

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

* * * * *

IN THE MATTER OF THE APPLICATION)
OF PUBLIC SERVICE COMPANY OF)
COLORADO FOR APPROVAL OF) PROCEEDING NO. 20A-XXXXE
WILDFIRE MITIGATION PLAN AND)
WILDFIRE PROTECTION RIDER)

DIRECT TESTIMONY AND ATTACHMENTS OF ARTHUR P. FREITAS

ON

BEHALF OF

PUBLIC SERVICE COMPANY OF COLORADO

July 17, 2020

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LIST OF ATTACHMENTS

Attachment APF-1	Wildfire Protection Rider Revenue Requirement Calculation 2021-2025
Attachment APF-2	Wildfire Costs Currently in Base Rates

GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	<u>Meaning</u>
2019 Electric Rate Case	Proceeding No. 19AL-0268E
Commission	Colorado Public Utilities Commission
CWIP	Construction Work In Progress
DSMCA	Demand-Side Management Cost Adjustment
O&M	Operations and Maintenance
PSIA	Pipeline System Integrity Adjustment
Public Service or Company	Public Service Company of Colorado
PUCT	Public Utility Commission of Texas
ROE	Return on Equity
SPS	Southwestern Public Service Company
TCA	Transmission Cost Adjustment
TCJA	Tax Cuts & Jobs Act
WACC	Weighted Average Cost of Capital
WMP or Plan	Wildfire Mitigation Plan
WPR	Wildfire Protection Rider
Xcel Energy	Xcel Energy Inc.
XES	Xcel Energy Services Inc.

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**I. INTRODUCTION, QUALIFICATIONS, PURPOSE OF TESTIMONY,
RECOMMENDATIONS**

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Arthur P. Freitas. My business address is 1800 Larimer Street, Suite
1100, Denver, Colorado 80202.

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

A. I am employed by Xcel Energy Services Inc. ("XES") as Manager of Revenue
Analysis. XES is a wholly-owned subsidiary of Xcel Energy Inc. ("Xcel Energy")
and provides an array of support services to Public Service Company of
Colorado ("Public Service" or the "Company") and the other utility operating
company subsidiaries of Xcel Energy on a coordinated basis.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?

A. I am testifying on behalf of Public Service.

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

2 A. As Manager of Revenue Analysis, I provide project supervision and technical
3 expertise for jurisdictional cost of service studies, revenue requirement
4 determinations, and related projects for Xcel Energy's utility operating
5 companies.

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

7 A. The purpose of my Direct Testimony is to present the Company's annual
8 revenue requirement associated with its updated Wildfire Mitigation Plan ("WMP"
9 or "Plan"), for which the Company proposes to recover eligible costs through its
10 proposed Wildfire Protection Rider ("WPR"); describe how the wildfire annual
11 revenue requirement will be updated and adjusted over the course of the
12 proposed five-year WPR term; explain what components of costs the Company is
13 proposing to include in the WPR; and describe the WPR true-up process.

14 **Q. ARE YOU SPONSORING ANY ATTACHMENTS AS PART OF YOUR DIRECT**
15 **TESTIMONY?**

16 A. Yes, I am sponsoring the following two attachments, which were prepared by me
17 or under my direct supervision:

- 18 • Attachment APF-1: WPR Revenue Requirement Calculation; and,
- 19 • Attachment APF-2: Wildfire Costs in Base Rates.

20 **Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.**

21 A. I recommend the Colorado Public Utilities Commission ("Commission") approve
22 Public Service's proposed revenue requirement calculation as reflected in
23 Attachment APF-1, which will be used for the first WPR true-up. I also

- 1 recommend the Commission approve the Company's 2021 WPR revenue
- 2 requirement of \$17,185,038 contained in Attachment APF-1.

