

**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 MODIFIED ) PROCEEDING NO. 19AL-XXXXE  
SCHEDULE RE-TOU AND RELATED TARIFF )  
CHANGES TO BE EFFECTIVE ON THIRTY- )  
DAYS' NOTICE. )

**DIRECT TESTIMONY AND ATTACHMENTS OF JENNIFER B. WOZNIAK**

**ON**

**BEHALF OF**

**PUBLIC SERVICE COMPANY OF COLORADO**

**December 2, 2019**

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**LIST OF ATTACHMENTS**

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**GLOSSARY OF ACRONYMS AND DEFINED TERMS**

| <b><u>Acronym/Defined Term</u></b> | <b><u>Meaning</u></b>   |
|------------------------------------|---|
| AGIS                               | Advanced Grid Intelligence and Security<br>Proceeding No. 16A-0588E |
| AMI                                | Advanced Metering Infrastructure                                    |
| Commission                         | Colorado Public Utilities Commission                                |
| CPCN                               | Certificate of Public Convenience and<br>Necessity                  |
| DSM                                | Demand Side Management  |
| FAQ                                | Frequently Asked Questions  |
| HAN                                | Home Area Network   |
| Modified RE-TOU                    | Modified Residential Energy Time of Use                             |
| Navigant                           | Navigant Consulting, Inc.   |
| Plan                               | Customer Education and Communication Plan                           |
| Public Service or the Company      | Public Service Company of Colorado                                  |
| RE-TOU Trial                       | Residential Energy Time of Use Trial                                |
| Xcel Energy                        | Xcel Energy Inc.  |
| XES                                | Xcel Energy Services Inc.   |

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

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

3 A. My name is Jennifer B. Wozniak. My business address is 1800 Larimer Street,  
4 Suite 900, Denver, Colorado 80202.

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

6 A. I am employed by Xcel Energy Services Inc. ("XES") as Director, Jurisdictional  
7 Communications for Colorado, Texas, and New Mexico. XES is a wholly owned  
8 subsidiary of Xcel Energy Inc. ("Xcel Energy") and provides an array of support  
9 services to Public Service Company of Colorado ("Public Service" or "Company")  
10 and the other utility operating company subsidiaries of Xcel Energy on a  
11 coordinated basis.

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

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

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

2 A. As the Director, Jurisdictional Communications, I am responsible for corporate  
3 communications, social media, public relations, and Demand-Side Management  
4 (“DSM”)/Energy Efficiency/Renewables marketing for Public Service and  
5 Southwestern Public Service Company, a sister operating company of Public  
6 Service that provides electric service to customers in Texas and New Mexico.  
7 My duties include managing all communications strategy, planning, and  
8 execution for Colorado, Texas, and New Mexico. My team also plans and  
9 executes all of the marketing campaigns for DSM, Energy Efficiency, and  
10 Choice/Renewables programs in the same regions cited above. The advertising  
11 element of those campaigns is managed by another department under the  
12 Customer Solutions function. A full description of my qualifications, duties, and  
13 responsibilities is set forth in my attached Statement of Qualifications.

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

15 A. The purpose of my Direct Testimony is to present the Company’s overall  
16 approach for educating customers on the Modified Residential Time of Use (“RE-  
17 TOU”) rate and describe how customer education regarding the Modified RE-  
18 TOU rate will be incorporated into the Customer Education and Communication  
19 Plan (the “Plan”) Public Service developed to educate customers on Advanced  
20 Meters and the Company’s grid modernization effort. I also discuss customer  
21 interest in time of use rates and customers’ communication preferences based  
22 on Navigant Consulting, Inc.’s (“Navigant”) customer survey data for the

1 Company's current RE-TOU trial ("RE-TOU Trial" or "Trial") and how this data  
2 has informed the development of the Plan.<sup>1</sup> Finally, I describe how the Plan will  
3 educate customers on the Modified RE-TOU rate in three phases and address  
4 the anticipated costs of implementing the Plan.

