

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 24M-0173E

IN THE MATTER OF THE COMMISSIONS' INVESTIGATION INTO THE APRIL 2024 FRONT RANGE WINDSTORM AND XCEL ENERGY'S PUBLIC SERVICE POWER SHUT-OFFS.

COMMISSION DECISION REQUIRING EMAIL NOTICE TO INTERESTED PARTIES, SETTING DEADLINES FOR RESPONSES, AND FORWARDING DECISION TO THE COLORADO INSURANCE COMMISSION

Issued Date: July 23, 2024
Adopted Date: July 17, 2024

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I. BY THE COMMISSION

A. Statement

1. This Decision sets forth a schedule for reply comments from local Offices of Emergency Management, first responders, members of the public that previously offered comments in this Proceeding, and other interested parties and stakeholders to Public Service

Company of Colorado's ("Public Service" or "Company") responses to the Commission's request for additional information in Decision No. C24-0400. In addition, the Decision also invites the Colorado Insurance Commission to provide comments as set forth below.

II. BACKGROUND

2. As we have discussed in previous Decisions, the purpose of this Miscellaneous Proceeding was to determine the manner in which Public Service conducted outages during a high wind event that occurred on April 6 to April 7, 2024. The Commission sought to gather information from the Company, the public and from local government emergency management office ("OEM") personnel to understand the manner in which the outage was conducted, the effect the outage had on residents in the impacted outage areas, communication issues between Public Service, its customers and local governments, and other related issues.

3. The Commission also looked for recommendations from those parties as to how any future outages should be conducted to ensure transparent and frequent communications, and to mitigate the problems that occurred with the outage, particularly during the time period prior to a final decision in the Company's pending Wildfire Mitigation Plan ("WPM") application filing. The Commission received substantial and meaningful information through this proceeding and through written comments to our web link that will inform how we proceed.

4. In addition to hearing from numerous individuals during a public comment hearing, the Commission also received hundreds of written comments through our website. Due to the information the Commission received, we determined it necessary to hold a Commissioners' Informational Meeting ("CIM") on May 7, 2024, in order for Public Service to respond to the concerns raised by the public, local business leaders and emergency management office leaders.

5. During the CIM the Company conceded its Public Safety Power Shutoff (“PSPS”) procedures failed in quite a few places, including a lack of coordinated communication with emergency management offices and first responders, as well as critical customers such as hospitals and its customers dependent on electrical durable medical equipment. In addition, emergency responders expressed frustration over a lack of information as to the duration of the PSPS and a lack of updates as restoration of power progressed. Public Service also addressed issues with providing up-to-date maps showing areas affected by the PSPS and the progression of power restoration. Local business leaders expressed concern over the lack of notice of the PSPS so local businesses could prepare for the outage, as well as other communication issues. Local OEMs were left unaware of the timing of the calling of a PSPS until notified of a pending press conference to announce the outage. OEMs noted the need for a single point of contact with the Company to ensure timely, accurate and up-to-the-minute notifications as events unfolded.

6. In Decision No. C24-0400, issued on June 11, 2024, we expressed our concerns with the PSPS. Chairman Blank set out eight areas to be addressed to help inform parties of the Commission’s priorities going forward, discussed in detail below. The Commission also set out several areas it determined were the core questions to be addressed by Public Service and other stakeholders as we transitioned to the next phase of incorporating best practices and state of the art technology in what we see as an increasing use of PSPS.

7. We requested Public Service supplement its presentation at the CIM with responses to the concerns and inquiries we raised in Decision No. C24-0400. We further requested that the Company keep this matter a priority and keep the Commission informed of its progress and plans, both here and in the upcoming 2024-2027 Wildfire Mitigation Plan application proceeding

(“WMP”). We emphasized we intend to continue to ensure Public Service is doing everything necessary to improve and implement a PSPS plan that emphasizes early, consistent, transparent and continuous communications until the event precipitating the PSPS has ended, the PSPS is called off and full power is restored. We encouraged the Company to adopt the mantra of “transparency” in every process and method it employs as part of a comprehensive, thoughtful plan that begins well before the occurrence of an outage event.

