

Decision No. C25-0457

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

PROCEEDING NO. 25M-0265E

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IN THE MATTER OF REPORTING FOLLOWING THE INVESTIGATIONS INTO RECENT  
OUTAGES AND CUSTOMER CARE PERFORMANCE MEASURES ON THE PUBLIC  
SERVICE COMPANY OF COLORADO ELECTRIC SYSTEM.

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**COMMISSION DECISION OPENING PROCEEDING AND  
TAKING ADMINISTRATIVE NOTICE OF FILINGS IN  
PROCEEDING NO. 24I-0394E**

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Issued Date: June 17, 2025

Adopted Date: June 4, 2025

**I. BY THE COMMISSION**

**A. Statement**

1. On September 17, 2024, the Colorado Public Utilities Commission (“Commission”) issued Decision No. C24-0668 to open Proceeding No. 24I-0394E directing Staff of the Commission (“Staff”) to investigate outages on the Public Service Company of Colorado (“Public Service” or the “Company”) electric system in 2024. Staff was directed to conduct this investigation through the authority vested in the Commission pursuant to Title 40, Articles 1 through 7 of the Colorado Revised Statutes.

2. Staff conducted its investigation of outages in 2024 and presented its findings at the Commissioners Weekly Meeting (“CWM”) on April 30, 2025. The final report was also filed on April 30, 2025 and is attached to this Decision as Attachment A.

3. Through a separate process pursuant to Staff’s audit authority, Staff also investigated Public Service’s customer service performance in 2024, including billing and

customer care. The results of this investigation were also presented at the CWM on April 30, 2025 and are attached to this Decision as Attachment B.

4. This Proceeding takes administrative notice of all filings in Proceeding No. 24I-0394E.

## **B. Background**

5. During 2024, the Consumer Affairs department of the Public Utilities Commission received numerous phone calls, complaints, and comments from the public regarding a series of outages on Public Service's electric system. For example, multiple protracted outages were reported during the weekend of August 3, 2024 to August 4, 2024, in Boulder and Jefferson counties prompting a series of complaints to be filed with the Commission.

6. A comment was also filed with the Commission by Ms. Flor Alvidrez, Denver City Councilwoman representing District 7. Councilwoman Alvidrez represented she filed comments on behalf of 178 business and residents in downtown Denver between Lincoln Street and Broadway. Councilwoman Alvidrez indicated these outages have negatively affected people's life sustaining medical device usage, as well as local business' ability to stay open to serve customers and generate revenue. In addition, she stated many restaurants and bars in her district have experienced significant loss in revenue and food spoilage due to long duration outages and medically dependent residents also suffered medication spoilage during outages.

7. In response to the concerns raised by the public, the Commission opened Proceeding No. 24I-0394E to investigate outages in 2024 using a variety of criteria detailed in Decision No. C24-0668.

8. Also in response to the volume of customer complaints received by PUC Consumer Affairs in 2024, Staff conducted a separate investigation of Public Service's customer service performance. Staff worked with PUC Consumer Affairs and conducted an audit of Public Service to attempt to better understand the customer concerns and broader trends within the utility's customer support functions. PUC Consumer Affairs concerns and Staff audit centered around two main area: customer support and billing issues.

9. On April 30, 2025, Staff presented the findings of both investigations at the CWM and made a series of recommendations.

10. On May 9, 2025, Public Service filed a response in Proceeding No. 24I-0394E to acknowledge the concerns and challenges in 2024 raised by Staff and to discuss how the Company plans to address these challenges.

**C. Proceeding 24I-0394E System Reliability: Findings and Conclusions**

11. Staff audited the Company's outage logs between 2015 and 2024 to establish a baseline for outages across Public Service's system in Colorado. Staff compared 2024 to this baseline and verified that outages increased significantly in 2024 compared to the past nine years on most of the Company's system. The number of outage minutes experienced by the average customer in 2024 more than doubled compared to the 2015-2023 baseline, and the number of individual outages increased by about 65 percent.

12. These impacts were spread across all nine regions of the Company's system, but were concentrated in the Front Range, Denver Metro area, San Luis Valley, Boulder, Western Colorado, and the Mountain regions. Although the High Plain, Home Light and Power, and Northern Colorado regions appeared to be more in line with their historical trends, every region

in Public Service’s system experienced an increase in their outage metrics in 2024 compared to 2023.