5 **Q. ARE YOU SPONSORING ANY ATTACHMENTS AS PART OF YOUR DIRECT**  
6 **TESTIMONY?**

7 A. Yes, I am sponsoring three attachments which were prepared by me or under my  
8 direct supervision. The attachments are as follows:

- 9 • Attachment JBW-1: Advanced Grid Communications Plan, filed on  
10 October 31, 2019 in Proceeding 16A-0588E;
- 11 • Attachment JBW-2: 60-day postcard for Advanced Grid communications;  
12 and
- 13 • Attachment JBW-3: 30-day postcard for Advanced Grid communications.

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<sup>1</sup> Navigant Consulting, Inc. ("Navigant") is the evaluator responsible for performing the Measurement & Verification Study for the Trial.

1                   **II.    OVERALL APPROACH TO CUSTOMER EDUCATION**

2   **Q.    HOW IS PUBLIC SERVICE PLANNING TO EDUCATE CUSTOMERS ON THE**  
3   **MODIFIED RE-TOU RATE?**

4   A.    The Company plans to align its customer education regarding the Modified RE-  
5   TOU rate with its plan to educate customers on Advanced Grid and Advanced  
6   Meter installations. We believe customer education regarding the Modified RE-  
7   TOU rate should complement customer education regarding Advanced Meters  
8   because, under the Company’s proposal, customers would be placed on the  
9   Modified RE-TOU rate once Advanced Meter deployment is completed in their  
10   area. This alignment will create a comprehensive and well-packaged set of  
11   communications so that customers can easily understand all of the developments  
12   that are happening over the same period of time. Customers will also have  
13   online tools and a Home Area Network (“HAN”) available to them to view interval  
14   data, better understand their energy usage, and take action to save energy and  
15   money. Because all of these developments will impact the customer at once, a  
16   comprehensive communications approach is appropriate.

17   **Q.    HAS PUBLIC SERVICE DEVELOPED A CUSTOMER EDUCATION PLAN FOR**  
18   **THE ADVANCED GRID INITIATIVE?**

19   A.    Yes. We have created the Plan to educate customers on the Advanced Grid  
20   initiative and associated products and services. The current version of the Plan  
21   is included as Attachment JBW-1 and was submitted on October 31, 2019 as  
22   part of the Annual Forecast Report the Company files in the proceeding



1 concerning its Certificate of Public Convenience and Necessity (“CPCN”) request  
2 for the Advanced Grid Intelligence and Security (“AGIS”) Initiative (Proceeding  
3 No. 16A-0588E). Since the Plan was initially formulated in 2016, the Plan has  
4 been refined on a regular basis, using the most up-to-date information based on  
5 industry research and the experiences of other investor-owned utilities. The Plan  
6 updates are regularly submitted to the Colorado Public Utilities Commission  
7 (“Commission”) through the status reporting process, which is required to  
8 address planning and implementation of customer education among other topics  
9 related to Advanced Meter deployment as provided in the Unopposed  
10 Comprehensive Settlement Agreement filed in the AGIS Proceeding No. 16A-  
11 0588E and approved by the Commission in Decision No. C17-0556. While it is  
12 premature to update the Plan with the education and communications strategy  
13 for the Modified RE-TOU rate, I speak generally to that strategy in my Direct  
14 Testimony based on the proposals presented by the Company in this Advice  
15 Letter filing.

16 **Q. HAVE COMMUNICATIONS BEEN SENT TO CUSTOMERS THUS FAR TO**  
17 **SUPPORT THE INSTALLATION OF ADVANCED METERS?**

18 A. Yes. In 2019, the Company is installing 13,000 Advanced Meters to customers  
19 in particular geographic locations to test voltage optimization technology (also  
20 called Integrated Volt Var Optimization or IVVO). Customers have been sent  
21 communications preparing them for meter installation, and giving them  
22 information on what to expect.

