

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

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IN THE MATTER OF ADVICE NO. 1814- )  
ELECTRIC OF PUBLIC SERVICE )  
COMPANY OF COLORADO TO REVISE )  
ITS COLORADO P.U.C. NO. 8 - ELECTRIC ) PROCEEDING NO. 19AL-\_\_\_\_\_E  
TARIFF TO REFLECT A MODIFIED )  
SCHEDULE RE-TOU AND RELATED )  
TARIFF CHANGES TO BE EFFECTIVE ON )  
THIRTY-DAYS' NOTICE. )

**DIRECT TESTIMONY OF STACEY L. SIMMS**

**ON**

**BEHALF OF**

**PUBLIC SERVICE COMPANY OF COLORADO**

**December 2, 2019**

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

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OF COLORADO TO REVISE ITS COLORADO )  
P.U.C. NO. 8 - ELECTRIC TARIFF TO ) PROCEEDING NO. 19AL-\_\_\_\_\_E  
REFLECT A MODIFIED SCHEDULE RE-TOU )  
AND RELATED TARIFF CHANGES TO BE )  
EFFECTIVE ON THIRTY-DAYS' NOTICE. )

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**GLOSSARY OF ACRONYMS AND DEFINED TERMS**

<b><u>Acronym/Defined Term</u></b>	<b><u>Meaning</u></b>
CIM	Commissioners' Information Meeting
Commission	Colorado Public Utilities Commission
EV	Electric Vehicle
Modified Schedule RE-TOU	Modified Schedule Residential Energy Time of Use Rate
Navigant	Navigant Consulting, Inc.
RE-TOU Trial	Residential Energy Time of Use Trial
RD-TDR Pilot	Residential Demand-Time Differentiated Rates Pilot (AKA Peak Demand)
Public Service or Company	Public Service Company of Colorado
Three Case Settlement or Settlement	2016 Non-unanimous Settlement Agreement in Consolidated Proceeding Nos. 16AL-0048E Phase II Electric Rate Case; 16A-0055E, the Renewable*Connect Proceeding; and 16A-0139E, the 2017 RE Plan Proceeding.
XES	Xcel Energy Services Inc.
Xcel Energy	Xcel Energy Inc.

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COLORADO TO REVISE ITS COLORADO P.U.C. )  
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TARIFF CHANGES TO BE EFFECTIVE ON )  
THIRTY-DAYS' NOTICE. )

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

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

3 A. My name is Stacey L. Simms. My business address is 1800 Larimer Street,  
4 Suite 1500, Denver, Colorado 80202.

5 **Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?**

6 A. I am currently employed by Xcel Energy Services Inc. ("XES") as Senior  
7 Manager, Product Portfolio in the Product Strategy and Development  
8 organization. XES is a wholly owned subsidiary of Xcel Energy Inc. ("Xcel  
9 Energy"), and provides an array of support services to Public Service Company  
10 of Colorado ("Public Service" or "Company") and the other utility operating  
11 company subsidiaries of Xcel Energy on a coordinated basis.

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

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

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

1 A. As a Senior Product Portfolio Manager, I focus on the Company's electric vehicle  
2 offerings, specifically directed at fleet strategies and programs. A description of  
3 my qualifications, duties, and responsibilities is set forth in my attached  
4 Statement of Qualifications. Before starting in my current role in June 2019, I  
5 was the Portfolio Manager on the Customer Solutions team, and as part of that  
6 position, I performed the project management functions necessary to support the  
7 Residential Energy Time-of-Use ("RE-TOU") Trial ("RE-TOU Trial" or "Trial"),  
8 including our customer recruitment and education strategy, subcontractor  
9 management, and stakeholder outreach.

10 **Q. PLEASE FURTHER DESCRIBE YOUR RESPONSIBILITIES AS RELATED TO**  
11 **THE RE-TOU TRIAL.**

12 A. I was the Portfolio Manager on the Customer Solutions team managing the Trial  
13 from April 2017 through May 2019. During this time I was responsible for, or  
14 supported, the following program management activities for the RE-TOU Trial:

- 15 • Budget management;
- 16 • Customer awareness, marketing, and recruitment;
- 17 • Staff hiring and management;
- 18 • Contractor and subcontractor oversight;
- 19 • Coordinating internal processes;
- 20 • Facilitating outreach and partnerships with external stakeholders;
- 21 • Supporting regulatory responses and presentations; and
- 22 • Quality assurance.

23 In addition to the responsibilities listed above, I also regularly represented Public  
24 Service at local and national conferences where I would educate various  
25 organizations about the RE-TOU Trial.

