



Electrify Paratransit Mobility Pilot 60-Day Notice Summary Report

On October 29, 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 Electrify Paratransit Mobility Pilot 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 Colorado Energy Office (“CEO”), provided as Attachment B.

The Company appreciates the time, attention, and thoughtful review of the Electrify Paratransit Mobility Pilot 60-Day Notice from interested stakeholders. Verbatim excerpts from the comments are provided below and the Company’s responses to all comments received:

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

Comment:

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 – in particular the customers of paratransit services, including individuals with physical disabilities that make driving inconvenient or impossible. We support the proposal and we thank the Company for bringing it forward.

Response:

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

Comment:

While this pilot is largely well-designed, it may face similar challenges as the carsharing pilot. Changes that would increase the success of the program include:

First, we anticipate that paratransit 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.” However, the company should consider 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 availability.

Response:

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. The Company recognizes that these added resources can benefit the program, helping to expand reach and impact.

Comment:

Second, we also anticipate that some paratransit operators or communities may be less able to bring co-funding to the table than others. We urge the Company Advisors to ensure that applicants are also seeking funding from to leverage multiple additional funding sources, such as the new Colorado Clean Transit Enterprise Fund. Additional funding sources outside of the Company’s TEP could extend the paratransit mobility budget and enable support for more than six vehicles.

Response:

The Company will be covering a large portion of the cost of the vehicles, and costs for charging and supply infrastructure, through rebates. Yet to help fill funding gaps, the Company will recommend to applicants that they seek to close those gaps, for example through resources such as those provided by any current or future electrification programs offered by the State of Colorado or the Colorado Clean Transit Enterprise Fund.

It is also worth noting that in discussions with some potential applicants, they have noted that they already have vehicle replacement schedules in place for their existing internal combustion engine (“ICE”) powered paratransit vehicles, due to normal planned vehicle retirements. As such, they have shared that they would plan to use this Pilot’s funding to cover the difference between a comparable ICE vehicle when transitioning to an electric vehicle during that replacement cycle. Through this approach, the operators are hoping to in fact further expand the number of electrified busses transitioned during planned retirement and replacement cycles. Public Service sees this as an innovative and positive

approach by these operators, because it could help the program expand the number of electrified paratransit busses beyond the three to six originally anticipated for this funding. However, we recognize that not all potential applicants have the same resources available to them and we will actively encourage them to seek additional funding sources that help them achieve their environmental, sustainability and electrification goals.

Also, while applicant partner dollars are helpful and expand the program, we may also choose to recognize additional “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 assessment and outreach; 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/ electric vehicle supply infrastructure (e.g. supply infrastructure and charging stations) that brings further electric transportation and public transportation access and economies of scale where this infrastructure will be placed.

Comment:

Finally, we request that the reporting, measurement and evaluation metrics 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.

Response:

Public Service 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 applications that were not selected, in compliance with customer data privacy and confidentiality rules.

2. Comments Submitted by CEO

Comment:

Application, Process, and Scoring - This section references multiple parties including paratransit companies and communities. It is unclear the role that each would play in this pilot, including who would be the applicant and who would contract with the Company. Note that in the following section, Process and Scoring, it states that “Communities will be asked to provide proposed siting / location information for the placement of the electrified paratransit vehicles and operations.” CEO recommends that the Company clarify the role of each party and who can be an applicant.

Response:

Paratransit operators are those organizations who operate the paratransit fleets. They may either own or lease the vehicles. They are tasked with delivering paratransit service. A paratransit operator applies for the vehicle rebate and charging associated electric vehicle supply equipment and electric vehicle supply infrastructure rebates.

Communities are those groups who have a vested interest in paratransit operations occurring within their geography, under their purview, and/or who directly benefit from the paratransit service.

Communities are encouraged to participate by working with paratransit operators during the application process to help inform and influence the electrification of paratransit services within and among the community's geography. The community should provide insights to the operator on potential impacts, benefits, cultural considerations and more.

The Company will work directly with paratransit operators, who will be applying for and receiving the rebates, while considering community input, to ensure that the program's goals are serving both the operator's and communities' interests.

Comment:

This section also states that "Potential communities/sites would be considered through evaluation and some combination of outputs from the Community Needs Assessment, interviews with communities, by using insights derived from the Company's HEC identification methodology, and by cross-referencing with other resources including the equity map that CEO is developing." It is not clear when in the process needs assessments are completed. CEO recommends that the Company more clearly describe the role of the Community Needs Assessment including who will perform the assessments and when they will be performed.

Response:

The Community Needs Assessment ("CNA") will occur in the initial stages of the process. The Company is considering leveraging existing processes, such as working with the Company's Partners in Energy ("PIE") program, engaging communities that participate in that program and surveying them to inform who might be interested in the program, and who might benefit.

Concerning whom might help with the CNA, the Company has previously worked with the Brendle Group, and may consider them for this project, as well as other similar and well qualified organizations who can support the CNA and planning. For outreach, the Company has previously partnered with 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 Public Service and express interest and ideas on how they can support this project's culturally competent outreach, partnership, and CNA

planning. The Company will also be actively reaching out to these kinds of organizations for their help and partnership. So, a combination of both qualified organizations and input from communities and partners will be used to inform the development of the CNAs.

Comment:

Application, Process, and Scoring, Process and Scoring Subsection - Under number four, it states that “Upon approval, the community’s electric paratransit vehicle(s) will be enrolled in the Company’s Fleet Electrification Advisory Program...”

Response:

Yes, upon enrollment in the Pilot, participants will be enrolled in FEAP to help benchmark the existing ICE fleet and to identify best fit for electrification. FEAP provides telematics-based analytics for the existing fleet as well as the electric vehicles (“EV”). Ultimately both the ICE and EVs will participate in FEAP to provide a data-driven assessment of the impact of electrification on the performance of paratransit vehicles.

Comment:

Is this referring to the company’s existing vehicles or the electric vehicles once they’re delivered? If existing, does this mean only companies that are replacing vehicles are eligible?

Response:

No, FEAP is designed to help organizations that are interested in electrification in order to support the development of a telematics-informed fleet electrification plan. The Company recognizes that organizations need programs that provide analytics to support planning, infrastructure, and sourcing required for procuring EVs and related infrastructure.

Comment:

Note that in Figure 1, under Procurement, it states that the Customer is enrolled in Fleet Electrification Advisory Program (“FEAP”) after procurement. CEO recommends that the Company clarify this portion of the notice.

Response:

The Company agrees with this comment and will clarify in the Final Notice, that upon application to the Pilot, participants will be enrolled in FEAP to support pre-electrification assessments, planning, and procurement.

Comment:

Under scoring, CEO recommends that the Company require applicants to include information about their routes such as typical paratransit mileage per day and ridership data to better understand suitability for electrification.

Response:

The Company appreciates this suggestion and will take this into consideration. As planned, the Company will utilize FEAP's telematics-based analytics to provide Total Cost of Ownership modeling of EVs against the existing ICE fleet vehicles to participants. FEAP can help provide data driven analytics that can inform whether a particular vehicle or route is suitable for electrification and helps fleet operators identify which models offer the best capability at the lowest cost.

Comment:

Reporting, Measurement, and Evaluation - CEO recommends that the Company collect information that will allow it to compare the operating costs between the electrified shuttle(s) and the ICE shuttle(s) operated by each agency. CEO further recommends the Company report on the suitability of the electrified shuttle(s) for a paratransit agency's needs and any corresponding challenges related to charging or range.

Response:

The Company will ask applicants to provide what information they can or are comfortable with sharing, so that appropriate comparative studies can be conducted, and insights gleaned.