1 **Q. WHAT KINDS OF COMMUNICATIONS HAVE BEEN SENT TO CUSTOMERS**  
2 **THUS FAR TO SUPPORT THE INSTALLATION OF ADVANCED METERS?**

3 A. Customers receiving one of the 13,000 meters have received a postcard 60 days  
4 prior to installation and a letter 30 days prior to installation. The materials can be  
5 viewed as Attachments JBW-2 and JBW-3, respectively. Other communications  
6 have also been developed to support meter installation. Frequently Asked  
7 Questions (“FAQs”) have been posted on the Company’s website, and meter  
8 installers have information cards to hand out to customers in the event they have  
9 questions. Customers also receive door hangers to notify them on the installation  
10 status of their Advanced Meter.

11 **Q. WHAT ARE THE RESULTS OF ADVANCED GRID COMMUNICATIONS TO**  
12 **CUSTOMERS THUS FAR IN 2019?**

13 A. The mailings have been successful in that there have been minimal meter  
14 deferral requests and very few inquiries to the Customer Contact Center. It  
15 appears that customers have been able to understand the information and  
16 instructions delivered to them.

17 **Q. WILL THESE SAME MATERIALS BE USED WHEN THE COMPANY BEGINS**  
18 **THE MASS DEPLOYMENT OF ADVANCED METERS IN 2021?**

19 A. Yes. The overall plan is to provide a high-level 90-day communication with a bill  
20 insert, follow up with the 60-day postcard, and then the 30-day letter. The 30-  
21 day communication may be delivered as an email or a mailed letter, depending  
22 on the customer’s communication preferences. This approach, including the

1 other tactics proposed as part of the Plan, is based on best practices from other  
2 utilities, such as ComEd in Chicago and Entergy in multiple states. ComEd has  
3 successfully installed over four million Advanced Meters in the Chicago metro  
4 area, and Entergy is in the process of their Advanced Meter deployment in  
5 Arkansas.

6 **Q. WHY DO CUSTOMERS NEED TO BE EDUCATED ON THE INTRODUCTION**  
7 **OF THE MODIFIED RE-TOU RATE?**

8 A. It is important to educate customers on the Modified RE-TOU rate because they  
9 need to understand how the rate works, when prices change, and how they can  
10 use online tools to understand energy consumption data and make behavior  
11 changes to save energy and money. Customers also need to be made aware of  
12 structure changes to avoid larger than expected energy bills.

13 **A. Customer Interest**

14 **Q. WHAT RESEARCH HAS PUBLIC SERVICE CONDUCTED REGARDING**  
15 **CUSTOMER INTEREST AND PARTICIPATION IN TOU RATES?**

16 A. Public Service has been conducting the RE-TOU Trial with its consultant  
17 Navigant since June of 2017. Navigant has prepared two initial reports of its  
18 research methods and data analysis, which have been filed with the Commission  
19 and are attached to Company witness Brooke A. Trammell's Direct Testimony as  
20 Attachments BAT-2 and BAT-3. In her Direct Testimony, Company witness  
21 Stacey L. Simms describes some of the key learnings from the Navigant  
22 customer surveys conducted during various phases of the Trial regarding

1 participants' adjustment of their energy usage behaviors while on the rate, their  
2 satisfaction with the rate, and their understanding of the rate structure. Ms.  
3 Simms also describes how those key learnings have influenced the Company's  
4 RE-TOU proposal.

5 **Q. WHAT DO CUSTOMERS SEE AS THE BENEFITS OF TOU PRICING?**

6 A. Based on Navigant's research, and as reflected in their report covering the period  
7 October 2018 to July 2019, the benefits of the Trial rate as perceived by  
8 customers were "Conserve energy" (70 percent), "Save money" (68 percent), and  
9 have "More control over your bill" (74 percent).<sup>2</sup> This is also further documented  
10 in the Direct Testimony of Ms. Simms.

