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

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IN THE MATTER OF THE APPLICATION OF PUBLIC SERVICE COMPANY OF COLORADO FOR APPROVAL OF ITS GAS PRICE VOLATILITY MITIGATION PLAN FOR ITS GAS UTILITY OPERATIONS FOR THE GAS PURCHASE YEAR JULY 1, 2010 THROUGH JUNE 30, 2011.	**DOCKET NO. 10A-027G**

STIPULATION AND AGREEMENT IN RESOLUTION OF PROCEEDING

This Stipulation and Agreement in Resolution of Proceeding ("Stipulation") is entered into by and between Public Service Company of Colorado ("Public Service" or "Company") and the Staff of the Public Utilities Commission of the State of Colorado ("Staff"), collectively referred to herein as the "Parties." Public Service and Staff are the only parties to this proceeding. This Stipulation sets forth the terms and conditions by which the Parties have agreed to resolve all outstanding issues presented by the Company's proposed Gas Price Volatility Mitigation Plan ("GPVM Plan") applicable to its Gas Utility Operations for the Gas Purchase Year July 1, 2010 through June 30, 2011, attached as Highly Confidential Appendix A to its Application filed with the Commission in this docket on January 19, 2010, that have or could have been contested in this proceeding. The Parties state that the results of the compromises reflected herein are a just and reasonable resolution of this GPVM Plan proceeding, that reaching agreement as set forth and implementation of the compromises and settlements reflected in this Stipulation will result in substantial savings to all concerned by establishing certainty and avoiding litigation. Each party hereto pledges its support of this Stipulation and states that each will defend the settlement reached. The Parties respectfully request that the Commission approve this Stipulation, without modification. For those Parties for whom this Stipulation is executed by counsel, such counsel states that (s)he has authority to execute this Stipulation on behalf of his/her client.

I. BACKGROUND

1. On January 19, 2010, Public Service filed an application seeking a Commission order approving its proposed GPVM Plan for its Gas Department for the Gas Purchase Year July 1, 2010 through June 30, 2011. The 2010-2011 Gas Department GPVM Plan, which was filed with the Application as Highly Confidential Appendix A, details the circumstances under which Public Service plans to use natural gas storage, fixed price contracts, and Commission-authorized financial instruments in hedging natural gas prices as part of its portfolio for acquiring natural gas supplies for its Colorado gas utility operations for the upcoming Gas Purchase Year. Specifically, and in accordance with the procedures originally adopted by the Commission in Decision No. C04-1112, mailed September 22, 2004, in Docket No. 02A-267G, and extended for an additional four years pursuant to Decision No. C09-0596 in Docket No. 08A-095G, Public Service requested that the Commission approve certain aspects of the GPVM Plan, as specifically set forth in Highly Confidential Appendix B, including: (i) the hedging strategy and implementation plan for the 2010-11 Gas Purchase Year; (ii) the proposed quantity of gas to be hedged; (iii) the timing of the hedges; (iv) the types of hedging instruments that the Company intends to use in implementing the proposed hedging plan; (v) the Floor Price for determining the costs related to the gas hedging cost cap; (vi) and the maximum hedging costs (collectively, the "GPVM Plan Approval Items").

2. On January 20, 2010, the Commission issued its Notice of Application Filed. On February 11, 2010, Commission Staff filed its Notice of Intervention, Entry of Appearance and Request for Hearing. On February 23, 2010, Staff filed a Motion For Extension of Time to File Answer Testimony and Waiver of Response Time requesting that the answer testimony filing date be changed from February 25, 2010 to March 4, 2010. The date for required Answer Testimony and a hearing date of March 11, 2010 were set by the Commission in Decision C010-0159, mailed February 23, 2010. The Commission granted Staff's Motion by Decision No. C10-0218, mailed March 10, 2010.

3. Prior to the scheduled date for the filing of answer testimony, representatives of Public Service and Staff met to discuss Staff's concerns with the Company's proposed GPVM Plan, most of which centered around the Company's implementation of the long-term strategy, as described in its GPVM Plan, as well as long-term hedging transactions. Settlement discussions ensued. On March 8, 2010, the Parties filed a Notice of Settlement and Joint Motion to Vacate Hearing, indicating that Public Service and Staff had reached a stipulation and agreement in principle settling the issues in this proceeding, and requested that the Commission vacate the hearing set for March 11, 2010 in this docket to proved the Parties additional time to finalize and to file an executed stipulation and agreement. The Commission granted the Parties Joint Motion to vacate the March 11 hearing by Decision No. C10-0220, mailed March 10, 2010. This Stipulation is the culmination of the Parties' settlement discussions.

II. TERMS OF SETTLEMENT

4. The Parties agree that the terms contained in the Resolution sections of this Stipulation shall apply to the GPVM Plans for the Gas Purchase Year July 1, 2010 through June 30, 2011 and to the remaining two Gas Purchase Years, ending June 30, 2013, to which

Decision No. C09-0596 in Docket No. 08A-095G is applicable. As a result of the agreements and compromises reached herein, the Parties agree that the GPVM Plan and GPVM Approval Form, filed as Appendix A (Public Version) and Highly Confidential Appendix A to the Application, should be revised to reflect a new Floor Price[1] and Annual Hedging Budget. These revisions are reflected in Revised Appendix A (Public Version), Highly Confidential Revised Appendix A and Highly Confidential Revised Appendix B to the Application, both of which are attached hereto. As such, the Parties agree that the Commission should grant the Application, as amended hereby, including Highly Confidential Revised Appendices A and B attached hereto.

A. Long-Term Strategy and Use of Over-The-Counter Based Fixed-for-Float and Costless Collar Hedging Instruments

Public Service's Position:

5. It is Public Service's position that previously filed and Commission-approved GPVM plans permit it to "target up to 25% of its local distribution company (LDC) heating season gas requirements to be hedged as part of the long-term hedge strategy set forth in the GPVM plan if gas prices are at or below the then set Floor Price plus the budgeted premium"[2] and, therefore, its proposed strategy to implement long-term hedges is not new. Public Service therefore believes that it has authority to transact[3] the long-term strategy as described in its

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1 As set forth in Section II. E below, the Parties have defined "Floor Price" for purposes of each GPVM Plan as the average of monthly index prices as published by Platts in its Inside FERC Gas Market Report for the index labeled "CIG-Rocky Mountains" over the previous four heating seasons (November to March).

2 See Public Service's Verified Application, Reminder of Shortened Notice Period and Proposed Procedural Schedule (Application), Public Version Appendix A, Price Volatility Mitigation Long-Term Strategy, p. 4.

3 In other documents associated with the GPVM Plan filed in this docket, the terms "transact," "purchase," and "execute" are synonymous for the act of transacting a hedge.

annual GPVM filing when certain conditions as described in the GPVM plan are met. Public Service also asserts that the Commission explicitly acknowledged and approved its use of a long-term hedge strategy in Docket No. 08A-095G, Decision No. R09-0211 (mailed March 2, 2009) and Order on Exceptions, Decision C09-0596 (mailed June 9, 2009) at paragraphs 45-47. Public Service states that its 2010-2011 GPVM Plan, as originally filed with the Application in this docket, and its previously-filed GPVM Plans, provided for a long-term strategy in which hedge transactions, if implemented, could settle in any of the four Gas Purchase Years immediately following the Gas Purchase Year covered by the GPVM Plan (hereinafter referred to as "2-5 Year Strategy"). Public Service notes that, in the past, it has implemented long-term hedges as part of the 2-5 Year Strategy under previous GPVM Plans.

Staff's Position:

6. Staff's position is that, although the 2-5 Year Strategy was contained in earlier GPVM plans which were originally filed as submittals and subsequently changed to approval format following Decision No. C04-1112 in Docket No. 02A-267G, the long-term hedges under the 2-5 Year Strategy have never been part of the specific GPVM Plan Approval Items in previous GPVM Plans either filed as submittals, or filed and approved, including the instant application. Staff's position is that a statement by Public Service in a GPVM Plan that sets forth the 2-5 Year Strategy does not make that statement part of the Commission-approved execution strategy under the previously approved GPVM Plan. Further, Staff believes that, although Public Service has implemented long-term hedges pursuant to the 2-5 Year Strategy, there is no filing by Public Service or any record at the Commission showing that Public Service implemented long-term hedges under the 2-5 Year Strategy as part of previous GPVM Plans. Staff therefore believes that the use of the 2-5 Year Strategy and OTC (Over-The-Counter)-based fixed-for-float

swaps and costless collars to implement long-term hedges are new additions to the GPVM Plan and contrary to the continuation of the Commission approved GPVM Plan program in Docket No. 08A-095G for four more years.[4] Staff is further concerned that long-term hedges implemented under the 2-5 Year Strategy will fall outside the Gas Purchase Year and thus exempt them from prudence review. Staff believes that the quantities of gas acquired outside of the particular Gas Purchase Year at issue here as well as the long-term hedges under the 2-5 Year Strategy should be excluded from this GPVM filing for the Gas Purchase Year July 1, 2010 through June 30, 2011; and any costs associated with long-term strategy incurred today should be disallowed.

