

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

\* \* \* \* \*

<b>IN THE MATTER OF REPORTING</b>	)	
<b>REQUIREMENTS FOR PUBLIC SERVICE</b>	)	
<b>COMPANY OF COLORADO FOR PIPELINE</b>	)	<b>PROCEEDING NO. 13M-0915G</b>
<b>INTEGRITY EXPENDITURES</b>	)	

**JOINT COMMENTS OF PUBLIC SERVICE COMPANY OF COLORADO, COLORADO  
OFFICE OF CONSUMER COUNSEL, STAFF OF THE COMMISSION, AND  
COLORADO NATURAL GAS**

Public Service Company of Colorado ("Public Service" or "Company"), the Office of Consumer Counsel ("OCC"), Staff of the Colorado Public Utilities Commission ("Staff"), and Colorado Natural Gas, Inc. ("CNG") (collectively, "the Parties"), through their undersigned legal counsels and pursuant to 4 Code of Colorado Regulations ("C.C.R.") 723-1-1400, hereby file joint comments on the requirements for future Public Service Pipeline System Integrity Adjustment ("PSIA") advice letter filings and annual reports.

On August 8, 2013, by Decision No. C13-0964 in Docket No. 10AL-963G, the Colorado Public Utilities Commission ("Commission") opened this Proceeding and referred it to an administrative law judge ("ALJ"). In that Decision, the Commission stated:

28. By this Decision we... open a new miscellaneous gas proceeding and refer it to an ALJ. The ALJ shall issue a recommended decision in this separate proceeding that establishes requirements for the future Public Service PSIA [Pipeline System Integrity Adjustment] advice letter filings and annual reports. Public Service, Staff, and the OCC shall be declared necessary parties in that proceeding, and the ALJ shall establish a notice and intervention period for other entities seeking to intervene. The ALJ shall require parties to file comments and/or testimony regarding their positions on the appropriate content of the advice letter filings and annual reports. Parties may also comment on the appropriate review process for

Colorado PUC E-Files System

each filing.

29. The ALJ may take evidence and make findings regarding the October PSIA advice letter filing on a priority basis such that requirements and guidelines are established in time for that filing.

Decision No. C13-0964 at Paragraphs 28-29. Consistent with Decision No. C13-0964, on November 21, 2013, ALJ Mana Jennings-Fader directed the Parties to file opening comments on January 17, 2014, and reply comments on January 29, 2014, stating the following in Decision No. R13-1455-I:

9. The comments will address the content of (that is, what should be included in) Public Service's annual PSIA October advice letter filings and in Public Service's annual April PSIA report filings. In addition, the Parties may include comments on the appropriate process to be used to review each type of filing. See Decision No. C13-0964 at ¶¶ 28-29 (quoted above).

10. In preparing their comments, the Parties should consider, but are neither bound nor limited by, the Commission's discussion at ¶¶ 11-15 in Decision No. C13-0587-I, which was issued on May 20, 2013 in Proceeding No. 10AL-963G.

Decision No. R13-1455-I at Paragraphs 9-10.

The Parties conferred regarding the required contents of Public Service's annual PSIA October advice letter filings and annual April PSIA report filings, and the appropriate process to be used to review each type of filing. Because the Parties were in agreement about several aspects of the required contents for filing and filing review process, but had not addressed all relevant issues to this proceeding in a joint comment, the Parties moved, on January 16, 2014, for an extension of time to file a joint comment on January 24, 2014, and to vacate the filing of response comments on January 29, 2014. On January 17, 2014, by Decision No. R-14-0072-I, ALJ Jennings-Fader granted the Parties' motion.

The Parties have agreed upon the required contents for Public Service's PSIA annual advice letter and report filings. The Parties provide, as Attachment A to this

filing, the agreed upon "PSIA Tariff and Related Performance Revisions" for Public Service's annual advice letter and report filings. The Parties note that for Public Service to provide interested parties with the most up-to-date information, the Parties have agreed to move Public Service's annual advice letter filings from October 1 to November 15. The Parties also note that the Parties have agreed for Public Service to make quarterly reports, in addition to Public Service's annual April report, to alert interested parties of the Company's progress towards achieving PSIA program forecasts presented in the Company's annual November 15 advice letter filings. Specific revisions and details with regard to Public Service's annual November 15 advice letter filings, quarterly reports, annual April reports are contained in Attachment A. The Parties also provide, as Attachment B to this filing, Attachment 2 (2012 PSIA Capital Expenditures Estimate vs. Actual) and Attachment 4 (Total O&M For the Calendar Year 2012 (before Retail allocation) Estimate vs. Actual) that have been a part of the Company's annual April report because those Attachments are referred to in the Parties' PSIA Tariff and Related Performance Revisions to illustrate the kind of information required from Public Service.