1 **II. WPR REVENUE REQUIREMENT CALCULATION AND TRUE-UP**

2 **Q. WHAT IS THE PURPOSE OF THIS SECTION OF YOUR DIRECT**
3 **TESTIMONY?**

4 A. In this section of my Direct Testimony, I present the revenue requirement
5 associated with the WMP that the Company proposes to recover through the
6 WPR. In 2021, the WPR revenue requirement is \$17,185,038, which is net of the
7 \$2,567,556 already included in base rates from the Company's most recent
8 electric rate case, Proceeding No. 19AL-0268E (the "2019 Electric Rate Case").

9 **A. Revenue Requirement Calculation**

10 **Q. HOW IS PUBLIC SERVICE PROPOSING TO RECOVER THE COSTS**
11 **INCURRED AS PART OF ITS WMP?**

12 A. Public Service is proposing to recover eligible costs incurred under the WMP
13 through a separate rate rider over a five-year term, similar to the manner in which
14 pipeline system costs are recovered through the Pipeline System Integrity
15 Adjustment ("PSIA"). Company witness Brooke A. Trammell sponsors the
16 proposed WPR tariff, discussing the mechanics of the WPR and policy drivers
17 supporting the Company's proposal in her Direct Testimony. Company witness
18 Sandra L. Johnson sponsors and discusses the Company's WMP.

19 **Q. WHAT COSTS ARE INCLUDED IN THE WILDFIRE ANNUAL REVENUE**
20 **REQUIREMENT?**

21 A. The WMP includes incremental and eligible capital and operation and
22 maintenance ("O&M") costs, which Ms. Johnson discusses in detail in her Direct
23 Testimony. The revenue requirement I present includes distribution capital and

1 O&M costs associated with the WMP activities that would be eligible for recovery
2 through the WPR above the level of costs currently in base rates. With respect
3 to capital costs, this includes the incremental plant balances associated with
4 eligible wildfire mitigation projects placed into service since 2019. As Ms.
5 Johnson explains, while the Company's electric base rates approved in its 2019
6 Electric Rate Case include some dollars associated with wildfire mitigation
7 activities, the Company has and will incur incremental capital costs in 2019 and
8 2020 to implement its WMP, and will continue to incur capital costs in 2021-2025
9 associated with its WMP. The Company has also included its 2021 incremental
10 O&M expense, which reflects the O&M expense over and above the level
11 reflected in base rates approved as part of the Company's 2019 Electric Rate
12 Case.

13 As reflected in the Company's illustrative WPR tariff filing, Attachment
14 BAT-2 to the Direct Testimony of Ms. Trammell, the wildfire annual revenue
15 requirement includes a return, equal to the Company's weighted average cost of
16 capital, on capital investments; the plant-related ownership costs associated with
17 such investments, including depreciation and amortization, accumulated deferred
18 income taxes, and income tax expense. The capital costs included in rate base
19 will use a 13-month average methodology, as the WPR is calculated using a
20 forecasted test year, subject to a true-up based on actual costs incurred over the
21 previous year.

1 **Q. IS PUBLIC SERVICE PROPOSING TO RECOVER TRANSMISSION COSTS**
2 **THROUGH THE WPR?**

3 A. No. Although the WMP includes transmission work, the Company plans to
4 recover Transmission capital costs associated with the WMP through its
5 Transmission Cost Adjustment ("TCA"). Additionally, the Company's base rates
6 approved in the 2019 Electric Rate Case include Transmission O&M at a level
7 consistent with the Company's projected wildfire Transmission O&M expense.
8 The amount in base rates is therefore sufficient to cover the costs of wildfire
9 Transmission O&M and the Company is not proposing to recover any
10 incremental Transmission O&M through the WPR. The Company's WPR
11 revenue requirement therefore does not include any transmission costs.

12 **Q. IS CONSTRUCTION WORK IN PROGRESS ("CWIP") INCLUDED IN THE**
13 **WILDFIRE REVENUE REQUIREMENT?**

14 A. No. The Company is not proposing to recover CWIP through the WPR, therefore
15 the only wildfire capital costs included in the revenue requirement are eligible
16 distribution plant in-service costs. The majority of capital projects that will be
17 placed into service under the WMP have short construction cycles and will be in-
18 serviced through routine structures. Since the majority of these assets will be
19 placed in service in the same month that construction begins, the Company
20 determined that the extra complexity of including CWIP in rate base is not
21 necessary.