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

1 A. The purpose of my Direct Testimony is to describe my program management  
2 work for the RE-TOU Trial, particularly as it involved customer recruitment,  
3 enrollment, and education; describe the Company's stakeholder engagement  
4 and outreach efforts throughout the RE-TOU Trial; and synthesize key learnings  
5 from the customer surveys Navigant Consulting, Inc. ("Navigant")<sup>1</sup> conducted  
6 during various phases of the RE-TOU Trial, involving participants' adjustment of  
7 their energy usage behaviors while on the rate, participants' satisfaction with the  
8 rate, and participants' understanding of the rate structure, and how these  
9 learnings have informed Public Service's proposal in this Advice Letter filing.

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<sup>1</sup> Navigant was awarded the Measurement & Verification ("M&V") contract for the RE-TOU Trial and Residential Demand-Time Differentiated Rates ("RD-TDR") Pilot through the Company's request for proposal ("RFP") process.

1           **II.   RE-TOU TRIAL RECRUITMENT AND ENROLLMENT**

2   **Q.   PLEASE DESCRIBE HOW PUBLIC SERVICE APPROACHED CUSTOMER**  
3       **MARKETING AND EDUCATION THROUGHOUT THE RECRUITMENT AND**  
4       **ENROLLMENT PROCESS FOR THE RE-TOU TRIAL.**

5   A.   From the outset, Public Service understood that the success of the RE-TOU Trial  
6       depended on its ability to recruit and enroll an appropriate test sample. To  
7       advance this goal, Public Service developed a comprehensive marketing plan,  
8       designed to create high visibility upon launch of the RE-TOU Trial and facilitate  
9       quick adoption by a diverse customer group. It was critical for these  
10      communication efforts to succeed in building an understanding of the rates and  
11      key concepts, in addition to creating customer awareness. The plan also  
12      included communication methods for reaching customers after enrollment, in an  
13      effort to retain them as volunteers in the Trial and enhance their overall  
14      experience and satisfaction. Public Service's marketing and communications  
15      campaigns relied on many marketing channels and strategies. Customers  
16      received or accessed information to help them better understand the Trial rate in  
17      multiple formats, including facts and figures, videos, diagrams, and common  
18      Q&A's. Customers even received decals to stick on their appliances to remind  
19      them to cut back their electrical usage during on-peak times, which were quite  
20      popular.

1 **Q. WHAT WERE THE SPECIFIC OBJECTIVES OF THE COMPANY'S**  
2 **MARKETING PLAN FOR THE RE-TOU TRIAL?**

3 A. Public Service's customer marketing plan had the following objectives:

- 4 • Operate within the framework for the Trial approved by the Colorado  
5 Public Utilities Commission ("Commission");
- 6 • Raise awareness of offerings while highlighting how customers can save;
- 7 • Position the Trial as an attractive customer choice in order to drive  
8 participation;
- 9 • Target critical customer segments in order to enroll a representative cross-  
10 section of customers;
- 11 • Alter messaging to align with segment needs and unique situations;
- 12 • Carefully design the customer experience in order to maximize customer  
13 satisfaction;
- 14 • Provide easy-to-understand, engaging, and effective educational materials  
15 related to demand, energy usage patterns, customer billing, and rate plan  
16 options;
- 17 • Provide the tools necessary for the Customer Contact Center to  
18 successfully handle related questions; and
- 19 • Develop a complementary post-enrollment customer experience in an  
20 effort to retain customers as Trial participants.

21 **Q. PLEASE SUMMARIZE YOUR OVERALL EXPERIENCE RECRUITING**  
22 **CUSTOMERS FOR THE RE-TOU TRIAL.**

23 A. Because the RE-TOU Trial relied on customers' voluntary participation, recruiting  
24 customers required a sustained, targeted, persistent, and ultimately resource-  
25 intensive effort. While Public Service was able to successfully recruit an  
26 impressive number of participants, the voluntary nature of the Trial meant that



1 the participants were a self-selected group that constitute only a small subset of  
2 Public Service customers.

3 **Q. WAS A DIVERSE GROUP OF CUSTOMERS NEEDED TO CREATE AN**  
4 **APPROPRIATE SAMPLE?**

5 A. Yes. Since the purpose of the Trial was to investigate a rate that potentially  
6 could be applicable to all residential customers, it was important that the sample  
7 reflect a diverse cross-section of the Company's residential customer base.  
8 Given that Trial participation was voluntary, extra efforts were taken to ensure  
9 that we were enrolling a representative cross-section of our customers.