The Parties believe that the PSIA Tariff and Related Performance Revisions, provided as Attachment A to this filing, establish clear guidelines for the types of information Public Service must include in its PSIA annual advice letter and report filings, are reasonable and in the public interest, and the Parties request that they be adopted.

Dated this 24<sup>th</sup> day of January, 2014.

Respectfully submitted,

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## PSIA tariff and related performance revisions

PSIA tariff involves two mandatory filings – November 15 to set the rate and April 1 to reconcile the revenues.

### November 15 PSIA Filing

#### General changes

1. The Company will change the Annual Filings section of the tariffs from October 1 to November 15.
2. The April report will be filed as a compliance filing and part of the November 15 Advice Letter proceeding that included the estimated costs for the same calendar year.

#### Specific changes

1. The Company will provide an update to the June Supplemental Report Appendix A Risk Ranking and Prioritization for the PSIA programs and projects in each November advice letter filing, which will include an explanation or table assessment of the priorities that informed our business plan/forecast.
2. The Company will provide a 5 year forecast for PSIA projects by parent project for both capital expenditures and O&M. The high level business plan for the forecasted capital and O&M spend should be reflected in the 5 year forecast spend attachment.
3. The Company will provide a high level 5 year business plan explaining what pipeline system integrity work the Company is planning on doing and why.
4. The Company will provide adequate detail around the forecast assumptions by project for the 1 year forecast that recovery is requested for the November filing; for example, general locations of work for applicable projects (such as divisions impacted or key cities/municipalities impacted) and maps or specific locations for applicable projects; a general discussion of the operational factors that the Company will face with each project (bypass, type of soil, location factors, expected downside factors such as potential additional pipeline to be addressed in the specific pipe sections, etc.); initial scope of work (such as miles of main, number of services, planned miles by pipe material, etc.); potential start and end dates of the work, if applicable; and assumptions pertinent to generating the estimate (such as cost per mile, cost per dig, etc.).
5. For TIMP, list the Capital and O&M expenditures for each project within TIMP (Assessments, MAOP validation, Pipeline Data Project, etc.), for each quarter, as:
  - a. Forecasted for the year by TIMP program, project and parent project number.
  - b. Estimated date/year of completion, and relevant in-service dates (Note: TIMP is generally considered to be ongoing; but will include dates for projects or assessments within TIMP where a completion date applies).



- c. Explain if this is a new project or part of an ongoing project.
6. For DIMP, list the Capital and O&M expenditures for each project within DIMP (Robotic ILI for IP lines, accelerated leak survey, etc.), for each quarter, as:
  - a. Forecasted for the year by DIMP program, project and parent project number.
  - b. Estimated date/year of completion, and relevant in-service dates (Note: DIMP is generally considered to be ongoing; but will include dates for projects within DIMP where a completion date applies).
7. For the West Main Pipeline program, provide an estimated date of completion of the program, its in-service date, and estimates for the following:
  - a. Overall costs, including capital expenditures and O&M, if any.
  - b. Miles of transmission pipeline by size and location. In other words what was initially estimated and what was actually replaced.
  - c. Number of new regulator stations.
  - d. Number of rebuilt regulator stations.

### **Quarterly Reporting**

1. The purpose of the quarterly reports is to alert interested parties of the progress the Company is making towards achieving its forecasted PSIA program filed in its annual November 15 Advice Letter filing.
2. The Company would like to file the quarterly presentations with the additional detail requested and agreed to by parties rather than creating a report in addition to the presentations.
3. The Company will provide variances of capital expenditures and O&M actual to forecasted costs by parent project number. See Attachments 2 & 4 in the April PSIA Filing for an example of the level of detail that will be provided. This will include a summary of forecast changes by project that will incorporate the request for explanations, analyses to management, and plans to remedy cost-overruns.
4. The Company will provide projected and actual miles of the pipelines replaced to date for each relevant PSIA program or category. We will further break down this information by pipeline type (transmission, mains, and services), material type (plastic, cast iron, and steel) and diameter for Transmission only.
5. The Company will provide projected and actual miles of the new pipelines used to replace existing mains and the type replaced on a quarterly basis, providing the diameter of the replaced mains and the diameter of the new mains by material type to facilitate the communication of any proposed upsizing on Transmission pipelines only and the reason for the upsizing.
6. For TIMP, list the Capital and O&M expenditures for each project within TIMP (Assessments, MAOP validation, Pipeline Data Project, etc.) for each quarter, as:
  - a. Forecasted for the year by TIMP program, project and parent project number.

