

Decision No. C23-0449-I

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

PROCEEDING NO. 23A-0242E

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IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR APPROVAL OF ITS 2024-2026 TRANSPORTATION ELECTRIFICATION PLAN.

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**INTERIM COMMISSION DECISION INVITING THE  
PARTIES TO EXPLORE CERTAIN QUESTIONS AND  
AREAS OF INTEREST THROUGHOUT THE COURSE OF  
THIS PROCEEDING**

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Mailed Date: July 12, 2023

Adopted Date: July 5, 2023

**I. BY THE COMMISSION**

**A. Statement**

1. By this Decision, we set forth questions and certain areas of interest that the Commission has discussed at the Commissioners' Weekly Meeting held on June 21, 2023, and July 5, 2023. Consistent with the discussion below, we do not require additional Supplemental Direct Testimony at this time, but as parties address pertinent issues, we invite the parties to address these questions and areas of interest throughout the course of this Proceeding.

**B. Discussion**

2. On May 15, 2023, Public Service Company of Colorado (Public Service or Company) filed an application (Application) to approve its proposed 2024-2026 Transportation Electrification Plan (TEP). Through Decision C23-0449, issued July 12, 2023, we set the Application for a hearing before the Commission *en banc*.

3. After our initial review of the Company's Application and Direct Testimony, we note that this Proceeding implicates several important policy considerations and topics in which the Commission is interested. While we do not require Public Service to file additional Supplemental Direct Testimony through this Decision,<sup>1</sup> we memorialize our invitation that the parties explore the following questions and areas of interest during the course of this Proceeding through testimony and other appropriate filings:<sup>2</sup>

- How does the Commission appropriately prioritize equity considerations within managed charging programs?
- Is it appropriate to establish certain uptime requirements for chargers that utilize ratepayer funds, similar to the standards associated with the National Electric Vehicle Infrastructure program? Public Service has indicated that it would like to achieve 97 percent uptime through the Company's contracts.<sup>3</sup> What is an appropriate method for monitoring this uptime standard and should there be any penalties or incentives tied to it? Is it appropriate to incorporate this uptime standard throughout the system?
- Are there ways to standardize and simplify the customer experience regarding chargers that utilize ratepayer funds?
- How can Colorado meet its goal of 940,000 electric vehicles (EVs) on the road in a way that improves the use of the electric grid and minimizes overall costs and maximizes overall benefits as to future capacity and transmission investments?
- Are there ways in which the EV aggregator, for which Public Service proposes to issue a request for proposals, can integrate with a more comprehensive Distributed Energy Resource Management System/Virtual Power Plant strategy?<sup>4</sup>

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<sup>1</sup> In Decision No. C23-0425-I, issued June 23, 2023, we directed Public Service to file Supplemental Direct Testimony. The deadline for this Supplemental Direct Testimony is July 14, 2023. By this Decision, we do not modify in any way the directives for Supplemental Direct Testimony set forth in Decision No. C23-0425-I.

<sup>2</sup> Through Decision No. C23-0446, issued July 7, 2023, the Commission required Public Service to confer with the parties in this Proceeding on a proposed procedural schedule. This order raises areas of interest discussed by the Commission to be further considered through filings in the normal course of the Proceeding and does not require additional or supplemental pleadings from any party.

<sup>3</sup> See HE 104 (Erwin Direct), p. 36.

<sup>4</sup> See HE 106 (Gouin Answer), p. 13.

- Are there ways in which participants in the EV managed charging program can tie benefits to the grid more directly to customer participation, rather than a fixed bill credit?
  - Are there examples of EV best practice policy or programs outside of Colorado that are appropriate to emulate in Public Service's TEP?
4. Specific to Public Service's proposed expansion of Company-owned infrastructure:
- How does Public Service's proposal for an increase in Company-owned infrastructure impact the overall market participation of other players?
  - Should a different structure be considered in which there is an independent evaluator and all players bid in, including the utility or is this type of activity better left to the free market?
  - Should the buffers between privately owned charging stations and Company-owned charging stations that the inaugural TEP contemplated be kept, or is the Company's proposal for a blanket expansion of charging capacity more appropriate?
  - What is the appropriate focus for utility investments in charging stations: disproportionately impacted communities? Areas where there is a certain population-to-charger ratio? Areas where energy storage or managed charging would provide an enhanced level of system benefits?

5. We view all of the above questions and areas of interest in the context of the State's goal of having 940,000 EVs in Colorado by 2030 and the important role that Public Service likely plays in achieving this goal.

6. We raise these initial areas and questions for the benefit of the Company and the parties as the Proceeding continues. While these areas are of noted interest to the Commission at this early stage of the Proceeding, additional areas of interest and concern pertinent to adjudication of the Application can and should be raised by the Company and parties through the course of their filings.

**II. ORDER**

**A. The Commission Orders That:**

1. Consistent with the discussion above, during the course of this Proceeding the parties should consider exploring the questions and areas of interest set forth above.

2. This Decision is effective on its Mailed Date.

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING  
July 5, 2023.**

(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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Commissioners