10 **Q. IN ADDITION TO SEEKING A REPRESENTATIVE SAMPLE OF RESIDENTIAL**  
11 **CUSTOMERS, DID THE RE-TOU TRIAL'S RECRUITMENT EFFORTS**  
12 **TARGET ANY PARTICULAR CUSTOMER GROUPS?**

13 A. Yes. The RE-TOU Trial's marketing and communication strategy sought to  
14 recruit six customer market segments of interest, including renters, seniors, and  
15 low income customers, as well as customers with solar, electric vehicles, and  
16 smart thermostats. Each of these groups has certain needs or circumstances  
17 that we believed could impact their interaction with the rate in a manner that  
18 differed from the general Colorado population, and we wanted to gain an  
19 understanding of these impacts through the Trial.

1 **Q. HOW DID THE COMPANY TARGET THESE CUSTOMER MARKET**  
2 **SEGMENTS IN ITS RECRUITMENT EFFORTS?**

3 A. While we sought to raise awareness of the pricing plan among all Colorado  
4 customers, we targeted our outreach to these specific customer market  
5 segments through several channels, such as direct mail for Seniors, new mover  
6 kits for renters, newspaper and radio advertisements for the general public, and  
7 several presentations to advocacy or network groups. For example, to reach low  
8 income customers, we partnered with Energy Outreach Colorado to inform  
9 potential participants of the Trial through its customer touch points. Another  
10 example is that to recruit electric vehicle owners, we placed newsletter ads and  
11 email messaging about the Trial rate option with common interest organizations  
12 like EV Drive Coalition and Electric Vehicle Council. Messages were developed  
13 using simple, straight-forward language and practical information that customers  
14 could easily understand and act upon.

15 **Q. HOW DID THE ENROLLMENT PROCESS WORK ONCE CUSTOMERS WERE**  
16 **SUCCESSFULLY RECRUITED?**

17 A. Participants were allowed to select their preferred rate, the RE-TOU Trial rate or  
18 the Residential Demand-Time Differentiated Rates Pilot ("RD-TDR Pilot") rate.  
19 The Company developed educational materials to help customers decide  
20 whether the RE-TOU Trial or the RD-TDR Pilot was a better choice for them  
21 based on their household's financial and lifestyle decision making criteria. To  
22 enroll, customers completed an online intake survey or called the Xcel Energy

1 Customer Contact Center, and both forms of enrollment took about 10 minutes to  
2 complete. Participants provided information about their heating and cooling  
3 systems, appliances, schedule, occupants, location of their premise, and other  
4 basic demographics.

5 In order to develop a control group for the M&V requirements, one out of  
6 three non-solar volunteers was selected for the control group and informed of  
7 their random selection for this group within 24 hours of enrollment. Solar  
8 participants were not recruited for the control group, but rather, solar volunteers  
9 were “matched” with similar solar customer profiles to create a separate solar  
10 control group. When in rare instances an electric vehicle owner asked to be  
11 removed from the control group and placed on the Trial RE-TOU rate, these  
12 requests were granted.

13 Because the metering currently in place for residential customers is not  
14 capable of TOU billing, for voluntary Trial participants, Public Service installed  
15 “bridge meters” allowing it to measure and bill a customer’s monthly electric  
16 energy usage under the rates. Once a customer’s bridge meter was installed,  
17 the customer received a door hanger and email advising that the new meter was  
18 installed and that the new rate had taken effect, as well as reminders on how to  
19 maximize savings by changing electricity usage behaviors. Control group  
20 customers did not receive this notice because they were not placed on the Trial  
21 rate, and they were also were not sent communications to encourage them to  
22 change behaviors.

1 **Q. HOW WERE THE CUSTOMER MARKET SEGMENTS YOU REFERENCED**  
2 **ABOVE CATEGORIZED IN THE ENROLLMENT PROCESS?**

3 A. Navigant used the below hierarchy to categorize the Trial participants into  
4 segments based on shared characteristics. The seven segments are:

- 5 • Solar;
- 6 • Low Income;
- 7 • Electric Vehicle (“EV”);
- 8 • Smart Thermostats;
- 9 • Seniors;
- 10 • Renters; and
- 11 • General Population.

12 As mentioned above, the customer market segment assignments were  
13 determined by the first applicable segment in the above hierarchy, or “waterfall.”  
14 The order of segment hierarchy was Solar, Low Income, EV, Smart Thermostats,  
15 Seniors, and Renter. Participants that did not meet the criteria for any of these  
16 identifying segments were designated as General Population. For example,  
17 every customer with solar was placed in the Solar segment, those without solar  
18 or EVs but with a smart thermostat would be placed in the Smart Thermostat  
19 segment, those that were low income and had EV would be placed in Low  
20 Income, and so on.

