

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 24A-0296E

IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR APPROVAL OF ITS 2025-2027 WILDFIRE MITIGATION PLAN, WILDFIRE MITIGATION ADJUSTMENT, PUBLIC SAFETY POWER SHUTOFF PLAN, AND THE RECOVERY OF ITS 2023 WILDFIRE MITIGATION PLAN DEFERRAL.

**INTERIM COMMISSION DECISION
STATING GOALS FOR INFORMATION-GATHERING;
REFERRING DISCOVERY DISPUTES AND MOTIONS
FOR EXTRAORDINARY PROTECTION TO AN
ADMINISTRATIVE LAW JUDGE; SCHEDULING A
PREHEARING CONFERENCE; AND PROVIDING
NOTICE PURSUANT TO § 40-6-109.5(4), C.R.S.**

Issued Date: September 23, 2024

Adopted Date: September 18, 2024

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I. BY THE COMMISSION**A. Statement**

1. On June 27, 2024, Public Service Company of Colorado (“Public Service” or the “Company”) filed an Application (“Application”) for approval of its 2025-2027 Wildfire Mitigation Plan (“WMP”) and Public Safety Power Shutoff (“PSPS”) Plan. Public Service’s Application is sweeping in its proposed costs and proposed actions to reduce and respond to wildfire risk within its service territory. It intertwines two distinct plans which reflect not only capital investments to reduce the risk of ignition from utility infrastructure, but also the decision-making and communications protocols Public Service would use to proactively inform emergency operations staff and impacted customers in the event of severe weather conditions that present an elevated risk of wildfires caused by Company equipment.

2. By this Decision, we state our goals for gathering information in this Proceeding that reflect the nuances of the Application and the diverse stakeholders it has the potential to impact, including federal, state, and local agencies, critical facilities, and qualifying medical customers. We also schedule a prehearing conference for October 1, 2024, to consider whether to make a finding of extraordinary circumstances pursuant to § 40-6-109.5(4), C.R.S., which would enable the Commission to institute a procedural schedule that creates further opportunities to gather information regarding these impacts. This Decision provides notice that during the prehearing conference on October 1, 2024, the Commission will determine whether extraordinary conditions exist to warrant extending the deadline for a final Commission decision to issue in this Proceeding pursuant to § 40-6-109.5(4), C.R.S. Finally, we refer all discovery disputes and motions for extraordinary protection to an Administrative Law Judge (“ALJ”).

B. Public Service's Application

3. This Application updates the Company's 2020 WMP, which was previously approved in Proceeding No. 20A-0300E.¹ Public Service's 2025-2027 WMP incorporates additional wildfire mitigation measures and activities that it states are designed to reflect changing conditions and to reduce the risk of wildfire ignition related to utility equipment.

4. Public Service states that climate change, increasing population in the Wildfire-Urban Interface ("WUI"), and drying and diseased forests have combined to increase the frequency and intensity of wildfires in the United States. Two of the most destructive fires in Colorado history in terms of structures lost—the Cameron Peak Fire and the Marshall Fire—have occurred since 2020. Public Service states that these evolving conditions have driven updates to its Wildfire Risk Map and new assessments of mitigation needs and response efforts.

5. Attachment AZS-1 to Hearing Exhibit ("HE") 101 is the Company's 2025-2027 WMP. In the WMP, the Company presents a new, three-tier Wildfire Risk Map developed with consideration to diverse datasets including wildfire likelihood and risk to potential structures. Most of the Company's mitigation efforts are focused on the moderate risk (Tier 2) and high risk (Tier 3) categories. As compared to the 2020 WMP, the geographic areas of moderate and high risk have nearly doubled in size for the updated WMP.

6. Public Service's 2025-2027 WMP includes four categories of defenses. The situational awareness category includes investments in tools and resources to support hazard identification, assessment, and response. This category includes deploying weather stations and artificial intelligence ("AI"), investing in risk modeling software like Technosylva, hiring staff to

¹ Decision No. R21-0109, issued February 26, 2021; Decision No. C21-0237, issued April 16, 2021.

provide in-house expertise on fields like meteorology, and creating a 24/7 Wildfire Command Center (“WCC”).

