

**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-\_\_\_\_E  
TEMPORARY WAIVERS FROM ITS )  
ELECTRIC TARIFF DUE TO COVID-19 )  
OUTBREAK )

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

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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. 8 - Electric Tariff (“Electric Tariff”) provisions relating to Disconnects and Reconnects, Late Payments, and Meter Reads as detailed herein, due to the recent COVID-19 outbreak. The Company 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 10, 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,<sup>1</sup> and on March 13, 2020, the President of the United States declared a National Emergency due to COVID-19.<sup>2</sup>

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

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

<sup>2</sup> 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 utilities<sup>3</sup> in the State to suspend service disconnections for delayed or missed payments from residential and small business consumers<sup>4</sup> 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 own review of its Electric Tariff and business practices, Public Service has determined that a number of changes to its business practices, along with waivers from its Electric Tariff are warranted and appropriate at this time. Public Service notes, however, that it will continue to engage with customers and stakeholders, and continue to review its

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<sup>3</sup> 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.

<sup>4</sup> “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.

Electric 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 Electric 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 Electric Service Rules and Regulations for Residential and Small Commercial:

The 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.
- (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 electric service being furnished by Company to other Customers in the immediate vicinity or supplied from the same distribution system.<sup>5</sup>

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 and small commercial electric 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 & Small Commercial for the Waiver Period. The Company notes that there are various other instances where its Electric 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 Electric Tariff, separated into the following categories: Disconnects and Reconnects, Late Payments, and Meter Reads.

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<sup>5</sup> COLO. PUC No. 8 Electric Orig. Sheet No. R56 (Residential & Small Commercial) (*emphasis added*).

<b>Disconnects &amp; Reconnects</b>		
<b>Tariff Sheet No.</b>	<b>Relevant Tariff Language</b>	<b>Requested Waiver for Waiver Period</b>
<b>Electric Affordability Program (EAP)</b>		
116C	<p><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 <b><u>if they maintain their payment schedule hereunder.</u></b>  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. <b><u>However, two (2) 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></b></p>	Public Service requests a waiver from the underlined language for the Waiver Period.
<b>Rules and Regulations: Discontinuance and Restoration of Service</b>		
R57	<p><u>Discontinuance of Service by Company – Residential and Small Commercial:</u>  A Customer <del>whose Monthly installment payment is not in default and whose new bill is not past due</del> may renegotiate an installment payment plan arrangement; <del>provided that the original arrangement amount will be paid in no more than six (6) Months from the date the original installment payment plan arrangement was entered into.</del></p>	Public Service seeks a waiver from the requirements that only Residential and Small Commercial customers who are not in default and whose new bill is past due may renegotiate an installment payment plan, and the six-month requirement, as reflected herein.
R61	<p><u>Discontinuance of Service by Company – Commercial and Industrial:</u>  A Customer <del>whose Monthly installment payment is not in default and whose new bill is not past due</del> may renegotiate an installment payment plan arrangement; <del>provided that the original arrangement amount will be paid in no more than three (3) Months from the date the original installment payment plan arrangement was entered into.</del></p>	Public Service seeks a waiver from the requirements that only Commercial and Industrial customers who are not in default and whose new bill is past due may renegotiate an installment payment plan, and the three-month requirement, as reflected herein.
<b>Electric Sales Rates</b>		
25	<p><u>Schedule of Charges for Rendering Service:</u>  <del>To institute or reinstitute electric service requiring a Premise visit within:</del>  <b>24 hours..... \$ 38.00</b>  <b>12 hours..... \$ 77.00</b></p>	Public Service seeks a waiver from its Schedule of Charges for Rendering Service for Residential and Small Commercial only, as the Company will not assess