21 **Q. HOW MANY CUSTOMERS IN THE RE-TOU TRIAL HAVE BEEN ASSIGNED**  
22 **TO EACH CUSTOMER MARKET SEGMENT THROUGH THIS PROCESS?**

23 A. As of November 1, 2019, there were 5,838 participants on the RE-TOU Trial rate  
24 and 3,162 participants in the control group. Technology segment participation  
25 included Solar (1,552), EVs (609), and Smart Thermostats (1,016), while

1 demographic-based segments included Renters (2,001), Seniors (805), Low  
2 Income (197), and General Population (2,820). Page 4 of Attachment BAT-3 to  
3 Ms. Brooke A. Trammell's Direct Testimony shows the participation at a different  
4 point in time, while leaving customer counts in from overlapping segmentation  
5 assignments.

6 **Q. HOW DOES ACTUAL ENROLLMENT COMPARE TO THE COMPANY'S**  
7 **ENROLLMENT TARGETS FOR THE RE-TOU TRIAL?**

8 A. Participation maximums for each rate were decided in the Non-unanimous  
9 Settlement Agreement in Consolidated Proceeding Nos. 16AL-0048E Phase II  
10 Electric Rate Case; 16A-0055E, the Renewable\*Connect Proceeding; and 16A-  
11 0139E, the 2017-2019 Renewable Energy Compliance Plan Proceeding ("Three  
12 Case Settlement" or "Settlement") and, with respect to the RE-TOU Trial, are as  
13 follows:

14 **Table SLS-D-X**  
15 **RE-TOU Participation Parameters**

	<b>2017</b>	<b>2018</b>	<b>2019</b>
RE-TOU Participation Goal	10,000	14,000	18,000
RE-TOU Participation Cap	10,000	20,000	30,000

16 There was also a maximum of 500 low-income customers allowed to be enrolled  
17 under the Three Case Settlement. Since the inception of the Trial, a total of  
18 approximately 13,000 unique customers voluntarily enrolled in the trial for any  
19 amount of time. Due to rolling enrollment and attrition, the actual number of  
20 participants varied throughout the course of the Trial. In spite of the recruitment

1 difficulties, it is my understanding that this one of the largest voluntary, non-  
2 incentivized time varying rate programs in the nation.

3 **Q. DID THE COMPANY DETERMINE THAT THE CUSTOMERS ENROLLING IN**  
4 **THE RE-TOU TRIAL ARE A REPRESENTATIVE SAMPLE OF ITS**  
5 **CUSTOMER BASE?**

6 A. No, not entirely. The design of the Trial included a control group and basic  
7 demographic segmentation provided for a comprehensive evaluation. However,  
8 because of the voluntary and self-selecting nature of the program, the participant  
9 mix skewed towards proportionally more renter participation than is found in the  
10 Residential class. In addition, it was observed that the participants in the Trial  
11 had lower usage than what is typical in the total residential population.

12 **Q. DOES THE COMPANY'S EXPERIENCE WITH RECRUITMENT AND**  
13 **ENROLLMENT FOR THE VOLUNTARY RE-TOU TRIAL INFORM ANY**  
14 **RECOMMENDATIONS FOR A MORE WIDESPREAD RE-TOU RATE?**

15 A. Yes. Given how challenging and resource-intensive it was for Public Service to  
16 recruit a small percentage of its customers to voluntarily enroll in the RE-TOU  
17 Trial, I have significant concerns that Public Service would not be able to  
18 implement a widespread RE-TOU rate, aiming for significant customer and  
19 system peak reduction benefits, through reliance on voluntary participation. For  
20 the potential benefits of a widespread RE-TOU rate to be realized, I support the  
21 Company's proposal to make its proposed Modified RE-TOU rate ("Modified  
22 Schedule RE-TOU") the default rate for residential customers. Ms. Trammell and

1 Company witness Mr. Steven W. Wishart address the potential benefits of the  
2 default Modified Schedule RE-TOU in their testimonies. I would also note that  
3 the opt-in aspects of the Trial led to a different approach for public awareness  
4 and enrollment marketing than what would be necessary for the Modified  
5 Schedule RE-TOU. Company witness Jennifer B. Wozniak explains the  
6 Company's communications plan for this proposal in her Direct Testimony.

