Decision No. C23-0566-I

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 23M-0234G

IN THE MATTER OF THE GAS INFRASTRUCTURE PLAN OF PUBLIC SERVICE COMPANY OF COLORADO FILED PURSUANT TO 4 CODE OF COLORADO REGULATIONS 723-4-4552 OF THE COMMISSION'S RULES REGULATING GAS UTILITIES.

INTERIM COMMISSION DECISION REQUESTING ADDITIONAL INFORMATION, AND MODIFYING PROCEDURAL SCHEDULE

> Mailed Date: August 22, 2023 Adopted Date: August 16, 2023

I. <u>BY THE COMMISSION</u>

A. Statement

- 1. On May 18, 2023, Public Service Company of Colorado (Public Service or Company) filed its Initial 2023-2028 Gas Infrastructure Plan, as revised on July 21, 2023 (Initial GIP). Public Service made the filing consistent with provisions in the Commission's Rules Regulating Gas Utilities, 4 *Code of Colorado Regulations* (CCR) 723-4-4550 to 4555 (Gas Infrastructure Planning Rules), that require the filing of gas infrastructure plans (GIPs) as part of the Commission's updated regulatory framework for gas utilities, adopted through Proceeding No. 21R-0449G (the Gas Rulemaking).
- 2. By this Decision, we request additional supporting information from Public Service, in accordance with Rule 4552(b)(IV), and modify the procedural schedule for this

Proceeding. Public Service shall respond to our request for additional information by September 11, 2023. The reply comment deadline is extended from September 1, 2023, to October 2, 2023.

B. Discussion

- 3. On August 14, 2023, a technical conference between the Company and the Commission was held. We appreciate the Company's participation and discussion, and the Company's stated willingness to provide additional information in writing on certain topics discussed at the technical conference. Based on the Commission's review of the filings made in this Proceeding to date, and the discussion at the technical conference, the Commission requests additional supporting information from the Company regarding its Initial GIP filing. We request that the Company respond to the following questions and directives:
 - To the extent practicable, for each project category set forth in Rule 4553(a)(III), provide the number of projects and associated dollar value of expected investment per year over the Action and Information periods, as in Table 2 of the Company's Initial GIP filing, that meet the following criteria, separately for each criterion:
 - a) projects that would have been included in the Initial GIP as a "planned project" if the definition included projects with an estimated utility capital investment between \$1 million and \$2 million, instead of projects exceeding \$3 million as contained in current Rule 4551(f);
 - b) projects that would have been included in the Initial GIP as a "planned project" if the definition included projects with an estimated utility capital investment between \$2 million and \$3 million, instead of projects exceeding \$3 million as contained in current Rule 4551(f);
 - c) projects that began construction prior to 2023 or expected to begin construction after 2028;
 - d) projects that the Company anticipates will be initiated in years 2023-2028, but that do not have a defined scope of work or associated cost estimate, or were otherwise too early in the Company's planning process to be included in the Initial GIP.

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- 2) To the extent practicable, reproduce Table 2 in the Company's Initial GIP for the total expected investment in each project category for each year of the Action and Information period. Please explain significant deviations between this revised Table 2 and capital expenditures forecasted in Proceeding No. 21A-0071G and 22AL-0046G.
- 3) Provide item 2 above assuming load growth is held at 0 percent, and a narrative addressing where the cost savings arise. Please comment on the potential for 0 percent load growth during the GIP total period.
- 4) For each project category, provide historical annual expenditures for the past five years.
- 5) Provide the average time between when the Company is alerted to the need for a project and the beginning of construction, separately for: (a) mandatory relocation projects; and (b) new business projects.
- 6) To the extent reasonably available, provide peak usage, customer growth, and total growth by customer type over the forecast period. If applicable, identify different assumptions by geographic area.
- Please refer to the cost-benefits analyses (CBAs) of non-pipeline alternatives (NPAs) provided in support of the Company's Initial GIP. The CBAs indicate the overall emissions rate for the Company's system will decline 30 percent between 2023 to 2030. Please explain if the emissions rate forecast is consistent with information provided in Proceeding No. 21A-0141E (the Company's 2021 Electric Resource Plan (ERP) and Clean Energy Plan (CEP)). If the emission rate values are consistent with the ERP/CEP values, please explain why and provide any calculations to support the values in the CBAs. Please explain other assumptions relevant to the CBAs as necessary.
- 8) Did the Company include all electric construction as a strategy to limit or eliminate future growth on the system, thereby avoiding some of the capacity needs? If yes, please explain how and the results of such analysis. If not, please explain why.
- 9) Did the Company evaluate any gas demand-response options as part of its NPA approach? If yes, please explain how and the results of such analysis. If not, please explain why.
- 10) Explain the connection between Stage Gate planning and construction date. What is the typically expected time to project initiation for each stage gate? Please indicate whether a project that has initiated construction or will initiate construction within the next few months should typically be at a high Stage Gate.
- What is the expected timeline for the Company's assessment of the Hydrogen Blending Demonstration project.
- 12) The Company states it has established its Design Day temperature based on a 1-in-30 year cold weather event occurring within an associated

weather zone, and that this process is repeated annually.¹ Please provide an analysis of the probabilistic temperature outputs for each weather zone for the past 20 years to demonstrate if the probability of a 1-in-30 year cold temperature is changing over time.

- Please provide a map indicating pipe material, age, diameter, and segment length for all distribution mains and transmission mains in the Company's gas system.
- 4. We request that Public Service respond to these directives and questions, including any discussion or explanation the Company wishes to provide, by September 11, 2023. The Reply Comment deadline is extended to October 2, 2023.

II. ORDER

A. The Commission Orders That:

- 1. The Commission requests that Public Service Company of Colorado provide responses to our requests for additional supporting information, consistent with the discussion above, by September 11, 2023.
- 2. The Reply Comment deadline in this Proceeding is extended to October 2, 2023.
 - 3. This Order is effective on its Mailed Date.

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¹ Initial GIP, at 32-33.

B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING August 16, 2023.



ATTEST: A TRUE COPY

THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

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MEGAN M. GILMAN

TOM PLANT

Commissioners

Rebecca E. White, Director