- b. Actual expenditures by date of quarterly report for TIMP program, project and parent project number.
  - c. Estimated date/year of completion (TIMP program is generally considered ongoing; but will include dates for projects or assessments within TIMP that a completion date applies).
  - d. Explain if this is a new project or part of an ongoing project.
7. For DIMP, list the Capital and O&M expenditures for each project within DIMP (Robotic ILI for IP lines, accelerated leak survey, etc.), for each quarter, as:
- a. Forecasted for the year by DIMP program, project and parent project number, and include November forecast.
  - b. Actual expenditures by date of quarterly report for DIMP program, project and parent project number, and include cumulative running totals.
  - c. Estimated date/year of completion (DIMP is generally considered ongoing; but will include dates for projects within DIMP that a completion date applies).
8. For the West Main Pipeline program, provide an estimated date of completion of the program, its in-service date, and a comparison of actual to estimate for the following:
- a. Overall costs.
  - b. Miles of transmission pipeline. In other words what was initially estimated and what was actually replaced.
  - c. Number of new regulator stations.
  - d. Number of rebuilt regulator stations.

### **April Reporting**

1. The Company will file its annual April PSIA report in the same November 15 Advice Letter Proceeding that it is reporting on.
  
2. The Company will provide updates annually in the April report. [The Company will provide the historic (past five years) capital and O&M expenditures by parent project as a one time report in the April 2014 report as described in the Miscellaneous Section described above, and going forward will provide only the most current year in the annual April reports]. See Attachments 2 & 4 in the April PSIA Filing for an example of the level of detail that will be provided. We will provide capital by parent project and miles of pipe replaced by parent project split between Transmission and Distribution (pipeline type). [O&M by project can be provided back to 2012; only TIMP O&M available prior to 2012]
  
3. The Company will provide capital expenditures and O&M explanations from actual to forecasted costs by parent project number of variance between forecast and actual. See Attachments 2 & 4 in the April PSIA Filing for the level of detail. This will include a summary of forecast changes by project that will incorporate the request for explanations, analyses to management, and plans to remedy cost-overruns. Continue to provide variance analysis by the six project/programs for capital expenditures and O&M. [For the April 2014 filing, will not be able to provide from prior Oct filing -- This will include a summary of forecast changes by project that will incorporate the request for explanations, analyses to management, and plans to remedy cost-overruns.]

4. The Company will provide an Attachment in the April report that documents/maps changes in parent project numbers used for actuals and projections. The Company will explain why a parent project number was added and/or why existing parent project numbers were not utilized to provide clarity as to which forecasted parent project numbers tie to actual costs by parent project number.
5. The Company will provide the parties with leak records annually in the same form and format as reported in the annual DOT report. If this data is not available in time to file with the April report, this will be filed in the next quarterly report.
6. For TIMP, provide an estimated date of completion of the program, its in-service date, and list the Capital and O&M expenditures for each project within TIMP (Assessments, MAOP validation, Pipeline Data Project, etc.), for the most current year, as:
  - a. Forecasted for the year by TIMP program, project and parent project number.
  - b. Actual expenditures for the most current year for TIMP program, project and parent project number.
  - c. Estimated date/year of completion, (TIMP program is ongoing; will include dates for projects or assessments within TIMP that a completion date applies). [For the April 2014 filing, will not be able to provide estimated date/year of completion from prior Oct filing.]
7. For DIMP, provide an estimated date of completion of the program, its in-service date, and list the Capital and O&M expenditures for each project within DIMP (Robotic ILI for IP lines, accelerated leak survey, etc.), for the most current year, as:
  - a. Forecasted for the year by DIMP program, project and parent project number.
  - b. Actual expenditures for the most current year for DIMP program, project and parent project number.
  - c. Estimated date/year of completion (DIMP is generally considered ongoing; but will include dates for projects within DIMP that a completion date applies). [For the April 2014 filing, will not be able to provide estimated date/year of completion from prior Oct filing.]
8. For the West Main Pipeline program, provide an estimated date of completion of the program, its in-service date, and a comparison of actual to estimated for the following:
  - a. Overall costs.
  - b. Miles of transmission pipeline. In other words what was initially estimated and what was actually replaced.
  - c. Number of new regulator stations.
  - d. Number of rebuilt regulator stations.