Resolution:

7. In accordance with the provisions set forth in this Stipulation at Sections B through G below, the Parties agree that the Company may enter into long-term hedges of two or three years when gas prices are at or below the Floor Price on the date of hedge purchase, through the use of fixed-for-float and costless collar hedging instruments (hereinafter referred to as "2-3 Year Strategy").

B. Implementation Strategy & Prudence Review

Public Service's Position:

8. It is Public Service's position that, under previous Commission decisions, it can execute the long-term strategy using hedging instruments that may be executed both within and

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4 Public Service seeks approval of the GPVM Plan in accordance with Decision No. C09-0596, mailed June 9, 2009, in Docket No. 08A-095G, wherein the Commission approved continuation of the GPVM filing and approval procedures established in Decision No. C04-1112 in Docket No. 02A-267G for four more years, for Gas Purchase Years spanning from July 1, 2009 through June 30, 2013. See Application, Appendix C, and Direct Testimony of Curtis C. Dallinger, p.2, ll. 8-13.

outside of the Gas Purchase Year, as described in the GPVM plan, at any time after the annual GPVM plan is approved, depending on market prices. The Company further believes that the proposed long-term strategy as set forth at page 4 of Appendix A to its original Application, if the Application were to be granted by the Commission as originally filed,[5] would allow it to execute hedges from two to five years out and would include the 2011-12, 2012-13, 2013-14 and 2014-15 heating seasons. It is also the Company's position that the annual approval of the GPVM plan provides for prudency of the plan to acquire all hedges (including those entered into as part of the long-term strategy) that are executed under the currently effective GPVM Plan. Public Service asserts that its Application in this docket is for the approval of a GPVM Plan that will be executed in periods covered by future Gas Purchase Plans and Gas Purchase Reports and the transactions will be subject to prudence review at that time. The standard of review is set forth in Rule 4604(h)(IV).

<u>Staff's Position:</u>

9. It is Staff's position that there is no previous Commission decision that specifically authorized Public Service to implement long-term hedges under the 2-5 Year Strategy for the applicable 2011-12, 2012-13, 2013-14, and 2014-15 years. The proposed long-term hedges of 2-5 years in length have never been part of the GPVM Plan Approval Items in previous GPVM Plans. Staff is also concerned that the unintended consequence of the long-term hedges under the 2 to 5 Year Strategy for those particular years is that the hedges are outside the current GPVM Plan for the Gas Purchase Year July 1, 2010 through June 30, 2011, and thus not subject to the prudence review. Commission Rule 4607(a), relating to the filing requirements of

5 The Company's proposed long-term strategy, as originally set forth in its Application, is being amended by this Stipulation as set forth in Revised Highly Confidential Appendix A attached hereto.

Gas Purchase Reports and Prudence Reviews, states that "The utility shall file a GPR [Gas Purchase Report] under the previous year's GPP [Gas Purchase Plan] docket number [filed approximately 15 months previously] as a separate filing from, and at the same time as, the annual GCA application." In addition, Rule 4607(e), relating to the prudence review process, and regarding utility testimony and exhibits, states that if "the Commission sets a hearing, the utility shall file its testimony and exhibits supporting gas cost recovery for the gas purchase year at issue." At the time of the prudence review for this Gas Purchase Year, long-term hedges implemented under the Company's 2-5 Year Strategy will not have taken place,[6] even though they will have been transacted for. Since the gas costs of these out-of-period hedges would not be reported as the gas costs for this Gas Purchase Year under the prudence review, they may escape being subject to prudence review. Further, Staff believes that long-term hedges should be limited to 2 to 3 years to fit within the timeframe of the extension of the GPVM Plan for four more years as provided for in Docket 08A-095G.

Resolution:

10. For each of the Gas Department GPVM Plans covered by the extension period approved in Docket No. 08A-095G, the Parties agree that the long-term hedges shall be limited to two to three years, or the applicable current Gas Purchase Year plus no more than two additional Gas Purchase Years thereafter. In the event that Public Service decides not to continue to transact long-term hedges under the 2-3 Year Strategy, or if the Commission terminates the use of long-term hedges under the 2-3 Year Strategy in the future, Public Service should be allowed to hold any such previously-transacted hedges until maturity.

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6 In other documents associated with the GPVM Plan filed in this docket, the terms take place, settle, and expire are synonymous for the act of settling a hedge at maturity or expiration date.

11. The Parties agree that the actual quantities of natural gas hedges acquired under the 2-3 Year Strategy would not be reviewed in a Gas Prudence Review until the applicable Gas Purchase Years in which these hedges actually settled. The Parties acknowledge and agree that the long-term hedging transactions entered into under the 2-3 Year Strategy included as a part of this Revised GPVM Plan will be subject to the prudence review provided for in Commission Rule 4604(h)(IV) and the prudence review standard set forth in Rule 4607(a) and (c), and as discussed by the Commission in Docket No. 02A-267G, Decision No. C04-1112, paragraph 48 (mailed September 22, 2004).

12. In order to provide the Commission with an accounting of the long-term hedges under the 2-3 Year Strategy, the Parties agree that the quantities of gas that have been hedged under the 2-3 Year Strategy, as well as data establishing that the total hedged quantities under the 2-3 Year Strategy for each Gas Purchase Year have not exceeded 25% of the forecasted requirements for each applicable heating season, shall be submitted to the Commission. The quantities of natural gas hedges acquired under this 2-3 Year Strategy will be filed in a form similar to the template attached as Exhibit A to this Stipulation. The Parties further agree that the limit for these gas quantities to be hedged under the 2-3 Year Strategy is 25% of the applicable Gas Purchase Year forecasted seasonal requirements, and acknowledge that the quantities of gas to be hedged under the 2-3 Year Strategy would change with a change in the forecasted seasonal requirements.

13. Public Service believes and Staff accepts, based on the representations of Public Service, that the hedged or forecasted quantities from Gas Purchase Year to Gas Purchase Year for the years covered under the 2-3 Year Strategy would change only minimally, if at all. The Parties further agree that, in order to provide transparency concerning this strategy, these hedged

quantities will also be filed in the format set forth in Exhibit A to this Stipulation in all future GPVM Plans. For purposes of future Gas Purchase Reports, the hedged quantities of gas will be included in the applicable Gas Purchase Year in which the hedges settle. For purposes of future GPVM Plans, the hedged quantities of gas will be included in a new PVM schedule, in the form substantially similar to Exhibit A to this Stipulation, for the GPVM Plans covering each successive Gas Purchase Year through the Gas Purchase Year in which the hedges settle. At that time, those quantities of gas will be included in the quantities to be hedged for the applicable Gas Purchase Year. The long-term hedges executed as part of the 2-3 Year Strategy will be reported as mark-to-market in accordance with the process described in Part E. below.

C. Accounting for Hedged Volumes Under Long-Term Strategy

Public Service's Position:

14. It is Public Service's position that it can execute the long-term strategy described in the GPVM plan at any time after the annual GPVM plan is approved. Public Service believes that this long-term strategy allows the Company to execute hedges of 2-5 years and would include the 2011-12, 2012-13, 2013-14 and 2014-15 heating seasons.

Staff's Position:

15. Since this GPVM Plan is for the Gas Purchase Year July 1, 2010 through June 30, 2011, Staff is concerned that the proposed "quantity of gas to be hedged" outside of the Gas Purchase Year will not be counted as the "quantity of gas to be hedged" for this Gas Purchase Year nor will be counted in the Gas Purchase Year in which the hedges take place.

Resolution:

16. The Parties agree that Public Service may hedge up to 25% of its Local Distribution Company seasonal gas requirements under the 2-3 Year Strategy if gas prices are at

or below the Floor Price at the time the hedge is purchased for the purchase requirements for each of the Gas Purchase Years covered by such hedging strategy during the 2010-2011 Gas Purchase Year.

