



Electric Car Sharing for Underserved Communities Pilot 60-Day Notice Summary Report

On November 5, 2021, Public Service Company of Colorado (“Public Service” or “the Company”) issued a 60-Day Notice (“Notice”) to update stakeholders regarding the Company’s development of an Electric Car Sharing for Underserved Communities Pilot to be incorporated into the Company’s 2021-2023 Transportation Electrification Plan (“TEP”) as approved by the Colorado Public Utilities Commission (“Commission”) through Decision No. C21-0017 in Proceeding No. 20A-0204E.

The original Notice and accompanying documentation can be found on the Company’s website:

https://www.xcelenergy.com/company/rates_and_regulations/filings/transportation_electrification_plan

The Company received written comments on the Notice collectively from the Southwest Energy Efficiency Project (“SWEEP”), Western Resource Advocates (“WRA”), Conservation Colorado, and Energy Outreach Colorado (“EOC”), provided as Attachment A; and from the Colorado Energy Office (“CEO”), provided as Attachment B.

The Company appreciates the time, attention, and thoughtful review of the Electric Car Sharing for Underserved Communities Pilot 60-Day Notice from interested stakeholders. Verbatim excerpts from the comments are provided below along with the Company’s responses to all comments received:

1. Comments Submitted by SWEEP, WRA, Conservation Colorado, and EOC

Comment:

Car sharing is an important tool to expand access to mobility without the costs of individual car ownership. This project aligns well with the statutory directive in SB19-077 to expand access to the use of electricity as a transportation fuel. It will help a wider range of people access more of the benefits of transportation electrification.

We agree with the Company that learning about how to support the electrification of car sharing services at scale is a worthy objective, and we appreciate that this project will both increase knowledge and provide a practical resource to underserved communities that will be immediately useful.

We support the partnership with Colorado Car Share, and coordination with the Regional Air Quality Council and the Colorado Energy Office, as described. The definition of underserved communities as described in this notice is reasonable.

Response:

Thank you for the positive feedback, and the Company appreciates the support for this Pilot.

Comment:

Securing community participation will be the crux of this project. This challenge will be partially addressed by the Company's proposal to provide an advisor to assist potentially interested communities with developing successful applications, but there are further steps that could make a difference.

First, the project should include robust, culturally competent community outreach and partnership. The Community Needs Assessment should be led by or in partnership with community-based organization(s) to identify where cars should be located to maximize their use and usefulness and solicit feedback how the pilot should be best deployed. When the Company is ready to release the application, the Company-led webinar should be widely publicized and delivered through a variety of communication channels that are appropriate for underserved communities, again in partnership with community-based organizations.

Response:

Thank you for highlighting the importance of and need for culturally competent community outreach, and partnership. The Company agrees that being sensitive to cultural needs is imperative in making this project successful, and it's beneficial to those individuals and groups the Pilot aims to serve. The Company plans to work with a combination of both Colorado CarShare, and local organization(s) to conduct the Community Needs Assessment ("CNA") which is both a process and an analysis that will help identify optimal placement of the vehicles and chargers and helps inform outreach. The objective of the CNA coupled with working with these organizations is ensuring that a culturally diverse, well-rounded mix of communities are encouraged to participate, actively engaged, and that their unique needs, voices and ideas are heard and considered in design, planning and implementation efforts.

For example, the Company has previously worked with The Brendle Group, and may consider them for this project, or other similarly well qualified organizations who can support the CNA and planning. For outreach, the Company has previously partnered with Energy Outreach Colorado ("EOC"), Zozo Group, Clean Energy for the Region ("CLEER") and other similar groups. These organizations, ones like them, and others are encouraged to actively reach out to the Company and express interest and ideas on how they can support this project's culturally competent outreach, partnership, and needs assessment planning. Public Service hopes to work with organizations like these to help publicize the Pilot.

Comment:

Second, we anticipate that community partners may need assistance with procuring equipment before being able to apply for a rebate. We appreciate that the Company states that for rebates, “Early payment options will be considered based on customer needs.” Will that include direct Company assistance with the vehicle acquisition transaction? If not, the Company could improve this proposal by recruiting another partner, such as the Green Bank of Colorado, to provide financing assistance to successful applicants to bridge any gaps between vehicle purchase and rebate.

Response:

The Company agrees. Public Service will look for opportunities to bring in potential partners to help facilitate the process of procuring equipment for communities, prior to their applying for rebates. The Company will also look to potential partners for help finding and considering possible supporting grants and other available funding sources that may benefit the mix of interested communities, and Colorado CarShare. The Company believes that these added resources can benefit the program by helping to expand reach and impact.

Comment:

Third, we also anticipate that especially income-qualified community applicants may be less able to bring co-funding to the table. We urge the Company Advisors to ensure that applicants are coordinating with their local governments, which may be able to contribute street space or other resources to projects. (For example, see the City of Denver’s program with Colorado CarShare to place vehicles at public housing locations.) This will help increase access to this program for a wider variety of applicants.