<p><del>To institute or reinstitute both gas and electric service requiring a Premise visit within:</del>  <b>24 hours..... \$ 107.00</b>  <b>12 hours..... \$ 150.00</b></p>	<p>reconnection charges for these customers during the Waiver Period.</p>
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Late Payments		
Tariff Sheet No.	Relevant Tariff Language	Requested Waiver for the Waiver Period
<b>Schedule of Charges for Rendering Service</b>		
25C	<p><u>Schedule of Charges for Rendering Service:</u>  <u>Payment and Late Payment Charge:</u> Bills for electric service and Charges for Rendering Service are due and payable in accordance with the <del>Payment and Late Payment Charge</del> provisions of the general electric service schedule under which the Customer receives service. <del>In the event that a Customer is billed for Charges for Rendering Service and the Customer's payment for such charges is not paid by the due date, the Payment and Late Payment Charge provisions under the applicable Residential, Commercial and Industrial Service shall be assessed to the Customer for all amounts not paid by the due date.</del></p>	<p>Public Service seeks a waiver from its late payment provisions for all customer classes, as the Company will not assess late payments during the Waiver Period.</p>
<b>Electric Sales Service Rates – Residential Service</b>		
30B	<p><u>Payment and Late Payment Charge:</u> Bills for electric service are due and payable within fourteen (14) business days from date of bill. A business day for purposes under this Payment and Late Payment Charge section is all non-Holiday weekdays. Residential Customers have the option of selecting a modified due date (“Custom Due Date”) for paying their bill. The due date can be extended up to a maximum of thirty (30) calendar days from the scheduled due date of the current bill. Customers selecting a Custom Due Date will remain on the selected due date for a period not less than twelve (12) consecutive Months. <del>A maximum late payment charge of one percent (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 fifty dollars (\$50) or less. The Company will remove the assessment of a late payment charge for one (1) billing period, but not more frequently than once in any twelve (12) Month period, at Customer's request. The late payment charge will not apply to a billed security</del></p>	<p>Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.</p>

	<del>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.</del>	
31A	<u>Residential Demand Service (Schedule RD)</u> Identical verbiage as found on Sheet No. 30B, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
32A, 32B	<u>Residential Demand-Time Differentiated Rates Service (Schedule RD-TDR)</u> Identical verbiage as found on Sheet No. 30B, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
33B	<u>Residential Energy Time-of-Use Service (Schedule RE-TOU)</u> Identical verbiage as found on Sheet No. 30B, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
<b>Electric Sales Service Rates – Small Commercial Service</b>		
40A	<u>Commercial Service (Schedule C):</u> Payment and Late Payment Charge: Bills for electric service are due and payable within fourteen (14) business days from date of bill. <del>Any amounts in excess of fifty dollars (\$50.00) not paid on or before three (3) business days after the due date of the bill shall be subject to a late payment charge of one and one half percent (1.5%) per Month.</del> A business day for purposes under this Payment and Late Payment Charge section is all non-Holiday weekdays.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
<b>Non-Metered Service</b>		
41A	<u>Non-Metered Service (Schedule NMTR):</u> Identical verbiage as found on Sheet No. 40A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
<b>Commercial and Industrial Secondary Service</b>		
43A	<u>Secondary General Service (Schedule SG):</u> Payment and Late Payment Charge: Bills for electric service are due and payable within fourteen (14) business days from date of bill. <del>Any amounts in excess of fifty dollars (\$50.00) not paid on or before three (3) business days after the due date of the bill shall be subject to a late payment charge of one and one half percent (1.5%) per Month.</del>	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
44	<u>Secondary General Low-Load Factor Service (Schedule SGL):</u> Identical verbiage as found on Sheet No. 43A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments

		during the Waiver Period.
45A	<u>Secondary General Critical Peak Pricing Service (Schedule SG-CPP):</u> Identical verbiage as found on Sheet No. 43A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
47B	<u>Secondary Standby Service (Schedule SST):</u> Identical verbiage as found on Sheet No. 43A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
48A	<u>Secondary Time-of-Use Service (Schedule STOU):</u> Identical verbiage as found on Sheet No. 43A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
49B	<u>Secondary Photovoltaic Time-of-Use Service (Schedule SPVTOU – SECTION A):</u> Identical verbiage as found on Sheet No. 43A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
49D	<u>Secondary Photovoltaic Time-of-Use Service (Schedule SPVTOU – SECTION B):</u> Identical verbiage as found on Sheet No. 43A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
50C	<u>Secondary General Time-of-Use - Electric Vehicle Service (Schedule SG-EV):</u> Identical verbiage as found on Sheet No. 43A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
<b>Commercial and Industrial Primary Service</b>		
55A	Primary General Service (Schedule PG): Payment and Late Payment Charge: Bills for electric service are due and payable within fourteen (14) business days from date of bill. <del>Any amounts in excess of fifty dollars (\$50.00) not paid on or before three (3) business days after the due date of the bill shall be subject to a late payment charge of one and one half percent (1.5%) per Month.</del>	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
56A	<u>Primary General Critical Peak Pricing Service (Schedule PG-CPP)</u> Identical verbiage as found on Sheet No. 55A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
57B	<u>Primary Standby Service (Schedule PST)</u> Identical verbiage as found on Sheet No. 55A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.