1 **III. STAKEHOLDER ENGAGEMENT**

2 **Q. FOR CONTEXT, PLEASE PROVIDE SOME BACKGROUND ON EXTERNAL**  
3 **STAKEHOLDER INTEREST AND INVOLVEMENT IN THE DEVELOPMENT**  
4 **AND IMPLEMENTATION OF THE RE-TOU TRIAL.**

5 A. Before I started working for Public Service, the Company entered into the  
6 Settlement that outlined the parameters for the RE-TOU Trial, as described in  
7 Ms. Trammell's Direct Testimony. As explained in the Settlement, the RE-TOU  
8 Trial was designed to facilitate the gathering of information and data to help the  
9 Company, the Commission, customers, and other stakeholders evaluate future  
10 optimal rate design structures in considering the transition to a TOU rate. In fact,  
11 the Settlement specifically required that "stakeholders will convene to analyze  
12 and discuss the data and trial participants' response prior to the final filing" of this  
13 Advice Letter.<sup>2</sup> Because the Settlement Agreement was negotiated and entered  
14 into by parties who represent all types of retail customers, low income customers,  
15 solar energy providers including community solar gardens developers,  
16 environmental interests, and independent power producers, as well as  
17 Commission Trial Staff, the Office of Consumer Counsel, and the Colorado  
18 Energy Office, Public Service remained extensively engaged with these  
19 stakeholders, and additional interested stakeholders, and benefited from their  
20 feedback and perspectives, throughout the development and implementation of  
21 the RE-TOU Trial. Throughout my involvement in the implementation of the RE-

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<sup>2</sup> Settlement at p. 29.



1 TOU Trial, Public Service's outreach extended to more than 40 stakeholder  
2 groups.

3 **Q. DID THE COMPANY ENGAGE IN STAKEHOLDER OUTREACH?**

4 A. Yes. Attachment F to the Settlement Agreement provided a stakeholder  
5 engagement protocol to be followed throughout the course of the RE-TOU Trial  
6 in addition to identifying certain aspects of the RE-TOU Trial that would require  
7 ongoing stakeholder participation.<sup>3</sup> On a semi-annual basis the stakeholder  
8 group was to review information regarding the RD-TDR Pilot and Trial  
9 participation in RE-TOU, including customer participation, customer feedback,  
10 survey and focus group results, Company progress on Trial implementation, and  
11 metrics to evaluate success including identification of customer subgroups  
12 investigated, impact on energy use, load profiles, and emissions, and  
13 implementing technology adoption.

14 **Q. PLEASE DESCRIBE HOW EXTERNAL STAKEHOLDERS WERE KEPT UP-**  
15 **TO-DATE ON THE TRIAL AND THE RESULTS.**

16 A. Public Service held quarterly stakeholder meetings in 2017 and 2018, provided  
17 notice of each meeting to intervening parties in the three Proceedings that are  
18 the subject of the Settlement Agreement, and opened the agenda to suggestions  
19 from stakeholders. At these quarterly stakeholder meetings, stakeholders  
20 received updates, were provided opportunities to ask questions, and could  
21 provide program feedback. In addition to following the procedures outlined

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<sup>3</sup> These requirements apply to the RD-TDR Pilot as well.

1 above, throughout the implementation of the Trial, Public Service continuously  
2 informed and updated more than 40 stakeholder groups on the progress and  
3 results of the Trial through multiple channels. During the first two years of the  
4 Trial, Public Service sent stakeholders frequent emails with recruitment updates,  
5 enrollments to date, key findings, upcoming marketing campaign details, and  
6 important next steps. Updates were not as frequent in 2019 as the recruitment  
7 phase had ended, no new data findings were available until post summer, and  
8 program feedback was not requested.

9 When invited to speak, I also provided numerous updates at events  
10 hosted by partner organizations. Typically, whether at stakeholder meetings or  
11 Commissioners' Information Meetings ("CIM") (two occurred during my tenure  
12 and a third took place in October 2019), stakeholder feedback was always  
13 positive, engaging, and supportive of the Trial. Engagement was most active in  
14 May 2017 through the first quarter of 2019, when recruitment successes and  
15 impact findings were more crucial to share.