Response:

There are no requirements to bring co-funding. The Company will be covering the entire cost of vehicles for Colorado CarShare, and much of the costs for charging and supply infrastructure. While dollars are helpful and expand the program, we also see “co-funding” by community applicants as their bringing additional resources such as: expertise; right of ways; dedicated charging/dwell spots; help with and support for outreach and education efforts; providing nuanced cultural insights that improve the CNA; supporting site artwork and betterment; etc. as being equally important. The Company actively encourages applicants and other stakeholders to help with community engagement and consider where and how they might help with electric vehicle supply equipment (“EVSE”) and electric vehicle supply infrastructure (“EVSI”) that brings further electric transportation and public transportation access and economies of scale where this infrastructure will be placed.

Comment:

Fourth, the notice states that “ideally no more than 10 vehicles [will be] supported by the pilot in any one community.” What specifically does the Company mean by “community” here? We encourage the company to be flexible with that definition, so that the vehicle deployments are maximally used and useful.

Response:

Your comment is appreciated, and noted, and the Company agrees on the need for flexibility in the definition of “community.” The Company will work to maximize the number of vehicles in a community, while also aiming to reach as many communities as possible that can be effectively served by these vehicles, the EVSI, and what the program aims to achieve. The Company’s definition of community is intentionally left broad to allow for optimal flexibility in finding the right mix of culturally, demographically, income qualified, and other impact-based factors to be considered.

Comment:

Finally, the scope of the project is listed at 35 total vehicles. That number is reasonable for an initial pilot. However, we would like the reporting, measurement and evaluation metrics to include the number of applications made, the number of projects funded, and the number that didn’t make the cut (with a brief narrative analysis of why). If the pilot is successful, this information could be helpful to scale the project in future years. Additionally, we recommend that reporting include the baseline level of electricity consumption and level of demand as applicable, as well as demographic and income information for participating communities, as available (perhaps provided on a voluntary basis by participants).

Response:

The Company agrees to reporting the number of applications made, the number of projects funded, and the number of applications that were not selected. The Company will consider providing additional analysis for those applications that were not selected yet accounting for what voluntary information communities provide.

If communities want to provide this additional information on a voluntary basis, the Company can report participant demographic information, but the Company is also bound to customer confidentiality and data privacy rules and will only report information that is provided by the participating community and in compliance with such rules.

2. Comments Submitted by CEO

Comment:

General Comments - CEO supports the Company's partnership with Colorado Carshare, however it would be helpful if the Company would explain why it selected Colorado Carshare and how its business model differs from other providers.

CEO recommends the Company provide more context on Colorado Carshare's role and how it will interact with the Company, communities, consultant, and applicants. After reviewing the 60-Day Notice, CEO is unclear on the roles and responsibilities of each party participating in the pilot.

As noted, CEO supports the Company's proposal, which includes providing the vehicles and infrastructure for this car sharing pilot. However, CEO would like to understand whether Colorado Carshare anticipates having the ability to leverage other funding sources that would cover the same costs following the conclusion of this pilot-- or whether this business model pilot presumes full utility funding. In other words, does this pilot provide an approach that can be scaled to other communities and locations if the Company is unable to provide funding following the pilot?

Response:

The Company chose to work with Colorado CarShare for several reasons.

1. Colorado CarShare is a non-profit, mission driven organization. Their mission includes support for income qualified and culturally diverse communities, while also providing beneficial environmental impacts.
2. Colorado CarShare has a desire to electrify their fleet, has already actively electrified a portion of that fleet, and has plans for ongoing and further electrification.
3. Colorado CarShare, through this project and partnership, is open to researching, innovating, experimenting, and finding ways to make the car share model work across culturally, demographically, and income qualified communities to improve those groups' access to and benefit from accessible, affordable, clean operating, and sustainable car sharing. The intent is to understand and optimize these models so that insights can be shared, and service expanded.
4. Colorado CarShare has an existing business model, brand, Colorado presence, in-place relationships, outreach program, and mission that best couple with the intended outcomes of the project.
5. Colorado CarShare is providing resources, insights and dollars to the partnership, and actively navigating, identifying, and applying for added grants that couple with and expand the reach and potential of what the project can achieve.

Colorado CarShare's role will be that of car share service provider, including its role as the "fleet operator" along with service education/outreach and administration. Colorado

CarShare already has the physical infrastructure, the software and platforms, local brand and regional presence, various outreach mechanisms, and the social infrastructure necessary to administer the car share fleet in a manner generally supportive of and appropriate for this Pilot.

