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
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

* * * * *

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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

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.
Q. PLEASE SUMMARIZE YOUR RESPONSIBILITIES AND QUALIFICATIONS.
A. As Manager of Revenue Analysis, I provide project supervision and technical expertise for jurisdictional cost of service studies, revenue requirement determinations, and related projects for Xcel Energy’s utility operating companies.

Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?
A. The purpose of my Direct Testimony is to present the Company’s annual revenue requirement associated with its updated Wildfire Mitigation Plan (“WMP” or “Plan”), for which the Company proposes to recover eligible costs through its proposed Wildfire Protection Rider (“WPR”); describe how the wildfire annual revenue requirement will be updated and adjusted over the course of the proposed five-year WPR term; explain what components of costs the Company is proposing to include in the WPR; and describe the WPR true-up process.

Q. ARE YOU SPONSORING ANY ATTACHMENTS AS PART OF YOUR DIRECT TESTIMONY?
A. Yes, I am sponsoring the following two attachments, which were prepared by me or under my direct supervision:
   - Attachment APF-1: WPR Revenue Requirement Calculation; and,
   - Attachment APF-2: Wildfire Costs in Base Rates.

Q. PLEASE SUMMARIZE YOUR RECOMMENDATIONS.
A. I recommend the Colorado Public Utilities Commission (“Commission”) approve Public Service’s proposed revenue requirement calculation as reflected in Attachment APF-1, which will be used for the first WPR true-up. I also
recommend the Commission approve the Company’s 2021 WPR revenue requirement of $17,185,038 contained in Attachment APF-1.
II. WPR REVENUE REQUIREMENT CALCULATION AND TRUE-UP

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

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

A. Revenue Requirement Calculation

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

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

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

A. The WMP includes incremental and eligible capital and operation and maintenance (“O&M”) costs, which Ms. Johnson discusses in detail in her Direct Testimony. The revenue requirement I present includes distribution capital and
O&M costs associated with the WMP activities that would be eligible for recovery through the WPR above the level of costs currently in base rates. With respect to capital costs, this includes the incremental plant balances associated with eligible wildfire mitigation projects placed into service since 2019. As Ms. Johnson explains, while the Company’s electric base rates approved in its 2019 Electric Rate Case include some dollars associated with wildfire mitigation activities, the Company has and will incur incremental capital costs in 2019 and 2020 to implement its WMP, and will continue to incur capital costs in 2021-2025 associated with its WMP. The Company has also included its 2021 incremental O&M expense, which reflects the O&M expense over and above the level reflected in base rates approved as part of the Company’s 2019 Electric Rate Case.

As reflected in the Company’s illustrative WPR tariff filing, Attachment BAT-2 to the Direct Testimony of Ms. Trammell, the wildfire annual revenue requirement includes a return, equal to the Company’s weighted average cost of capital, on capital investments; the plant-related ownership costs associated with such investments, including depreciation and amortization, accumulated deferred income taxes, and income tax expense. The capital costs included in rate base will use a 13-month average methodology, as the WPR is calculated using a forecasted test year, subject to a true-up based on actual costs incurred over the previous year.
Q. IS PUBLIC SERVICE PROPOSING TO RECOVER TRANSMISSION COSTS THROUGH THE WPR?

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

Q. IS CONSTRUCTION WORK IN PROGRESS (“CWIP”) INCLUDED IN THE WILDFIRE REVENUE REQUIREMENT?

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

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

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

A. Public Service is proposing a capital structure composed of long-term debt and equity using the actual balances in each year of the WMP to calculate the debt and equity percentages. Since CWIP is not in rate base, it would not be appropriate to include short-term debt in the capital structure. Given the short construction cycle of the assets associated with the WMP, financing the construction using short-term debt is not necessary. Therefore, including short-term debt in the capital structure of the WPR would not be reflective of the financing costs of the wildfire assets.
Q. WHAT IS PUBLIC SERVICE PROPOSING FOR THE COST OF DEBT AND
THE COST OF EQUITY USED IN THE WILDFIRE REVENUE REQUIREMENT
TO BE COLLECTED THROUGH THE WPR?

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

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

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

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

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

Q. WHAT DO YOU MEAN BY “INCREMENTAL” COSTS?

A. Once the annual revenue requirement is calculated, the amount of wildfire
mitigation costs already included in base rates are subtracted so that the revenue
recovered through the WPR represent only costs which are incremental to, or in
addition to, those already reflected in base rates.
Q. HOW IS THE INCOME TAX EXPENSE CALCULATED IN THE WPR REVENUE REQUIREMENT?