### **Miscellaneous Issues**

1. The presentations/quarterly meetings with Staff and OCC will continue.
2. The “true up” will be broken down into two components: the difference between forecasted and actual costs; and the difference between forecasted and actual revenues.

3. The Company will provide a description of the impact that the 2013 Colorado floods had on each of the six programs, if any, in the April 2014 filing.
4. The Company will provide the one time report of historic capital costs and O&M expenditures costs by parent project (past five years) in the April 2014 filing. [O&M by project can be provided back to 2012; only TIMP O&M available prior to 2012]
5. The Company will provide a list of contracts and change orders including vendor names that parties can review and audit at the Company's office or by request.

**2012 PSIA Capital Expenditures Estimate vs. Actual**

Colorado PUC E-Files System

Description	Parent Number	Total (Original)	YE Spend
AMRP Main	11094408	\$ 21,228,000	19,758,086
AMRP Services	11105774	3,172,000	3,987,818
		<b>24,400,000</b>	<b>23,745,904</b>
Accelerated CAB gas svc replac	11226060	\$ 15,139,800	10,842,486
		<b>\$ 15,139,800</b>	<b>10,842,486</b>
Accelerated coated steel main replac	11454426	\$ 1,740,000	365,860
IP Line Assessments	11546446	\$ 4,000,000	289,635
Business Systems project, cathodic protection	11576561	0	653,116
Business Systems project, IMP distribution	10954223	0	(4,478)
		<b>\$ 5,740,000</b>	<b>1,304,132</b>
IMP - Dist Main Installation	11184777	\$ 5,606,100	18,940,655
IMP - Trans Reg Stn - Southern Div	11491623	178,000	2,232,590
IMP Capital Related Work	10523090	12,120,700	5,395,728
IMP Dist Reg Stn	11375327		0
IMP - Dist Reg Stn	11184789	2,061,100	0
		19,965,900	26,568,973
IMP - PDMS (IMP Gas Records System)	11546443	4,233,700	48,666
IMP - MAOP (IMP Gas Records System)	11546439	2,291,100	0
IMP - PDMS (Distribution)	11706970	0	5,846,301
CP Data Project (IMP Gas Records System)	11547186	1,500,000	652,590
		8,024,800	6,547,556
Install automation to shut valves	11500761	0	2,951
		<b>\$ 27,990,700</b>	<b>33,119,481</b>
Renew 8" West Main - ROW	11330299	\$ 15,200,000	1,356,581
Renew 2.2 miles - 8" west main Transmission	11330308	4,800,000	13,866,239
West Main Replacement - Distribution Pipeline Renewal	11578222		2,635,244
West Main Replacement - Distribution Reg Stations	11578229		369,944
West Main Replacement - Distribution Pipeline Reinforcement	11578238		2,142,139
West Main Replacement - Distribution Service Replacement	11700769		82,233
West Main Replacement - Land Purchase	11745860		1,347,238
West Main Replacement - Trans Meter Station	11706365		5,294
West Main Replacement - Transmission Reg Stations	11578244		352,574
		<b>\$ 20,000,000</b>	<b>22,157,486</b>
Edwards to Meadow Mountain (2011 Carryover)	11095389	\$ -	2,279,729
Edwards to Meadow Mtn Loop Reg Station	11454428		488,689
MWLTP-Edwards/Meadow Mtrn Dist Reg	11454434		32,806
Edwards to Mdw Mtn - Dist Reinforcement	11505761		3,168
Edwards to Meadow Mtn Loop RTU's	11523577		(18,698)
Non-precap mtr sta Edwards/Meadow Mtn	11524926		13,861
Edwards - Meadow Mountain Air Blend Facility Upgrades	11524933		12,784
ROW - Edwards to Meadow Mtn Loop	11210103		63
		<b>\$ -</b>	<b>2,812,401</b>
		<b>\$ 93,270,500</b>	<b>93,981,890</b>

PSCo Gas Company  
 April 1, 2013 PSIA Update Filing  
 Total O&M For the Calendar Year 2012 (before Retail allocation)

