

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

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**IN THE MATTER OF REPORTING)
REQUIREMENTS FOR PUBLIC SERVICE)
COMPANY OF COLORADO FOR PIPELINE) DOCKET NO. 13M-0915G
INTEGRITY EXPENDITURES)**

**SUPPLEMENTAL JOINT COMMENT OF PUBLIC SERVICE COMPANY OF
COLORADO, COLORADO OFFICE OF CONSUMER COUNSEL, STAFF OF THE
COMMISSION, AND COLORADO NATURAL GAS
ON PROVIDING ADDITIONAL NOTICE OF PUBLIC SERVICE'S APRIL PSIA
REPORT**

Public Service Company of Colorado ("Public Service" or "Company"), the Office of Consumer Counsel ("OCC"), Staff of the Colorado Public Utilities Commission ("Staff"), and Colorado Natural Gas, Inc. ("CNG") (collectively, "the Parties"), through their undersigned legal counsels hereby file this Supplemental Joint Comment on providing notice for the annual April Pipeline System Integrity Adjustment ("PSIA") report filings. On February 10, 2014, a hearing was held on the requirements for future PSIA advice letter filings and annual reports. At the hearing, ALJ Mana Jennings-Fader directed the Parties to confer and to propose a process for providing notice for the April PSIA report filings. The Parties conferred and propose that Public Service provide notice of the April PSIA report filings in a manner similar to the process used to provide notice of the annual November advice letter filings.

The Parties have proposed in Joint Comments filed on January 24, 2014 to file the April PSIA reports in the same docket as the corresponding PSIA advice letters, which were filed in the previous November. If the Commission approves the requirements outlined in the Joint Comments, Commission Rule 1207 and § 40-3-104,

Colorado PUC E-Filings System

C.R.S., which establish the notice requirements for changes in rates or service, would provide the applicable notice requirements for the November 15th PSIA advice letter filings. However, there are no specific notice requirements for the April PSIA report filings. The April PSIA reports are neither applications nor petitions requiring Commission notice under Commission Rule 1206 and § 40-6-108, C.R.S.. Also, they are not requests for changes in rates or services, requiring utility notice under Commission Rule 1207 and § 40-3-104, C.R.S. The April PSIA reports detail the PSIA costs incurred during the previous year, and explain the management of project costs and deviations between budgeted and actual costs. While the information provided in the April PSIA reports may eventually result in requests for rate changes and be considered in a Commission prudency review of PSIA costs incurred by Public Service, they do not request approval of any specific change in rates or services. As such, the Parties believe that the statutory notice requirements for the annual PSIA filings are met with Public Service providing notice of the November 15th tariff filings. For example, Public Service provided an alternative form of notice for Advice Letter No. 849 – Gas to implement new PSIA rates, effective January 1, 2014. That form of notice was approved by the Commission in Decision No. C13-1345 in Docket No. 13A-1040G.

As discussed at the hearing, the Parties recognize an unusual circumstance in the annual PSIA filings cycle — persons may not have an interest in the PSIA filing proceeding initiated by Public Service's November 15th PSIA advice letter filing, but may later have reason to claim an interest in the proceeding based upon the corresponding April PSIA report filing, which would not be noticed by rule or statute. To ensure that all persons, who may claim an interest in the proceeding based upon new information

provided in the April PSIA report filings, are given sufficient notice, the Parties propose that Public Service provide additional notice of the April PSIA report filings in a manner similar to the process used to provide notice of the November 15th PSIA advice letter filings. Specifically, the Parties propose that Public Service provide the following notice:

- filing of the April PSIA report with the Commission;
- causing to be published a legal notice in the *The Denver Post*, in the form attached to these Supplemental Joint Comment as Attachment A, on the first Sunday in May, following filing the April PSIA report; and
- posting to the Company's website the April PSIA report and the public versions of all related exhibits.

Even though Rule 1207 and § 40-3-104, C.R.S. do not apply to the April PSIA report filings, the Parties believe that the proposed additional notice of the April PSIA report filings would be sufficient to provide notice to all persons who may have an interest in Public Service's annual PSIA filing proceedings.

Dated this 27th day of February, 2014.

Respectfully submitted,

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Attorneys for Trial Staff of the Public

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Attachment A

Date of Notice: May __, 201__

SAMPLE NOTICE OF PUBLIC SERVICE COMPANY OF COLORADO
1800 LARIMER STREET, DENVER, COLORADO 80202-5533
APRIL 1 REPORT ON PIPELINE SYSTEM INTEGRITY COSTS

You are hereby notified that Public Service Company of Colorado has filed with the Public Utilities Commission of the State of Colorado ("Commission") its annual April 1 Report on Pipeline System Integrity costs incurred from January 201__ - December 201__. The April 1 Report details Pipeline System Integrity costs, and explains the management of project costs and deviations between budgeted and actual costs. Information provided in the April 1 Report may result in Public Service requesting revisions to its Pipeline System Integrity Adjustment ("PSIA") rider in its Colorado P.U.C. No. 6 - Gas tariff, and may be considered in the Commission's prudence review of the Pipeline System Integrity costs incurred by Public Service.

Copies of the April 1 Report are available for examination and explanation at the main office of Public Service Company of Colorado, 1800 Larimer Street, Suite 1400, Denver, Colorado 80202-5533, or at the office of the Public Utilities Commission, 1560 Broadway, Suite 250, Denver, Colorado, 80202. Customers who have questions may call the Commission at (303) 894-2000, Xcel Energy at 1-800-895-4999, fax to Xcel Energy at 1-800-895-2895, or e-mail to inquire@xcelenergy.com.

Anyone who desires may file written comment or objection to this filing or challenge any of the activities and their respective costs by requesting that the Commission convene a hearing. Anyone who desires to file written comment or objection or make a hearing request shall file them with the Colorado Public Utilities Commission, 1560 Broadway, Suite 250, Denver, Colorado, 80202 or email the document to: puc@dora.state.co.us on or before ninety (90) days of the date the Company files its April 1 Report. The filing of a comment or objection or request for hearing by themselves will not allow you to participate as a party in any proceeding on the proposed action.

If you wish to participate as a party in this matter, you must file written intervention documents under applicable rules.

Members of the public may attend any hearing and may make a statement under oath about the proposed revisions, whether or not he/she has filed a written objection or request to intervene. Anyone desiring information regarding if and when a hearing may be held shall submit a written request to the Commission or, alternatively, shall contact the External Affairs section of the Commission at its local number (303) 894-2070 or toll free number (800) 456-0858.

By: Scott B. Brockett
Director, Regulatory Administration and Compliance