17. Any volumes of gas that are hedged for Gas Purchase Years other than November 2010 through March 2011 will be netted against the remaining hedges to be transacted for the applicable years. Such hedged volumes cannot be counted against the total volumes of gas allowed to be hedged for the heating season (November to March) in Gas Purchase Year 2010-2011. For example, if Public Service executes any hedges for November 2012 through March 2013 during the 2010-2011 Gas Purchase Year (April through October 2010), Public Service will file its 2012-2013 GPVM Plan for approval with the Commission showing the total "quantity of gas to be hedged," including those hedges already transacted in 2010-2011. These volumes will not be hedged again. As this example shows, since Public Service is limited to hedging up to 25% of the forecasted heating season requirements under the 2-3 Year Strategy, Public Service represents that it is virtually impossible for the long-term hedge quantities to exceed the overall hedging requirement for the 2012-2013 heating season.

D. Process for Mitigation of Risk Exposure

Public Service's Position:

18. Public Service does not believe that long-term hedges will necessarily cause a higher default risk. Long-term contracts contain some higher risk exposure because an entity is exposed to the market for a longer period of time. Public Service further believes the risk of non-performance by a counterparty is more directly related to the counterparty's financial condition and trends over time than the amount of time that elapses between the date of the initial transaction and the date it settles.

Staff's Position:

19. Staff is concerned that long-term hedges will cause a higher default risk (or nonperformance risk) because of the length of time the entity is exposed to the market. Staff believes that generally-accepted accounting principles, formerly set forth in Statement of Financial Accounting Standard (SFAS) No. 157[7], require that Public Service consider the default risk of the counterparty and make a necessary adjustment to its calculations when the Company uses models to calculate the ongoing exposure to the Company and to ratepayers. Staff believes that the long-term hedges should be limited to 2-3 years as a mitigating factor against this higher risk.

Resolution:

1. **Process**

20. Public Service represents, and Staff accepts, that Public Service has adopted the following principles and processes in mitigating the risk of default of counterparties to hedge transactions, and agrees to continue to follow these principles and processes for the Gas Purchase Years subject to this Stipulation:

21. Public Service calculates exposure similar to others in the industry with minor exceptions. Any transaction, hedged or not, that is marked (*i.e.*, financial or fixed price purchase or sale) is marked daily in the Company's systems based on forward prices generally obtained from third-party sources accepted by the industry and Wall Street. Credit default risk is a function of the financial condition of the counterparty. The industry generally uses the rating

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7 See summary of SFAS No. 157 at http://www.fasb.org/summary/stsum157.shtml.

agencies (S&P and Moody's) ratings when looking for default risk. These agencies calculate a default probability and recovery percentage that they publish.

22. The long-term nature of hedging may result in a higher dollar risk exposure with the counter-party when the volatility of the applicable commodity price is greater over the term of the hedge, due to the longer-term reliance upon the financial soundness of the counterparty. To address this potentially higher risk, Public Service routinely monitors counterparty financial conditions and market and counterparty trends. The Company requires and will continue to require contract provisions, including, but not limited to, adequate assurance, or other contract provisions that allow the Company to request financial forms of security if the Company deems a counterparty's creditworthiness to be materially impaired.

23. Public Service has procedures in place to handle risks associated with its long-term gas hedging activities by using over-the-counter derivatives as financial instruments that also implement Public Service's hedging plan. In order to mitigate these risks, Public Service subjects all counterparties to a credit review per the guidelines set forth in Public Service's Wholesale Credit and Performance Risk Management Policy, as may be modified by Public Service from time to time. A current copy of Public Service's Wholesale Credit and Performance Risk Management Policy (Dated July 15, 2009 – Revision 5) is attached as Highly Confidential Exhibit B to this Stipulation.

24. In addition to the mitigation measures set forth above, Public Service represents that it performs a review of available credit and collateral requirements daily on all counterparties and may adjust the amount of collateral according to the guidelines set forth in Public Service's Wholesale Credit and Performance Risk Management Policy.

2. Allowable Adjustment to Hedged Quantities in Case of Counterparty Default

25. In addition, in the event that counterparty defaults on a hedged transaction, Public Service will apply the following guidelines in determining whether to leave the position open or to replace the position:

(a) If the Company, as the result of a default by the counterparty, is required to pay the counterparty to settle a fixed-for-float swap or costless collar, the Company will replace the defaulted position with a new fixed-for-float swap for the same period and in the same quantity of the defaulted position.

(b) If the Company, as the result of a default by the counterparty, receives none or only a portion of the positive benefit that would be due as a result of a positive mark on the defaulted hedged position, the Company will replace the hedge with the appropriate instrument for the current price level, provided that it has budget dollars available under the hedge plan. If no hedging dollars are available, the position will be left un-hedged. The available hedging dollars will be the difference between the approved budget for that particular Gas Purchase Year, less any option premiums paid in implementing that year's seasonal hedging strategy.

E. Hedge Budget and Floor Price

Public Service's Position:

26. Public Service's initially filed GPVM Plan, attached to the Application as Highly Confidential Appendix A, p. 3 states, "The proposed targeted gas hedging budget for Public Service's gas customers is $30.0 million which was approved in Docket No. 08A-095G." The Floor Price[8] used to calculate the impact of the various hedges on the hedging budget has been proposed by the Company on an annual basis and is subject to approval by the Commission as part of its annual approval of the Company's GPVM plan.

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[8] Exhibit C, which is attached hereto and incorporated herein, provides examples on the interactions between the Floor Price, Settlement Price, and Strike Price that are used in the calculation of the hedge budget and in the recovery as gas costs in the GCA.

Staff's Position:

27. Based on the Company's filing, Staff's position is that the combined budget for the seasonal strategy and the budget, as represented by the mark-to-market value of the 2-5 Year Strategy proposed by the Company for the same Gas Purchase Year, should be $30 million. Fixed-for-float swaps or costless collars may not incur any upfront costs at their initial construction and, therefore, no dollar amounts are counted against the budget in the year for which they are executed. To the extent there are no upfront costs to reduce the size of the budget, Public Service could theoretically engage in unlimited hedges. Staff's concern about unlimited hedges was somewhat alleviated by Public Service's assertion contained in both the public and Highly Confidential versions of Appendix A and through other assurances provided by the Company that Public Service is required to limit the seasonal gas requirements it hedges on a long-term basis to 25% of its local distribution company seasonal gas requirements.[9] Staff remains concerned about the financial exposure from these cost-free financial instruments that are accounted for as mark-to-market and when the mark-to-market value starts to trend significantly in one direction within the initially proposed long-term timeframe of 2 to 5 years, depending on how Public Service manages the trades. Staff understands that Public Service does not want to trade the hedge positions once they are transacted. Since the budget for seasonal strategy is determined in the applicable Gas Purchase Year, Staff believes the budget for long-term hedges under the 2-5 Year Strategy should be considered in the same Gas Purchase Year when they become applicable even though the costs when they were transacted were zero. The offset to the budget for long-term hedges under the 2-5 Year Strategy should be the mark-to-market value when the budget for the GPVM Plan is considered. In Staff's view, the previous

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[9] See Application, Public Version Appendix A, Price Volatility Mitigation Long-Term Strategy, p. 4.

GPVM Plans only included the seasonal strategy that provided an understanding of the budget. Staff recognizes that offsets have not needed to be considered before, because Public Service's implementation of previous GPVM Plans generally did not include long-term hedge transactions under the 2-5 Year Strategy. Further, Staff believes that the long-term hedges should be limited to 2-3 years as a mitigating factor against a ballooning budget.

Resolution:

28. The Parties agree that long-term hedges agreed to in this Stipulation that may be initiated in the current Gas Purchase Year have no impact on the current year's budget. The Parties agree that the long-term hedges that are transacted pursuant to the 2-3 Year Strategy by the Company for a given Gas Purchase Year will count against that year's budget limit of $30 million. The Parties further agree that the budget for the GPVM Plan for an applicable year with long-term hedges under such 2-3 Year Strategy shall be the remaining balance of the allowed annual budget amount of $30 million after the offset for long-term hedges. The offset to the budget for these long-term hedges under the 2-3 Year Strategy will be determined by the volume from the respective long-term hedges in prior years, multiplied by the negative difference between the currently effective Floor Price, the determination of which is set forth below, and the contracted strike price of a fixed-for-float swap or the contracted strike price associated with the put option that is part of a costless collar.[10] For the purpose of this offset, the then-applicable Floor Price is the average of monthly index prices as published by Platts in its Inside FERC Gas Market Report for the index labeled "CIG-Rocky Mountains" over the previous four heating seasons (November to March). The Parties also agree that Public Service will use the average of

[10] The volume associated with a costless collar will be the same as the volume of the underlying puts and calls, as Public Service uses the same number of puts and calls when constructing a costless collar.

the monthly index prices as described above as a guide to reset the Floor Price in the annual GPVM filing each year; however, if Public Service proposes an alternative Floor Price, it shall provide its rationale and a detailed explanation for such alternative Floor Price in its annual GPVM application, which shall be subject to Commission approval.

