

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

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IN THE MATTER OF THE PETITION OF)
PUBLIC SERVICE COMPANY OF)
COLORADO FOR APPROVAL OF) PROCEEDING NO. 20V-____G
TEMPORARY WAIVERS FROM ITS GAS)
TARIFF DUE TO COVID-19 OUTBREAK)

**VERIFIED NOTICE AND PETITION OF PUBLIC SERVICE
FOR APPROVAL OF TEMPORARY WAIVERS FROM ITS GAS TARIFF DUE TO
COVID-19 OUTBREAK, REQUEST FOR WAIVER OF NOTICE AND INTERVENTION
PERIOD, AND EXPEDITED DECISION**

Public Service Company of Colorado (“Public Service” or the “Company”), pursuant to 4 Code of Colorado Regulations (“CCR”) 723-1 Rules 1003 and 1304(h) of the Colorado Public Utilities Commission’s (“Commission”) Rules of Practice and Procedure, respectfully petitions the Commission to grant temporary waivers from its Colorado PUC No. 6 - Gas Tariff (“Gas Tariff”) provisions relating to Disconnects and Reconnects, Late Payments, and Meter Reads as detailed herein, due to the recent COVID-19 outbreak. Public Service also hereby notifies the Commission of changes it is making to its disconnection practices due to the COVID-19 outbreak, for which it does not believe a temporary waiver is required.

As explained below, Public Service is issuing this Notice and requesting these waivers due to the unforeseen and unprecedented events occurring due to the COVID-19 outbreak, and in response to Governor Polis’s March 20, 2020 Executive Order D 2020 012 - *Order Limiting Evictions, Foreclosures, and Public Utility Disconnections and Expediting Unemployment Insurance Claim Processing to Provide Relief to Coloradans*

Affected by COVID-19 (the “Executive Order Re: Utility Disconnections” or “Executive Order”).

The Company continues to closely monitor the spread of COVID-19 and is in constant communications with local, state, and federal agencies, as well as other health organizations to better understand and coordinate responses. Due to these emergency circumstances, Public Service also requests the Commission waive the notice and intervention period set forth in Rule 1206, issue an expedited decision on or before April 17, 2020, and grant this Petition without a hearing if it is unopposed or no party requests a hearing.

In support of this Petition, Public Service states as follows:

I. PETITION FOR WAIVERS

The Company believes good cause exists to grant the waivers and relief requested in this Petition. The State of Colorado and world at large are currently responding to the unexpected and unprecedented COVID-19 pandemic, with federal, state, and local officials issuing new social-distancing directives and guidance on a near-daily basis. On March 10, 2020, Governor Polis declared a State of Emergency due to the presence of COVID-19 in the State,¹ and on March 13, 2020, the President of the United States declared a National Emergency due to COVID-19.²

On March 20, 2020, Governor Polis issued the Executive Order Re: Utility Disconnections. Among other things, the Executive Order provides as follows:

¹ See <http://www.coemergency.com/2020/03/state-eoc-update-governor-declares.html>.

² Available at <https://www.whitehouse.gov/presidential-actions/proclamation-declaring-national-emergency-concerning-novel-coronavirus-disease-covid-19-outbreak/>.

- Directs the Commission to work with all public utilities³ in the State to suspend service disconnections for delayed or missed payments from residential and small business consumers⁴ related to the impacts of COVID-19.
- Directs the Commission to work with all public utilities to waive reconnection fees and suspend accrual of late payment fees for all residential customers and small business consumers most significantly burdened by the impacts of COVID- 19 as well as to make reasonable efforts to reinstate service for those customers currently disconnected for nonpayment or arrearage related to the impacts of COVID-19.
- Directs the Commission to work with all public utilities to develop and provide payment assistance programs to aid customers, particularly customers qualified for the Low Income Energy Assistance Program, in the payment of their utility bills, related to the impacts of COVID-19.
- Directs the Commission to work with public utilities to provide guidance on prioritizing payment assistance; directs the Commission to collect and monitor relevant data from public utilities on the implementation of Statewide measures undertaken in response to the Executive Order, and on a weekly basis report these efforts to the Office of the Governor and post them on Commission’s website.
- Directs the Colorado Energy Office (“CEO”) to work with providers, trade associations, and consumers of propane heating across the State to evaluate impacts related to COVID-19, and to report relevant recommendations to the Office of the Governor to mitigate the impacts related to COVID-19.

