Decision No. C25-0169-I

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 24A-0547E

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.

INTERIM COMMISSION DECISION CLARIFYING PROCEDURES AND ADOPTING AN AGENDA FOR THE JOINT TECHNICAL CONFERENCE

Issued Date: March 7, 2025
Adopted Date: March 5, 2025

I. BY THE COMMISSION

A. Statement

1. Through this Decision, we clarify procedures and adopt an agenda for the March 13, 2025 joint technical conference scheduled in both Proceeding No. 24A-0442E (the 2024 Just Transition Solicitation ("JTS")) as well as in Proceeding No. 24A-0547E (the Company's 2025-2029 Distribution System Plan ("DSP")).[1]

B. Discussion

2. In Decision No. C25-0097-I,[2] we scheduled a technical conference in the JTS and directed Public Service Company of Colorado ("Public Service" or the "Company") to be prepared to address certain models and forecasts the Company has put forth both in the JTS Proceeding as

[1] These proceedings are not consolidated. The Company has cross-referenced forecasting across proceedings such that consistent explanation across both proceedings through a joint technical conference explaining the parallel filings and modeling will benefit both records. As discussed, the public and parties to each proceeding are invited to attend or view the technical conference. As discussed further below, transcripts of the technical conference can be made available for each proceeding. Concurrent with this decision, a parallel decision is issued in the JTS. Decision No. C25-0168-I, Proceeding No. 24A-0442E.

[2] Issued February 13, 2025, in Proceeding No 24A-0442E.

well as in the DSP Proceeding. Subsequently, in Decision No. C25-0154-I,[3] we expressly scheduled the joint technical conference in the DSP. As we have previously noted, there appears to be parallel forecasting from the Company in the JTS Proceeding and the DSP Proceeding, including, for example, forecasts regarding electric vehicles ("EVs") and beneficial electrification ("BE"). The intent of the joint technical conference is to allow the Commission and parties to have more transparency regarding certain critical forecasts and models underlying the separate but concurring DSP and JTS filings.

3. In Decision No. C25-0097-I, we specifically directed Public Service to make available for Commissioner questioning the Company officials, including Mr. Goodenough and Mr. Bailey, who are able to discuss the models and forecasts regarding the adoption rates and load shapes for EVs, BE, and other large forecasted loads such as data centers. We also directed the Company to be prepared to demonstrate the 8760 process used to develop the peak forecast, including the underlying load shapes (*e.g.*, EVs, BE, and data centers). Regarding the DSP, we required Public Service to make available for questioning the Company officials, including Mr. Mino, who are able to discuss the LoadSEER tool and demonstrate how it generated the relevant forecasts. We also indicated interest in the residential customer rate analysis we directed Public Service to file in the DSP Proceeding and how it is impacted by the 8760 load shape projections. In Decision No. C25-0154-I in the DSP, we reiterated the directives from Decision No. C25-0097-I and further required Public Service to be prepared to address at the technical conference the supplemental direct testimony ordered in the DSP, and particularly the requirement to prepare a residential rate impact forecast based on the lower-low growth forecast.

[3] Issued March 4, 2025, in Proceeding No. 24A-0547E.

4. In this Decision, we take the opportunity to clarify the procedures for the technical conference and adopt an anticipated agenda. To begin, while intervenors to both the JTS and the DSP will be provided with the Zoom login information prior to the technical conference, the technical conference is for Commissioner questions only. Joining the zoom session will allow intervenors to observe the technical conference in real time, including any confidential session that might occur, assuming intervenors have signed any necessary and applicable non-disclosure agreements pertinent to the confidential or highly-confidential information discussed in a particular session.[4] The technical conference will also be publicly broadcast on the Commission's website, and transcribed by a court reporter for the benefit of the parties, including any intervenors who are unavailable on March 13, 2025. It is our hope that intervenors can use the discussion at the technical conference to inform and improve their ongoing advocacy in these cases through discovery, testimony, and at the evidentiary hearings.

5. To ensure the joint technical conference is as efficient as possible, we further refine our prior directives by adopting an agenda comprised of the following six categories: (1) EVs and managed charging, (2) BE, (3) large new loads such as data centers, (4) the 8760 process for peak load forecasts and LoadSEER, (5) the long-term residential customer rate analysis, and (6) a miscellaneous category.[5] Additional details regarding our expectations for each of the six agenda categories is set forth below.

[4] Intervenors may attend any confidential or highly confidential session(s) if they have signed the necessary NDA(s) for the information to be discussed in that session. While confidential or highly-confidential sessions are possible, the Commission aims to have the majority, if not all, of the technical conference via public discussion.