7. The system resiliency category includes physical investments in distribution and transmission infrastructure that are intended to reduce the risk of a utility-caused wildfire. The Company proposes enhanced assessments of the distribution and transmission system, including using unmanned aerial systems (“UAS” or “drones”). Its infrastructure proposals range from targeted distribution undergrounding and major transmission line rebuilds, to replacements of small conductors and poles, and non-expulsion device upgrades. This category also incorporates increased vegetation management practices, including right-of-way clearance and expanded vegetation-free zones around facilities.

8. The operational mitigations category establishes how the Company plans to adjust electric system operations to reduce the risk of a utility-caused wildfire. This includes both the Enhanced Powerline Safety Settings (“EPSS”) program and the PSPS Plan. Through the EPSS program, the Company states that it modifies settings in distribution system relays and reclosers to create a more sensitive operating mode during periods of elevated wildfire risk. From a pilot covering 8 feeders, the Company proposes to expand EPSS to cover approximately 300 Tier 2 and Tier 3 feeders during the 2025-2027 WMP.

9. The PSPS Plan is set forth in Attachment VAR-1 to HE 117. The PSPS Plan describes the sequence of events and decisions the Company proposes to proceed through to plan for, initiate, and restore service after a PSPS. The PSPS Plan addresses meteorological factors that contribute to the potential implementation of PSPS and presents timelines for communication with various stakeholders, including offices of emergency management, state and local officials, and potentially impacted customers.

10. Finally, the customer support category includes customer-related functions like information, education, and assistance through targeted programs. Public Service states that it intends to promote education and preparedness among customers through channels like social media, videos, media outreach, and community meetings and town halls. It further states that it is developing lists of customers who may have specific medical needs, or who are responsible for critical facilities/critical infrastructure, to increase its ability to provide advance notice around wildfire emergencies. Additionally, Public Service states that it is proposing a new rebate program to support residential customers to purchase battery energy storage systems and vehicle-to-home equipment, focusing on income-qualified customers and qualifying medical customers who may uniquely benefit from back-up power systems to mitigate the impact of PSPS.

11. The Company prioritized these activities with consideration to information such as Wildfire Risk Map tier as well as risk-spend efficiency (“RSE”), a calculation it developed to compare the cost-benefit of various activities based on their ability to reduce the risk of a hypothetical fire.

12. Ultimately, the Company estimates its suite of proposed activities at \$1.6 billion dollars in capital investments and \$253 million in operations and maintenance expenses over the 2025-2027 period—totaling approximately \$1.9 billion. Among the largest capital investments include funding for overhead pole assessment, remediation, and asset inventory; targeted distribution undergrounding; EPSS; and transmission line rebuilds.² However, the Company’s budget also addresses expenses related to communications, customer program rebates, and staffing.

² HE 101, Attachment AZS-3, p. 1.

13. Public Service proposes to recover these costs in part by extending prior practices under which it recovers transmission capital costs through the Transmission Cost Adjustment and defers capital and incremental operations and maintenance costs for future recovery. However, Public Service also proposes the creation of a Wildfire Mitigation Adjustment (“WMA”). Under this process, Public Service would develop separate accounting structures to isolate wildfire-related work. Public Service would then recover deferred costs and the projected revenue requirement for WMP work through the WMA on an ongoing basis, with twice-annual true-ups based on actual expenditures, subject to annual prudence review. Public Service argues that this concurrent recovery mechanism is necessary to support its financial health and reduce risk to its credit metrics.

14. To manage all of these efforts, Public Service states that it is consolidating its wildfire expertise into a centralized, standalone business unit led by a Vice President of Wildfire Risk Management. The Company has also established a Wildfire Risk and Governance Steering Committee comprised of WMP leadership and other Company executives, who will address work plan prioritizations, progress reporting and corrective actions, and updates to risk models as they may impact work planning.

15. Public Service also proposes to implement the 2025-2027 WMP by hiring 41 new positions, some of which would be dedicated to Public Service and others which would support the Xcel Energy enterprise. 31 of the new positions would be assigned to a dedicated Wildfire Risk team and would have functions like analytics, outreach, communications, and incident command, including staffing the proposed WCC. Among the roles Public Service plans to hire is a Community Resilience Manager to serve as a single point of contact for county emergency

operations centers, first responders, and other emergency response staff. Public Service also proposes to hire a DI Community and IQ Customer representative.