Colorado CarShare will interact with the Company, communities, consultant, and applicants at all stages of the CNA, community partnership discussion, siting consideration, planning, and implementation processes in order to help insure feasibility and likely success. As such, Colorado CarShare is a key partner in the success and overall delivery of this Pilot. They will be looking not only to operate and learn from the work being done but ensuring that the model continues to perpetuate following the Company's initial involvement during this Pilot phase.

Also, because of Colorado CarShare's existing business model and associated operational infrastructure, they may operate the cars in perpetuity, appropriate to their business model, in locations that are successful, align to their planning cycles, and at their discretion, during and potentially following the initial two-year Partnership, Research, and Innovation Pilot term. Colorado CarShare is free at any time to contribute added financial resources, revenue from car share use fees, and/or pursue other funding from grants, and donations.

Comment:

Section A. Project Description, Goals, and Key Outcomes - CEO recommends that as part of the goals, the Company also consider an analysis of the limitations of the pilot. As noted above, this pilot is designed around one organization and a specific model. Drawing conclusions about electrification of carsharing in underserved communities broadly may be difficult.

Response:

The Company will be reporting out what was detailed in Section F of the 60 Day Notice.

Comment:

Section B. Estimated Costs, Benefits, Value to Customers - This section includes a \$200,000 budget for community needs assessments. CEO requests that the Company clarify approximately how many assessments the budget covers.

Response:

The Company is currently scoping the number of assessments that will take place with potential vendors and will better understand what the budget covers.

Comment:

Section E. Application, Process, and Scoring - The notice states that, “Interested communities will have the opportunity to apply...” Does this mean that only communities, e.g. local governments, can apply? If so, CEO recommends that in the same way community organizations can apply for Charging Hub rebates and Higher Emissions Communities (“HEC”) designation, they should also have the ability to apply to be a host for a CarShare project.

Response:

The Company agrees. The Pilot is not limited to local governments only. Other forms and definitions of communities may apply for the Pilot too, and are actively encouraged to do so. “Communities” may include some combination of culturally diverse geographic locations and/or associated groups (e.g. housing authorities), neighborhoods and/or socioeconomic areas, areas that are underserved by public transit and other forms of transportation, groups and/or neighborhoods who are income qualified through a state or regional definition of income qualification, and others. This is not an exhaustive list. While Colorado CarShare will administer the vehicles through their existing operations, we agree that “communities” should be able to apply to host a car sharing project, and that this could include hosting a place for the vehicles to dwell and a charger, hosting and supporting community outreach and education, and participating to build and expand the affordable and accessible car sharing model in their community, including for example, community mobility hubs.

Comment:

Under this section it also states, “The communities, vehicle, and charger siting will be determined through a combined process. It will consider insights derived from the community needs assessment...” Under Outcomes, the notice states, “First, it will produce a viable community needs assessment of communities in the Company’s service area to understand where best to place the electrified car sharing vehicles...” CEO requests that the Company clarify when the needs assessment(s) will be completed. These statements suggest that it will happen prior to project selection. CEO recommends the Company provide more information on the needs assessment including the timing and its relationship to applicant proposals and evaluation criteria.

Response:

The CNA(s) will generally occur on an ongoing basis to help identify communities. The Company will also take applicant proposals into consideration for site selection and evaluate them using the Notice’s process and scoring criteria. Finally, determination will also consider those sites that are deemed feasible from a car share service, and community engagement perspective.

Comment:

Section E. Application, Process, and Scoring, Process and Scoring Subsection - Bullet 3 states, “Successful applicants will be notified of their rebate funding amount...” CEO requests that the Company clarify if the rebate would go to applicant or to Colorado Carshare. Should the applicant be prepared to front the money and then be reimbursed through the grant? Under Figure 1, it states, “Customer submits invoices and receives payments.” And, “Early payment options will be considered based on customer needs.” CEO recommends that the Company clarify this aspect of the pilot and if possible, be prepared to provide advance payment in most if not all cases. In CEO’s experience, local government procurement requirements and budget constraints are likely to delay or limit participation so making this aspect of the program flexible is likely to increase participation, particularly if community-based organizations are eligible to participate.

Response:

All rebate funding for vehicles will go to Colorado CarShare. This will allow Colorado CarShare to work with participants with flexibility. Rebate funding for EVSE/EVSI will primarily go through individual community applicants who are awarded to participate in the Pilot, and/or could be provided to Colorado CarShare on behalf of the applicant where applicable.

Comment:

Section F. Reporting, Measurement, and Evaluation - CEO recommends that the Company collect qualitative data from communities and individual users of the carshare in order to inform the pilot’s second goal of providing “...insights to inform possible future expansions of electrified car sharing within underserved communities.”

Response:

If participants are willing to provide this qualitative information to the Company on a voluntary basis, we can report qualitative information. Please note that the Company is also bound by customer confidentiality and data privacy rules and can only report information that is available and in compliance with such rules.