[5] The Commission will aim to discuss each topic in turn, if possible, recognizing that there is some overlap. However, if the need for a confidential session arises, confidential or highly-confidential discussions may be moved to an appropriate time for convenience and efficiency. As discussed herein, we will aim to reserve at least some time at the end of the technical conference for the possibility of a confidential session.

6. The first agenda category of EVs and managed charging will include the forecasts and models underlying assumed adoption rates for both EVs and plugin hybrids, participation in managed charging (both under existing programs and future expanded programs), and existing and future load shapes for charging. This category would also cover impacts on coincident and non-coincident peak demands and distribution constraints in the DSP. Although Public Service must have available all models and forecasts necessary to discuss these topics, we anticipate that this first agenda category will cover the following JTS and DSP hearing exhibits: Hr. Ex. 106, Goodenough Direct (JTS); Hr. Ex. 101, Attachment JWI-2, Volume II (JTS); Hr. Ex. 114, Goodenough Supplemental Direct (JTS); Hr. Ex. 103, Pollock Direct (DSP); Hr. Ex. 105, Mino Direct (DSP); Hr. Ex. 105, Attachment DCM-9, LoadSEER Technical Appendix (DSP); Hr. Ex. 109 (DSP); Hr. Ex. 109, Attachment 2 (DSP); Hr. Ex. 109, Attachment 3 (DSP); and Hr. Ex. 109, Attachment 4 (DSP).

7. The second category regarding BE will include adoption rates and efficiency curves of heat pump water heaters, air source heat pumps ("ASHPs"), cold climate ASHPs, and assumptions regarding backup fuel source for ASHPs (*i.e.*, electric resistance or gas furnace). We will further focus on the load shapes for such devices and the resulting coincident and non-coincident peak demand forecasts in both the JTS and DSP. Another important issue in this category is the current and forecasted participation rates in load management and demand response programs under existing and expanded programs and the associated anticipated impacts on the coincident and non-coincident peak infrastructure requirements. Although Public Service must have available all models and forecasts necessary to discuss these topics, we anticipate that this second agenda category will cover the following JTS and DSP hearing exhibits: Hr. Ex. 106, Goodenough Direct (JTS); Hr. Ex. 101, Attachment JWI-2, Volume II (JTS); Hr. Ex. 114,

Goodenough Supplemental Direct (JTS); Hr. Ex. 103, Pollock Direct (DSP); Hr. Ex. 105, Mino Direct (DSP); Hr. Ex. 105, Attachment DCM-9, LoadSEER Technical Appendix (DSP); Hr. Ex. 109 (DSP); Hr. Ex. 109, Attachment 2 (DSP); Hr. Ex. 109, Attachment 3 (DSP); and Hr. Ex. 109, Attachment 4 (DSP).

8. The third category will cover the forecasts and underlying assumptions associated with large new loads such as data centers. This includes anticipated load shapes and potential for demand response associated with such loads. For example, we plan to investigate whether loads such as data centers typically have backup power supplies and whether such supplies could be used to provide grid resources during peak demand periods. Likewise, we are curious whether the assumed load shapes for data centers differ according to the type or purpose of the data center.[6] We anticipate this second agenda category will cover the following JTS and DSP hearing exhibits, although the Company must be prepared to include materials outside of this list, as necessary: Hr. Ex. 106, Goodenough Direct (JTS); Hr. Ex. 107, Bailey Direct (JTS); Hr. Ex. 107, Attachment TLB-1.

9. The fourth agenda category is the 8760 process used for peak load forecasts in the JTS as well as the LoadSEER platform in the DSP. Although the 8760 load shapes associated with incremental load will be covered to some extent in the earlier categories, we intend to look more broadly at how the Company used the 8760 process to develop the peak demand forecasts in the JTS and how the 8760 data is incorporated into LoadSEER for purposes of the DSP. For example, we intend to investigate whether and how targeted distribution investments in specific areas of the

[6] The Commission recognizes that Public Service has marked certain facts regarding large new loads as highly confidential. While we will attempt to keep the technical conference discussion public to the extent feasible, we will reserve a portion of time near the end of the technical conference to enter into a confidential Zoom session. This will help ensure that we have time to investigate issues that have been marked as highly confidential as to large new loads or any other matters that arise during the course of the technical conference.

distribution system are reflected in the load forecasts for purposes of Encompass and the JTS. We are also curious about what the Company uses to understand the locational nature of new loads such as EVs and BE, particularly as it relates to anticipated distribution investments. Although Public Service must have available all models and forecasts necessary to discuss these topics, we anticipate that this fourth agenda category will cover the following JTS and DSP hearing exhibits: Hr. Ex. 106, Goodenough Direct (JTS); Hr. Ex. 101, Attachment JWI-2, Volume II (JTS); Hr. Ex. 114, Goodenough Supplemental Direct (JTS); Hr. Ex. 105, Mino Direct (DSP); Hr. Ex. 105, Attachment 1C (DSP); Hr. Ex. 105, Attachment 2C (DSP); Hr. Ex. 105, Attachment 4C (DSP); Hr. Ex. 105, Attachment DCM-9, LoadSEER Technical Appendix (DSP); Hr. Ex. 109 (DSP); Hr. Ex. 109, Attachment 2 (DSP).