1 **Q. WHAT IS A ROUTINE STRUCTURE?**

2 A. Routine structures are typically used for repeatable, high-volume work where
3 assets become used and useful on a very short time cycle. Most of the work
4 collected under routine structures are opened and completed in a single day and
5 the remaining ones are generally completed in two or three days. In addition, the
6 costs associated with each individual work order are relatively small. Individual
7 pole replacements are an example of the type of work performed under routine
8 structures. The reason routine structures are used is because the administrative
9 burden of making each individual work order a stand-alone project with a specific
10 in-service date would be cost prohibitive.

11 **Q. WHAT IS PUBLIC SERVICE PROPOSING FOR THE CAPITAL STRUCTURE**
12 **FOR ITS WILDFIRE REVENUE REQUIREMENT TO BE COLLECTED**
13 **THROUGH THE WPR?**

14 A. Public Service is proposing a capital structure composed of long-term debt and
15 equity using the actual balances in each year of the WMP to calculate the debt
16 and equity percentages. Since CWIP is not in rate base, it would not be
17 appropriate to include short-term debt in the capital structure. Given the short
18 construction cycle of the assets associated with the WMP, financing the
19 construction using short-term debt is not necessary. Therefore, including short-
20 term debt in the capital structure of the WPR would not be reflective of the
21 financing costs of the wildfire assets.

1 **Q. WHAT IS PUBLIC SERVICE PROPOSING FOR THE COST OF DEBT AND**
2 **THE COST OF EQUITY USED IN THE WILDFIRE REVENUE REQUIREMENT**
3 **TO BE COLLECTED THROUGH THE WPR?**

4 A. Public Service is proposing to use the actual embedded cost of long-term debt
5 for each year of the WMP. The return on equity ("ROE") is the ROE approved in
6 the Company's 2019 Electric Rate Case, which is 9.30 percent.

7 **Q. PLEASE DESCRIBE THE O&M EXPENSES INCLUDED IN THE WILDFIRE**
8 **REVENUE REQUIREMENT.**

9 A. The O&M expenses included in the wildfire revenue requirement include eligible
10 2021 incremental expenses for inspection/modeling, protection, replacement,
11 and vegetation management. Ms. Johnson describes these expenses in her
12 Direct Testimony.

13 **Q. ARE ANY OF THE O&M EXPENSES SOUGHT FOR RECOVERY THROUGH**
14 **THE WPR RELATED TO INTERNAL LABOR?**

15 A. No. The eligible O&M expenses included in the revenue requirement are all
16 incremental, external costs. All internal labor costs have been excluded as they
17 are already reflected in base rates.

18 **Q. WHAT DO YOU MEAN BY "INCREMENTAL" COSTS?**

19 A. Once the annual revenue requirement is calculated, the amount of wildfire
20 mitigation costs already included in base rates are subtracted so that the revenue
21 recovered through the WPR represent only costs which are incremental to, or in
22 addition to, those already reflected in base rates.

1 **Q. HOW IS THE INCOME TAX EXPENSE CALCULATED IN THE WPR REVENUE**
2 **REQUIREMENT?**

3 A. Income tax expense is calculated by starting with the required earnings and then
4 subtracting synchronized interest expense and adding taxable temporary
5 additions/deductions (these are also known as "Schedule M items") to arrive at
6 taxable income. The applicable state and federal income tax rates are then
7 applied to the taxable income to arrive at the current income tax expense.
8 Deferred income tax expense is added to arrive at total tax expense. The federal
9 income tax rate reflects the 21 percent rate effective January 1, 2018, with the
10 enactment of the Tax Cuts and Jobs Act ("TCJA"). The state income tax rate
11 reflects the 4.63 percent Colorado state income tax rate only. I did not include
12 the California state income tax rate into the WPR income tax calculation because
13 in Decision No. C20-0505 addressing the Company's Application for Rehearing,
14 Reargument, and Reconsideration in the 2019 Electric Rate Case, the
15 Commission clarified that the California state income taxes should be recovered
16 as an expense item in base rates rather than through the income tax expense
17 calculation. Additionally, the Company incurs California state income taxes
18 specifically in connection with certain renewable energy credit sales transactions
19 and not with work that will be performed through the WMP, therefore, inclusion of
20 California state income tax in the WPR revenue requirement would be
21 inappropriate.