Based on these directives, customer inquiries, the overall COVID-19 situation, and the Company’s review of its Gas Tariff and business practices, Public Service has determined that a number of changes to its business practices, along with waivers from its Gas Tariff, are warranted and appropriate at this time. Public Service notes, however, that it will continue to engage with customers and stakeholders, continue to review its Gas

³ For purposes of the Executive Order, “public utility” or “public utilities” means an investor-owned, municipal, or cooperative entity providing electric, gas, or water service within the State of Colorado.

⁴ “Small business consumers” means a public utility customer whose utility service is classified as a small business user or a small commercial user pursuant to a utility tariff established by the PUC or a public utility customer who is seeking such tariff status.

Tariff and business practices, and may come forward with additional waiver/variance requests related to the COVID-19 outbreak in the future.

Considering the ongoing public health emergency, in this Petition Public Service first provides notice to the Commission of changes it has made to its disconnect policy, effective March 15, 2020 (which is when the Company began implementing such measures). Based on the permissive language included in the Company's disconnect policy, Public Service does not believe that a waiver is needed to implement these changes. Second, Public Service requests temporary waivers from a number of its Gas Tariff provisions, addressed in Section III below, *nunc pro tunc* from March 20, 2020 until the later of when there is no longer a COVID-19 State of Emergency at the State or Federal level or expiration of the directives regarding utility disconnections, reconnection fees, and late payments or other actions required of utilities in response to COVID-19 ("Waiver Period"), subject to the terms and conditions set forth herein.

II. NOTICE OF CHANGES TO PUBLIC SERVICE'S DISCONNECT POLICY

According to the Company's Gas Service Rules and Regulations for Residential and Small Commercial sales customers (both of which contain similar language):⁵

Company **may** discontinue service upon not less than fifteen (15) days' written notice to customer [and to any designated third party] of Company's intention to discontinue service:

- (1) If customer fails to pay, or make arrangements for payment of, bills for service rendered as provided in these rules.

⁵ COLO. PUC No. 6 Gas Tariff Sheet No. S5A (Residential), and COLO. PUC No. 6 Gas Tariff Sheet No. S14 (Commercial), (*emphasis added*). The Commercial provisions do not include the parenthetical "and to any designated third part," and the Residential provisions do not include the parenthetical "distribution" reference in subpart (3). The Commercial provision applies to both small and large commercial gas sales customers, but the Company is only noticing the Commission that it is providing flexibility to small commercial gas sales customers at this time.

(2) If customer fails to comply with Company's rules and regulations after due notice of such failure is given by Company and reasonable time is allowed for compliance.

(3) If customer's use of service is detrimental to the natural gas service being furnished by Company to other customers in the immediate vicinity or supplied from the same [distribution] system.

Similar permissive language applies to small transportation customers on Tariff Sheet No. T18⁶ and Tariff Sheet No. T50.⁷ The Company's disconnect policy provides Public Service with discretion to discontinue service if the requisite conditions are met. In light of the COVID-19 outbreak and the Executive Order Re: Utility Disconnections, Public Service hereby notifies the Commission that it plans to refrain from disconnecting any Residential, Small Commercial sales, and Small Transportation gas customers who fail to pay, or make arrangements for payment through the Waiver Period.

Because the Company's disconnect policy for these customer groups is permissive, Public Service does not believe a waiver is necessary. If the Commission disagrees, however, and believes a waiver is necessary, Public Service respectfully requests the Commission issue a partial and temporary waiver of subsection (1) of the above-referenced Rules and Regulations for Residential (Sheet No. S5A), Small Commercial sales (Sheet No.S14 as applied to Small Commercial sales only), and subsection (i) of the referenced provision for Small Transportation (Sheet Nos. T18 and

⁶ COLO PUC No. 6 Gas Tariff Sheet No. T18 reads in pertinent part, under the heading "Suspension or Termination of Gas Transportation Service for Cause": "In any of the following circumstances constituting default by Shipper, Company may immediately discontinue gas transportation service by suspending service under Shipper's Service Agreement, by revoking Shipper's authority to act as agent on behalf of other Shippers or Receiving Parties, or by terminating Shipper's Service Agreement: (i) Shipper failed to remit full and timely payment for services invoiced by Company . . ."

