

May 13, 2020



On March 13, 2020, Public Service Company of Colorado (“Public Service” or “the Company”) issued a 60-Day Notice to modify its existing Insulation and Air Sealing product to clarify the existing eligibility requirements due to hazards related to blower door tests where asbestos, black mold, or vermiculite has been present. The new requirements will be implemented as proposed, with the adjustments described below, on May 14, 2020. The original Notice and accompanying documentation can be found on the Company’s website, here:

https://www.xcelenergy.com/company/rates_and_regulations/filings/colorado_demand-side_management

The Company received written comments on the Notice from select members of the Energy Efficiency Business Coalition (EEBC). After careful consideration of the comments, the Company determined that a correction to the proposed verbiage is warranted. The Company provides the following formal response:

1. Comment Submitted by the EEBC:

After reviewing all the BPI and EPA and OSHA documentation I could not find a reference to what PSCo is referring to regarding the blower door testing after asbestos insulation has been removed.

The following lists all occurrences of asbestos in the BPI and EPA websites. Their statement This change aligns the product with Building Performance Institute standards to promote safety and proper procedures for homes where these health concerns are present is not supported by any documentation. The change should be disallowed.

Response:

The company agrees with the EEBC statement and proposes the following verbiage in lieu of the original 60-Day notice:

For areas being treated, where there is a risk of asbestos, or other hazardous materials becoming airborne, blower door diagnostic tests may not be performed. In these situations, the contractor is required to safely complete air sealing measures to the best of their abilities and note the invoice that the presence of a hazardous material prevented a blower door test from being completed. These customers will not be eligible for an air-sealing rebate.

2. Comment Submitted by the EEBC:

The 60-day notice prevents the program from performing air sealing and insulation work in a home that “has” or at one time in the history of the building “had” asbestos, black mold, or vermiculite installed in the building. The 60 day notice also states the Building Performance Institute (BPI) standards align with Xcel’s new requirements. After a review of the BPI standards there could be found no requirements prohibiting testing of houses *after* mitigation had occurred in the house. The last sentence in the first paragraph of the 60-day notice should be stricken from the notice.

Response:

The Company agrees and points to the alternate language referenced in Comment 1.

3. Comment Submitted by the EEBC

With tighter homes the health problems increase from mold and dust from asbestos and vermiculite. There is no reason to disqualify rebates for mitigated problems. Owners may drop not only air sealing and insulation projects but also drop mitigating other problems, leading to increased health and safety issue. Mitigation is costly and should have its own rebates along with air sealing and insulation.

Response:

The Company agrees with the first remark and points to the alternate language referenced in Comment 1.

The Company does not believe that mitigation rebates fall under the jurisdiction of its DSM portfolio and therefore cannot address the recommendation.