Line No.	Project	Project Description	Oct 1, 2011 Filing		April 1, 2013 Filing		Difference
			Parent Number	Forecast Total	Parent Number	Actual Total	Actual less Fcst
1	CAB	Accelerated CAB gas svc replace	11226060	1,570,796	11226060	843,245	(727,551)
2							
3	DIMP	Leak Geo-Coding	11619844	30,775	11619844	34,907	4,132
4		Cross Bore Inspections	11619856	750,000	11619856	922,543	172,543
5		Accelerated Leak Survey	11619863	68,778	11619863	49,440	(19,339)
6		IP Line Assessments	11619868	4,000,000	11619868	-	(4,000,000)
7		Accelerated Actions (Risk Model)	11619872	1,000,000	11619872	38,157	(961,843)
8		DIMP Labor/Non Labor	11594137	324,358	11594137	-	(324,358)
9		PSIA - Bridge Crossing/Exposed	New for April 1		11651888	109,751	109,751
10		Cap Improvement IP Main Assess	New for April 1		11546446	11,668	11,668
11		Gas Distribution O&M	New for April 1		10071860	44,624	44,624
12		PSIA Manager Codes	None		None	(1,043)	(1,043)
13	<b>DIMP Total</b>			<b>6,173,911</b>		<b>1,210,045</b>	<b>(4,963,866)</b>
14							
15	TIMP	IMP - Dist Main Installation	11184777	-	11184777	400	400
16		IMP - Trans Reg Stn - Southern Div	11491623	-	11491623	-	-
17		IMP Capital Related Work	10523090	6,931,122	10523090	2,829	(6,928,293)
18		IMP Dist Reg Stn	11375327	-	11375327	-	-
19		O&M Specifically	10577721	1,609,780	10577721	9,469,718	7,859,938
20		IMP - PDMS	11546443	572,000	11546443	-	(572,000)
21		IMP - MAOP	TBD	578,000	None	-	(578,000)
22		O&M Gas Pipeline Data Management	New for April 1		11610347	256,066	256,066
23		Cap Improvement IP Main Assess	New for April 1		11546446	137,865	137,865
24		PSIA Manager Codes	None		None	2,248,591	2,248,591
25	<b>TIMP Total</b>			<b>9,690,902</b>		<b>12,115,470</b>	<b>2,424,568</b>
26							
27	West Main	Renew 8" West Main - ROW	11330299	-	11330299	-	-
28		Renew 2.2 miles - 8" west main	11330308	-	11330308	-	-
29	<b>West Main Total</b>			<b>-</b>		<b>-</b>	<b>-</b>
30							
31	AMRP	AMRP Main	11094408	42,449	11094408	135,737	93,288
32		AMRP Services	11105774	17,387	11105774	21,855	4,468
33		O&M Specifically	11130848	1,626,862	11130848	990,860	(636,002)
34		PSIA Manager Codes	None		None	215,272	215,272
35	<b>AMRP Total</b>			<b>1,686,698</b>		<b>1,363,724</b>	<b>(322,974)</b>
36							
37	Edwards	Edwards to Meadow Mountain Loop	N/A	-	N/A	-	-
38							
39	<b>Grand Total O&amp;M</b>			<b>19,122,307</b>		<b>15,532,485</b>	<b>(3,589,822)</b>