III. PUBLIC SERVICE RESPONSE

8. On July 11, 2024, Public Service filed its response to our request for additional information. The Company stated it has already begun to make changes to its communication and coordination strategies based on input received in this proceeding and other venues. It also indicated it filed its WMP on June 27, 2024, that addresses infrastructure investments and operational actions it will make to reduce the risk and impact of wildfire. In addition, the WMP includes a PSPS plan, a PSPS communications plan, and testimony addressing how Public Service will communicate and engage with customers and key stakeholders on wildfire activities.

9. Public Service set out the ways it is making improvements for future PSPS events and other wildfire operations such as improving communications, increasing support for its critical care customers, and improving coordination with communities.

A. Company response to request for development of a list of business associations, chambers of commerce, emergency operations centers, and downtown partnerships likely to be adversely impacted by high winds.

10. In response, Public Service states it will be conducting outreach to business associations, chambers of commerce, and downtown partnerships in areas of elevated wildfire risk to educate them on the Company’s wildfire activities and where additional resources are available.

Public Service notes this process will also assist it in gaining a greater understanding of the role these business groups play in advancing the Company's wildfire-related outreach, as well as preparing them for the impacts of its wildfire mitigation measures. Public Service states it will be communicating with customers and other stakeholders who may be affected by a PSPS event through multiple channels in advance of the expected event, including launching web content with up-to-date information about PSPS events. Public Service commits to communicating with customers and other stakeholders who may be affected by a PSPS event through multiple channels in advance of the expected event, including virtual town hall meetings and ensuring multi-lingual communications.

B. Company response to need to create detailed, accurate PSPS maps defining high wind and outage areas prior to and during such events, which overlay with county maps identifying critical facilities and homes with residents reliant on durable medical equipment in order to direct increased resources to those areas in preparation for outages.

11. Public Service indicates it has taken steps to improve its outage map to provide additional information to customers on impacts of a PSPS event. The Company contends its outage map will approximate the geographical extent of customer impacts during a PSPS event, displayed on an interactive online map that displays the paths of affected electrical infrastructure and the residences and facilities likely to be impacted. Public Service claims customers will be able to navigate to their locations in the map to see whether they are impacted by the PSPS. While the Company hopes to generate the map as quickly as possible once PSPS impact boundaries are established it points out that the map updates require a manual process, which may take approximately two hours to update the map with PSPS boundaries.

12. The Company states it is also working to develop an upgraded outage map for future release that will incorporate features related to PSPS that will allow customers to see visual representations of impacted PSPS areas during events. The upgraded outage map is intended to provide customers with more detailed information on the status of power disruptions in their area.

13. According to Public Service, its outage map should allow OEMs to review areas of its system where they understand critical facilities or homes with customers relying on durable medical equipment are located. However, the Company represents its publicly available outage map cannot identify its critical customers, critical facilities, or customers on durable medical equipment due to privacy concerns. Public Service believes that by using its outage map, OEMs will nevertheless have a resource to cross check the potential of specific facilities or residences to be part of a proactive power shutoff.

C. Company response to our interest in map and list development in conjunction with local governments which identify local critical facilities and infrastructure customers such as hospitals, water treatment facilities, as well as residential customers and assisted living facilities. As well, information on backup power, including batteries and generators at each facility, and available back up options for residential customers.

14. Public Service commits to partner with OEMs to study their own identification of local critical facilities and infrastructure as well as identify and consider whether these customers have known backup power options. Through this process, the Company states it will work towards solidifying the identification of critical customers that reflects input from OEMs.