1 **Q. WHAT AMOUNT OF WILDFIRE COSTS ARE CURRENTLY INCLUDED IN**
2 **BASE RATES?**

3 A. In Decision No. C20-0096 in the Company's 2019 Electric Rate Case, the
4 Commission approved an Unopposed Partial Wildfire Settlement Agreement in
5 which the Company was authorized to include in base rates certain incremental
6 2019 wildfire mitigation costs. This included \$5.7 million in 2019 distribution
7 capital additions and \$5.0 million in 2019 distribution and transmission O&M.
8 The capital additions were estimated to be in-service over the course of the test
9 year,¹ and the Company calculated a 13-month average rate base balance.
10 Therefore, the amount of capital costs already included in base rates associated
11 with wildfire mitigation is approximately \$1.7 million. The O&M expenses in base
12 rates include both distribution and transmission O&M. The distribution O&M
13 amount included in base rates is \$2.4 million, and the transmission O&M
14 included in base rates is \$2.2 million. As previously discussed, transmission
15 O&M will not be included in the WPR. The amount of wildfire costs in base rates,
16 calculated as a revenue requirement, is presented in Attachment APF-2.

17 **Q. HOW MIGHT THE WILDFIRE REVENUE REQUIREMENT BE IMPACTED IF**
18 **PUBLIC SERVICE FILES AND THE COMMISSION APPROVES A RATE CASE**
19 **DURING THE PROPOSED FIVE-YEAR WPR PERIOD?**

20 A. If Public Service files and the Commission approves a Phase I Electric Rate
21 Case during the five-year WPR period, both the WPR revenue requirement and

¹ The test year in the 2019 Electric Rate Case was the 12 months ending August 31, 2019.

1 the amount in base rates will likely need to be adjusted. Similar to other
2 mechanisms such as the PSIA, Public Service will likely seek approval in a future
3 rate case to transfer some portion (the projects completed and in service that
4 have undergone a prudence review) of the costs in the WPR into base rates.
5 Transferring the eligible costs into base rates will change both the amount in
6 base as well as the WPR revenue requirement, which will necessitate a change
7 to the WPR rate, which we would address through an appropriate future filing
8 with the Commission.

9 **B. True-Up and Projected Wildfire Revenue Requirement**

10 **Q. HOW WILL THE COMPANY ADJUST AND UPDATE ITS WILDFIRE REVENUE**
11 **REQUIREMENT TO ENSURE THE WPR ONLY RECOVERS THE ACTUAL**
12 **AMOUNT OF ELIGIBLE WILDFIRE COSTS INCURRED IN A GIVEN YEAR?**

13 A. The WPR will utilize a forecasted estimate of its annual eligible WMP costs to
14 calculate a projected revenue requirement, which will then be charged for the
15 upcoming year. Similar to other riders, such as the TCA or PSIA, after the
16 conclusion of each of the five years the WPR is effective, an annual true-up will
17 be used to reconcile the projected revenue requirement for the previous year to
18 the actual revenue required for the same year, as well as the difference between
19 revenues the rider was designed to recover and actual dollars collected.
20 Consistent with other riders/adjustment mechanisms, Public Service proposes to
21 make a true-up filing for each WMP year on or before April 15 of the following
22 year. Public Service proposes to revise its projected revenue requirement
23 annually, with a filing to the Commission on or before November 15 to reflect the

forecasted revenue requirement for the upcoming year with a January 1 effective date. The forecasted revenue requirement will also include the true-up adjustment from the previous April 15 filing.