11 **Q. HOW WILL CUSTOMER BENEFITS BE INCORPORATED INTO CUSTOMER**  
12 **EDUCATION ON THE MODIFIED RE-TOU RATE?**

13 A. The potential benefits of the Modified RE-TOU rate that matter most to  
14 customers will inform the development of customer messaging that will be used  
15 in communications materials. A focus will be placed on energy conservation, the  
16 potential to save money by shifting energy usage away from the summer on-  
17 peak window and during periods with the highest carbon emissions, and control  
18 over bill. There will also be messaging that these rates will support the  
19 Company's long-term carbon reduction goals. As described by Ms. Simms,  
20 these focus areas are appropriate because they represent the reasons Trial  
21 participants were most motivated to enroll in the RE-TOU Trial rate.

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<sup>2</sup> See Attachment BAT-3 at p. 46.

1 **Q. DID THE RE-TOU TRIAL INDICATE THE PARTICIPANTS' PREFERRED**  
2 **MODE AND FREQUENCY OF COMMUNICATION?**

3 A. Yes. Trial participants indicated that they valued frequent and diverse  
4 communications, with one-quarter of respondents stating they would have  
5 preferred more frequent communications. Electronic communications were  
6 favored by many, but there were no one-size-fits-all preferred approaches.  
7 Based on the resources used, a majority of respondents valued stickers  
8 (prompts), and considered information provided through MyAccount (the  
9 Company's online account management system), and email to be helpful (85  
10 percent, 84 percent, and 81 percent of survey respondents, respectively).<sup>3</sup> A  
11 significant number of customers (73 percent) also valued the website as a source  
12 of information.<sup>4</sup> The Navigant study also suggested that more targeted and  
13 tailored communications approaches may enhance customer engagement and  
14 possibly reduce peak period consumption.

15 **B. Education Strategy**

16 **Q. WHAT STRATEGIES DO YOU ANTICIPATE USING TO REACH**  
17 **CUSTOMERS?**

18 A. There are three phases to the Plan strategy included in Attachment JBW-1. The  
19 first phase includes raising awareness through an introductory and wide-reaching  
20 effort to inform customers about Advanced Meter installations and educate them

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<sup>3</sup> Attachment BAT-3 at p. 44.

<sup>4</sup> *Id.*

1 on the overall benefits of grid intelligence. TOU awareness would be added to  
2 this phase. The second phase will support successful meter installations by  
3 targeting affected customers in geographic areas to educate and minimize  
4 confusion. More detail about the Modified RE-TOU rate would be provided in this  
5 communication. The third phase involves customer engagement, which will  
6 continue post Advanced Meter installation, so that customers can take full  
7 advantage of Advanced Meter features and opportunities to save money with the  
8 Modified RE-TOU rate. The strategies will be executed across multiple  
9 communications channels including, but not limited to, website updates,  
10 stakeholder outreach meetings, media outreach, social media, blogs, direct mail,  
11 e-mail, outbound calls, door hangers, community events, bill inserts, targeted  
12 advertising, fact sheets, video, and customer testimonials. Communications  
13 about the Modified RE-TOU rate will be most focused on email and updates  
14 through MyAccount, which will display interval energy consumption data.

15 It is important to use a diverse set of communications channels to reach  
16 customers in their preferred manner. As of November 2019, approximately  
17 998,000 Public Service customers have provided email addresses and chosen  
18 email as their preferred method of communications. This represents only about  
19 67 percent of all electric customer premises (roughly 1.5 million) in Colorado.  
20 This is another reason to use diversified communications channels to help  
21 ensure that all customers receive adequate information and education.

1 Under the Company's proposal, customers on the RE-TOU Trial would transition  
2 to this new rate on January 1, 2021. A separate communication will be sent to  
3 these customers informing them of the change.