58A	<u>Primary Time-of-Use Service (Schedule PTOU)</u> Identical verbiage as found on Sheet No. 55A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
<b>Commercial and Industrial Transmission Service</b>		
70A	<u>Transmission General Service (Schedule TG)</u> Identical verbiage as found on Sheet No. 55A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
71A	<u>Transmission General Critical Peak Pricing Service (Schedule TG-CPP)</u> Identical verbiage as found on Sheet No. 55A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
72B	<u>Transmission Standby Service (Schedule TST)</u> Identical verbiage as found on Sheet No. 55A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
<b>Commercial and Industrial Special Contract</b>		
80A	<u>Special Contract Service - RTD (Schedule SCS-7)</u> Identical verbiage as found on Sheet No. 55A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
81A	<u>Special Contract Service - RTD (Schedule SCS-8)</u> Identical verbiage as found on Sheet No. 55A, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
<b>Area Lighting</b>		
90	<u>Residential Outdoor Area Lighting Service (Schedule RAL):</u> Payment and Late Payment Charge: Bills for electric service are due and payable in accordance with the Payment <del>and Late Payment Charge</del> provisions of the general service schedule under which the Customer receives service. In the event that a Customer is billed for lighting service separate from a general service schedule, Payment <del>and Late Payment Charge</del> provisions under the Residential Service shall be applicable.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
91	<u>Commercial Outdoor Area Lighting Service (Schedule CAL)</u> Identical verbiage as found on Sheet No. 90, quoted above.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
91	<u>Parking Lot Lighting Service (Schedule PLL)</u>	Public Service seeks a

	Identical verbiage as found on Sheet No. 90, quoted above.	waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
<b>Public Street and Highway Lighting Service</b>		
95A	<u>Metered Street Lighting Service (Schedule MSL):</u> <u>Payment and Late Payment Charge:</u> Bills for electric service are due and payable within fourteen (14) business days from date of bill. <del>Any amounts in excess of fifty dollars (\$50.00) not paid on or before three (3) business days after the due date of the bill shall be subject to a late payment charge of one and one half percent (1.5%) per Month.</del>	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
96A	<u>Metered Intersection Service (Schedule MI):</u> <u>Payment and Late Payment Charge:</u> Bills for electric service are due and payable in accordance with the <del>Payment and Late Payment Charge</del> provisions of the general service schedule under which the Customer receives service. In the event that a Customer is billed for lighting service separate from a general service schedule, <del>Payment and Late Payment Charge</del> provisions under the Commercial Service shall be applicable.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
97E	<u>Energy Only Street Lighting Service (Schedule ESL):</u> <u>Payment and Late Payment Charge:</u> Bills for electric service are due and payable within fourteen (14) business days from date of bill. <del>Any amounts in excess of fifty dollars (\$50.00) not paid on or before three (3) business days after the due date of the bill shall be subject to a late payment charge of one and one half percent (1.5%) per Month.</del>	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
100A	<u>Customer-Owned Lighting Service (Schedule COL):</u> <u>Payment and Late Payment Charge:</u> Bills for electric service are due and payable in accordance with the <del>Payment and Late Payment Charge</del> provisions of the general service schedule under which the Customer receives service. In the event that a Customer is billed for lighting service separate from a general service schedule, <del>Payment and Late Payment Charge</del> provisions under the Commercial Service shall be applicable.	Public Service seeks a waiver from its late payment provisions, as the Company will not assess late payments during the Waiver Period.
<b>Electric Affordability Program</b>		
116C	<u>Electric Affordability Program (EAP):</u> <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. <del>However, two (2) or more missed, partial or late payments within any Program Year will result in the Company</del>	Public Service seeks a waiver from the referenced language such that a customer will not be removed from the EAP for any missed, partial or late payments during the Waiver Period.