15. Public Service also reveals that beginning on June 25, 2024, it launched an outreach campaign to contact its customers through email and phone calls to ensure they are aware of the Company's medical assistance programs. Public Service expects its outreach campaign to lead to

growth of its customers enrolled in its medical assistance programs, which in turn, will assist the Company in identifying customers on its system that are Qualifying Medical Customers.

D. Company response to preference to see options made available through the regulated system, facilitated through rebates or other mechanisms to ensure backup power is available when needed.

16. The Company's notes its WMP is introducing a new rebate offering called the PSPS Resilience Rebate for certain residential customers to assist their procurement of back-up power resources. According to Public Service's response, eligible customers would be its Income-Qualified customers, customers enrolled in the Company's Medical Exemption Rate, and customers enrolled in the Company's Medical Certification Program. Public Service envisions the rebate will encompass Battery Energy Storage Systems ("BESS") and Vehicle-to-Home ("V2H") charging equipment to assist in the mitigation of outages experienced during PSPS and wildfire events.

17. Public Service believes the back-up storage device can assist customers in mitigating the impacts of the power outage and powering critical home electrical devices that are necessary to protect customer safety and wellbeing. In addition, V2H equipment could similarly be used by customers to facilitate back-up energy supply, where the back-up energy supply source would be the battery in an electric vehicle.

E. Company response to our request to implement a more integrated system between Public Service and counties, including protocols for coordinated power outage meetings and a dedicated single point of contact at the utility that counties know will be available and have the most current information available.

18. Public Service represents that since the April 6 to 7, 2024, outage event, it has been meeting with OEMs and receiving their input on ways to improve its communication and planning.

In the Company's judgment, those meetings have been successful in promoting refinements to its existing single points of contact and improving consistency between Public Service's various area managers. The Company further notes in its WMP, it is proposing to add a community resilience manager, who will serve as the new single point of contact for county emergency operations, first responders, and other emergency preparedness and response officers. The role, according to Public Service, will embed resources to coordinate with those stakeholders during PSPS events, as well as during other wildfire emergency response events.

F. Company response about Commission interest in learning about the technology available that would more quickly restore power and require fewer patrol inspections of power lines following a PSPS or other outages.

19. Public Service notes its operational mitigation plan EPSS, which it states modifies settings in relays and recloser controls on the distribution system to create a wildfire-specific operating mode will be able to segment and reduce the areas of its system that are part of PSPS events. With reduced areas that experience a proactive de-energization, the Company is of the opinion it will reduce the amount of the system that it needs to inspect as part of the power restoration process, which promotes a faster return to service.

20. The Company also points to technological advances that are taking place in fault detection such as Gridscope sensors that can provide for real-time identification of specific system issues. Such issues, according to Public Service, could include faults that occur while the feeder is de-energized, so a utility could dispatch crews to a specific location where a known problem exists. Public Service also mentions the use of drone technologies to conduct inspections of individual sections of its facilities.

G. Company response to Commission suggestions that when a PSPS event is likely, Public Service should share information with local jurisdictions in a more proactive manner, including:

- 1. Identifying areas of the system where communications are dependent on electric service being operational, including type, location and duration of backup, especially in more remote mountain areas.**

21. The Company, as explained more fully in Item C above, will be working with OEMs to identify critical customers on its system, which may also encompass those that have communication needs dependent on electric service.

- 2. Develop incident protocols and incorporate them into trainings with emergency services agencies on a regular basis, as well as coordination to establish the identity and location of customers with medical needs using electric-dependent durable medical equipment, and cross-referencing that information with local jurisdictions if possible, taking into consideration privacy issues.**

22. Public Service represents it is currently in the process of contacting its customers to raise awareness of the Company's medical assistance programs, which will promote the Company's identification of Qualifying Medical Customers on its system. However, the Company notes it cannot provide to emergency services agencies the identification of its Qualifying Medical Customers without receiving consent to do so from those customers. However, through discussions and partnerships with local jurisdictions, the Company indicates it is open to additional means to raise awareness with customers of its medical assistance programs. Through the registration of its customers in these programs, the Company states it will maintain documented and reliable listings of its Qualifying Medical Customers.