13. In April 2024, Public Service began to implement new Wildfire Safety Operations (“WSO”) operational procedures to reduce fire risk due to the Company’s equipment on a “Major Event Day”, which includes days with high fire risk weather conditions such as dry and/or hot weather with high winds. These new procedures coincided with a significant April 2024 windstorm that resulted in as many or more outage minutes as a typical entire year.

14. Additionally, on April 6, 2024, the Company initiated its first and only Public Safety Power Shutoff (“PSPS”), in which power was intentionally turned off for a long period for many customers in Boulder and the Northern Colorado regions. It is Staff’s understanding that the new WSO procedures and PSPS event added additional safety measures in response to this windstorm.

15. At the same time, the “newness” of these procedures likely increased the number of outages and delayed restoration times, and the Company did not adequately communicate to customers when and where these impacts would occur.

16. These new WSO procedures also contributed to more frequent and longer outages throughout the year.

17. Excluding Major Events outages reveals underlying outage rates have increased over time, and the current way the company reports outage causes makes it difficult to understand which causes are driving the increase, specifically with respect to Wildfire Safety Operations and the large number of “unknown” causes reported by the Company. Staff found the Company’s reporting, specifically with respect to WSO, insufficient to fully track, understand, and explain the outage causes across the system.

18. For a more granular view of the most significant customer impacts, Staff conducted a feeder-level analysis of the 15 worst performing feeders in 2024 and compared outage metrics for these feeders, both with and without Major Events, compared to their performance since 2015. These feeders were used as a sample of the most severe impacts on the system in 2024. Customers on these 15 of more than 800 feeders on the Company's system experienced about 18 percent of the outage minutes in 2024.

19. Customers on all but one of the 15 worst performing feeders in 2024 experienced outage minutes per customer that far exceeded their historic baseline and reached their highest rates since at least 2015. When major events are excluded, customers on most of these feeders still experienced higher-than-normal outage minutes, and many still experienced all-time-high levels of outage minutes.

20. Staff also conducted a case study of an area of South Broadway in the City and County of Denver ("Denver") for which the Commission received numerous public comments from businesses that experienced extremely frequent outages in 2024.

21. These businesses are served by a small section of a larger feeder in Denver, and their neighbors are served by two different feeders that did not experience the same outages. Staff's analysis showed that even though these businesses experienced similar outage rates to the worst performing feeders on the Company's system, a feeder-level analysis does not capture such high outage concentration in small geographical areas.

22. As part of its recommendations, Staff proposed additional reporting in the Company's outage log regarding major weather events, WSO operations, outage causation, and progress toward implementing its Feeder Performance Improvement Plans ("FPIP").

**D. Customer Service: Findings and Conclusions**

23. The Company's Customer Call Response time increased dramatically in 2024. To comply with its Commission-approved Quality of Service Plan ("QSP")<sup>1</sup> without penalties, the Company must answer 70 percent or more of its customer calls in under 45 seconds. In 2023, the Company exceeded this metric with 74.9 percent of calls answered in under 45 seconds. In 2024, the Company responded to only 45.7 percent of customer calls under the 45 second goal.

24. The average response time in 2024 was 452 seconds, nearly 10 times longer than the average response time from 2014-2023.

25. More calls were abandoned or terminated in 2024 than in previous years. Customers abandoned nearly 200,000 calls in 2024 without speaking to an agent, more than a 4-fold increase compared to 2023. The Company also disconnected over 100,000 non-emergency calls when call volumes were high and did so without providing customers the opportunity to leave a message.

26. The decline in customer service performance coincided with utility staff layoffs and buyouts in the Company's Customer Care department. Utility staffing decreased by over 20 percent from 2022 to 2024. The utility staffing budget was 5 percent below the budget in 2020 despite an increase in electric rates of 30 percent over the same time period.

27. More customers did not properly receive their monthly bills than in previous years. In 2024, 58 percent more customers did not receive monthly bills compared to 2023, and 240 percent more customers did not receive monthly bills compared to 2020.

28. Billing complaints increased by about 40 percent compared to 2022, and the time-to-resolve billing complaints increased 4-fold compared to 2020-2023.

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<sup>1</sup> Approved in Proceeding No. 23A-0356E.

29. As part of its recommendations, Staff proposed that the Company should track and report on efforts to improve customer experience regarding average auto-disconnection, abandoned calls, staffing levels, billing errors, and time to complaint resolutions.