4 **Q. HAS PUBLIC SERVICE PREVIOUSLY USED THESE STRATEGIES?**

5 A. Yes, these strategies have been used in a variety of communications plans for  
6 introducing new programs or initiatives. These practices have successfully  
7 educated customers and driven enrollments in energy efficiency programs, as  
8 evidenced by continuous annual goal achievement in the state of Colorado.  
9 Each communications strategy is different and based on the unique challenges  
10 and specifics of each plan's objectives. The RE-TOU Trial and Residential  
11 Demand Time Differentiated Rate Pilot ("RD-TDR Pilot") used a communication  
12 strategy designed to support customers' voluntary opt-in. It is the Company's  
13 proposal that the Modified RE-TOU rate be implemented for all residential  
14 customers once Advanced Meter deployment is completed in their area. While  
15 the initial RE-TOU Trial and RD-TDR Pilot communications focused on  
16 recruitment as described by Ms. Simms, the initial Modified RE-TOU rate  
17 communications will focus on education.

18 **Q. WHY ARE THE STRATEGIES YOU PROPOSE EFFECTIVE FOR EDUCATING**  
19 **CUSTOMERS?**

20 A. These strategies are effective for educating customers because they provide  
21 information over a period of time, and each phase builds upon the previous one.  
22 Phases I through III gradually increase the complexity of information being

1 provided to customers, and each will be adjusted based on customer feedback  
2 as time progresses. These strategies use almost every possible communications  
3 channel so that each customer can be reached through the channel that they  
4 prefer (e.g., email, direct mail, bill onserts, etc.). Customers moving to the  
5 service territory at any time in the future while the tariff is in effect, will receive  
6 information about the rate structure in new mover kits, which are sent to every  
7 new customer. Information on the TOU Trial was included in the new mover kits,  
8 and similar information the the tariff would be included for new customers.

9 **Q. WHAT WILL YOU CALL THE TOU RATE IN THE COURSE OF EDUCATING**  
10 **CUSTOMERS?**

11 A. The Company conducted a “lexicon study” in 2019 with its advertising agency of  
12 record, Carmichael Lynch. Lexicon studies are assessments of proposed  
13 language for various terms, which could include how the Company discusses  
14 topics such as renewables and energy mix with customers. This particular study  
15 assessed the term “Time of Use” and it was recommended that “Flex Pricing  
16 Plan” would better convey the rate to customers. The Company has yet to  
17 decide how the rate will be branded, but it is highly unlikely the rate will be  
18 promoted as TOU or RE-TOU in the Company’s communications to customers,  
19 even though that is the nomenclature the Company has included in its proposed  
20 tariff.



1 **Q. WHAT ARE THE RELATIVE TIMELINES FOR LAUNCHING EACH**  
2 **CUSTOMER EDUCATION PHASE?**

3 A. The timelines for each phase are included in Table JBW-D-1 as follows: Phase I  
4 – Raising Awareness would take place from Q2 2021 to Q2 2023; Phase II –  
5 Supporting Meter Installation would happen from Q2 2021 to Q4 2024; Phase III  
6 – Customer Engagement would take place from Q3 2021 to Q4 2024. For  
7 example, customers receiving their meter in Q3 of 2021 would see a bill insert  
8 90 days prior (June of 2021) to meter install, a postcard 60 days prior (July of  
9 2021) to meter install, and a letter or e-mail 30 days (August of 2021) prior to  
10 meter install. The communications at the 60 and 30 day points would include  
11 information on the new rate that would be implemented after Advanced Meter  
12 deployment was completed in a customer’s area. Depending on the complexity  
13 of the approved Modified RE-TOU rate, additional communications may be  
14 warranted. There will also be mass communications supporting both Advanced  
15 Meter installation and the introduction of the Modified RE-TOU rate. These  
16 communications will commence at the beginning of 2021.

17 **Table JBW-D-1: Customer Education Timeline**

| <b>Phase</b> | <b>Event</b>                 | <b>Timing</b>     |
|--------------|------------------------------|-------------------|
| I            | Raise awareness              | Q2 2021 – Q2 2023 |
| II           | Informing meter installation | Q2 2021 – Q4 2024 |
| III          | Customer engagement          | Q3 2021 – Q4 2024 |

1 This is in conjunction with the planned timing for Advanced Meter installation  
2 commencing in the second quarter of 2021. This timeline is subject entirely to  
3 the timing of the project, and any changes to the Advanced Meter installation  
4 timeline would impact the timing of the education plan, and the communications  
5 on the Modified RE-TOU rate.