Q. CAN YOU PROVIDE AN ILLUSTRATIVE EXAMPLE OF HOW THE WPR TRUE- UP WILL WORK?

A. Yes. I will use 2021 to provide an illustrative example of how the true-up will work. For the purpose of this illustration, assume the 2021 projected revenue requirement was \$20 million, whereas the actual 2021 revenue requirement was \$18 million and actual 2021 collections were \$19 million. Table APF-D-1 provides details of this illustrative example:

Table APF-D-1: Illustrative True-Up Example

2021 Projected Revenue Requirement (A)	\$20 million
2021 Actual Revenue Requirement (B)	\$18 million
2021 Actual Revenue Collections (C)	\$19 million
2021 Revenue Requirement True-Up (B) – (A)	(\$2 million)
2021 Revenue True-Up (A) – (C)	\$ 1 million
2021 Total True-Up – Over-collection	(\$1 million)

In this instance the true-up adjustment is an over-collection of \$1 million. The difference between the projected revenue requirement and the actual revenue requirement is a \$2 million over-collection. However, that would be offset by the difference in projected collections versus actual collections. The projected rates were set with the goal of collecting \$20 million. However, only \$19 million was collected due to fewer actual billing determinants compared to the projected billing determinants used to set rates. The difference in billing

1 determinants results in a \$1 million under-collection with the net being a \$1
2 million over-collection. This calculation of the true-up of the 2021 WPR would
3 occur in the spring of 2022 with the calculation being filed by April 15, 2022. The
4 \$1 million over-collection would then be included in the Company's November
5 15, 2022, filing which presents the projected revenue requirement and rates to be
6 charged in 2023. The 2023 revenue requirement would then be reduced by the
7 \$1 million true-up adjustment from 2021.

8 **Q. IS PUBLIC SERVICE PROPOSING TO INCLUDE ANY INTEREST OR**
9 **CARRYING COSTS ON ANY AMOUNTS SUBJECT TO TRUE-UP AS PART**
10 **OF THE WPR?**

11 A. Yes. Public Service is proposing to include a carrying cost on its true-up WPR
12 balance, both over and under, based on the weighted average cost of capital
13 ("WACC") (based on the capital structure approved in the Company's last
14 approved electric rate case) used to calculate the actual revenue requirement.
15 The carrying cost will be calculated monthly by multiplying the monthly true up
16 WPR by the weighted average cost of capital, and dividing by 12.

17 **Q. WHY IS IT REASONABLE THAT THE COMPANY BE PERMITTED TO**
18 **INCLUDE CARRYING COSTS AT THE COMMISSION-APPROVED AFTER-**
19 **TAX WACC?**

20 A. Carrying costs are appropriate due to the timing in the application of the true-up
21 balance to the WPR rates. That is, there will be a somewhat significant lag for
22 the correction of the WPR revenue requirement. For example, under Public
23 Service's proposal, the 2021 true-up will be calculated and reviewed in 2022 and

1 then collected/returned in 2023. In total, there will be a two-year difference
2 between the true-up is first calculated and when it is included in the WPR rates.
3 Accordingly, reasonable carrying charges (which are symmetrical between Public
4 Service and its customers) recognize the time value of money to both the
5 Company and its customers.

6 **Q. HAS THE COMPANY CALCULATED A WILDFIRE REVENUE**
7 **REQUIREMENT?**

8 A. Yes. Using wildfire budget estimates developed and presented by Ms. Johnson,
9 I have calculated the revenue requirement for each of the five years the WPR will
10 be in place. The revenue requirement for each of the years is presented in Table
11 APF-D-2. Public Service is requesting approval of its 2021 revenue requirement.
12 The revenue requirements for the years 2022 through 2025 are provided for
13 illustrative purposes only. Public Service will request approval for each of those
14 years in its annual November 15 advice letter filings I discussed earlier, but will
15 apply the same methodology as used herein and in Attachment APF-1 to
16 calculate its annual revenue requirement during the WPR term.