16 **Q. WHAT WERE SOME OF THE KEY MILESTONES AND DEVELOPMENTS OF**  
17 **THE TRIAL THAT WERE COMMUNICATED TO STAKEHOLDERS?**

18 A. The Trial was publicized to customers starting January 1, 2017, with active  
19 outreach for enrollment starting in March 2017. In June 2017, a stakeholder  
20 meeting was held to discuss enrollment progress, marketing and outreach  
21 tactics, and opportunities for additional technologies to be brought to the Trial.  
22 On October 10, 2017, a CIM was held to provide the Commission with a status

1 update, summary of awareness, marketing and education strategies and  
2 outcomes, and a basic rate design discussion. On January 30, 2018 a second  
3 CIM was held to provide program updates. In February 2018, a stakeholder  
4 meeting was held to inform the various parties to the Settlement a status update,  
5 and to review preliminary impact findings. At a stakeholder meeting in February  
6 2019, Navigant presented impact analysis from the first year of the study  
7 (findings from June 2017 – September 2018). The second year impact analysis  
8 (findings from October 2018 – July 2019) was presented in a stakeholder  
9 meeting in November 2019.<sup>4</sup>

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<sup>4</sup> The Navigant Re-TOU Trial Evaluation Reports 1 and 2 are attached to Ms. Trammell's Direct Testimony as Attachments BAT-2 and BAT-3, respectively.

1                                   **IV.   RE-TOU TRIAL CUSTOMER SURVEYS**

2   **Q.   PLEASE PROVIDE SOME BACKGROUND ON THE RE-TOU TRIAL**  
3   **CUSTOMER SURVEYS.**

4   A.   As part of its engagement, Navigant conducted surveys of the participants during  
5       various phases of the Trial regarding participants' adjustment of their energy  
6       usage behaviors while on the rate, their satisfaction with the rate, and their  
7       understanding of the rate structure. In addition to the customer surveys,  
8       Navigant also performed a statistical analysis of load reductions and bill impacts,  
9       which is further discussed by Mr. Wishart in his Direct Testimony. The "Wave 1"  
10      post enrollment survey asked customers to provide their general understanding  
11      of the program learned from recruitment materials and early education efforts.  
12      The post enrollment survey had an overall response rate of 48 percent. Then,  
13      two rounds of "Wave 2" surveys were launched following the 2017 and 2018  
14      summer cooling seasons. These surveys were used to gauge self-reported  
15      behaviors undertaken during the summer, customers' general understanding of  
16      how the rate works, and customer satisfaction. These surveys had an overall  
17      response rate of 34 percent. A "Wave 3" survey was launched in August 2019 to  
18      gauge changes in customers' understanding, behaviors, and perceptions during  
19      the time of the Trial, with an overall response rate of 36 percent. Three rounds of  
20      a "Dropout" survey were fielded to gauge customers' reasoning for opting out of  
21      the rate, with an overall response rate of 28 percent. These high response rates  
22      demonstrate a set of highly engaged customers throughout the RE-TOU Trial.

1 **Q. WHY DID THE RE-TOU TRIAL INCLUDE MULTIPLE ROUNDS OF**  
2 **CUSTOMER SURVEYS?**

3 A. The main purpose of conducting multiple rounds of surveys was to allow the Trial  
4 to track how customers' understanding of the Trial rate developed over time,  
5 which helped us confirm the effectiveness of our customer education plan. We  
6 also wanted to determine how customers adjusted their energy usage behaviors  
7 over time in response to increased experience with the rate, as well as making  
8 sure our customers remained satisfied with the Trial rate throughout their  
9 participation. Finally, surveying customers in the early enrollment phase also  
10 allowed for recruitment adjustments and improvements.

11 **Q. DID THE SURVEYS SUGGEST THAT PARTICIPATING CUSTOMERS WERE**  
12 **SATISFIED WITH THE TRIAL RATE?**

13 A. Yes. The majority of respondents remained satisfied with the Trial rate. The  
14 "Wave 3" survey reported that 84 percent of respondents indicated that they  
15 would recommend the rate to a friend or family member. Additionally, 68 percent  
16 of respondents stated their bills were the same or lower than their expectations.

17 **Q. DID THE SURVEY SUGGEST THAT PARTICIPATING CUSTOMERS**  
18 **UNDERSTOOD THE RATES?**

19 A. Yes. The results of the "Wave 3" survey reported that 87 percent of respondents  
20 stated that they have a basic understanding or better of their bills. Additionally,  
21 80 percent of respondents were able to correctly answer questions that gauged  
22 understanding of the rate structure. The survey results also showed that

1 customer knowledge appears to increase with experience, as the proportion of  
2 respondents with a “fairly complete” or “complete” understanding increased from  
3 34 percent in the post-enrollment survey to 49 percent in the Wave 3 survey.

