

Decision No. C20-0263

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 19M-0561EG

IN THE MATTER OF THE COMMISSION'S CONSIDERATION OF ELECTRIC AND GAS
UTILITY REPORTS PERIODICALLY FILED OR SUBMITTED TO THE COMMISSION.

PROCEEDING NO. 07S-521E

IN THE MATTER OF ADVICE LETTER NO. 1495 – PUBLIC SERVICE COMPANY OF
COLORADO REVISION TO THE INTERRUPTIBLE SERVICE OPTION CREDIT (ISOC)
TARIFF – ELECTRIC.

**COMMISSION DECISION ADDRESSING
ELECTRIC AND GAS UTILITY REPORTS
PERIODICALLY FILED OR SUBMITTED TO THE
COMMISSION AND CLOSING OF PROCEEDING**

Mailed Date: April 20, 2020
Adopted Date: April 15, 2020

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I. BY THE COMMISSION**A. Back ground**

1. The Commission in Decision No. C19-0842, mailed October 17, 2019, opened this miscellaneous proceeding to consider reports periodically filed with the Commission, or submitted to the Commission Director (Director) or other Staff of the Commission (Staff), by investor-owned electric and gas utilities, and wholesale electric cooperative utilities.

2. The Commission described this as a “‘Housekeeping Proceeding’ to solicit information from the utilities, Staff, and other interested parties, to provide information and recommendations so that the Commissioners can determine if modifications should be made to the rules, settlements, and or decisions regarding these Reports.”¹

3. The Commission ordered each investor-owned electric or gas utility, and wholesale electric cooperative utility to file a tabulated list of all reports regularly filed into a proceeding, or submitted to the Director or Staff. The lists were required to:

include, at a minimum, the type of filing, the proceeding number for those reports filed with the Commission, the Commission Staff member to which the report is addressed for those submitted outside a proceeding, the frequency of the reporting, the average number of pages in the report, the basis for the reporting with specific reference to federal regulation, Colorado statute, rule, settlement and or decision, along with recommendations as to the utility’s perception of the cost/benefit of each report.²

4. The Commission directed Staff to file “responsive comments including additions to and or corrections to the list provided by the utilities, and Staff’s opinion as to the usefulness

¹ Decision No. C19-0842 at ¶ 8.

² *Id.* at ¶ 9.

of the Reports and or recommendations for changes to the Reports.”³ Staff was also directed to “include recommendations as to how they can summarize and advise the Commissioners as to the content of the Reports that Staff believes continue to be useful.”⁴

5. Lists were filed by: Colorado Natural Gas, Inc. (CNG) and Black Hills Energy electric and gas utilities (Black Hills) on December 16, 2019; Tri-State Generation and Transmission Association Inc. (TSGT) on December 27, 2019; Atmos Energy Corporation (Atmos) on December 31, 2019; and Public Service Company of Colorado (Public Service) on January 7, 2020. While all utilities provided basic information on the reporting and the basis for reporting, only Atmos and TSGT provided assessments as to the value of the reports.

6. Staff completed its review of the utility filings and filed its responsive comments on March 9, 2020.

B. Discussion

1. Colorado Natural Gas, Inc. Reporting

7. CNG provided a list of 19 reports that are filed with the Commission on a quarterly, annual, or triennial basis. Three of the reports are filed pursuant to federal directives by the Energy Information Administration and Department of Transportation, Pipeline and Hazardous Materials Safety Administration. The remaining reports are filed pursuant to either Commission rules or decisions.

8. Staff commented that the CNG Residential Arrearage and Service Termination Data report may be replaced with a different reporting requirement depending on the final disposition of Senate Bill 20-030 which is pending in the Colorado Legislature. The Tax Cuts

³ *Id.* at ¶ 10.

⁴ *Id.*

and Job Act (TCJA) quarterly filings will cease once CNG seeks and is granted release from the TCJA proceeding. Staff opined that all CNG filed reports remain useful at this time.

2. Black Hills Energy Reporting

9. Black Hills provided a joint filing that lists the reports required for Black Hills Colorado Electric, LLC, Black Hills Colorado Gas, Inc., Black Hills Gas Distribution, LLC, and Rocky Mountain Natural Gas LLC that included 31 electric reports that are filed monthly, quarterly, or annually; and 16 gas reports that are filed annually.

10. Staff opined that all Black Hills reports remain useful at this time.

3. Tri-State Generation and Transmission Association, Inc. Reporting

11. TSGT provided a list of five reports that are filed with the Commission on an annual, biannual, or quadrennial basis. TSGT questioned the value of the long-term transmission plan reports as compared to the effort required to prepare them.

12. Staff stated that it found great value in the long-term transmission plan reports as they provide a long-term view of utility plans for transmission which is essential for electric resource planning. Staff further opined that all reports remain useful at this time.

