

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

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**IN THE MATTER OF ADVICE NO. 1526 -)
ELECTRIC OF PUBLIC SERVICE COMPANY)
OF COLORADO FOR INCREASE IN THE) DOCKET NO. _____
RENEWABLE ENERGY STANDARD)
ADJUSTMENT)**

**DIRECT TESTIMONY OF
ROBIN L. KITTEL**

1 Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A. My name is Robin L. Kittel. My business address is 1225 Seventeenth
3 Street, Suite 1000, Denver, Colorado 80202.

4 Q. BY WHOM ARE YOU EMPLOYED AND IN WHAT POSITION?

5 A. I am employed by Xcel Energy Services, Inc., a wholly-owned subsidiary
6 of Xcel Energy Inc., the parent company of Public Service Company of
7 Colorado. My job title is Director, Regulatory and Strategic Analysis.

8 Q. ON WHOSE BEHALF ARE YOU TESTIFYING IN THE PROCEEDING?

9 A. I am testifying on behalf of Public Service Company of Colorado ("Public
10 Service" or the "Company").

**11 Q. HAVE YOU INCLUDED A DESCRIPTION OF YOUR QUALIFICATIONS,
12 DUTIES, AND RESPONSIBILITIES?**

13 A. Yes. A description of my qualifications, duties, and responsibilities is
14 included as Attachment A.

15 Q. WHAT IS THE PURPOSE OF YOUR DIRECT TESTIMONY?

1 A. The purpose of my direct testimony is to support Advice Letter No. 1526 –
2 Electric, in which Public Service requests modifications to tariff sheet 114,
3 including an increase in the Renewable Energy Standard Adjustment
4 (“RESA”) to two percent starting January 1, 2009 and a change in tariff
5 title, removing the term “Interim”. Tariff sheet 114 would become the
6 Renewable Energy Standard Adjustment.

7 **Q. ARE THERE ANY LIMITS ON THE AMOUNT OF THE RESA?**

8 A. Yes. House Bill 07-1281 amended C.R.S. §40-2-124. These amendments
9 authorize Public Service's request to increase the RESA from its current
10 1.46 percent to the full 2 percent allowed under the law.

11 **Q. PLEASE DESCRIBE THE CHANGES IN LAW RESULTING FROM**
12 **HB07-1281.**

13 A. The statutory changes from HB07-1281 have been implemented by the
14 Commission through changes to the Commission's Renewable Energy
15 Standard Rules, 4 CCR 723-3-3650 et. seq, (“RES Rules”). Rule 3661(a)
16 states: “The net rate impact of actions taken by an investor owned QRU to
17 comply with the renewable energy standard shall not exceed two percent
18 of the total electric bill annually for each customer of that QRU.” The
19 RESA is an adjustment clause that is applied to the total electric bill of
20 each of Public Service retail customer. The increase in the RESA,
21 requested by Advice Letter No. 1526 – Electric, is authorized by Rule
22 3661(a).

1 Rule 3661(j) provides: “If the retail rate impact does not exceed the
2 maximum percent level, a QRU may acquire more than the minimum
3 amount of eligible energy resources and RECs required under the
4 renewable energy standard.” We believe that HB07-1281 authorizes the
5 Company to acquire the Eligible Energy Resources above that required for
6 compliance so long as the Company does not exceed the two percent
7 retail rate impact cap limitation. As such, Public Service believes the
8 legislature authorized us to raise the RESA to the full two percent. Public
9 Service reserves the funds that are collected through the RESA for paying
10 for the incremental costs of Eligible Energy Resources and program
11 administration expenses.

12 **Q. HAS THE COMMISSION APPROVED A PLAN TO ACQUIRE ELIGIBLE**
13 **ENERGY RESOURCES IN EXCESS OF THE MINIMUMS REQUIRED**
14 **TO MEET THE RENEWABLE ENERGY STANDARD?**

15 A. Yes. Public Service filed on November 15, 2007 its 2007 Colorado
16 Resource Plan (“CRP”) that proposed differing levels of Eligible Energy
17 Resources. They include, but are not limited to, Eligible Energy
18 Resources as defined by Commission Rule 3652(g). In the CRP, Public
19 Service recommends approval of up to 850 MWs of new intermittent
20 resources such as wind or PV and up to 600 MWs of concentrated solar
21 thermal with storage during the resource acquisition period of 2007
22 through 2015. This Resource Plan adds Eligible Energy Resources in
23 excess of the minimum amounts required to meet the Renewable Energy

1 Standard. The Commission approved¹ the acquisition of Eligible Energy
2 Resources up to the 850 MWs of intermittent resources and up to 600
3 MWs of concentrated solar thermal with storage (CSP), but with a
4 minimum of 200 MW CSP.

5 **Q. IN COMMISSION DECISION NO. C08-0929 DID THE COMMISSION**
6 **MAKE ANY RECOMMENDATION REGARDING THE TWO PERCENT**
7 **RESA?**

8 A. Yes. In Decision No. C08-0929, paragraph 278 the Commission agreed
9 with and supported the position of the parties in the Resource Plan case
10 that Public Service should be able to raise the RESA to the full two
11 percent such that Public Service may collect and use funds from the
12 RESA to acquire renewable resources beyond what is needed for
13 compliance as long as the two percent rate cap is not exceeded. The
14 Company's proposals on how the RESA funds will be spent over the RES
15 Planning Period is set forth in the Company's 2009 Renewable Energy
16 Standard Compliance Plan, filed on December 1, 2008.

17 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

18 A. Yes, it does.

¹ Colorado Public Utilities Commission Decision No. C08-0929, mailed September 19, 2008 at page 22.

Robin Kittel
Statement of Qualifications

Experience	2001 – Present	<i>Xcel Energy Inc.</i>	Denver, Colorado
	Director, Regulatory Administration		March 2008 - present
	Director,		
	Regulatory & Policy Analysis		Sept 2006 – March 2008
	Director, Business Relations		August 2001 - Sept 2006
	Manager, Policy Analysis		March 2001 – August 2001

I am responsible for managing the regulatory policies and practices for PSCo with an emphasis on our electrical business. I testified before the Public Utilities Commission as the policy witness for Xcel Energy's Renewable Energy Standard Compliance plan and I manage the development and filing of regulatory matters as it relates to Xcel Energy's electrical business.

As the Director of Business Relations, I was responsible for managing multiple functions associated with transmission's external relations; directing the contract services to wholesale customers, participation in Regional Transmission Organizations (RTO), and transmission regulatory policy across our footprint.

Business Relations negotiated and managed hundreds of contracts from system studies of multi-million dollar generator interconnection to transmission service over our systems. I was responsible for the managing the transmission budget and fees associated with transmission

Attachment A

service on Xcel Energy system as well as the fees under the RTO systems.

I was responsible for the coordination and effective participation in Regional Transmission Organization developments and implementation of new market rules and changes to reliability standards. I directed policy coordination and participation in industry organizations such as Edison Electric Institute, North American Reliability Council, and North American Energy Standards Board. I represented Xcel Energy on key stakeholder committees with the Southwest Power Pool (SPP) and Western Electricity Coordinating Council (WECC) board of directors; I chaired the Market Operations Policy Committee for SPP and was a member of the WestConnect Steering Committee.

I am a registered Professional Engineer licensed in Texas.