4 **Q. DID THE CUSTOMER SURVEYS REVEAL ANY FEATURE OF THE TRIAL**  
5 **RATE THAT PARTICIPANTS HAD DIFFICULTY UNDERSTANDING?**

6 A. Yes. Most survey respondents had difficulty understanding that their electricity is  
7 more expensive in the summer months than in the winter. Only 39 percent of  
8 survey respondents reported understanding this feature of the Trial rate. Looking  
9 back on the Trial, this confusion was not expected, and it will be addressed with  
10 the transition to the summer-only Modified RE-TOU rate.

11 **Q. DID THE SURVEY ADDRESS CUSTOMERS’ MOTIVATIONS FOR**  
12 **ENROLLING IN THE RATE?**

13 A. Wave 2 surveys showed Trial survey respondents were most motivated to enroll  
14 in order to conserve energy (95 percent), save money (94 percent), and have  
15 more control over their bills (78 percent). The Wave 3 survey showed 74 percent  
16 of respondents chose bill savings as the single most compelling factor for why  
17 they made behavior changes, followed by 18 percent with environmental  
18 motivations.

19 **Q. DID THE SURVEYS ADDRESS CHANGES IN PARTICIPANTS’ ENERGY**  
20 **USAGE BEHAVIORS?**

21 A. Yes. Questions in Wave 2 and 3 asked about energy saving/shifting actions  
22 taken by customers.

1 **Q. WHAT ACTIONS DID CUSTOMERS REPORT THEY TOOK?**

2 A. Overall, respondents to the survey indicated that shifting their dishwasher,  
3 electric dryer, oven, and range to off-peak or shoulder times were the main  
4 actions taken. Survey respondents with electric vehicles also shifted charging to  
5 off-peak times.

6 **Q. DID CUSTOMERS REPORT SHIFTING THEIR AIR CONDITIONING USAGE?**

7 A. Twenty-six percent of respondents reported turning off their AC during peak  
8 periods, and 12 percent reported changing thermostat settings during the Trial.  
9 However, the difference in average reported temperature settings during peak  
10 and shoulder periods was less than one degree.

11 **Q. DID THE CUSTOMER SURVEYS ADDRESS SMART THERMOSTATS?**

12 A Yes, the surveys explored smart thermostat saturation and use. Customer  
13 surveys showed that nearly three quarters of survey respondents have either a  
14 smart or programmable thermostat in their home. Most respondents (86 percent)  
15 had their smart/programmable thermostat prior to enrolling in the Trial, but 11  
16 percent of the respondents with these thermostats purchased them after  
17 enrolling. Eighty percent of respondents with a smart/programmable thermostat  
18 reported that it was in fact programmed, but among respondents who had not  
19 programmed their thermostat after enrolling in the Trial, 42 percent said they  
20 would be interested in having Public Service program or optimize their thermostat  
21 settings.

1 **Q. DID THE CUSTOMER SURVEYS ADDRESS ELECTRIC VEHICLE CHARGING**  
2 **BEHAVIORS?**

3 A. Yes. Between the post-enrollment and Wave 3 surveys, the proportion of survey  
4 respondents owning or leasing a plug-in electric vehicle grew from six percent to  
5 16 percent. Nearly all (99.5 percent) respondents reported charging their  
6 vehicles at home, and the majority charge nightly (37 percent) or three times per  
7 week (49 percent). Thirty-two percent of respondents reported charging at a  
8 public station, and 17 percent reported charging at work. Three-quarters of  
9 respondents reported that they “always” use a scheduler when charging at home  
10 while 10 percent reported never using a scheduler.

11 **Q. WHAT DID THE CUSTOMER SURVEYS SHOW ABOUT THE SOLAR AND**  
12 **STORAGE PARTICIPANTS?**

13 A. A total of 379 respondents had photovoltaic solar. When deciding to enroll in the  
14 RE-TOU Trial, 76 percent of solar respondents reported that they did not  
15 consider the orientation of their solar panels, 18 percent did consider orientation,  
16 and six percent were unsure. Battery storage was relatively uncommon, and  
17 there were only 24 survey respondents with battery storage. Of these, most (83  
18 percent) purchased battery for reliable backup power, and 42 percent also  
19 indicated that it was purchased to use in combination with solar panels to store  
20 and use the electricity produced by the solar panels.