29. Applying the above agreement to the Application filed in this docket, the Parties agree that the Company's GPVM Plan, as contained in Appendix A (Public Version) and Highly Confidential Appendix A, and the Approval Form setting forth GPVM Plan Approval Items, as contained in Highly Confidential Appendix B, shall be revised. Accordingly, the Parties agree that the Revised Appendix A (Public Version), Highly Confidential Revised Appendix A and the Highly Confidential Revised Appendix B shall replace and supersede the corresponding Appendix A (Public Version), Highly Confidential Appendix A and Highly Confidential Appendix B filed with the Application and shall become a part of the amended Application to be granted by the Commission in this proceeding.

F. Mark-to-Market Value in an Informational filing with the Commission

Public Service's Position:

30. Public Service does not currently provide any mark-to-market information on hedges executed as part of its long-term hedging strategy to the Commission.

Staff's Position:

31. Staff believes that, given the 2-5 year timeframe for long-term hedges requested by Public Service, the financial exposure from these cost-free financial instruments as they are marked to market can be significant when the gas price starts to trend and sustains in one direction. Staff believes it is appropriate that Public Service should file an exception report with the Commission if the mark-to-market value exceeds $30 million. Staff further believes

Public Service should end all hedging until such time as the Commission addresses the exception report.

Resolution:

32. Public Service shall provide a quarterly report to the Commission, in the same docket in which the applicable GPVM Plan was approved, showing the mark-to-market value of the long-term hedges transacted under the 2-3 Year Strategy as of the end of each calendar quarter. This quarterly report is to be filed within 15 days of the end of each quarter. These reports will cover the second, third and fourth quarters of the same calendar year and the first quarter of the subsequent calendar year. Under this schedule, the cycle of quarterly reports will be filed under each new GPVM Plan docket filed in the middle of January each year. The quarterly report shall be in the format provided in Exhibit D, attached hereto and incorporated as a part hereof.

G. Compliance with Decision No. R09-0211, Docket No. 08A-095G

33. The Administrative Law Judge's Recommended Decision, Decision No. R09-0211, in Docket No. 08A-095G, provides as follows in Paragraph 124:

> 124. Valid concerns are raised regarding availability of objective measures to evaluate the benefit or success of the hedging program. Public Service welcomes further discussion regarding measurement metrics. Being unsure whether such measures can be derived, and none being proposed, none will be adopted in this proceeding. Rather, the parties will be ordered to confer regarding same prior to evaluation of the hedging program following the period approved herein. Public Service will be required to address the same in a future filing.

Public Service's Position:

34. Public Service believes that the discussion by the ALJ in Decision No. R09-0211 (mailed March 2, 2009), Docket 08A-095G, regarding the measurement and evaluation of its

hedging program should begin as soon as practical for both parties. Public Service believes that it is appropriate to file the results of the discussions between the parties with Public Service's next formal filing requesting a further extension of the GPVM program beyond the additional four-year period approved in Docket No. 08A-095G.

Staff's Position:

35. Staff believes that measurement and evaluation programs should be in place to evaluate the hedging program, through the prudence review process, after this Gas Purchase Year.

Resolution:

36. The Parties agree to hold monthly meetings to discuss this issue beginning as soon as practicable. The Parties contemplate that any agreement reached as to the appropriate measurement and evaluation of the Company's hedging program would apply equally to the Company's hedging program for its Electric Department.

III. IMPLEMENTATION

37. This Stipulation shall not become effective until the issuance of a final Commission Order approving the Stipulation that does not modify the Stipulation in a manner that is unacceptable to any of the Parties. In the event the Commission modifies this Stipulation in a manner unacceptable to any Party, that Party shall have the right to withdraw from this Stipulation and proceed to hearing on the issues that may be appropriately raised by that Party in this docket. The withdrawing Party shall notify the Commission and the Parties to this Stipulation by e-mail within three business days of the Commission modification that the Party is withdrawing from the Stipulation and that the

Party is ready to proceed to hearing; the e-mail notice shall designate the precise issue or issues on which the Party desires to proceed to hearing (the "Hearing Notice").

38. The withdrawal of a Party shall not automatically terminate this Stipulation as to the withdrawing Party or any other Party. However, within three business days of the date of the Hearing Notice from the first withdrawing Party, all Parties shall confer to arrive at a comprehensive list of issues that shall proceed to hearing and a list of issues that remain settled as a result of the first Party's withdrawal from this Stipulation. Within five business days of the date of the Hearing Notice, the Parties shall file with the Commission a formal notice containing the list of issues that shall proceed to hearing and those issues that remain settled. The Parties who proceed to hearing shall have and be entitled to exercise all rights with respect to the issues that are heard that they would have had in the absence of this Stipulation.

39. Hearing shall be scheduled on all of the issues designated in the formal notice filed with the Commission as soon as practicable. In the event that this Stipulation is not approved, or is approved with conditions that are unacceptable to any Party who subsequently withdraws, the negotiations or discussions undertaken in conjunction with the Stipulation shall not be admissible into evidence in this or any other proceeding, except as may be necessary in any proceeding to enforce this Stipulation.

IV. GENERAL TERMS AND CONDITIONS

40. This Stipulation reflects compromise and settlement of all issues raised or that could have been raised in this docket. Approval by the Commission of this Stipulation shall constitute a determination that the Stipulation represents a just, equitable and reasonable resolution of all issues which were or could have been contested between the Parties hereto in this proceeding. Notwithstanding the resolution of the issues set forth in this Stipulation, none of

the methodologies herein contained shall be deemed by the Parties to constitute a settled practice or precedent in any future proceeding, and nothing herein shall constitute a waiver by any party with respect to any matter not specifically addressed herein.

41. The Parties to this Stipulation state that reaching agreement as set forth herein by means of a negotiated settlement rather than through a formal adversarial process is in the public interest and that the results of the compromises and settlements reflected by and in this Stipulation are just, reasonable and in the public interest.

42. Except as otherwise provided herein, neither anything said, admitted or acknowledged in the negotiations leading up to the execution of said Stipulation, the settlement terms and conditions contained in this Stipulation, nor the Stipulation itself, may be used in this or any other administrative or court proceeding by any of the Parties hereto.

43. The Parties agree to a waiver of compliance with any requirements of the Commission's Rules and Regulations to the extent necessary to permit all provisions of this Stipulation to be carried out and effectuated.

44. This Stipulation may be executed in counterparts, each of which when taken together shall constitute the entire Stipulation.

DATED this 11th day of March, 2010.

Respectfully submitted,

PUBLIC SERVICE COMPANY OF COLORADO

By:______________________
Scott B. Brockett
Director, Regulatory Administration
Xcel Energy Services Inc.
Agent for Public Service
Company of Colorado

Approved as to form:

____
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By:______________________
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Public Service Company
Long Term Hedge Report
Volumes - Gas Dept

Exhibit A
2010-11 GPVM Plan
Schedule PVM-5

2010-11	Total Requirements	Volumes in Dth Eligible for Long-Term Hedge Strategy	Cumulative Long-Term Hedges Under Contract	Eligible Long-Term Volumes in Dth Not Under Contract
November	16,277,720	4,069,430	2,400,000	1,669,430
December	22,494,470	5,623,618	2,480,000	3,143,618
January	23,232,740	5,808,185	2,480,000	3,328,185
February	18,995,240	4,748,810	2,240,000	2,508,810
March	15,879,350	3,969,838	2,480,000	1,489,838
Total Winter	96,879,520	24,219,880	12,080,000	12,139,880

2011-12	Total Requirements	Volumes in Dth Eligible for Long-Term Hedge Strategy	Cumulative Long-Term Hedges Under Contract	Eligible Long-Term Volumes in Dth Not Under Contract
November	16,143,120	4,035,780		4,035,780
December	22,448,020	5,612,005		5,612,005
January	23,237,020	5,809,255		5,809,255
February	18,997,240	4,749,310		4,749,310
March	17,327,490	4,331,873		4,331,873
Total Winter	98,152,890	24,538,223	0	24,538,223

2012-13	Total Requirements	Volumes in Dth Eligible for Long-Term Hedge Strategy	Cumulative Long-Term Hedges Under Contract	Eligible Long-Term Volumes in Dth Not Under Contract
November	16,090,010	4,022,503		4,022,503
December	22,504,030	5,626,008		5,626,008
January	23,333,090	5,833,273		5,833,273
February	19,044,280	4,761,070		4,761,070
March	15,976,000	3,994,000		3,994,000
Total Winter	96,947,410	24,236,853	0	24,236,853

EXHIBIT B
(Public Version)

There are risks associated with counterparty performance in using over the counter derivatives as financial instruments to implement the Company's hedging plan. In order to mitigate these risks the Company subjects all counterparties to a credit review per the guidelines set forth in the Company's Wholesale Credit and Performance Risk Management Policy, which is contained in Highly Confidential Exhibit B. The following is a summary of the credit review and is provided solely for purposes of the public version of this Exhibit B.