PSCo Gas Company  
 April 1, 2013 PSIA Update Filing

YEAR

2012

Total O&M (before Retail allocation)															
Project	Description	Parent Number	Jan Fcst	Feb Fcst	Mar Fcst	Apr Fcst	May Fcst	Jun Fcst	Jul Fcst	Aug Fcst	Sep Fcst	Oct Fcst	Nov Fcst	Dec Fcst	Forecast Total
Accelerated Main Renewal Program	AMRP Main	11094408	\$ 1,782.86	\$ 1,740.41	\$ 2,504.49	\$ 3,141.23	\$ 4,202.45	\$ 4,499.59	\$ 4,629.94	\$ 4,626.94	\$ 4,626.94	\$ 4,329.00	\$ 3,008.16	\$ 2,759.18	\$ 42,449.00
	AMRP Services	11105774	730	713	1,026	1,287	1,721	1,843	1,895	1,895	1,895	1,773	1,478	1,130	17,387
	O&M Specifically	11130848	68,328	66,701	95,985	120,388	161,059	172,447	177,328	177,328	177,328	165,940	138,283	105,746	1,626,862
AMRP-O&M			\$ 70,841	\$ 69,155	\$ 99,515	\$ 124,816	\$ 166,983	\$ 178,790	\$ 183,850	\$ 183,850	\$ 183,850	\$ 172,043	\$ 143,369	\$ 109,635	\$ 1,686,698
CAB gas service replacement project	Accelerated CAB gas svc replac	11228060	\$ 136,863	\$ 135,086	\$ 133,519	\$ 127,232	\$ 127,232	\$ 127,232	\$ 127,232	\$ 127,232	\$ 128,809	\$ 128,809	\$ 135,086	\$ 136,863	\$ 1,570,798
CAB-O&M			\$ 136,863	\$ 135,086	\$ 133,519	\$ 127,232	\$ 127,232	\$ 127,232	\$ 127,232	\$ 127,232	\$ 128,809	\$ 128,809	\$ 135,086	\$ 136,863	\$ 1,570,798
DIMP O&M Related Work	Leak Geo-Coding		\$ 2,565	\$ 2,565	\$ 2,565	\$ 2,565	\$ 2,565	\$ 2,565	\$ 2,565	\$ 2,565	\$ 2,565	\$ 2,565	\$ 2,565	\$ 2,565	\$ 30,775
	Cross Bore Inspections		0	187,500	187,500	187,500	187,500	187,500	0	0	0	0	0	0	750,000
	Accelerated Leak Survey (CAB/PVC/CI/BS)		0	0	0	0	11,463	11,463	11,463	11,463	11,463	11,463	0	0	68,778
	IP Line Assessments		0	0	600,000	600,000	600,000	600,000	600,000	600,000	400,000	0	0	0	4,000,000
	Accelerated Actions (Risk Model)		0	0	125,000	125,000	125,000	125,000	125,000	125,000	125,000	125,000	0	0	1,000,000
	DIMP Labor/Non Labor		26,738	26,738	26,738	26,738	28,488	28,739	26,739	26,739	26,739	28,487	26,738	26,738	324,358
DIMP-O&M			\$ 29,303	\$ 216,803	\$ 941,803	\$ 941,803	\$ 955,016	\$ 765,767	\$ 765,767	\$ 765,767	\$ 567,515	\$ 165,769	\$ 29,303	\$ 29,303	\$ 6,173,911
TIMP Capital Related Work	MP - Dist Main Installation	11184777	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	MP - Trans Reg Stn - Southern Div	11491623	0	0	0	0	0	0	0	0	0	0	0	0	0
	MP Capital Related Work	10523090	76,175	176,175	276,175	476,125	666,549	958,124	1,176,125	1,121,125	876,125	676,125	376,125	76,174	6,931,122
	MP Dist Reg Stn	11375327	0	0	0	0	0	0	0	0	0	0	0	0	0
	O&M Specifically	10577721	134,090	134,090	134,140	134,140	134,140	134,140	134,190	134,190	134,190	134,190	134,140	134,140	1,609,780
	MP - PDMS	11546443	7,150	TBD	28,600	32,175	35,750	50,050	60,775	71,500	71,500	71,500	71,500	71,500	572,000
	MP - MAOP	TBD	5,100	10,200	25,500	44,200	44,200	56,100	57,800	62,900	68,000	68,000	68,000	68,000	578,000
TIMP-O&M			\$ 222,515	\$ 320,485	\$ 484,415	\$ 686,640	\$ 880,639	\$ 1,198,414	\$ 1,428,890	\$ 1,389,715	\$ 1,149,815	\$ 949,815	\$ 649,765	\$ 349,814	\$ 9,690,902
West Main Replacement	Renew 8" West Main - ROW	11330299	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Renew 2.2 miles - 8" west main	11330308	0	0	0	0	0	0	0	0	0	0	0	0	0
West Main Replacement-O&M	Total O&M		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Grand Total			\$ 459,322	\$ 741,508	\$ 1,639,252	\$ 1,880,490	\$ 2,129,870	\$ 2,270,203	\$ 2,505,739	\$ 2,466,564	\$ 2,029,989	\$ 1,416,433	\$ 957,523	\$ 625,415	\$ 19,122,307