16. At the same time, Public Service acknowledges that it is not the only entity engaged in, or responsible for, wildfire mitigation. According to the Colorado State Forest Service (“CSFS”), “over 400 entities (federal, state, tribal, and local) touch on wildfire mitigation in the State of Colorado alone.”³ In its testimony, Public Service references layered partnerships with diverse entities. At the local level, it discusses coordination with fire departments, sheriffs’ departments, open space departments, and offices of emergency management (“OEMs”). At the state level, it references relationships with state agencies like CSFS and divisions within the Colorado Department of Public Safety, including the Division of Homeland Security and Emergency Management and the Division of Fire Prevention and Control. At the federal level, it discusses developing wildfire mitigation partnerships with the U.S. Forest Service and the Bureau of Land Management, given that approximately 50 percent of Tier 2 and Tier 3 geographic areas is managed by those entities.⁴ It also discusses efforts to reach community-based organizations, such as churches and community centers, and to partner with healthcare industry representatives to help improve outreach to qualifying medical customers.⁵ Public Service witnesses states frequently that the Company is in the process of identifying and meeting with these various stakeholders.

17. Adding to the complexity, Public Service’s Application also invokes multiple other concurrent or anticipated proceedings. As the Company predicted in its direct testimony, it filed Proceeding No. 24A-0380EG on September 5, 2024, requesting authorization for deferred

³ HE 101, Direct Testimony of Anne Z. Sherwood, p. 24:10-12.

⁴ HE 101, Attachment AZS-1, p. 94; HE 101, Direct Testimony of Anne Z. Sherwood, p. 60:1-15.

⁵ HE 101, Attachment AZS-1, p. 91.

accounting associated with increased costs for wildfire liability insurance. Public Service also states that there may be connections between investments made for wildfire mitigation in this Proceeding and investments that may be proposed to meet state goals related to electrification as part of its upcoming distribution system plan (“DSP”), pursuant to Electric Rule 3528 and as recently modified by Senate Bill (“SB”) 24-218. SB 24-218 authorizes Public Service to propose a grid modernization adjustment clause (“GMAC”) through which certain distribution costs may be recovered,⁶ and the Company asserts that once the GMAC has been created, it could become the appropriate mechanism for recovering 2026 and 2027 WMP costs.

C. April 2024 PSPS Event

18. Public Service initiated its first PPS action in Colorado during the weekend of April 6-7, 2024, before this Proceeding was filed. The Commission initiated an investigation of that action by Decision No. C24-0232⁷ in Proceeding No. 24M-0173E, stating that it sought “information regarding the Company’s operational actions and decision-making, customer communications activities, and community engagement efforts” throughout the PPS process, through which approximately 55,000 customers were proactively deenergized.⁸

19. Through that proceeding, the Commission received hundreds of public comments, hosted a Commissioners’ Information Meeting, and received comments from the Company as well as from local OEMs, often with a focus on promoting effective communication with OEMs and to potentially impacted customers, including customers with medical needs.

20. On September 9, 2024, Public Service made its final filing in Proceeding No. 24M-0173. Public Service explains that the Application filed in this Proceeding includes the

⁶ § 40-2-132.5(7)(b)(I), C.R.S.

⁷ Issued April 15, 2024.

⁸ Decision No. C24-0232, issued April 15, 2024, at ¶¶ 4, 6.

Company's formalized PSPS Plan, a related communications plan, and supporting testimony on a multitude of issues, such as how the Company intends to communicate and engage with customers and key stakeholders on wildfire activities.⁹ Public Service states that it intends to continue to consider the input received in the Commission's earlier proceeding as the resolution of the Company's PSPS Plan continues for the 2025-2027 WMP.