The credit review incorporates the following steps.

1. All counterparties are reviewed financially and credit lines approved prior to permitting any transactions (financial or otherwise).
    a. Audited financial statements (comparative) are required
    b. Annually reviewed
    c. Rating agency ratings and reviews are utilized when available
    d. When qualified, lines are limited by the tangible net worth and unsecured debt ratings
    e. Security is required if not qualified, or when the required credit exceeds available unsecured credit
    f. Security issuers are also qualified/approved when applicable

2. Financial hedging is enabled/transacted under an ISDA (Int'l Swaps & Derivatives Agreement).
    a. The ISDA contains 'thresholds" - they are similar to credit lines, but applicable only to transactions under the ISDA.
    b. We measure and monitor exposure (Mark-to-Market) every day
    c. When the exposure exceeds the threshold (generally, thresholds for major banks falls in the $10 to $20 million range) the ISDA requires the excess be paid to our company as security/margin (this is usually cash/wired)
    d. These provisions are reciprocal, so they apply to us as well as the counterparty
    e. Our operating company thresholds are generally in the $10 to $20 million range as well

3. Adequate Assurance is also included in our agreements
    a. This provision allows a party to request adequate assurance (collateral) in the event that counterparty's creditworthiness is deemed materially impaired.
        i. This is generally applicable if a counterparty were to be downgraded to below investment grade (i.e. BB+/equivalent or lower)
        ii. It could also be invoked in the event that a major adverse decision/judgment was rendered against them (i.e. a regulatory decision not allowing needed recovery of costs imprudently incurred)

Exhibit C
Interactions of Floor Price, Settlement Price and Strike Price on Hedge Budget And Gas Cost Recovery in the Gas Cost Adjustment (GCA) Mechanism

To clarify the various calculations regarding the floor price and its impact or lack thereof in determining the annual budget for the GPVM, the calculated cost of the hedge program and the actual dollars that will be debited or credited to the GCA the following examples are presented to illustrate the impacts under different scenarios:

Scenario 1 – Strike price above the floor price but below the settlement price

Given a floor price of $5.00, assuming the CIG Rocky Mountain index price settles at $7.00 per Dth and Public Service has a fixed price hedge at a $6.50 strike price for a volume of 500,000 Dth for the month.

a) The annual hedge budget would be reduced from $30M to $29.25M as a result of taking the difference between the $6.50 strike price and the $5.00 floor price multiplied by the monthly volume of 500,000 Dth.

b) The calculated cost of the hedge plan would be reduced by $250,000 as a result of the positive settlement value from the hedge, which is calculated by taking the difference between the $7.00 index settlement and the $6.50 strike price multiplied by the monthly volume of 500,000 Dth.

c) The value credited to the GCA would be the actual settlement cost of the hedge which is $250,000 and is calculated by taking the difference between the $7.00 index settlement and the $6.50 strike price multiplied by the monthly volume of 500,000 Dth.

Scenario 2 – Strike price above floor price and settlement price, however settlement price is below the floor price

Given a floor price of $5.00, assuming the CIG Rocky Mountain index price settles at $4.00 per Dth and Public Service has a fixed price hedge with a $6.50 strike price for a volume of 500,000 Dth for the month.

a) The annual hedge budget would be reduced from $30M to $29.25M as a result of taking the difference between the $6.50 strike price and the $5.00 floor price multiplied by the monthly volume of 500,000 Dth.
b) The calculated cost of the hedge plan would be increased by $750,000 as a result of the negative settlement value from the hedge, which is calculated by taking the difference between the $5.00 floor price[1] and the $6.50 strike price multiplied by the monthly volume of 500,000 Dth.
c) The value debited to the GCA would be the actual settlement cost of the hedge which is $1,250,000 and is calculated by taking the difference between the $4.00 index settlement and the $6.50 strike price multiplied by the monthly volume of 500,000 Dth.

Scenario 3 – Strike price above floor price and settlement price, however settlement price is above the floor price

[1] When the actual index settlement is below the floor price, for purposes of calculating the cost of the hedging program relative to the annual budget the floor price is used instead of the index settlement as described in the GPVM plan.

Given a floor price of $5.00, assuming the CIG Rocky Mountain index price settles at $5.50 per Dth and Public Service has a fixed price hedge with a $6.50 strike price for a volume of 500,000 Dth for the month.

a) The annual hedge budget would be reduced from $30M to $29.25M as a result of taking the difference between the $6.50 strike price and the $5.00 floor price multiplied by the monthly volume of 500,000 Dth.

b) The calculated cost of the hedge plan would be increased by $500,000 as a result of the negative settlement value from the hedge, which is calculated by taking the difference between the $5.50 index price[2] and the $6.50 strike price multiplied by the monthly volume of 500,000 Dth.

c) The value debited to the GCA would be the actual settlement cost of the hedge which is $500,000 and is calculated by taking the difference between the $5.50 index settlement and the $6.50 strike price multiplied by the monthly volume of 500,000 Dth.

Scenario 4 – Strike price below floor price and above settlement price

Given a floor price of $5.00, assuming the CIG Rocky Mountain index price settles at $4.00 per Dth and Public Service has a fixed price hedge with a $4.50 strike price for a volume of 500,000 Dth for the month.

[2] In this scenario the actual index settlement was above the floor price and therefore for purposes of calculating the cost of the hedging program relative to the annual budget the index price is used as described in the GPVM plan.

a) The annual hedge budget would remain at $30M; since the floor price is greater than the strike price no adjustment to the annual budget is required.

b) There would be no impact on the calculated cost of the hedge plan since the strike price of the hedge is below the floor price.

c) The value debited to the GCA would be the actual settlement cost of the hedge which is $250,000 and is calculated by taking the difference between the $4.00 index settlement and the $4.50 strike price multiplied by the monthly volume of 500,000 Dth.

The following table compares the differences in the annual hedge budget, the cost of the hedge plan and the value debited or credited to the GCA as a result of changing the floor price from $5.00 to $5.85 for each of the scenarios listed above.

Scenarios	**$5.00 Floor Price**	**$5.85 Floor Price**
1A – Annual Budget	$29.25M	$29.675M
1B – Hedge Cost	($250,000)	($250,000)
1C – GCA Impact	($250,000)	($250,000)
2A – Annual Budget	$29.25M	$29.675M
2B – Hedge Cost	$750,000	$325,000
2C – GCA Impact	$1,250,000	$1,250,000
3A – Annual Budget	$29.25M	$29.675M
3B – Hedge Cost	$500,000	$325,000
3C – GCA Impact	$500,000	$500,000
4A – Annual Budget	$30M	$30M
4B – Hedge Cost	$0	$0
4C – GCA Impact	$250,000	$250,000

Exhibit D

Public Service Company
Long-Term Hedge Summary
Open Positions as of
Quarter Ended December 31, 2009

Month	Volume (Dth)	Weighted Average Contract Price[1]	Current Market Price[2]	Mark to Market Value[3]
November 2010	2,400,000	$5.818	$5.64	($428,100)
December 2010	2,480,000	$6.165	$6.15	($35,960)
January 2011	2,480,000	$6.322	$6.38	$143,840
February 2011	2,240,000	$6.321	$6.36	$86,800
March 2011	2,480,000	$6.23	$6.15	($198,400)
Total	12,080,000			($431,820)

1 The weighted average contract price is the sum of the volumes of each open contract multiplied by their respective contract price divided by the total volume of all open contracts for each respective month. The contract price was the then current forward market price at the time when each long-term hedge was transacted.

2 The current market price for each month as of the quarter ended date in the heading.

3 The mark to market price is the difference between the weighted average contract price and the current market price multiplied by the monthly volume.