PSCo Gas Company  
 April 1, 2013 PSIA Update Filing

YEAR

2012

O&M															
Project	Description	Parent Number	Jan Act	Feb Act	Mar Act	Apr Act	May Act	Jun Act	Jul Act	Aug Act	Sep Act	Oct Act	Nov Act	Dec Act	Actual Total
Accelerated Main Renewal Program	AMRP Main	11094408	0	827	2,140	2,785	1,230	35	18	26	88	3,932	34,767	89,889	135,737
	AMRP Services	11105774			86				16,622	6,697	(1,556)	6			21,855
	PSIA Manager Codes		11,979	11,707	9,150	12,983	11,409	76,751	18,356	8,744	11,890	15,113	9,303	19,886	215,272
	O&M Specifically	11130848	31,428	31,919	32,058	30,446	138,020	84,282	87,896	57,443	143,963	239,858	63,069	50,877	990,860
AMRP-O&M			\$ 43,406	\$ 44,453	\$ 43,434	\$ 46,214	\$ 150,659	\$ 161,068	\$ 120,891	\$ 72,910	\$ 153,985	\$ 258,910	\$ 107,140	\$ 160,853	\$ 1,363,724
CAB gas service replacement project	Accelerated CAB gas svc replac	11226060	7,380	44,458	48,351	70,870	95,614	79,341	95,010	88,095	60,140	99,597	69,800	84,589	\$ 843,245
CAB-O&M			\$ 7,380	\$ 44,458	\$ 48,351	\$ 70,870	\$ 95,614	\$ 79,341	\$ 95,010	\$ 88,095	\$ 60,140	\$ 99,597	\$ 69,800	\$ 84,589	\$ 843,245
DIMP O&M Related Work	Leak Geo-Coding	11619844												\$ 34,907	\$ 34,907
	Cross Bore Inspections	11619856					238,787	281,581	22,766			1,444		377,964	922,543
	Accelerated Leak Survey (CAB/PVC/C/BS)	11619863									8,848		25,389	15,202	49,440
	IP Line Assessments	11619868													0
	Accelerated Actions (Risk Model)	11619872										9,793	12,241	16,123	38,157
	PSIA - Bridge Crossing/Exposed	11651888										59,705		50,046	109,751
	Cap Improvement IP Main Assess	11546446							226	9,050	3,523	(363)	(960)	192	11,668
	Gas Distribution O&M	10071860												44,624	44,624
	PSIA Manager Codes							(402)	59	34	(733)				(1,043)
	DIMP Labor/Non Labor	11594137													0
DIMP-O&M			\$ -	\$ -	\$ -	\$ -	\$ 238,787	\$ 281,179	\$ 23,051	\$ 9,083	\$ 81,136	\$ 1,081	\$ 36,670	\$ 539,057	\$ 1,210,045
TIMP Capital Related Work	MP - Dist Main Installation	11184777	1,462	16,126	(17,588)			400				1,347		(1,347)	\$ 400
	MP - Trans Reg Stn - Southern Div	11491623													0
	MP Capital Related Work	10523090	164	16,621	(16,784)			2,988	(271)	4,939	26	(730)	(4,123)		2,829
	MP Dist Reg Stn	11375327													0
	O&M Specifically	10677721	(256,007)	920,270	385,013	330,216	610,473	1,046,053	1,208,839	930,444	1,267,733	1,081,405	756,925	1,178,455	9,489,718
	MP - PDMS	11546443													0
	O&M Gas Pipeline Data Management	11610347										159,213	32,949	63,905	256,066
	Cap Improvement IP Main Assess	11546445										28,250	46,218	65,398	137,865
	PSIA Manager Codes		(2,023)	81,903	118,321	103,452	103,887	397,773	140,037	218,335	187,651	157,974	320,528	420,754	2,248,591
	MP - MAOP	None													0
TIMP-O&M			\$ (256,404)	\$ 1,043,919	\$ 468,963	\$ 433,668	\$ 714,359	\$ 1,448,113	\$ 1,348,605	\$ 1,153,719	\$ 1,455,409	\$ 1,425,459	\$ 1,152,497	\$ 1,727,164	\$ 12,115,470
West Main Replacement	Renew 8" West Main - ROW	11330299													\$ -
	Renew 2.2 miles - 8" west main	11330308													0
West Main Replacement-O&M	Total O&M		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Grand Total			\$ (205,618)	\$ 1,132,830	\$ 560,748	\$ 550,752	\$ 1,199,419	\$ 1,969,701	\$ 1,587,557	\$ 1,323,807	\$ 1,750,670	\$ 1,785,047	\$ 1,366,107	\$ 2,511,463	\$ 15,532,485