21. Public Service further explains that the PSPS Plan presented in this Application was informed by and reflects utility practices as refined by its unique circumstances. The Company states that it intends to continue to explore areas of refinement, such as continuing to consider the needs of OEMs, critical customers, qualifying medical customers, and income-qualified and disproportionately impacted community customers, urging the Commission to direct further feedback or recommendations addressing the PSPS Plan to this Proceeding.¹⁰

D. Procedural History

22. With its Application, Public Service filed testimony and attachments from 19 witnesses. It also filed a Motion for Alternative Form of Notice.

23. By Decision No. C24-0488-I,¹¹ the Commission granted Public Service's Motion for Alternative Form of Notice.

24. By Decision No. C24-0575-I,¹² the Commission deemed the Application complete, set it for hearing *en banc*, and acknowledged or granted certain interventions. Parties to this Proceeding are: Public Service, Staff of the Commission, the Utility Consumer Advocate, the City of Boulder, Colorado Energy Consumers, Climax Molybdenum Company, Comcast Cable Communications Management, LLC, the Colorado Solar and Storage Association ("COSSA") and

⁹ Public Service Responsive Comments, September 9, 2024, p. 2.

¹⁰ Public Service Responsive Comments, September 9, 2024, p. 3.

¹¹ Issued July 9, 2024.

¹² Issued August 12, 2024.

the Coalition for Community Solar Access (“CCSA”) (together, “COSSA/CCSA”), the City and County of Denver, and Western Resource Advocates.

25. Due to the sweeping nature of the Proceeding in coverage and cost, the Commission further directed Public Service to confer with parties and to file a Motion for Approval of a Proposed Procedural Schedule or a Report explaining the results of conferral, and scheduled a prehearing conference for September 11, 2024. To facilitate efficient case management, the Commission directed Public Service to work with parties to incorporate certain procedural steps into the proposed schedule. First, the Commission directed parties to address whether there should be at least two public comment hearings, and if so, to provide recommendations as to appropriate formats and timing. Second, the Commission directed parties to include at least one option for a technical conference to demonstrate software and/or tools, including the Company’s Technosylva software and refined, public-facing outage map.¹³

26. The Commission also directed the Company to file supplemental direct testimony addressing the following requests, stating that it may include further direction by a future decision:

- a. Provide a 20-year rate forecast model, in executable format and as close to possible as the tool presented at the July 25, 2024 Commissioners’ Information Meeting in Proceeding No. 24M-0003ALL, with the following variations:
- b. Incorporating no 2025-2027 WMP investments.
- c. Incorporating all 2025-2027 WMP investments.
- d. Incorporating the Company’s five-year capital budget projections for Colorado from the Company’s latest investor presentation. For the period after that five years, the forecast should be based on long-term earnings per share or dividend growth targets that the Company is committing to meet in its investor presentation.
- e. Incorporating the assumption that the Company securitizes the costs of the 2025-2027 WMP, and anticipated future WMP investments, over a 25-year period and at a 4 percent securitized interest rate.¹⁴

¹³ Decision No. C24-0575-I, issued August 12, 2024, at ¶¶ 40-41.

¹⁴ Decision No. C24-0575-I, issued August 12, 2024, at ¶¶ 36-37.

27. Finally, the Commission also directed the Company to address whether it intended to waive any statutory deadlines to accommodate these activities.¹⁵

28. Contemporaneously, the Commission issued Decision No. C24-0574,¹⁶ by which it reopened and extended the intervention period for this Proceeding as a courtesy to provide an opportunity for government agencies, including state and local emergency management entities, to intervene. No further interventions were received by the extended deadline of August 22, 2024.

29. Public Service timely filed a Notice of Conferral and Unopposed Motion to Approve Consensus Procedural Schedule and Request for Waiver of Response Time (“Procedural Schedule Motion”) on August 29, 2024. The Procedural Schedule Motion also requests that the Commission vacate the prehearing conference scheduled for September 11, 2024.

30. By Decision No. C24-0644-I,¹⁷ we vacated the prehearing conference, waived response time to the Procedural Schedule Motion, and determined that we would take up the procedural schedule by a separate decision. We suggested that given the unique nature of this Proceeding, we may see fit to make a finding of extraordinary circumstances pursuant to § 40-6-109.5(4), C.R.S.¹⁸

31. On September 13, 2024, Public Service filed its First Motion for Extraordinary Protection and associated non-disclosure agreements. Public Service states that the motion is filed in response to discovery requests from the City of Boulder and that it is unopposed. Therefore, it requests a waiver of response time.