A. Income tax expense is calculated by starting with the required earnings and then subtracting synchronized interest expense and adding taxable temporary additions/deductions (these are also known as “Schedule M items”) to arrive at taxable income. The applicable state and federal income tax rates are then applied to the taxable income to arrive at the current income tax expense. Deferred income tax expense is added to arrive at total tax expense. The federal income tax rate reflects the 21 percent rate effective January 1, 2018, with the enactment of the Tax Cuts and Jobs Act (“TCJA”). The state income tax rate reflects the 4.63 percent Colorado state income tax rate only. I did not include the California state income tax rate into the WPR income tax calculation because in Decision No. C20-0505 addressing the Company’s Application for Rehearing, Reargument, and Reconsideration in the 2019 Electric Rate Case, the Commission clarified that the California state income taxes should be recovered as an expense item in base rates rather than through the income tax expense calculation. Additionally, the Company incurs California state income taxes specifically in connection with certain renewable energy credit sales transactions and not with work that will be performed through the WMP, therefore, inclusion of California state income tax in the WPR revenue requirement would be inappropriate.
Q. WHAT AMOUNT OF WILDFIRE COSTS ARE CURRENTLY INCLUDED IN BASE RATES?

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

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

A. If Public Service files and the Commission approves a Phase I Electric Rate 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.
the amount in base rates will likely need to be adjusted. Similar to other mechanisms such as the PSIA, Public Service will likely seek approval in a future rate case to transfer some portion (the projects completed and in service that have undergone a prudence review) of the costs in the WPR into base rates. Transferring the eligible costs into base rates will change both the amount in base as well as the WPR revenue requirement, which will necessitate a change to the WPR rate, which we would address through an appropriate future filing with the Commission.

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

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

A. The WPR will utilize a forecasted estimate of its annual eligible WMP costs to calculate a projected revenue requirement, which will then be charged for the upcoming year. Similar to other riders, such as the TCA or PSIA, after the conclusion of each of the five years the WPR is effective, an annual true-up will be used to reconcile the projected revenue requirement for the previous year to the actual revenue required for the same year, as well as the difference between revenues the rider was designed to recover and actual dollars collected. Consistent with other riders/adjustment mechanisms, Public Service proposes to make a true-up filing for each WMP year on or before April 15 of the following year. Public Service proposes to revise its projected revenue requirement 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>
<thead>
<tr>
<th>Table APF-D-1: Illustrative True-Up Example</th>
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<tbody>
<tr>
<td>2021 Projected Revenue Requirement (A)</td>
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<tr>
<td>2021 Actual Revenue Requirement (B)</td>
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<tr>
<td>2021 Actual Revenue Collections (C)</td>
</tr>
<tr>
<td>2021 Revenue Requirement True-Up (B) – (A)</td>
</tr>
<tr>
<td>2021 Revenue True-Up (A) – (C)</td>
</tr>
<tr>
<td>2021 Total True-Up – Over-collection</td>
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</tbody>
</table>

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

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

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

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

A. Carrying costs are appropriate due to the timing in the application of the true-up
balance to the WPR rates. That is, there will be a somewhat significant lag for
the correction of the WPR revenue requirement. For example, under Public
Service’s proposal, the 2021 true-up will be calculated and reviewed in 2022 and
then collected/returned in 2023. In total, there will be a two-year difference
between the true-up is first calculated and when it is included in the WPR rates.
Accordingly, reasonable carrying charges (which are symmetrical between Public
Service and its customers) recognize the time value of money to both the
Company and its customers.

Q. HAS THE COMPANY CALCULATED A WILDFIRE REVENUE
   REQUIREMENT?

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

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<th>2021</th>
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<td>19,752,594</td>
<td>26,289,027</td>
<td>31,037,563</td>
<td>34,095,900</td>
<td>37,004,809</td>
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<td>Amount in Base Rates</td>
<td>2,567,556</td>
<td>2,567,556</td>
<td>2,567,556</td>
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<td>Net Revenue Requirement</td>
<td>17,185,038</td>
<td>23,721,471</td>
<td>28,470,008</td>
<td>31,528,344</td>
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III. CONCLUSION

Q. PLEASE RESTATE YOUR RECOMMENDATIONS.

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

Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?

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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OF THE STATE OF COLORADO

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IN THE MATTER OF THE
APPLICATION OF PUBLIC SERVICE
COMPANY OF COLORADO FOR
APPROVAL OF WILDFIRE MITIGATION
PLAN AND WILDFIRE PROTECTION
RIDER

PROCEEDING NO. 20A-XXXXE

___________________________________________
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.

[Signature]
Arthur P. Freitas
Manager, Revenue Requirements South

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

[Signature]
SCHUNA D. WRIGHT
Notary Public

My Commission expires May 6, 2021

SCHUNA D WRIGHT
Notary Public
State of Colorado
Notary ID #19974007683
My Commission Expires 05-06-2021