### **E. Conclusions**

30. We find that a non-adjudicatory proceeding should be opened for the Company to report information regarding outage logging and customer service and allow the Commission to track the Company's performance in these areas. The goal of this reporting is to monitor the Company's progress toward addressing the issues brought up in Staff's investigations, to serve as an expectation of performance in these areas, and to provide information to the Commission for future proceedings.

31. We require Public Service to report the following information on a quarterly basis and in an executable format:

#### **Auto-disconnection of customer calls, reported on ongoing monthly basis:**

- i. Total number of auto-disconnections; and
- ii. Total number of calls abandoned by customers

#### **Non-Billing, reported on an ongoing monthly basis:**

- iii. Total number of customers not receiving bills each month by customer class;
- iv. Breakdown of root causes of lack of billing;
- v. Progress towards resolution of root causes;
- vi. Average time to resolve non-billing issue;
- vii. Average cumulative customer bill after resolution of non-billing; and
- viii. Process and timeline for communicating with customers regarding billing issues.

#### **Customer Care Staffing Levels, reported on an ongoing monthly basis:**

- ix. Head count in the following departments:
- x. Customer Care;

- xi. Billing;
- xii. Distribution maintenance;
- xiii. Breakdown of internal vs. external headcount by department; and
- xiv. Explanation of how these functions are allocated between the holding company and Public Service to the extent it's relevant.

**Responsiveness to PUC Consumer Affairs, reported on an ongoing monthly basis:**

- xv. Number of Complaints from PUC Consumer Affairs;
- xvi. Average time to respond to PUC Consumer Affairs;
- xvii. Average time to resolve concerns raised by PUC Consumer Affairs.

**Outage Log, pursuant to Rule 3203:**

- xviii. Add a column denoting Census Block Group (GEOID) to group outages on feeders that span more than one census block group.
- xix. Include IEEE 1366 Op Co Level reporting which is the system level Major Events designation as a permanent part of the log.
- xx. Include IEEE 1366 Region Level reporting which is the regional level Major Events designation as a permanent part of the log.
- xxi. Include EPSS flag indicating if EPSS was used during any given outage
- xxii. Include WSO event flag indicating whether Wildfire Safety Operations procedures were used for a particular outage.
- xxiii. Provide definitions of all outage categories and include, as changes occur;
  - 1. Log any changes in the categorization process for outages; and
  - 2. Log any changes in the definition of outage categories;
- xxiv. Provide discussion of the “unknown” category of outage cause and progress towards minimizing this categorization
- xxv. Report on the progress made on the feeders identified in the Company's FPIP, including what upgrades have been completed, and the outage results.
- xxvi. Report on the 20 Census Block Groups with the highest reliability issues.
  - 1. Use the same criteria that the Company uses in its QSP to identify these census blocks.
  - 2. Report on what projects are planned and have been completed to address these issues.
  - 3. Report whether and to what extent these Census Block Groups are DI communities.



xxvii. Provide a description of how the Company is using the AMI meter capabilities to track and respond to outages on its system.

32. We will order the first report to be filed by July 31, 2025, and cover the first two quarters (January 1 to March 31, and April 1 to June 30) of 2025. Thereafter, each report is to be filed within 30 days of the end of a quarter. The initial reporting period will end after the report for the 2nd quarter (April 1 to June 30) of 2027.

33. We request that Staff collaborate with Commission Counsel to explore the possibility of emergency rulemaking, assessing whether such rules might be an appropriate solution to address some or all of the challenges identified in Staff's investigations into outages and customer service issues.

## **II. ORDER**

### **A. The Commission Orders That:**

1. The Commission opens this Miscellaneous Proceeding to receive reports from Public Service Company of Colorado ("Public Service") regarding outage logging and customer service consistent with the discussion above.

2. Public Service is ordered to file the Initial Report no later than July 31, 2025, which shall address the first two quarters (January 1 to March 31, and April 1 to June 30) of 2025. Subsequent reports shall be filed within 30 days of the end of each subsequent quarter.

3. The initial reporting period shall conclude upon Public Service filing its report for the second quarter of 2027.

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

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING  
June 4, 2025.**

(S E A L)



ATTEST: A TRUE COPY

Rebecca E. White,  
Director

THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF COLORADO

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Commissioners