Gas Price Volatility Mitigation Plan
Public Service Company of Colorado - Gas Department
December 2009

Review of Historical Market Conditions

During the winter of 2008-2009, the US economy entered into "The Great Recession". Gross Domestic Product (GDP) decreased by 2.6 percent, unemployment rose to 7.5 percent and manufacturing decreased by 11.4 percent resulting in record high gas storage inventories and falling natural gas prices. The winter of 2008-2009 was the coldest since 2002-2003, however, the cold winter did not push prices up as the impact of a slowing economy sent natural gas demand spiraling downward. The average NYMEX Closing price for the first quarter of 2009 was $4.89 per MMBtu as compared to the average NYMEX Closing price for the fourth quarter of 2008 of $6.94 per MMBtu.

The summer of 2009 was the 34th coolest since 1895. For the months from June to August 2009, the average temperature was 0.4 degrees below the 20th century average for the Lower-48 States. According to the Energy Information Administration (EIA) the electric-power sector's natural gas consumption through July 2009 increased by 0.4 percent compared to the same period in 2008, due to coal–to-natural gas fuel switching. However, this increase in natural gas consumption only prevented prices from falling even further as the average NYMEX Closing price for the second quarter of 2009 was $3.497 per MMBtu and $3.39 per MMBtu in the third quarter of 2009 as demand from the industrial, residential and commercial sectors continued to be hampered by weak economic conditions as worldwide economic growth continued to shrivel.

Despite falling demand and prices, natural gas production in the Lower-48 States rose by 2.9 percent year-over-year through July 2009, despite a more than 40 percent decline in the working rig count since the start of the year. As a result, on September 4, 2009, the NYMEX October natural gas futures contract closed at $2.73 per MMbtu, a 7-year low.

However, only a month later, on October 9, 2009, the November NYMEX natural gas futures contract rebounded up 75% to close at $4.77 per MMbtu as the third coldest October weather engulfed most of the demand centers of the U.S. natural gas market. This resulted in a reversal of the long slide in natural gas prices as the average NYMEX Closing price for fourth quarter of 2009 was $4.1683 per MMBtu. The 12-month average NYMEX Henry Hub natural gas settlement price for 2009 was $3.9862 per MMBtu, as compared to an average settlement price of $9.04 per MMBtu in 2008. During 2009, the NYMEX Henry Hub futures contract swung between a low of $2.508 in September to a high of $6.22 in January.

The combination of a cooler than normal summer and increasing natural gas production helped push U.S. natural gas storage inventories to a new record high at the end of the injection season, eclipsing the previous record high set in November, 2007 of 3.518 Bcf. EIA reported the injection season ended with 3.837 Tcf in storage on November 27, 2009, which is 470, Bcf higher than the same week in 2008 and 487 Bcf above the five-year average.

Regionally, the monthly gas price index for CIG- Rockies Mountains, as posted by Inside FERC's Gas Market Report, ranged from a high of $4.35 per MMBtu in January, 2009 to a low of $2.30 per MMBtu for September 2009. In addition, the daily spot market actually dropped as low as $1.85 per MMBtu over the labor-day weekend and would most likely have kept falling had Colorado not experienced the second coldest October on record.

Market Outlook

In September, 2009, Federal Reserve Chairman Ben Bernanke stated that the current economic recession was "very likely over." It is being forecasted that the economy will start to recover during the winter of 2009-2010; however, the recovery will be fragile. According to Global Insight, the GDP is projected to show mild growth, 0.7 percent, compared to last winter. The unemployment rate is expected to remain at approximately 10 percent, and manufacturing, an important component of natural gas demand, is projected to decline 1.6 percent this winter compared to last winter's steep decline of 11.4 percent. Economic growth may well reemerge, but will likely do so gradually and the recovery has yet to register a strong impact on industrial demand. PIRA Energy Group (PIRA) estimates coal based electric generation's projected aggressive re-capture of the electric generation market from gas will result in sizable overall net demand losses, barring a very cold winter.

In September 2008, the natural gas directed rig count hit a historical high of 1,606 active rigs leading to an estimated increase in natural gas production in the Lower-48 States of 2.9 percent year-over-year through July 2009. Although we have experienced a decline in excess of 40% in the overall working rig count since the start of the year, the horizontal rig count has dropped only about 27 percent according to Cambridge Energy Research Associates (CERA).

Horizontal rigs are used predominantly to drill shale gas wells, which typically produce twice the output of a conventional well on average, and are the primary reason for the surge in natural gas supply during the past few years. The cost of developing shale gas wells is falling as operators implement operational efficiencies and realize increases in initial production rates due to the implementation of directional drilling techniques. The number of wells required to maintain production is falling and will continue to fall as major shale plays ramp up and become a larger component of North America natural gas production. The Marcellus and the Haynesville shale gas plays continue to lead a slight recovery in the gas-directed rig count. CERA estimates that the increased activity in these areas more than offsets the decline in activity in other areas. This is part of the reason why natural gas production levels have not dropped proportionally to the decline in the total natural gas rig count.

The continuing supply/demand imbalance has allowed natural gas inventories to set a new all time high inventory level as of November 27, 2009 of 3,837 billion cubic feet (Bcf). This record natural gas storage inventory has put significant downward pressure on gas prices this year and is expected to continue through 2010. Currently, NYMEX prices for the 2010-11 heating season are $6.34 and current price forecasts for Henry Hub for this upcoming heating season range from $4.23 to $7.00.

Although record high storage levels, resilient production and lower demand due to broader economic events have put downward pressure on gas prices and the downward pressure is anticipated to continue, in the past natural gas prices have tended to reverse themselves relatively quickly. The possibility of price fluctuations due to extreme weather events remain, which underscores the need for continued price volatility mitigation efforts. Therefore, the goals of the Company's gas price mitigation efforts will be similar to those of previous years' plans

Definition of Volatility

This plan is titled "Gas Price Volatility Mitigation Plan", however it should be noted that the academic definition of the word volatility is not being used in the title or throughout this document. For purposes of this document, the "volatility" that the plan is mitigating is sharp upward price movement only. It is assumed in this document that downward price "volatility" is considered beneficial to the ratepayers and therefore the plan does not specifically attempt to mitigate downward price volatility.

Price Volatility Mitigation Goals

The overall goal of the Company's Price Volatility Mitigation Plan is to reduce the exposure to and magnitude of gas price spikes at a reasonable cost to Public Service Company's gas sales customers. The goal of the plan is not to attempt to outguess the market or speculate on the future direction of energy prices. Uncertain economic outcomes and the volatility of the natural gas market create conditions where the final result of implementing the Company's plan may be gas costs that are somewhat higher than if all gas supply had been purchased on the monthly spot market.

Hedge Budget

The proposed Annual Gas Hedging Budget for Public Service's gas customers is $26.05 million, which is calculated by adjusting the $30.0 million dollar budget limit that was approved in Docket No. 08A-095G by the offset from the long-term hedges that are currently in place for the upcoming heating season determined in accordance with the Stipulation and Agreement entered in Docket No. 10A-027G.[1] The volumetric target for Public Service's LDC gas portfolio, as approved by the Commission in Docket No. 08A-095G, is to hedge 75% of the Company's normal winter purchases, thereby leaving 25% of the normal requirements to be purchased on a spot basis. The Company will use storage to hedge approximately 22% of the normal winter requirements and financial instruments to hedge the remaining 53%. The overall hedge volumes for the 2010-2011 hedge plan is 51,720,000 MMBtu, as shown on Schedule PVM-2, page 1, while the monthly volumes to be hedged are identified on Schedule PVM-2, page 2.

The Company will implement the Volume Schedule (Schedule PVM-2, page 2) each month using the Hedging Tool/Gas Price Matrix, attached as Schedule PVM-3. This matrix is designed in such a way as to keep the total hedging costs within the proposed targeted hedging budget ($26.05 million). The matrix takes into account that the approved hedging tools for this plan will

[1] The offset to the budget for these is determined by the volume for the long-term hedges applicable to the current Gas Purchase Year, that were previously executed in prior years, multiplied by the negative difference between the currently effective Floor Price, and the contracted strike price of a fixed-for-float swap or the contracted strike price associated with the put option that is part of a costless collar. For the purpose of this offset, the then-applicable Floor Price is the average of monthly index prices as published by Platts in its Inside FERC Gas Market Report for the index labeled "CIG-Rocky Mountains" over the previous four heating seasons (November to March), unless an alternative Floor Price is approved by the Commission.

include fixed price purchases (including NYMEX with basis differentials and fixed-for-float swaps), costless collars and call options. The Hedging Tool/Gas Price Matrix outlines the hedging tools to be used at the various gas pricing levels that may be experienced over the implementation period.

