





8. The Commission understands that the Division may be required to make minor revisions to the verification workbook discovered through its use in the verification process. Such minor revisions may include, but may not be limited to, scrivener errors, formula errors, or updates to emissions factors based on future published information. The Division will publish any revisions to the verification workbook but need not return to the Commission to make changes or corrections of this nature. The Commission requests that the Division schedule further consultation in the event of changes to the fundamental methods included in the Guidance.
9. The Commission believes the PUC is the appropriate state agency to interpret 40-2-125.5(3)(a)(III) and encourages the PUC to provide such guidance. As the entity charged with assuring the state achieves the House Bill 1261 climate targets, the Commission believes it's important to avoid double counting of zero emission attributes. Consequently, the Commission believes that once a CEP is approved, the renewable energy used to comply with the utility's CEP must be accompanied by RECs and those RECs must be retired the year they are generated.
10. The Commission requests update briefings from the Division regarding Clean Energy Plans that have been filed with the Colorado Public Utilities Commission in order to understand the progress being made by the electric sector towards 2025 and 2030 GHG targets.
11. The Commission understands that utilities are still evaluating whether or not they intend to file a CEP. For generating utilities that are required to file a resource plan with the PUC, conversations are occurring with each of their all requirements wholesale customers regarding that customer utility's intent to file. This information will be included in the filing to the PUC in order to accurately establish the baseline emissions for CEP verification purposes. Therefore, the Commission requests that the Division develop a list of all Colorado electric utilities intending to file a Clean Energy Plan as expeditiously as possible, to provide the list to the Commission as part of the scheduled September 2021 GHG briefing, and update the list as necessary in the future.
12. The Commission, in fulfillment of the consultation requirement in § 40-125-5(4)(VIII)(C), C.R.S., and having been fully advised by the Division, supports the Clean Energy Plan Guidance for use by the Division when performing the verification of emissions reductions associated with Clean Energy Plan filings at the PUC.