¹⁵ Decision No. C24-0575-I, issued August 12, 2024, at ¶ 40.

¹⁶ Issued August 12, 2024.

¹⁷ Issued September 6, 2024.

¹⁸ *Id.* at ¶ 4.

E. Proposed Procedural Schedule

32. The Procedural Schedule Motion proposes the following procedural schedule:

Deemed Complete	Monday, August 12, 2024
Supplemental Direct Testimony	Thursday, October 10, 2024
Virtual Public Comment Hearing	Thursday, October 17, 2024 (business hours)
Answer Testimony	Friday, November 22, 2024
Technical Conference	Wednesday, December 18, 2024
Rebuttal & Cross-Answer Testimony	Friday, January 10, 2025
Stipulations/Settlement Agreements	Tuesday, January 21, 2025
Pre-Hearing Motions	Monday, January 21, 2025
Settlement Testimony	Monday, January 27, 2025
Corrections to Pre-Filed Testimony & Exhibits	Monday, January 27, 2025
Virtual Public Comment Hearing	Monday, January 27, 2025 (after 5 p.m.)
Evidentiary Hearing	February 3-13, 2025
Statements of Position	Friday, March 7, 2025

33. Public Service states that the schedule is designed to accommodate the busy holiday season. While the schedule incorporates a further 130 days pursuant to § 40-6-109.5(1), C.R.S., Public Service states it does not waive any statutory deadlines. However, Public Service notes that the proposed date for filing Supplemental Direct Testimony could change should the Commission wish to direct further topics.

34. The Motion also states that discovery will be governed by Rule 4 *Code of Colorado Regulations* 723-1-1405.

F. Findings and Conclusions

35. Compared to the 2020 WMP, the Company's 2025-2027 WMP has doubled the geographic areas of focus, quadrupled the proposed budget for capital investments, expanded the categories of work and types of mitigation activities, and proposed new staff and new internal business units. For some activities that were once pilots, such as EPSS, Public Service proposes to roll them out on a large scale. Moreover, Public Service seeks to fund this work through a new, concurrent cost recovery mechanism.

36. The Application before the Commission involves extraordinary levels of complexity. The Company's cost recovery proposals have implications for other pending and anticipated applications, as well as raising questions about how federal, state, local, and ratepayer funding can be braided and leveraged to reduce wildfire risk overall. Moreover, the Company's Application functionally includes two nested but distinct efforts: the 2025-2027 WMP and the PSPS Plan. While Public Service proposes to execute wildfire mitigation investments rapidly, it strives to avoid exercising the PSPS Plan except in extreme circumstances. While the WMP reflects major capital and operations investments, the PSPS Plan reflects critical communications protocols and decision-making frameworks. These plans may invoke different questions about the roles of local, state, and federal entities in cost recovery and communications; different approaches to balancing effective regulation with utility managerial discretion; and different measures of successful implementation.

37. Public Service's request for approval of a PSPS Plan may also create unanticipated new risks as we move forward. The Commission's processes are robust and deliberate. Emergency response efforts must be proactive, quick, and decisive. Emergencies can evolve quickly and communications must evolve accordingly and along multiple channels. The Commission must be

careful that our consideration of utility proposals does not result in standards that may be challenging to implement and may not serve changing customer needs.

38. Colorado has experienced several devastating wildfires in the last few years resulting in loss of life and extraordinary property loss. In addition, we recently experienced a PSPS which, admittedly, was lacking in communication and coordination. Therefore, we have sought in early stages of the process to ensure that there will be a fulsome record on which we can make appropriate decisions. We have done this initially by encouraging the participation of entities with unique subject matter expertise, such as local OEMs, and by directing the parties to incorporate certain procedural milestones. We remain committed to developing the most complete record possible for this Proceeding and to enhancing our understanding of the real-world implications of the proposals put before us.