10. The fifth agenda category will cover the long-term residential customer rate analysis. In the JTS, Public Service has offered to present the long-term rate analysis model submitted in the JTS Proceeding.[7] We are more interested, however, in the long-term rate analysis model submitted as part of the JTS supplemental direct that is based on the lower-low forecasts as well as the different versions of the residential customer rate analysis required in the DSP. For example, we intend to investigate the drivers of the cost savings from the lower-low forecasts, including how much of the savings results from lower peak demand as opposed to lower energy sales. We will also seek a better understanding of how the anticipated downward pressure on rates from increased energy usage are modeled and whether data centers loads and consumer loads are treated differently for purposes of the modeling. In addition, we expect the Company to be able to quantify the differences between the distribution capital budget used to calculate the long-term rate forecast in the JTS and the distribution capital budget used in the DSP. Consistent with the

[7] Proceeding No. 24A-0442E, Hr. Ex. 101, Ihle Direct, pp. 117-18.

supplemental direct testimony we ordered in the DSP, we will inquire about the DSP's residential customer rate analysis and TCA-D rate forecast models and how these change when the lower-low sales forecast and/or flattened load shapes are assumed. We anticipate this fifth agenda category will cover the following JTS and DSP hearing exhibits, although the Company must be prepared to include materials outside of this list, as necessary: Hr. Ex. 101, Ihle Direct (JTS); Hr. Ex. 101, Attachments JWI-5 and JWI-6 (JTS); Hr. Ex. 110, Ihle Supplemental Direct (JTS); Hr. Ex. 110, Attachments JWI-7 and JWI-8 (JTS); Hr. Ex. 109 (DSP); and Hr. Ex. 109, Attachment 1 (DSP).

11. The sixth and final agenda category is a miscellaneous category. We anticipate this category will include inquires such the underlying weather patterns to the load forecasts and potential duration of those patterns. We will likely raise questions regarding whether, for purposes of identifying necessary distribution investment, the Company views virtual power plant resources as entirely energy limited and thus, unable to serve coincident or even non-coincident peak loads. We are also curious whether the recently approved distribution investments associated with the Company's transportation electrification plan are accounted for in the DSP proceeding. Likewise, we intend to investigate the anticipated adoption rates of behind-the-meter solar and storage and the impact this is forecasted to have on load shapes. We also might inquire about the differences in forecasted transmission investment associated with the Company's base case versus the lower-low forecast. In addition, we are curious how the forecasted transmission investments would change if most of the large new loads are located outside of the Denver Metro transmission constraint and how the forecasted transmission and distribution investments would change if future battery storage investments were located within transmission and distribution constrained areas. We anticipate that this sixth agenda category will cover the following JTS and DSP hearing exhibits: Hr. Ex. 105, Siebenaler Direct (JTS); Hr. Ex. 105, Attachment AWS-1 (JTS);

Hr. Ex. 107, Bailey Direct (JTS); Hr. Ex. 111, Landrum Supplemental Direct (JTS); and Hr. Ex. 113, Martz Supplemental Direct (JTS).

12. As a general matter, the Company must be prepared to clarify at the technical conference the specific modeling approaches used in each proceeding (including any instances where the modeling approaches differ) and to answer questions, to the extent possible, through demonstration of the Company's models or the input files to those models. Also, we clarify that the agenda set forth in this Decision refines but does not replace prior Commission directives regarding the joint technical conference.[8]

II. ORDER

A. It Is Ordered That:

1. Consistent with the discussion above, we adopt the procedures and agenda set forth above for the March 13, 2025 joint technical conference scheduled in both Proceeding No. 24A-0442E (the 2024 Just Transition Solicitation) as well as in Proceeding No. 24A-0547E (the Company's 2025-2029 Distribution System Plan).

[8] *See* Proceeding No. 24A-0547E, Decision No. C25-0154-I, issued March 4, 2025; Proceeding No. 24A-0442E, Decision Nos. C25-0097-I, issued February 13, 2025, and C25-0147-I, issued February 28, 2025.

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

B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING March 5, 2025.

(S E A L)

ATTEST: A TRUE COPY

Rebecca E. White,
Director

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

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COMMISSIONER ERIC BLANK
ABSENT