	<del>initiating its regular collection and Discontinuance of Service process.</del>	
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<b>Meter Reads</b>		
<b>Tariff Sheet No.</b>	<b>Relevant Tariff Language</b>	<b>Requested Waiver for the Waiver Period</b>
<b>Rules and Regulations: Monthly Bills and Payment Options</b>		
R35	<p><u>Monthly Bills:</u>            Bills for service will be rendered Monthly. The Company reserves the right to require payment of bills for service at more frequent intervals. In such event, meters will be read at the intervals specified by the Company. If the Company is unable to read a meter after reasonable effort, the Customer will be billed on an estimated usage based on the best available information. For Residential and Commercial Customers without interval data metering, the Company will prorate an initial or a final bill for a period less than the scheduled Monthly billing period based on consumption 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 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, <del>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, 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 consumption for billing the final bill to a Customer. If the Company has read the meter within the past thirty (30) days, the Company will advise the Customer to select one (1) of three (3) options to determine the final bill consumption. The first option is to allow</del> the Company to estimate the Customer's consumption based upon the Customer's 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. <del>Third option is the</del></p>	<p>Public Service requests a waiver from the provisions that require the Company to conduct customer meter reads. During the Waiver Period, the Company will estimate usage based on historic billing data; alternatively, the customer may elect to read their own meter on the day of termination and send that information to the Company.</p>

	<p><del>Customer can request to have the Company read the meter and pay a non-regularly scheduled final meter reading charge under the Company's Schedule of Charges for Rendering Service. The Company shall perform said meter reading within three (3) days from the date to discontinue service. For the purpose of this special meter reading, such three (3) calendar day shall not include Sundays or Holidays.</del></p>	
R55	<p><u>Discontinuance of Service at Customer's Request:</u>  A Customer wishing to discontinue or terminate service shall give at least three (3) days' notice to allow the Company time to <del>render a meter reading and</del> issue a final bill. <del>The Company shall perform said meter reading within three (3) days from the date to discontinue service subject to the Monthly Bills section of this Electric Tariff. For the purpose of this special meter reading, such three (3) calendar day shall not include Sundays or Holidays.</del> 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/her Monthly Billing Period, as described in the Monthly Bills section of this Electric Tariff. Where notice to discontinue or terminate 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 <del>and can render a final reading of the meter.</del> 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>	<p>Public Service requests a waiver from the requirement the Company perform a meter reading within three days of the request during the Waiver Period, as reflected herein. During the Waiver Period, the Company will estimate the 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.</p>
R36	<p><u>Monthly Bills:</u>  When Company for any reason submits a bill to a Customer for utility service which contains an estimated reading or a no charge, Company will include on such bill a notice informing Customer that the bill does contain an estimate or no charge. <del>Also included on such bill will be a statement requesting Customer to call Company so an accurate meter reading may be obtained. In all bills for additional charges resulting from a period of estimated or skipped billings, Company will include a written notice of Customer's right to pay such additional charges in installments, where such charges were not the result of meter inaccessibility and Customer's refusal to read his or her own meter.</del></p>	<p>Public Service seeks a waiver from the referenced meter reading requirements during the Waiver Period.</p>

The requested waivers are partial in that each only seeks a partial waiver from the referenced Electric Tariff provisions. Further, the requested waivers are temporary, in that the Company is requesting the waivers remain in place through 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 10, 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 10, 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 6th day of April, 2020.

Respectfully submitted,

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**ATTORNEYS FOR PUBLIC SERVICE  
COMPANY OF COLORADO**

**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 TEMPORARY WAIVERS FROM ITS ) PROCEEDING NO. 20V-XXXXE  
ELECTRIC TARIFF DUE TO COVID-19 OUTBREAK )**

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**VERIFICATION**

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**STATE OF COLORADO )  
CITY AND ) SS:  
COUNTY OF DENVER )**

I, Steven P. Berman, being duly sworn, do hereby depose and state that I am Director, Regulatory Administration, Xcel Energy Services Inc., agent for Public Service Company of Colorado, Petitioner in the foregoing Petition; that I have read the foregoing Petition; and that the facts set forth therein are true and correct to the best of my knowledge, information and belief.

/s/ Steven P. Berman  
Steven P. Berman  
Director, Regulatory Administration