6 Customers on the RE-TOU Trial rate would receive a communication in  
7 Q1 of 2021 informing them of the change before the first billing under Schedule  
8 RE-TOU.

9 **Q. DOES THE PLAN ADDRESS CONCERNS OF LOW INCOME AND OTHER**  
10 **CUSTOMER GROUPS WITH RESPECT TO ADVANCED METERS AND THE**  
11 **MODIFIED RE-TOU RATE?**

12 A. Yes, this is already included in the Plan on page 16 of Attachment JBW-1.  
13 Messages will address, among other things, how customers on fixed or limited  
14 budgets can take advantage of personal energy use information and the Modified  
15 RE-TOU rates in a manner that may allow them to better manage their energy  
16 costs. Low income and other customer groups will have access to Advanced  
17 Meters, be on the Modified RE-TOU rate, and have the potential to realize the  
18 benefits of saving energy and money, as discussed by Ms. Trammell and Mr.  
19 Wishart in their direct testimonies.

20 **Q. WILL THE COMPANY PROCEED WITH THE EDUCATION PLAN IF THE**  
21 **MODIFIED RE-TOU RATE IS APPROVED AS PROPOSED?**

22 A. Yes.

1 **Q. WILL THE COMPANY OFFER NEW PRODUCTS OR SERVICES TO**  
2 **SUPPORT CUSTOMERS ON THE MODIFIED RE-TOU RATE?**

3 A. Yes. Our education strategy will be complemented by new products and  
4 services that will help customers understand how they use energy and how to  
5 better manage their energy. These products and services may come through  
6 digital channels such as MyAccount or through targeted demand-side  
7 management programs.

8 **Q. PLEASE DESCRIBE SOME OF THE PRODUCTS AND SERVICES THE**  
9 **COMPANY MAY OFFER TO SUPPORT CUSTOMERS ON THE MODIFIED RE-**  
10 **TOU.**

11 A. The Company is in the process of developing a number of products and services  
12 we believe would support customers which include:

- 13 • High Bill Alerts – These are personalized notifications for customers that  
14 indicate when energy usage trends may exceed predetermined thresholds  
15 or baselines so customers can change their behavior prior to receiving  
16 their bill.
- 17 • Pre-pay – For customers that need to budget their energy usage, pre-pay  
18 products allow customers to purchase a set amount of energy to use each  
19 month and then track, through customer portals, how their consumption is  
20 tracking versus that budget. This can help control their energy usage and  
21 more easily visualize how their energy usage impacts their costs.
- 22 • End-Use Disaggregation – With the customer portals, algorithmic analysis  
23 will identify the energy usage of individual devices within the customer's  
24 home and identifies how much these devices and technologies contribute  
25 to the customer's monthly energy consumption. This tool can help  
26 customers identify inefficient technologies in need of replacement or  
27 behaviors that need to be changed to reduce energy costs.

- 1 • Energy Dashboard – Within the new web and mobile customer portals,  
2 energy usage dashboards will inform customers about the energy usage  
3 of their entire homes as well as individual devices within their homes. This  
4 tool compares data to a comprehensive database of similar products to  
5 alert customers of opportunities to save energy and money.
- 6 • Virtual Energy Audits - Provides an on-demand or periodic assessment of  
7 the energy usage/efficiency of a premise based on actual performance  
8 versus expected performance based on various parameters (*i.e.* size,  
9 year, build, occupancy, devices, etc.). With disaggregation and other  
10 analytics capabilities, these audit results will improve over time to provide  
11 more accurate and relevant information. Audits may also be used to  
12 monitor the health and status of appliances to identify opportunities for  
13 customer to reduce maintenance costs and improve energy efficiency.