⁷ COLO PUC No. 6 Gas Tariff Sheet No. T50 reads in pertinent part, under the heading "Cause for Suspension, Termination, or Revocation": "In any of the following circumstances constituting default by Shipper, Transporter may discontinue Gas Transportation Service by suspending service under Shipper's Service Agreement, by revoking Shipper's authority to act as Agent on behalf of other Shippers or Receiving Parties, or by terminating Shipper's Service Agreement: a) Shipper failed to remit to Transporter full and timely payment for services invoiced by Transporter; . . ."

T50, as applied to Small Transportation only) customers for the Waiver Period. The Company notes that there are various other instances where its Gas Tariff contains permissive language, and the Company may modify its practices consistent with such permissive language to carry out the objectives embodied in the Executive Order and this Petition.

III. REQUESTED WAIVERS

Second, Public Service requests the following waivers from its Gas Tariff, separated into the following categories: Disconnects and Reconnects, Late Payments, and Meter Reads.

| Disconnects & Reconnects | | |
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| Tariff Sheet No. | Relevant Tariff Language | Requested Waiver for Waiver Period |
| Gas Affordability Program (GAP) | | |
| 34C | <u>Conditions of Service:</u> d) Regardless of arrears balances, the Company agrees to maintain service and suspend collection activities under the Discontinuance of Service by Company section to Qualified Customers <u>if they maintain their payment schedule hereunder.</u> e) With respect to payment default provisions, a single missed, partial or late payment within any Program Year shall not result in the automatic removal of a Qualified Customer from the Program. <u>However, two or more missed, partial or late payments within any Program Year will result in the Company initiating its regular collection and Discontinuance of Service process.</u> | Public Service requests a waiver from the underlined language for the Waiver Period. |
| Rules and Regulations: Discontinuance and Restoration of Service | | |
| S6 | <u>Discontinuance of Service by Company – Residential:</u> A Customer whose Monthly installment payment is not in default and whose new bill is not past due may renegotiate an installment payment plan arrangement, provided that the original arrangement | Public Service seeks a waiver from the requirements that only Residential customers who are not in default and whose new bill is past due may renegotiate an installment payment plan, and the six-month requirement. This request applies to |

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| | amount will be paid in no more than six months from the date the original installment payment plan arrangement was entered into. | residential customers, including residential gas lighting. |
| S9 | <u>Restoration of Service – Residential:</u> Service which has been terminated due to failure to pay or make arrangements for payment of bills for service rendered will be restored if customer pays all applicable collection or reconnection charges, enters into installment plan arrangements or modified budget billing arrangements and makes the first installment payment. This provision will not apply in cases where termination has occurred due to breached arrangements. If service is terminated after breach of arrangements, service will be reinstated only after customer has made payment in full of all amounts owed, including any collection or reconnection charges and after posting any deposit required for service. | Public Service seeks a waiver from the stricken requirement as it is not requiring payment in full for restoration of service for residential customers after termination has occurred due to breached arrangements. |
| S15 | <u>Discontinuance of Service by Company – Commercial:</u> A Customer whose Monthly installment payment is not in default and whose new bill is not past due may renegotiate an installment payment plan arrangement; provided that the original arrangement amount will be paid in no more than three months from the date the original installment payment plan arrangement was entered into. | Public Service seeks a waiver from the requirements that only Commercial sales customers who are not in default and whose new bill is past due may renegotiate an installment payment plan, and the three-month requirement. This waiver request applies to both small and large commercial sales customers and commercial gas lighting. |
| S16 | <u>Restoration of Service – Commercial Sales:</u> Service which has been terminated due to failure to pay or make arrangements for payment of bills for service rendered will be restored if customer pays one-half of the amount shown on the notice of termination, all applicable collection or reconnection charges, enters into an installment payment plan arrangement to pay the remaining account balance in equal monthly installments over a period of time not to exceed three months . This provision will not apply in cases where termination has occurred due to breached arrangements. If service is terminated after breach of arrangements, service will be reinstated only after customer has made payment in full of all amounts owed, | Public Service seeks a waiver from the stricken payment in full requirement for small commercial sales customers only as it is not requiring payment in full for restoration of service for small commercial sales customers after termination has occurred due to breached arrangements. Public Service also seeks a waiver from the three month requirement as applicable to small commercial sales customers. These waiver requests do not apply to large commercial sales customers. |