17 **Table APF-D-2: Annual Revenue Requirements (2021-2025)**

	2021	2022	2023	2024	2025
Total Revenue Requirement	19,752,594	26,289,027	31,037,563	34,095,900	37,004,809
Amount in Base Rates	2,567,556	2,567,556	2,567,556	2,567,556	2,567,556
Net Revenue Requirement	17,185,038	23,721,471	28,470,008	31,528,344	34,437,254

1 **III. CONCLUSION**

2 **Q. PLEASE RESTATE YOUR RECOMMENDATIONS.**

3 A. In sum, I recommend the Commission approve Public Service's proposed
4 revenue requirement calculation as reflected in Attachment AFP-1, which will be
5 used for the first WPR true-up. I also recommend the Commission approve the
6 Company's 2021 revenue requirement of \$17,185,038 contained in Attachment
7 AFP-1.

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

9 A. Yes, it does.

Statement of Qualifications

Arthur P. Freitas

I graduated from Marquette University with a Bachelor's degree in Business Administration in 1994. I worked for Boston Gas Company from 1998 through 2000 as a rate analyst. In 2000, I began working for a consulting group, La Capra Associates. While at La Capra Associates, I gained a broad range of experience and expertise that encompassed utility functions from system planning through retail ratemaking. I performed analyses on a range of topics that included retail cost allocation and rate design, electricity market design and analysis, power market forecasting, and integrated resource planning. I have significant experience involving the regulatory process. I have participated in the regulatory process on behalf of both regulated utilities and other interested stakeholders in multiple states. The issues explored include cost allocation and retail rate design, integrated resource planning, resource acquisition, transmission system expansion, and renewable energy policy. During the course of my involvement in numerous regulatory proceedings, I have drafted and reviewed pre-filed testimony, developed and responded to discovery, and conducted analyses on issues relevant to the proceeding to support the testimony of expert witnesses. In 2011, I joined XES as Principal Rate Analyst and was promoted to Manager of Revenue Analysis for Public Service's affiliate Company Southwestern Public Service Company ("SPS"). I assumed my current role as Manager of Revenue Analysis for Public Service in April 2020.

I submitted pre-filed testimony before the Colorado Public Utilities Commission on the revenue requirement calculation in Docket No. 20A-0204E. I have also testified before the New Mexico Public Regulation Commission in Case No. 17-00255-UT on SPS's cost of service and on transmission costs. I also submitted pre-filed testimony on those same issues in Case Nos. 19-00170-UT, 15-00139-UT, and 15-00296-UT. In Case No. 17-00044-UT I submitted testimony on the revenue requirement calculations in an application for a Certificate of Convenience and Necessity to construct two wind projects. I testified before the Public Utility Commission of Texas ("PUCT") in Docket No. 43695, a rate case filed in 2014, regarding expenses incurred and revenues received from the Southwest Power Pool and other utilities under the applicable Open Access Transmission Tariff. In addition, I submitted pre-filed testimony in PUCT Docket Nos. 49831, 47527 and 45524, both of which were base rate cases. I also submitted pre-filed testimony to the PUCT in Docket Nos. 42042 and 42004 regarding transmission-related costs incurred under tariffs approved by the Federal Energy Regulatory Commission. In Docket No. 46936, I submitted testimony on the revenue requirement calculations in the companion application in Texas for a Certificate of Convenience and Necessity to construct two wind projects. I have also submitted pre-filed testimony on cost of service and formula rate mechanisms before the FERC in Docket Nos. ER19-404, ER19-675, and ER20-277. Finally, I have testified before the Massachusetts Department of Public Utilities on behalf of Blackstone Gas Company, and I have submitted pre-filed testimony to the New Hampshire Public Utilities Commission on behalf of the Office of Consumer Advocate.

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RIDER)

AFFIDAVIT OF ARTHUR P. FREITAS
ON BEHALF OF
PUBLIC SERVICE COMPANY OF COLORADO

I, Arthur P. Freitas, 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 seventeenth day of July 2020.



Arthur P. Freitas
Manager, Revenue Requirements South

Subscribed and sworn to before me this 17th day of July, 2020.



Notary Public

My Commission expires May 10, 2021