14 **Q. WHEN WILL THESE PRODUCTS AND SERVICES BE AVAILABLE TO**  
15 **CUSTOMERS?**

16 A. We expect these products and services to be available with the initial mass  
17 deployment of Advanced Meters in 2021 or soon after. Many of these programs  
18 are significantly enhanced by the interval data provided daily through our AGIS  
19 investment. Prior to Advanced Meter deployments, the customer portal may offer  
20 similar products and services; however, these may have some limitations as any  
21 analysis is done with monthly consumption data, which can limit accuracy and  
22 timeliness.

23 **Q. ARE THERE EXISTING PROGRAMS OR APPLIANCES THAT COULD HELP**  
24 **CUSTOMERS ALTER THEIR SUMMER ON-PEAK ENERGY USAGE?**

25 A. Yes. DSM programs are available to help reduce air conditioning usage and  
26 include smart thermostats and efficient air conditioning incentives. Other DSM  
27 programs can be used to further assist customers reduce their summer on-peak  
28 energy usage depending on their specific needs and circumstances. In addition,

1 numerous electric vehicle and battery storage pilot programs are being designed  
2 and considered that could help customers.

3 **C. Additional Considerations**

4 **Q. WHAT ARE OTHER CONSIDERATIONS RELATING TO THIS OVERALL**  
5 **APPROACH?**

6 A. When customers are about to receive a Advanced Meter, they will receive  
7 several types of communications over time leading up to the meter install. They  
8 will also be informed as to the terms of meter opt-out, which have yet to be  
9 determined (the Company plans to file an advice letter for meter opt-outs in  
10 2020). Customers will also receive information leading up to the roll out of the  
11 Modified RE-TOU rate. There is a great deal of information for customers to  
12 process around the same period of time making clarity and simplicity critical.  
13 An over-complicated TOU rate or Advanced Meter opt-out will create  
14 unnecessary confusion for customers. A clear distinction will also have to be  
15 drawn between the elimination of summer tiered rates and the implementation of  
16 the Modified RE-TOU rate.

17 **Q. WHAT CAN BE DONE TO MITIGATE THE POTENTIAL FOR CONFUSION?**

18 A. It is important that whatever details of the Modified RE-TOU rate are approved,  
19 that the rate be as straight-forward as possible so that customers can easily  
20 understand it and modify their behavior accordingly. It is also important for the  
21 Company to provide clear and easy-to-understand communications regarding the

1 Modified RE-TOU rate and simultaneous developments impacting customers,  
2 including Advanced Meters.

3 **Q. WOULD THE POTENTIAL FOR CONFUSION BE EXACERBATED IF TOU**  
4 **EDUCATION WAS NOT A PART OF ADVANCED GRID/METER EDUCATION?**

5 A. Yes. In order to keep a consistent voice and simplify all of the upcoming  
6 changes impacting customers, a consolidated communications effort is  
7 recommended.

8 **Q. WILL THESE RECOMMENDATIONS CHANGE IF PUBLIC SERVICE'S**  
9 **PROPOSAL IS CHANGED OR SIGNIFICANTLY MODIFIED?**

10 A. Potentially, yes. If, through the regulatory process, the Company's proposal is  
11 significantly altered upon approval, the education and communications plan  
12 would need to be revisited.

1                                   **III.     COSTS OF CUSTOMER EDUCATION PLAN**

2   **Q.     WHAT ARE THE ESTIMATED COSTS OF IMPLEMENTING THE CUSTOMER**  
3   **EDUCATION PLAN FOR THE MODIFIED RE-TOU RATE?**