Floor Price

This year's floor price will be $[redacted], this is the average of the Inside FERC–CIG monthly index price over the past four heating seasons (November through March) as shown on Schedule PVM-1.

The floor price is used to determine the cost of the Price Volatility Mitigation Plan when either a fixed price swap or a costless collar is purchased. In calculating the total cost of the plan, all settlement costs included in the hedging budget will be based on the costs above the floor price. For instance, if the Company purchases a $6.50 per MMBtu fixed price swap (or a costless collar with a floor price of $6.50 per MMBtu) against the GPVM plan floor price of $[redacted] per MMBtu it counts $[redacted] per MMBtu towards the hedging budget if CIG Index prices settled at $[redacted] per MMBtu or lower. However, if the Company purchases call options only the actual premiums paid are counted against the hedge budget.

Price Volatility Mitigation Long-Term Strategy

Consistent with past plans, there are two primary features of the Company's price volatility mitigation strategy: a seasonal strategy and a longer-term (2 to 3-year) strategy. Public Service will utilize this two-pronged approach in its plan in an effort to provide longer-term price stability, while at the same time mitigating much of the intra-seasonal volatility.

The long-term price volatility mitigation strategy will focus on a time horizon of two to three years. This time horizon and corresponding strategy will allow customers to avoid a portion of the price risk related to significant increases in gas prices that may last for longer periods of time. The utilization of a longer-term strategy will allow the Company to mitigate the effects of this type of price risk, while allowing the seasonal strategy to mitigate the effects of the shorter-term price spikes during peak demand months.

In keeping with a portfolio approach to its gas price volatility mitigation strategy, Public Service will target up to 25% of its local distribution company (LDC) seasonal gas requirements to be hedged on a longer-term basis if gas prices are at or below the floor price for the 2010-11 Gas Purchase Year. This quantity will provide a level of price stability in the Company's gas portfolios, while not eliminating the desire for the portfolios to be sensitive to market prices in the long run. In addition, the long-term strategy will complement the seasonal strategy in providing reasonably-priced gas supply service to customers.

Public Service will begin the implementation of its long-term price volatility mitigation strategy if gas prices in the Rocky Mountain Region are at or below the floor price as described above. Employing this level of pricing will ensure that the longer-term component of the volatility mitigation strategy will remain reasonably market sensitive, while still providing an adequate level of price stability.

Price Volatility Mitigation Seasonal Strategy

The purpose of the seasonal component of the strategy is to reduce the risk of price spikes resulting from short-term upsets in the wholesale gas markets. The seasonal strategy will allow for gas prices to be hedged between the months of April 2010 through October 2010, prior to the months of delivery. This time frame allows the Company to analyze market data regarding production trends, demand trends and storage inventory levels in making its hedging decisions. The seasonal nature of the strategy is intended to provide a desired level of price risk protection, while maintaining a balance between market premiums and overall plan costs.

To allow for a more cost effective approach to the hedging activity, the targeted volume may be modified for a particular month to allow for standard-sized packages of gas to be hedged. For example, in an effort to make the acquisition of the hedging instruments more cost effective, the targeted daily volumes may be modified to match the standard NYMEX contract size (10,000 MMBtu per contract). The Volume Schedule (Schedule PVM-3, page 2) incorporates a dollar cost averaging approach, where the Company will layer in the hedged volume over the planned implementation period. The layering approach spreads the timing risks of the hedging decision over the full planning horizon and ensures that the Company will not enter into all or a very large percentage of the hedged volume at the peak of the market.

This year's Hedging Tool/Gas Price Matrix has been designed to limit the amount of hedge premium costs to $0.66 per MMBtu (equal to the $26.05 million Annual Gas Hedge Budget divided by the 39.6 Bcf seasonal hedge volumes) when CIG market prices are at or above the $[redacted] per MMBtu floor price. The design of the Hedging Tool/Gas Price Matrix (Schedule PVM-3) is based on the assumption that the future pricing for financial instruments will stay within their historic pricing levels. The historic pricing levels for premiums associated with At-the-Money ("ATM") Call options have been approximately 17% - 22% of the ATM strike price. Therefore, the Company will manage the $0.66 per MMBtu premium cost by purchasing fixed price swaps or costless collars if the fixed price quote is at $[redacted] per MMBtu or lower for the months being hedged. As strike prices move above $[redacted] per MMBtu, the Company will target purchasing ATM Call options as long as the premium cost does not exceed $0.66 per MMBtu. If the Company is unable to purchase ATM Call options at or less than $0.66 per Dth, the Company will switch to purchasing Out-the-Money ("OTM") Call options, with the strike price adjusted above the ATM to limit the cost of the premium to $0.66 per MMBtu. While it is understood that call options with significantly higher strike prices will not provide as much protection against smaller movements in gas price, the trade off for lower premiums is appropriate as forward gas prices move further away from the floor price.

Implementation Strategy

In implementing the Company's Price Volatility Mitigation Plan, the Company will use its best judgment to select the days to complete the hedging activity. On the selected day(s), the Company will complete the hedging transaction as identified in the Volume Schedule (Schedule PVM-2, page 2) using the hedging instruments identified in the Hedge Tool/Gas Price Matrix (Schedule PVM-3). Due to small or "odd lot" volumes in various months, and the need to apply percentage splits to the hedge volumes, the Company may use a particular hedging instrument for certain months of the delivery period, while using another instrument for another month. In doing so, the Company will strive to meet the intent of the matrix selection process while still allowing it to complete the transactions in a commercially acceptable fashion (e.g., where the volume is so small or the volume does not fit into a normal trading package size, the hedging counter-parties may not be interested in completing such transactions). In order to provide flexibility to deal with the timing of weather events at the beginning or end of a month, the Company may hedge the monthly volumes any time during the period ten days before and ten days after the original targeted month.

As required by previous Commission orders approving Public Service's use of financial instruments to hedge gas prices in Docket No. 08A-095G, Schedule PVM-4 is attached addressing "Special Requirements for Financial Derivatives." Schedule PVM-4 lists the financial tools available to be used in the hedging program, the individual authority limits and record keeping requirements for each financial derivative transaction.

Adjustment as a result of Counterparty Default

In the event that counterparty defaults on a hedged transaction, Public Service will apply the following guidelines in determining whether to leave the position open or to replace the position:

a) If the Company, as the result of a default by the counterparty, is required to pay the counterparty to settle a fixed-for-float swap or costless collar, the Company will replace the defaulted position with a new fixed-for-float swap for the same period and in the same quantity of the defaulted position.

b) If the Company, as the result of a default by the counterparty, receives none or only a portion of the positive benefit that would be due as a result of a positive mark on the defaulted hedged position, the Company will replace the hedge with the appropriate instrument for the current price level, provided that it has budget dollars available under the hedge plan. If no hedging dollars are available, the position will be left un-hedged. The available hedging dollars will be the difference between the approved budget for that particular Gas Purchase Year, less any option premiums paid in implementing that year's seasonal hedging strategy.

Conclusion

Continued gas price volatility is projected for the upcoming heating season. The Company is proposing to implement a strategy that will protect approximately 75% of the normal winter requirements from exposure to gas price fluctuations. Also, to manage the hedging costs, a mix of hedging instruments, including call options, fixed-float swaps and costless-collars is being proposed. This plan will achieve the goal of the Company's Price Volatility Mitigation Plan, which is to reduce the exposure to and magnitude of gas price spikes at a reasonable cost to Public Service's customers.