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| | including any collection or reconnection charges and after posting any deposit required for service. | |
| S22 | <u>Discontinuance of Service by Company – Interruptible Industrial:</u> A customer whose monthly installment payment is not in default and whose new bill is not past due may renegotiate an installment payment plan arrangement, provided that the original arrangement amount will be paid in no more than three months from the date the original installment payment plan arrangement was entered into. | Public Service seeks a waiver from the requirements that only Interruptible Industrial sales customers who are not in default and whose new bill is past due may renegotiate an installment payment plan, and the three-month requirement. |
| Gas Schedule of Charges for Rendering Service | | |
| 12 | <u>Schedule of Charges for Rendering Service:</u> To institute or reinstitute gas service requiring a premise visit within: 24 hours.....\$ 94.00 12 hours.....\$ 126.00 To institute or reinstitute both gas and electric service requiring a Premise visit within: 24 hours.....\$ 107.00 12 hours.....\$ 150.00 | Public Service seeks a waiver from its Schedule of Charges for Rendering Service for Residential and Small Commercial sales customers only, as the Company will not assess reconnection charges for these customers during the Waiver Period. |

| Late Payments | | |
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| Tariff Sheet No. | Relevant Tariff Language | Requested Waiver for the Waiver Period |
| Residential Gas Service – Schedule RG | | |
| 14 | <u>Payment and Late Payment Charge:</u> Bills for gas service are due and payable within fourteen (14) business days from date of bill... A maximum late payment charge of 1.0% per month shall be applied to all billed balances for Commission jurisdictional charges that are not paid by the billing date shown on the next bill unless the balance is \$50 or less. The Company will remove the assessment of a late payment charge for one billing period, but not more frequently than once in any twelve-month period, at customer's request. | Public Service seeks a waiver from its late payment charge provisions for Residential customers, as the Company will not assess late payment charges during the Waiver Period. |

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| | The late payment charge will not apply to a billed security deposit, or in instances where a Company billing error is involved, or where complications arise with financial institutions in processing payments that are no fault of the customer, or where a customer is current on an active payment arrangement. | |
| Residential Gas Outdoor Lighting Service – Schedule RGL (Residential Gas Lighting) | | |
| 15 | <u>Payment and Late Payment Charge:</u> Identical verbiage as found on Sheet No. 14, quoted above. | Public Service seeks a waiver from its late payment charge provisions for Residential Gas Lighting customers, as the Company will not assess late payment charges during the Waiver Period. |
| Commercial – Small Gas Service – Schedule CSG | | |
| 16 | <u>Payment and Late Payment Charge:</u> Bills for gas service are due and payable within fourteen (14) business days from date of bill. Any amounts in excess of fifty dollars (\$50.00) not paid on or before three business days after the due date of the bill shall be subject to a late payment charge of 1.5% per month. | Public Service seeks a waiver from its late payment charge provisions for Small Commercial gas sales customers, as the Company will not assess late payment charges during the Waiver Period. |
| Commercial – Large Gas Service – Schedule CLG | | |
| 17 | <u>Payment and Late Payment Charge:</u> Identical verbiage as found on Sheet No. 16, quoted above. | Public Service seeks a waiver from its late payment charge provisions for Large Commercial gas sales customers, as the Company will not assess late payment charges during the Waiver Period. |
| Interruptible Industrial Gas Service – Schedule IG | | |
| 19A | <u>Payment and Late Payment Charge:</u> Identical verbiage as found on Sheet No. 17, quoted above. | Public Service seeks a waiver from its late payment charge provisions for Interruptible Industrial gas sales customers, as the Company will not assess late payment charges during the Waiver Period. |
| Gas Affordability Program | | |
| 34C | <u>Conditions of Service:</u> e) With respect to payment default provisions, <u>a single missed, partial or late payment within any Program Year</u> shall not result in the automatic removal of a Qualified Customer from the Program. However, two or more missed, partial or | Public Service seeks a waiver from the referenced language such that a customer will not be removed from the GAP for any missed, partial or late payments during the Waiver Period. |

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| | late payments within any Program Year will result in the Company initiating its regular collection and Discontinuance of Service process. | |
| Gas Transportation Terms and Conditions – Billing and Payment | | |
| T47 | <p><u>Payment and Late Payment Charge:</u> Bills for Gas Transportation Service are due and payable within fourteen (14) Business Days from the date of the bill. If the customer fails to receive a bill, Transporter, upon request, will issue a duplicate. However, failure to receive a bill in no way exempts the customer from payment for service rendered. Unless otherwise agreed in writing or unless otherwise waived by EBB posting, any amounts in excess of fifty dollars (\$50.00) not paid on or before nine (9) Business Days after the due date of the bill may be subject to a late payment charge of 1.5 percent per Month.</p> | Public Service seeks a waiver from its late payment charge provisions for all gas transportation customers, as the Company will not assess late payment charges during the Waiver Period. |

