers. The Company believes that the proposed alternative notice is sufficient to alert affected and interested parties of the changes that the Company is proposing by its AGR Filing in a timely fashion. As such, there is good cause for the alternative form of notice requested by this Motion.

WHEREFORE, Public Service respectfully requests that the Commission approve the alternative forms of notice set forth in this Motion pursuant to §40-3-104(1)(c)(I)(E), C.R.S. and Rule 1207(b).

Dated this 17th day of July 2020.

Respectfully Submitted,

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