- 3. For each of the critical factors cited by the Commission, Public Service should identify and address critical communications, infrastructure and facilities, as well as identify medically dependent customers to consider potential roles for the Company to partner with those facilities and customers to provide necessary backup equipment for PPS events. The Company should also investigate whether that backup equipment could be used to provide power back to the grid during other times, or**

whether demand response programs for backup equipment could be feasible to lessen the cost of implementing such backup programs for all ratepayers.

23. Public Service will be offering a rebate for certain residential customers, including Qualifying Medical Customers, to assist procurement of backup power supply. For critical customers, the Company states it does not have a wildfire specific proposal to enhance their backup power supply alternatives. However, it notes some of these customers, such as hospitals, already have backup power supply resources. Public Service indicates it is interested in learning more about the additional needs of these customers for backup supply and whether it should consider additional offerings to facilitate those resources.

24. Regarding using customer backup power supply resources to support the electrical grid, the Company states it encourages customers to consider enrolling in its Demand Management programs, such as Peak Day Partners and Peak Partner Rewards, which allows customers to receive incentives or credits for their reduction of load during peak times. Public Service maintains it is considering opportunities to combine into its wildfire mitigation communications and engagement information related to Demand Management programs to assist customers in reducing the cost of implementing backup power supply resources.

H. Company response to Commission recommendation that prior to a PSPS event, written and widely disseminated communication plans should already be in place.

25. Public Service indicates it has developed an education and outreach strategy to deploy prior to PSPS and wildfire emergency events. In addition to its education and outreach efforts, the Company says it also plans on making outbound telephone calls, emails, and text messages to the customers that are expected to be affected by the PSPS and other relevant stakeholders. Additionally, the Company intends to publicize through media outreach, website

updates and social media posts, a Geographic Information System map of approximated and forecasted PSPS areas. The Company will also amplify messaging from and partner with third-party public safety and emergency response organizations.

26. Public Service envisions its communications strategy will evolve as the nature of wildfire risk across its service territory evolves. The Company maintains it is committed to maturing, adapting, and improving its communications strategies and processes as its understanding of wildfire risk changes over time, and as its risk profile changes over time.

- I. Company response to Commission recommendation that proactive warnings of a PSPS to local OEM centers should occur as a matter of course. Early communication of a PSPS should be a priority to allow local governments to plan their responses with sufficient advance warning.**

27. Public Service states its PSPS plan as set out in its WMP application provides for advance notice of up to 48 to 72 hours of PSPS events to OEMs, local and state officials, the Commission, critical customers and Qualifying Medical Customers.

- J. Company response to Commission recommendation that protocols should be established to provide redundancy of communication through multiple channels to meet people where they are.**

28. The Company responds that it will communicate through outbound telephone calls, emails, and text messages to customers expected to be affected by a PSPS. The Company also states it intends to publicize PSPS events via media outreach, website updates, social media posts, and outage maps of approximated forecasted PSPS areas.

- K. Company response to pleas from OEMs to establish a single point of contact at Public Service and establish a regular cadence for updates to all local OEMs prior to and during PSPS events.**

29. As explained previously, Public Service agrees to use a single point of contact with OEM officials and it plans to deploy a new fulltime position to act as a standalone contact for emergency operations, first responders and other emergency preparedness and response officers.

L. Company response to Commission concern for Public Service to provide accurate and updated information as soon as possible.

30. Public Service asserts it monitors multiple data streams, including meteorological and wildland fuel conditions, ongoing fires, fire suppression resource availability and constraints, electrical system conditions and outages, asset conditions, field observations, and other resources. Public Service commits to proactively communicate reliable, accurate, and timely information to its employees, customers, emergency responders, the general public, and other stakeholders before, during, and after a PSPS event.