| Meter Reads | | |
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| Tariff Sheet No. | Relevant Tariff Language | Requested Waiver for the Waiver Period |
| Rules and Regulations: Natural Gas Service – General | | |
| R9 | <p><u>Monthly Bills (as applicable to Residential (Schedule RG) and Small Commercial (Schedule CSG) Sales):</u> For residential, small commercial, and agricultural customers receiving service under Schedules RG or CSG, the Company will prorate an initial or a final bill for a period less than the scheduled monthly billing period based on therm usage and adjust for heating degree days from either an actual or estimated meter read. Regardless of the length of the shortened monthly billing period for the initial or final bill, the Company will prorate the monthly minimum charges under the applicable rate schedule for initial and final bills based on the number of days in the shortened billing period divided by thirty (30) days. Prorating will not be applicable to the monthly minimum charges for the final bill if</p> | Public Service requests a waiver from the provisions that require the Company to conduct customer meter reads for final bills under Schedules RG and CSG. During the Waiver Period, the Company will estimate usage based on historic billing data; alternatively, the residential or small commercial sales customer may elect to read their own meter on the day of termination and send that information to the Company. |

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| | <p>notice to discontinue service is received by the Company within four (4) days of the end of the customer's monthly billing period. For final bills, upon notification by customer to Company of customer's desire to terminate service as set forth in Discontinuance of Service By Customer sections of the Rules and Regulations, <u>if the Company has not read the meter for a regular meter reading within the previous thirty (30) days, the Company shall read the meter to determine the therm usage and adjust for heating degree days, for billing the final bill to a customer.</u> If the Company has read the meter within the past thirty days, the Company will advise the customer to select one of three options to determine the final bill therm usage. The first option is to allow the Company to estimate the customers therm usage based upon the customers historic billing data. The second option is for the customer to read their meter on the day of termination and send or call in that information to the Company. Third option is the customer can request to have the Company read the meter and pay a nonregularly scheduled final meter read charge under the Company's Schedule of Charges for Rendering Service. The Company shall perform said meter reading within three days from the day to discontinue service. For the purpose of this special meter reading, such three calendar day shall not include Sundays or Holidays.</p> | |
| R9 | <p><u>Monthly Bills (as applicable to Schedule CLG):</u> For commercial and industrial customers receiving service under Schedule CLG the Company shall prepare an initial or final bill using the metering data available. However, for an initial or a final bill for a period less than the scheduled monthly billing period the Company will prorate the applicable</p> | <p>Public Service requests a waiver from the provisions that require the Company to conduct customer meter reads for final bills under Schedule CLG. During the Waiver Period, the Company will estimate usage based on historic billing data; alternatively, the commercial and industrial</p> |

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| | monthly minimum charges consistent with the prorate method described above. | sales customer may elect to read their own meter on the day of termination and send that information to the Company. |
| General Terms and Conditions – Natural Gas Sales Service | | |
| S5 | <p><u>Natural Gas Sales Service - Residential Discontinuance of Service at Customer's Request:</u></p> <p>A Customer wishing to discontinue or terminate service shall give at least three days' notice to allow the Company time to render a meter reading and issue a final bill. The Company shall perform said meter reading within three days from the date to discontinue service. For the purpose of this special meter reading, such three calendar day shall not include Sundays or Holidays. The Company may prorate and estimate the final bill for a period less than the Monthly billing period if the Customer wants to discontinue service on a date other than the end date of his monthly billing period, as described in the Monthly Bills section of this Natural Gas Tariff. Where notice to discontinue service is not provided by the customer, the customer will be liable for payment of service until such time the Company is made aware of the discontinuance and can render a final reading of the meter. Notice by a Customer to discontinue or terminate service will not relieve the Customer from any minimum or guaranteed payment under a contract or an applicable rate schedule.</p> | Public Service requests a waiver from the requirement the Company perform a meter reading within three days of the request to discontinue or terminate residential service during the Waiver Period, as reflected herein. During the Waiver Period, the Company will estimate the residential customer's consumption based upon the customer's historic billing data for the final bill. Alternatively, the second option remains for the customer to read their meter on the day of termination and send or call in that information to the Company. |
| S13 | <p><u>Natural Gas Sales Service – Commercial Sales Discontinuance at Customer's Request – Commercial:</u></p> <p>A customer wishing to discontinue service shall give at least three days' notice to allow the Company time to render a meter reading and issue a final bill. The Company shall perform said meter reading within three days from the date</p> | Public Service requests a waiver from the requirement the Company perform a meter reading within three days of the request to discontinue all classes of commercial sales service during the Waiver Period, as reflected herein. During the Waiver Period, the Company will estimate the commercial sales customer's consumption based upon the Customer's historic billing data for |