Schedule PVM-1

INSIDE FERC CIG- ROCKY MOUNTAIN INDEX

						NOV-MAR
YEAR	**NOV**	**DEC**	**JAN**	**FEB**	**MAR**	**AVG**
[redacted]						
2005-06	$ 10.75	$ 8.60	$ 8.84	$ 6.65	$ 6.14	$ 8.20
2006-07	$ 3.61	$ 6.02	$ 5.98	$ 7.09	$ 7.81	$ 6.10
2007-08	$ 5.99	$ 5.63	$ 4.17	$ 6.41	$ 6.17	$ 5.67
2008-09	$ 2.78	$ 4.63	$ 4.35	$ 2.98	$ 2.47	$ 3.44
2009-10	$ 4.32	$ 4.20	$ 5.54	*$ 5.65*	*$ 5.62*	$ 5.07
2010-11	$ 5.98	$ 6.32	$ 6.52	$ 6.48	$ 6.36	$ 6.34
Average-Past 4 Heating Seasons						**$ 5.854**

NOTE: Feb & Mar 2010 are projected prices based upon NYMEX and CIG basis as of December 28, 2009

Gas Department Overall Hedge Volumes 2010-2011

Delivery Month	Total Requirements	Storage Withdrawals	Total Hedges	Total Hedges (Rounded)	Total PVM Quantities	PVM % of Total Req.	Daily Hedge Quantities
November, 2009	16,277,720	[redacted]				75%	[redacted]
December, 2009	22,494,470					75%	
January, 2010	23,232,740					75%	
February, 2010	18,995,240					75%	
March, 2010	15,879,350					75%	
Total	96,879,520	20,878,585 22%	51,781,056 53%	51,720,000 53%	72,659,641 75%	75%	

Schedule PVM-2
Gas Department Monthly Hedge Volumes 2010-2011

Delivery Month	Month Volume Total	Daily Volume Total (Rounded)	Completed Hedges	Daily Transaction Volume: April	May	June	July	August	September	October
November	[redacted]	[redacted]	80,000	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
December	[redacted]	[redacted]	80,000	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
January	[redacted]	[redacted]	80,000	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
February	[redacted]	[redacted]	80,000	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
March	[redacted]	[redacted]	80,000	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]	[redacted]
Total	**51,720,000**		400,000	200,000	200,000	200,000	200,000	195,000	190,000	130,000

Public Service Company of Colorado

2010-11 Gas Price Volatility Mitigation Plan
Schedule PVM-3

	2010-11 Hedging Tool/Price matrix							
Hedge Volume						Hedge Cost		
Target (Dth)	39,640,000					Target	$26,050,800	$ 0.657
				Hedging Instruments				
	Market	Market at	Fixed Price or				Total	
	Floor	Time of Hedge	Costless Collar	ATM Call	OTM Call		Cost	
Pricing Scenario 1	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 2	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 3	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 4	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 5	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 6	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 7	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 8	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 9	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 10	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 11	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 12	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 13	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 14	[redacted]							
% of Portfolio								
Cost							$26,050,800	
Pricing Scenario 15	[redacted]							
% of Portfolio								
Cost							$26,050,800	

Schedule PVM-4
Public Service Company of Colorado
Special Requirements for Financial Derivatives

Public Service's 2010-2011 Gas Price Volatility Mitigation Plan will use financial derivative products, including fixed-for-float swaps, NYMEX futures contracts with basis differentials, costless collars and call options in its efforts to mitigate gas price volatility for the Company's gas sales customers.

The Company has established individual authority limits for the following individuals:

Gas Buyer/Trader: Monica Nedbalski, Janice Vargas, Kathleen Little and Jeff Spector shall have the authority to complete all transactions, subject to prior approval by the Manager, Gas Supply or the Director, Gas Supply. The Gas Buyer/Trader shall have the discretion to agree to variances in price quotes up to 5% of the price approved by the Manager, Gas Supply or the Director, Gas Supply. The maximum amount of any financial derivatives entered into during any single day by each Gas Buyer will be limited to 50,000 Dth per day (1,550,000 Dth per month) per month.

Manager, Gas Supply: Jeff Ishee or Craig Rozman shall have the authority to approve all swaps, financial transactions, costless collars, and call options up to the full price and quantity limits included in the Company's Price Volatility Mitigation Plan.

Director, Gas Supply: Tim Carter shall have the same authority to approve the use of financial derivatives as the Manager, Gas Supply.

Vice President, Fuels: Susan Arigoni shall have the same authority to approve the use of financial derivatives as the Manager, Gas Supply.

Finally, Public Service will record and maintain the required supporting information and documentation on each financial derivative transaction.

All personnel titles referenced above are for employees of Xcel Energy Services Inc.

Gas Price Volatility Mitigation Plan Approval Form
Public Service Company of Colorado
Gas Department
2010-11 Gas Purchase Year

Public Service Company of Colorado is requesting approval of the following three items related to its Gas Price Volatility Mitigation Plan for the Gas Purchase Year of July 1, 2010 through June 30, 2011:

1) The Gas Price Volatility Mitigation Plan for the 2010-11 Gas Purchase Year includes two components: a seasonal strategy and a long-term strategy. The combined volume, available to be hedged under the two components, is a maximum of 75% of the Company's normal winter purchase requirements during November 2010 through March 2011. The long-term strategy targets up to 25% of the Company's seasonal gas purchase requirements for the next three heating seasons (November through March, ending March 2013) and will be implemented at or below a gas price (CIG index) of $[redacted] per Dth, which is the current Floor Price for the 2010-11 Gas Purchase Year.

   The seasonal strategy will target a volume of up to 75% (depending on whether any part of the long-term strategy has been implemented) of the Company's normal winter purchase requirements during November 2010 through March 2011. The company will use storage to hedge approximately 22% of the normal winter requirements and financial instruments to hedge the remaining 53%. The volumes to be hedged, as identified on page 3 of this Confidential Appendix B, will be spread out over the year with the specified volumes hedged each month. These monthly volumes will be reduced to reflect any volumes acquired as part of the long term hedging plan from prior year's plans.

   The Company will manage the $0.58 per MMBtu premium cost by purchasing fixed price swaps or costless collars if the fixed price quote is at $[redacted] per MMBtu or lower for the months being hedged. As strike prices move above $[redacted] per MMBtu, the Company will target purchasing ATM Call options as long as the premium cost does not exceed $.58 per MMBtu. If the Company is unable to purchase ATM Call options at or less than $0.58 per Dth, the Company will switch to purchasing Out-the-Money ("OTM") Call options, with the strike price adjusted above the ATM to limit the cost of the premium to $0.58 per MMBtu. The exact volumes to be hedged using the various instruments, the use of a specific hedge instrument and the strike price of the hedge instrument will be dependent on the market price of the hedging instrument and the approved targeted hedging budget, as set forth in section (2) below.

2) The Floor Price and the Annual Hedging Budget for the 2010-11 Gas Price Volatility Mitigation Plan are as follows:

   Floor Price: $[redacted] per Dth
   Annual Hedge Budget: $26.05 Million[1]

3) The gas purchase volume to be included in the Gas Price Volatility Mitigation Plan and the timing of the implementation of the plan are set forth on page 3 of this Confidential Appendix B. Page 3, entitled Overall Projected Hedge Volumes, identifies for each delivery month the Total Requirements, Storage Activities, Monthly and Daily Hedge Quantities to be hedged in each delivery month. The schedule also identifies the timing of the implementation of the hedging plan, stating the volume to be hedged in each of the transaction execution months for the given month of delivery.

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1 This is the $30 million Annual Hedge Budget, as approved in Decision No. C09-0596 in Docket No. 08A-095G adjusted for the offset for the long-term hedges in accordance with the Stipulation and Agreement entered in Docket 10A-027G.

PSCo LDC - Gas
Overall Projected Hedge Quantities
2010-2011 Gas Purchase Year

	a.	b.	c.	d.	e. **	f.	g.	h.	i.	j.	k.	l.	m.	n.	o.
1	**Delivery Month**	Total	Storage	Hedged	Total Hedge	Daily Hedge	Daily Transaction Volumes Hedged For Delivery Month (MMBtu/day)**								
2		Requirements	Activities	Quantities	Quantities	Volume	Completed	March	April	May	June	July	August	September	October
3		(From GPVM)	(From GPVM)	((b.x .75) - c.)	(c. + d.)	(d./days per mo.	Hedges								
15					0%										
16	November, 2010	[redacted]													
17															
18	December														
19															
20	January, 2011														
21															
22	February														
23															
24	March														
25															
26	April														
27															
28	**Total**	96,879,520	20,878,585	51,781,055	51,720,000										
29			22%	53%	53%										

30 ** Hedge Quantities are rounded.

CERTIFICATE OF SERVICE
10A-027G

I hereby certify that on this 11th day of March, 2010, an original and seven (7) copies of the foregoing **"STIPULATION AND AGREEMENT; AND HIGHLY CONFIDENTIAL EXHIBIT B AND HIGHLY CONFIDENTIAL APPENDICES A AND B (FILED UNDER SEAL)"** were served via hand delivery to:

Doug Dean, Director
Colorado Public Utilities Commission
1560 Broadway, Suite 250
Denver, CO 80202

and a copy was electronically served to all parties on March 11, 2010, as follows:

David A. Beckett First Assistant Attorney General Office of the Attorney General 1525 Sherman Street, 6th Floor Denver, CO 80203 David.beckett@state.co.us	Erin Overturf Assistant Attorney General Office of the Attorney General 1525 Sherman Street, 6th Floor Denver, CO 80203 Erin.overturf@state.co.us.
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Wynne Leonard