M. Company response to Commission recommendation to minimize the time for an outage during a PSPS and developing mechanisms for remote sensing and verification of energizing capability to speed up reenergization of lines at the conclusion of a PSPS.

31. Public Service addressed this issue above in Section F in its discussion of the technology available to more quickly restore power and require fewer patrol inspections of power lines following a PSPS or other outages.

N. Company response to Commission request to look at ways in which the topological architecture of the system can maximize reliability while isolating areas with the potential for higher risk from extreme weather events and fire.

32. The Company states it has revised its identification of the highest wildfire risk areas on its system through an updated Wildfire Risk Map. The map was based on federally recognized landscape data sources and includes a weighted evaluation of wildfire and population risk to match local variables in its service area and with Company assets. Public Service states its entire service

territory is established into one of three risk tiers, with Tier 1 having the lowest wildfire risk and Tier 3 having the highest wildfire risk. The Company expects the Wildfire Risk Map will assist it in prioritizing where to complete work on its system.

IV. FINDINGS

33. After reviewing Public Service's responses to the concerns and questions we raised in Decision No. C24-0400, we appreciate the progress the Company has made to date. Certainly, we see real progress in addressing the issues that first cropped up in the initial public comment hearing and the CIM. However, we still want to hear from customers, OEM personnel, first responders and other emergency management personnel on their thoughts and insights into the responses Public Service provided in its July 11, 2024 response.

34. We therefore request the Commission to provide email notification to customers, OEM personnel, first responders, business leaders and other stakeholders who have previously commented in this proceeding to let them know about this opportunity to respond to the Company's filing.

35. We will set a three-week deadline from the effective date of this Decision, or August 13, 2024, for those parties identified above to file reply comments. We also set September 3, 2024, as the deadline for Public Service to file a response to those comments.

36. During the July 17, 2024, deliberations, Commission Plant raised the matter of communicating with the insurance industry to inform it that Public Service is providing this type of wildfire risk reduction. It was his belief that the insurance industry may be interested in taking into consideration the mitigation being undertaken in Colorado to reduce wildfire and extreme weather risks as they develop insurance rates. Commissioner Plant noted Colorado is experiencing

some of the highest increases in insurance rates in the entire country, largely due to wildfire risk. The Commission wishes to communicate the actions Public Service and the Commission are taking in order to institutionalize a process and recognize the development of these mitigation and safety plans within the risk analysis developed by the insurance industry for homeowners and business owners in Public Service's geographic territory. We request that Public Service provide information on these actions as well. We set a deadline of August 13, 2024, for the Company to detail whether, and to what extent it has communicated these matters to the insurance industry.

37. We also find it beneficial to provide the Colorado Insurance Commission with a copy of this Decision and request it also provide any information as to the possibility of the actions the Company and this Commission have taken to potentially mitigate rising insurance costs in the State.

V. ORDER

A. The Commission Orders That:

1. Commission Staff shall provide email notification to customers, Office of Emergency Management personnel, first responders, business leaders and other stakeholders who have previously commented in this proceeding to give them an opportunity to respond to the July 11, 2024 filing of Public Service Company of Colorado ("Public Service").

2. Stakeholders identified in Ordering Paragraph No. 1 shall file responses no later than August 13, 2024.

3. Public Service may respond to the comments received from stakeholders. The deadline for it to respond shall be no later than September 3, 2024.

4. Public Service shall also respond to the Commission no later than August 13, 2024, as to whether and to what extent it has provided information on its Wildfire Mitigation plans and Public Safety Power Shutoff improvement plans to the insurance industry.

5. Commission Administrative Staff shall forward a copy of this Decision to the Colorado Insurance Commission to allow it the opportunity to respond to the concerns raised consistent with the discussion above.

6. This Decision is effective immediately on its Issued Date.

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING
July 17, 2024.**

(S E A L)



ATTEST: A TRUE COPY

Rebecca E. White,
Director

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

ERIC BLANK

MEGAN M. GILMAN

TOM PLANT

Commissioners