4   **A.**    Estimated Plan costs are driven primarily by the frequency and channel of  
5           communication.    Electronic channels, such as blogs and social media, are  
6           relatively inexpensive.   Advertising and direct mail is more expensive.   An  
7           important part of a comprehensive communications plan is the use of multiple  
8           channels in order to reach customers through the channels they use.   Based on  
9           known project parameters thus far, those channels and estimated costs for the  
10          implementation of advanced grid communications only have been developed and  
11          are included on pages 17-23 of Attachment JBW-1.   The incremental additional  
12          cost estimate for communicating the Modified RE-TOU rate has been developed  
13          at a high level, and it would be in addition to the budget for the advanced grid  
14          communications in Attachment JBW-1, and be dependent on the amount of  
15          ongoing education required.   The estimate is in the range of approximately  
16          \$825,000 to \$4.78 million dollars depending on if one or all tactics are employed.  
17          If an additional communication (other than email) is needed in addition to what is  
18          already planned for advanced grid, there would be additional costs.   The  
19          following table represents estimated costs for additional communications (not  
20          including email) to customers:

1  
2

**Table JBW-D-2**  
**Estimated Incremental Communications Costs**

| <b>Communication tactic</b> | <b>Cost per item including postage</b> | <b>Total cost per send to 1.5 million premises</b> |
|-----------------------------|--|--|
| Welcome packet              | \$1.84                                 | \$2.76 million                                     |
| Letter                      | \$0.80                                 | \$1.2 million                                      |
| Postcard                    | \$0.55                                 | \$825,000  |
| <b>TOTAL</b>                |  | <b>\$4.785 million</b>                             |

3           The Modified RE-TOU rate communications strategy will be refined after  
4 Navigant has delivered a more detailed report with more specifics on customer  
5 preferences. The report is expected in early 2020. The Company can provide  
6 more refined estimates at the appropriate time during this proceeding in  
7 conjunction with the more detailed Navigant report. The estimate is also subject  
8 to change based upon any changes in the parameters of the project when meter  
9 vendors are selected, the final Modified RE-TOU rate that is ultimately approved,  
10 and when the actual implementation of the project is finalized.

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

12 **A.** Yes, it does.



**Statement of Qualifications**

**Jennifer B. Wozniak**

As the Director, Jurisdictional Communications, I am responsible for corporate communications, social media, public relations and DSM/Energy Efficiency/Renewables marketing for Public Service Company of Colorado and Southwestern Public Service. My specific job duties include managing all communications strategy, planning, and execution for Colorado, Texas and New Mexico. This includes developing and executing communications and outreach strategies using multiple channels that explain company business initiatives. I also lead crisis communications efforts in coordination with Operations, Media Relations, Enterprise Continuity and other key stakeholders in order to communicate with customers and the media. My team also plans and executes upon all of the marketing campaigns for DSM, Energy Efficiency and Choice/Renewables programs in the same regions cited above. My team and I have been executing on the first wave of mailings for the Advanced Grid initiative and will be responsible for customer education and communications when mass Advanced Meter deployment begins in 2021.

Formerly at Xcel Energy, I worked in the Marketing department, serving in both project management and as the Director of Marketing and Customer Strategy. My past experience includes working in many competitive industries such as banking, retail grocery, office supplies, and sports management. I have held multiple leadership roles in these industries covering the areas of marketing, customer strategy, risk management, strategic planning, human resources and finance. I earned a Bachelor of

Arts degree in English and an MBA in Marketing from the University at Buffalo in Buffalo, NY. My MBA was focused upon the discipline of Market Research.

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 JENNIFER B. WOZNIAK  
ON BEHALF OF  
PUBLIC SERVICE COMPANY OF COLORADO

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I, Jennifer B. Wozniak, being duly sworn, state that the Direct Testimony and attachments were prepared by me or under my supervision, control, and direction; that the Direct Testimony and attachments are true and correct to the best of my information, knowledge and belief; and that I would give the same testimony orally and would present the same attachments if asked under oath.

Dated at Denver, Colorado, this 2<sup>nd</sup> day of December, 2019.

  
\_\_\_\_\_  
Jennifer B. Wozniak  
Director, Jurisdictional Communications

Subscribed and sworn to before me this 2<sup>nd</sup> day of December, 2019.

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

My Commission expires 4.22.20