1 **Q. WHAT ARE YOUR CONCLUSIONS FROM THE CUSTOMER SURVEY**  
2 **RESULTS?**

3 A. Based on the customer survey results, and the higher than average response  
4 rate to our surveys, I would conclude that most respondents were satisfied with  
5 their experience on a time varying rate, gained a better understanding of the time  
6 varying rate with increased experience and education, and were motivated to  
7 change their energy usage behaviors to realize the potential benefits of the rate.<sup>5</sup>  
8 In particular and on a personally encouraging note, I would also conclude that  
9 survey respondents were motivated to shift their energy usage behaviors away  
10 from on-peak times not only for potential bill savings but also to help the  
11 environment. However, despite customers' overall comprehension of the rate  
12 structure, participants were confused with its seasonal complexity. I believe this  
13 concern will be addressed by the Company's proposal to adopt a summer-only  
14 Modified RE-TOU rate.

15 **Q. IS IT REASONABLE TO ASSUME THESE CONCLUSIONS APPLY TO ALL**  
16 **TRIAL PARTICIPANTS?**

17 A. Yes. Based on my experience, the survey response rates of 48 percent, 34  
18 percent, and 36 percent for Waves 1, 2, and 3, respectively, were large enough

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<sup>5</sup> Navigant indicates in its most recent report that “[l]ow income customers have the smallest impact estimates during the summer and are the only segment without a statistically significant reduction in on-peak consumption during either season.” See Attachment BAT-3 to Ms. Trammell's Direct Testimony, at page 20. The low income segment is addressed in more detail by Ms. Trammell and Mr. Wishart in their direct testimonies.

1 that these conclusions can reasonably be applied to the larger sample of Trial  
2 participants.

3 **Q. HOW DID THESE CONCLUSIONS INFLUENCE THE COMPANY'S**  
4 **PERSPECTIVE ON MODIFICATIONS TO THE RE-TOU RATE?**

5 A. These conclusions, that customers were generally satisfied with their experience  
6 on the Trial rate, that their understanding of the rate increased with experience,  
7 and that participants were motivated to alter their behavior and energy usage in  
8 order to realize benefits of the Trial rate, support the Company's proposal to  
9 modify the RE-TOU rate to be the default rate for residential customers. The  
10 conclusion that most customers are motivated to adjust their energy usage by  
11 their desire to help the environment supports the Company's proposal to set the  
12 on-peak window to when carbon emissions are at their highest as a means to  
13 further its carbon reduction goals. Additionally, the finding that seasonality of the  
14 rate was confusing to most Trial survey respondents supports the Company's  
15 proposal to implement a summer-only Modified RE-TOU rate.

16 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

17 A. Yes, it does.

## **Statement of Qualifications**

### **Stacey L. Simms**

I began working for XES in 2017, in the Customer Solutions: Renewable Energy and Choice Programs. During this time, I was the Portfolio Manager managing the launch of two choice programs for our residential customers: Time of Use and Peak Demand. Currently, I am a Senior Portfolio Manager with the Electric Vehicle Program at XES, focusing on Fleet Strategies and Programs.

Prior to joining the Company, I worked three years in the energy services sector focusing on energy performance assessments, contracts and construction projects. My job was to delivered tangible strategies and action plans to overcome the technological, contractual, financial, economic and political challenges of complicated public sector projects.

From 2007- April 2012, I served at the Governor's Energy Office (later to be renamed the Colorado Energy Office) starting as a program manager for the transportation fuel program, transiting to the renewable energy program manager to ending my service as the Associate Director of Programs.

I have a Master's Degree in Organizational Development and Project Management from Regis University (Denver). I currently am a registered Project Management Professional with the PMI Institute.

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

\* \* \* \*

IN THE MATTER OF ADVICE NO. )  
1814-ELECTRIC OF PUBLIC SERVICE )  
COMPANY OF COLORADO TO )  
REVISE ITS COLORADO P.U.C. NO. 8 )  
- ELECTRIC TARIFF TO REFLECT A ) PROCEEDING NO. 19AL-XXXXE  
MODIFIED SCHEDULE RE-TOU AND )  
RELATED TARIFF CHANGES TO BE )  
EFFECTIVE ON THIRTY-DAYS' )  
NOTICE. )

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AFFIDAVIT OF STACEY L. SIMMS  
ON BEHALF OF  
PUBLIC SERVICE COMPANY OF COLORADO


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I, Stacey L. Simms, being duly sworn, state that the Direct Testimony was prepared by me or under my supervision, control, and direction; that the Direct Testimony is true and correct to the best of my information, knowledge and belief; and that I would give the same testimony orally, if asked under oath.

Dated at Denver, Colorado, this 2nd day of December, 2019.

  
\_\_\_\_\_  
Stacey L. Simms  
Senior Manager, Product Portfolio

Subscribed and sworn to before me this 2nd day of December, 2019.

  
\_\_\_\_\_  
Notary Public

My Commission expires 7.22.2020