4. Atmos Energy Corporation Reporting

13. Atmos provided a list of 14 reports that are filed quarterly, annually, biannually, and triennially. Atmos provided comments indicating value or “no comments” on all but one report. Atmos indicated for the TCJA report that “the Commission should find an orderly way to wind down the quarterly TCJA filings down, or perhaps just transition to an annual TCJA filing due three months after the conclusion of each utilities’ fiscal year.”⁵

⁵ Atmos Report, Table at p. 2.

14. Staff noted in response comments that the Commission, in Decision No. C18-0326-I in Proceeding No. 18M-0074EG issued May 11, 2018, stated “[o]nce the necessary advice letter tariff filings have been made to account for TCJA impacts on rates, each utility may file a motion to be excused from further participation in this proceeding.”⁶ Staff further opined that all reports remain useful at this time.

5. Public Service Company of Colorado Reporting

15. Public Service provided a list of 88 reports that are filed daily during summer months (only the system supply reports), quarterly, semiannually, or annually, but the utility did not provide any recommendations regarding the future disposition of the reports.

16. Staff in its comments identified several reports that are filed periodically that should be discontinued.

17. First, were the Therm conversion reports (Report No. 2) which were required as a result of Decision No. C00-801 in Proceeding No. 99S-609G issued July 21, 2000. Staff noted that Public Service filed an amendment to its Therm conversion tariff with Advice Letter No. 889 – Gas Amended, Proceeding No. 15AL-0883G which modified tariff sheets 13A to state: “[e]ach proposed revision of the Energy Factors will be accomplished by posting the energy factors on the Company website and will be accompanied by such supporting data and information as the Commission may require from time to time.”⁷ Staff opined that there is no longer a requirement to file the Therm conversion reports with the Commission.

18. Second, were the monthly gas quality of service (QSP) reports (Report No. 13) which were required under the previous approved QSP regime. Staff noted that the metrics and

⁶ Staff Responsive Comments at p. 3.

⁷ *Id.*

filing requirements were modified with Commission approval of new QSP metrics and annual reporting pursuant to Decision Nos. R19-0565 issued on July 3, 2019 and C19-0728 issued September 3, 2019 in Proceeding No. 18A-0918G, and all future QSP reporting should comply with the 2019 decisions.

19. Third, and similar to the above item, were the quarterly electric QSP reports. Staff noted that the implementation of a new QSP is an issue in the electric rate case, Proceeding No. 19AL-0268E, which is currently before the Commission, and that the final decision in Proceeding No. 19AL-0268E will determine whether continued or modified reporting will be required.

20. Fourth, were the Interruptible Service Option Credit (ISOC) annual reports which were required by Decision No. R08-0621 in Proceeding No. 07S-521E issued June 19, 2008. Staff noted that a similar reporting requirement was recently approved in Decision No. C18-0417 in Proceeding No. 17A-0462EG on June 6, 2018, except that the reporting is included in the annual demand side management reports making the separate annual report pursuant to Decision No. R08-0621 redundant. Staff recommended that the Commission eliminate the filing required by Decision No. R08-0621.

21. Lastly, Staff noted that Public Service report item No. 72 is essentially the same as report item 71 and can be eliminated from the list.

6. Staff of the Commission's General Comments

22. Staff further recommended that it schedule quarterly briefings with each of the three Commissioners individually to go over any observations or issues identified in reports filed over the prior three-month period.

C. Findings and Conclusions

23. The reports currently being filed by CNG, Black Hills, TSGT, and Atmos remain useful. As a result, no change in the reporting requirements are ordered in this proceeding.

24. The Public Service Therm conversion reporting requirement in Decision No. C00-801, Proceeding No. 99S-609G, was superseded with the approval of Advice Letter No. 889 – Gas Amended, Proceeding No. 15AL-0883G, and is no longer required.

25. Public Service shall provide gas QSP reporting in accordance with Decision Nos. R19-0565 and C19-0728.

26. The Public Service electric QSP reporting will be decided in Proceeding No. 19AL-0268E which is currently before the Commission.

27. The ISOC annual reports required by Decision No. R08-0621 in Proceeding No. 07S-521E have been superseded by reporting that is now included in the annual demand side management reports. In order to reduce administrative burden, Public Service is no longer required to file the now-redundant ISOC annual reports required by paragraph 227 of Decision No. C08-0621.

II. ORDER**A. The Commission Orders That:**

1. The disposition of all electric and gas reports filed periodically with the Commission are as discussed above.

2. Public Service Company of Colorado is no longer required to file the Interruptible Service Option Credit annual reports required by paragraph 227 of Decision No. C08-0621.

3. This proceeding is hereby closed.

4. The 20-day period provided for in § 40-6-114, C.R.S., within which to file applications for rehearing, reargument, or reconsideration begins on the first day following the effective date of this Decision.

5. This Decision is effective on its Mailed Date.

**B. ADOPTED IN COMMISSIONERS' WEEKLY MEETING
April 15, 2020.**

(S E A L)



ATTEST: A TRUE COPY

Doug Dean,
Director

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

JEFFREY P. ACKERMANN

JOHN GAVAN

MEGAN M. GILMAN

Commissioners