39. Accordingly, we set forth the following goals which, based on information available at this time, we hope could help guide proactive engagement by parties and other stakeholders on this complex process:

- f. The Commission would like to better understand the interrelationships of federal, state, and local agencies, and private or nonprofit sector partners, in wildfire mitigation, with a particular focus on issues like vegetation management.
- g. The Commission would like to better understand the interrelationships of federal, state, and local agencies in emergency management preparedness and response, in order to understand how Public Service can best leverage existing resources, and how the Commission can efficiently support appropriate collaboration and coordination.
- h. The Commission would like to understand whether and how Public Service can leverage funding resources and opportunities available across the federal, state, and local levels.
- i. The Commission would like to understand whether and how Xcel Energy is leveraging existing situational awareness tools, including risk tools and cameras, and where permitted to make such additional investments, it is able to provide system-wide benefits through resource sharing.

40. We ask parties for their help in addressing these goals through their testimony.

We also address further procedural steps below through this lens.

1. Procedural Schedule and Extension of Statutory Deadline

41. We appreciate parties' efforts to develop a consensus procedural schedule which incorporates the procedural actions we originally set forth. However, given the complexity of the issues woven into this Proceeding, we anticipate that additional procedural activities may be appropriate. For instance, we seek to hear from stakeholders who are potentially impacted by, but not parties to, this Proceeding. Foremost among these activities, we plan to schedule a Commissioners' Information Meeting that will enable us to hear directly from state agencies with expertise in varied relevant topics, such as emergency operations, forestry, wildfire mitigation, and insurance. We may also schedule public comment hearings to gather information from interested persons who are not parties to this proceeding, such as customers dependent upon durable medical equipment and with heat-sensitive medical conditions.

42. Under § 40-6-109.5(4), C.R.S., the Commission may extend the deadline to issue a final decision by an additional 130 days after notice and a hearing at which the existence of extraordinary conditions is established.

43. Because we find it necessary to provide additional means and opportunities to gather relevant information for our consideration of the Application, we seek to extend some, or all of the dates set forth in the Procedural Schedule Motion by a period of approximately 2-3 months. We thus reschedule the previously vacated prehearing conference for October 1, 2024, for the purpose of determining whether to make a finding of extraordinary circumstances pursuant to § 40-6-109.5(4), C.R.S.

44. Prior to the prehearing conference, Public Service may submit a filing to waive the statutory deadline for a Commission decision pursuant to § 40-6-109.5, C.R.S. Public Service may also confer with parties and propose a revised procedural schedule with an evidentiary hearing in May 2025 instead of February 2025, and with the other elements included in the parties' earlier consensus proposal.¹⁹ The Commission will then add to that modified schedule the additional procedures found necessary to complete the record for this Proceeding, consistent with the discussion above. A motion to vacate the prehearing conference shall be filed no later than noon on September 24, 2024, for it to be addressed at our weekly business meeting on September 25, 2024.

45. The Commission will establish a procedural schedule for this Proceeding by separate decision.

2. Discovery Disputes and Protective Orders

46. We refer to an ALJ the First Motion for Extraordinary Protection filed by Public Service on September 13, 2024. We further refer to an ALJ any discovery disputes in this matter and motions for protective orders filed by Public Service or any other party.

II. ORDER

A. It Is Ordered That:

1. A remote prehearing conference in this Proceeding is scheduled as follows:

DATE: October 1, 2024

TIME: 1:00 p.m. to no later than 3:00 p.m.

¹⁹ Commissioner availability may be determined by contacting Ron Davis (ron.davis@state.co.us).

PLACE: Join by videoconference using zoom at the link to the parties to be provided by email.

2. The parties are on notice that during the prehearing conference scheduled for October 1, 2024, the Commission will hear from the parties as to whether extraordinary conditions exist to warrant extending the deadline for a final Commission decision to issue in this Proceeding, pursuant to § 40-6-109.5(4), C.R.S.

3. The Commission will establish a procedural schedule for this Proceeding by separate decision, consistent with the discussion above.

4. Any discovery disputes in this matter and motions for protective orders filed by Public Service or any other party are referred to an Administrative Law Judge. The First Motion for Extraordinary Protection filed by Public Service Company of Colorado on September 13, 2024, is also referred to the Administrative Law Judge.

5. This Decision is effective on its Issued Date.

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING
September 18, 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