

Decision No. C25-0666-I

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

PROCEEDING NO. 24A-0547E

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IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR APPROVAL OF ITS 2025-2029 DISTRIBUTION SYSTEM PLAN AND THE GRID MODERNIZATION ADJUSTMENT CLAUSE.

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PROCEEDING NO. 25A-0061E

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IN THE MATTER OF THE APPLICATION FOR APPROVAL OF PUBLIC SERVICE COMPANY OF COLORADO'S AGGREGATOR VIRTUAL POWER PLANT PROGRAM AND TARIFF, ALONG WITH ASSOCIATED PROGRAM BUDGET AND COST RECOVERY METHODOLOGY.

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**INTERIM COMMISSION DECISION EXTENDING PAGE  
LIMIT FOR STATEMENT OF POSITIONS AND  
PROVIDING DIRECTION**

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Issued Date: September 15, 2025

Adopted Date: September 10, 2025

**I. BY THE COMMISSION**

**A. Statement**

1. On December 16, 2024, Public Service Company of Colorado (“Public Service” or the “Company”) filed its Application for Approval of its 2025-2029 Distribution System Plan (“DSP”) and Grid Modernization Adjustment Clause (“Application”) in this Proceeding. On January 31, 2025, pursuant to Senate Bill (“SB”) 24-218, Public Service filed an Application for Approval of an Aggregator Virtual Power Plant in Proceeding No. 25A-0061E (Proceeding No. 25A-0061E or “AVPP Application”). This Proceeding is the consolidated docket of the AVPP Application and the DSP Application.

2. Through Decision No. C25-0261-I, issued April 8, 2025, the Commission adopted a procedural schedule and scheduled an *en banc* remote evidentiary hearing.

3. The remote evidentiary hearing was held on August 25-29 and September 2-3, 2025.

4. Per the adopted procedural schedule, Statements of Position (“SOPs”) are due from the parties on September 26, 2025.

5. Through this decision, we invite parties to include legal arguments and discussion in their SOPs addressing the topics discussed below. To accommodate this additional discussion, we extend the usual 30-page limit contained in Rule 1202(d) of the Commission’s Rules of Practice and Procedure, 4 *Code of Colorado Regulations* (“CCR”), 723-1, to 35 pages.

#### **B. Discussion, Findings, and Conclusions**

6. This Proceeding involves several issues of first impression regarding Senate Bill (“SB”) 24-218. In light of the novelty of many issues before the Commission, we highlight several areas of interest that we invite particular comment on in SOPs from parties.

7. SB 24-218 requires that the Commission determine if projected distribution activities are “qualifying distribution activities” in relation to cost recovery through the grid modernization adjustment clause. Specifically, the statute requires the Commission to evaluate “whether the projected distribution activities and corresponding budgets strategically benefit or advance... greenhouse gas emission reductions, beneficial electrification, increased reliability, and increased resiliency” amongst other broad items including meeting applicable targets, standards, plans, and regulations and facilitating state energy policy goals relevant to Public Service.

8. The Commission is interested in party comment regarding how to appropriately evaluate whether a proposed distribution activity “strategically benefit[s] or advance[s]” the enumerated goals. Particularly, we are interested in:

- What metrics or criteria should the Commission consider when weighing the benefits or advancements related to greenhouse gas emission reductions, beneficial electrification improvements, increased reliability, and increased resiliency as contemplated by SB 24-218?
- How should “increased resiliency” be quantified or best assessed by the Commission, and is it clearly distinct from reliability?
- How should “increased reliability” be evaluated?
  - What reliability metrics should be applied?
  - Should the Commission apply reliability metrics across the system, the geographic area (*e.g.*, census block), or distribution equipment (*e.g.*, feeder) being improved upon?
  - Assuming a reliability metric is used as part of the GMAC framework, what size sample of reliability data do we need, and should any lag between investment and reliability assessment be implemented?
  - How can these metrics be reviewed on the timelines contemplated by SB 24-218?; should the Commission take any specific procedural pathway to first, establish the metrics, and second, review the results?
  - What are the pros and cons of the various reliability metrics (*i.e.*, SAIDI, SAIFI, CAIDI, CAIFI, CEMI6, and CELI12) that the Commission should consider?
- Should the Commission weigh customer service issues such as customer satisfaction, average response time to customer calls, termination of customer calls, and billing complaints when determining the appropriateness of GMAC recovery of distribution activities?; and
- The Commission solicits comments on the idea discussed by the chair with various witnesses at the evidentiary hearing: whether the Commission should consider allocating some amount of GMAC funds to engage a third-party entity to proactively and systematically reach out to commercial and residential customers to better comprehend customer experience with outages, billing, interconnection, and other service issues.

9. Finally, to accommodate this additional discussion, we extend the usual 30-page limit contained in Rule 1202(d) of the Commission's Rules of Practice and Procedure, 4 CCR 723-1, to 35 pages.

## II. ORDER

### A. It Is Ordered That:

1. The 30-page limit for pleadings before the Commission is extended to 35 pages in order to accommodate additional discussion on areas of interest, consistent with the discussion above.

2. This Decision is effective immediately upon its Issued Date.

a. **ADOPTED IN COMMISSIONERS' WEEKLY MEETING  
September 10, 2025.**

(S E A L)



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THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

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MEGAN M. GILMAN

Commissioners

Rebecca E. White,  
Director

COMMISSIONER TOM PLANT,  
ABSENT