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| | <p>to discontinue service. For the purpose of this special meter reading, such three calendar day shall not include Sundays or Holidays. The Company may prorate and estimate the final bill for a period less than the monthly billing period if the customer wants to discontinue service on a date other than the end date of his monthly billing period, as described in the Monthly Bills section of this natural gas tariff. Where notice to discontinue service is not provided by the customer, the customer will be liable for payment of service until such time the Company is made aware of the discontinuance and can render a final reading of the meter. Notice by a customer to discontinue service will not relieve the customer from any minimum or guaranteed payment under a contract or an applicable rate schedule.</p> | <p>the final bill.</p> |
| <p>S20</p> | <p><u>Interruptible Industrial Sales Discontinuance of Service at Customer's Request - Industrial:</u> A customer wishing to discontinue service shall give at least three days' notice to allow the Company time to render a meter reading and issue a final bill. The Company shall perform said meter reading within three days from the date to discontinue service. For the purpose of this special meter reading, such three calendar day shall not include Sundays or Holidays.The Company may prorate and estimate the final bill for a period less than the monthly billing period if the customer wants to discontinue service on a date other than the end date of his monthly billing period, as described in the Monthly Bills section of this natural gas tariff. Where notice to discontinue service is not provided by the customer, the customer will be liable for payment of service until such time the Company is made aware of the discontinuance and can render a final reading of the meter. Notice by a customer to discontinue service will not</p> | <p>Public Service requests a waiver from the requirement the Company perform a meter reading within three days of the request to discontinue Interruptible Industrial sales service during the Waiver Period, as reflected herein. During the Waiver Period, the Company will estimate the Interruptible Industrial customer's consumption based upon the Customer's historic billing data for the final bill.</p> |

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| | relieve the customer from any minimum or guaranteed payment under a contract or an applicable rate schedule. | |
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The requested waivers are partial in that each only seeks a partial waiver from the referenced Gas Tariff provisions. Further, the requested waivers are temporary, in that the Company is requesting the waivers remain in place for the Waiver Period. The requested temporary waivers are warranted and in the public interest, given the extraordinary circumstances and Executive Order.

Public Service further requests that due to the emergency circumstances surrounding COVID-19, the Commission issue a final decision as soon as possible but no later than April 17, 2020. Pursuant to Rule 1003(b), a petitioner may request a waiver or variance to be effective less than 40 days after the date of filing, in which case “the petition must include a request to waive or shorten the Commission notice and intervention period found in paragraph (d) of rule 1206.” 4 CCR 723-1-1003(b). Consistent with Rule 1003(b), Public Service requests the Commission waive the notice and intervention period set forth in Rule 1206 and grant this Petition without a hearing if it is unopposed or no party requests a hearing.

Public Service notes that as a provider of essential public utility services, it is taking the COVID-19 outbreak very seriously. The energy grid is a key part of the nation’s critical infrastructure, and Public Service has a responsibility to take a well-planned, heightened approach to the threats that COVID-19 poses. Public Service continues to monitor the evolving situation very closely. The Company is focused on helping its customers and will continue to evaluate its business practices and how it can best serve its customers through these difficult and extraordinary times. The Company

will continue to engage with the Commission as is necessary and appropriate. For the reasons articulated above, Public Service believes its request is in the public interest and that good cause exists to grant its request, including waiving the notice and intervention period set forth in Rule 1206.

IV. CONCLUSION

WHEREFORE, Public Service Company of Colorado respectfully requests that for good cause shown, the Commission:

- A. Enter an order granting Public Service its requested waivers as set forth above;
- B. Waive the notice and intervention period set forth in Rule 1206 and grant this Petition no later than April 17, 2020 without a hearing if it is unopposed or no parties request a hearing.
- C. Grant any other waiver or variance from any other Commission Rule or Decision the Commission may deem necessary to grant the above requested-relief, or any other relief the Commission may deem appropriate.

DATED this 7th day of April, 2020.

Respectfully submitted,

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COMPANY OF COLORADO**

