

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 24M-0173E

IN THE MATTER OF THE COMMISSIONS' INVESTIGATION INTO THE APRIL 2024
FRONT RANGE WINDSTORM AND XCEL ENERGY'S PUBLIC SERVICE POWER
SHUT-OFFS.

**COMMISSION DECISION REQUESTING
A FURTHER RESPONSE**

Mailed Date: June 11, 2024

Adopted Date: May 15, 2024

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I. BY THE COMMISSION

A. Statement

1. The purpose of opening this proceeding was to determine the manner in which Xcel Energy, doing business as, Public Service Company of Colorado (Public Service or the Company) conducted outages during a high wind event that occurred on April 6 to April 7, 2024. The Commission sought to gather information from the Company, the public and from local government emergency management personnel as to, among other things, the manner in which the outage was conducted, the effect the outage had on residents in the impacted outage areas,

communication issues between Public Service, its customers and local governments. The Commission also looked for recommendations from those parties as to how any future outages should be conducted to ensure transparent and frequent communications, and to mitigate the problems that occurred with the outage, particularly during the time period prior to a final decision in the Company's pending Wildfire Mitigation Plan (WPM) application filing. The Commission received substantial and meaningful information through this proceeding and through written comments to our web link that will inform how we proceed.

B. Discussion

2. Extremely high winds occurred during the weekend of April 6 to April 7, 2024, resulting in several Front Range counties experiencing wind gusts in excess of 100 miles per hour in some locations and sustaining high winds throughout the weekend. This weather event resulted in planned power shutoffs and other pro-active wildfire mitigation actions deployed by Public Service particularly on its electric distribution system because it had advance warning of the high wind event.

3. In response to the projected high wind event, the Company asserted it de-energized certain of its distribution lines, as well as adjusted the settings on certain transmission and distribution feeders to prevent its equipment from automatically re-energizing in the event the equipment tripped off-line. This process, known as a Public Safety Power Shutoff (PSPS) was the first time such a proactive method had been utilized in Colorado. It is estimated the shutoffs impacted approximately 55,000 Public Service customers across six counties. In addition to those 55,000 customers subject to the PSPS shutoffs, approximately 100,000 additional customers lost power due to the wind event.

4. By Decision No. C24-0232, issued April 15, 2024, the Commission opened this Proceeding to gather information on Public Service's pro-active wildfire mitigation actions deployed April 6 to April 7, 2024, in its electric transmission and distribution systems. Through this decision, we set a public comment hearing to hear first-hand accounts from the public about the outage, how they were personally affected, and what could be done to mitigate the issues that occurred in April 2024. We also set out a series of questions for Public Service to answer regarding the Company's operational actions and decision-making, customer communications activities, and community engagement efforts. We required the Company to answer the following questions.

- a. A detailed timeline of the utility decisions and events related to the April 6 to April 7, 2024 high wind event including timeframes for restoration of service.
- b. The specific criteria used by the Company to determine what pro-active measures were taken on which transmission and distribution lines.
- c. A detailed map showing the miles and location of transmission and distribution lines and the number of customers impacted at the height of the outages and at 5pm on Sunday, April 7, 2024, for the following:
 - i. Lines pro-actively de-energized;
 - ii. Wildfire Safety Operation activity;
 - iii. Total actual outages.
- d) The process and procedures the Company utilized in order to restore service including:
 - i. Prioritization of restoration activities;
 - ii. Physical inspection process and timeline, including description of the use of helicopters, drones, or other technology to conduct line inspections;
 - iii. Description of any differences in the restoration process for the various categories of outage (*e.g.*, preventative outages, WSOs, and other outages);
 - iv. Information regarding the number of and nature of issues encountered (*e.g.*, number of downed trees on lines, number of bent poles, etc.)
- e) Information regarding whether and how much assistance the Company sought or received from other utilities or non-utility crews including an explanation of the Company's decision-making regarding such actions.

- f) The Company's customer emergency communications plan in effect during the April 6 to April 7, 2024 event.
- g) A detailed timeline of all customer communication efforts during the course of the event including the method of communication. Provide the specific information supplied to customers for different kinds of customers - residential, commercial, medical community, etc.
- h) Provide all maps provided to the public over the course of the event, the timeframe of when they were provided, and the means of communication (e.g., describe what website or other media were used to provide such maps).
- i) A description of the Company's coordination efforts with other neighboring electric service providers including a timeline of and information communications provided or requested.
- j) A description of the Company's coordination efforts with other kinds of service providers such as telecommunications companies, basic emergency service providers and Public Safety Answering Points, first responders, other county level emergency response and disaster management, etc. including the timeline of communications and information provided or requested.
- k) A description of the Company's coordination efforts with medical service providers. Include a description of the Company's efforts to identify and contact customers with electricity-dependent medical equipment.

5. Public Service filed its responses to our questions on April 26, 2024, providing substantial information in answer to the questions we posed.

6. In response to Decision No. C24-0232, the Commission received over 700 written public comments and heard from an additional 50 people at the virtual public comment hearing held on April 17, 2024. Members of the public provided detailed anecdotes of the hardships they experienced during the outage and the lack of information from Public Service setting the PSPS and the length of time the outage would continue before power was restored. Public comments also underscored the anxiety felt due to the lack of information. Some comments focused on the fact that those households with persons reliant on durable medical devices were not informed with sufficient notice to make alternative arrangements.

7. Because of the heavy response and the disquieting stories, we heard and read, we scheduled a Commissioners' Information Meeting (CIM) for May 6, 2024, to hear directly from the Company and local emergency management personnel. Therefore, we issued Decision No. C24-0256 on April 24, 2024, to discuss with Public Service, its actions and responses to the questions we posed in Decision No. C24-0232. We also wanted to hear specifically from the Company regarding: 1) how Public Service made decisions on where and when the PSPSs were initiated, including an explanation of any wildfire modeling; 2) the frequency, timing, and methods of communications to customers; 3) the process of restoration of service; and 4) Public Service's response to the oral and written public comments that the Commission received. After hearing from the Company, we then sought to convene a panel of city and county managers and emergency personnel to hear their experiences with the PSPSs of April 6 to April 7, 2024, and their suggestions for going-forward in future high wind events.

8. Representing Public Service at the CIM on May 6, 2024, was Mr. Robert Kenney, President of Public Service and Mr. Michael Lamb, Senior VP of Distribution and Gas Operations. Public Service discussed the key event takeaways from the high wind event and outage. Also discussed was an overview of the wind event; the operational mitigations the Company utilized for high wind risk; the criteria for enabling Wildfire Safety Operations (WSO) and Wildfire Safety Settings (WSS); and PSPSs. The Company further explained the criteria for enabling WSO, including WSS and criteria for enabling PSPS. Public Service explained the use of its Technosylva software used to model PSPS and risk analysis. The Company offered its explanations of why some neighborhoods were impacted partially with some residents experiencing outages, while neighbors retained power, as well as neighborhoods impacted by PSPS and why those neighborhoods with underground lines were nonetheless subject to PSPS.

9. The Company discussed its communications issues with customers during the high wind event and the restoration of power upon the event's conclusion. Public Service asserted it was committed to improve communication, publish maps of areas affected by outages, and support line workers to restore power as soon as possible. The Company also set out a plan for improved PSPS communications that includes earlier and more frequent communications.

10. The second part of the CIM involved a dialog with Mr. Mike Chard, Boulder Director of Office of Disaster Management, Mr. Nathan Whittington, Jefferson County Manager of Emergency Management, and Ms. Lori Hodges, Larimer County Director of Emergency Management, and Ms. Bettina Swigger, CEO of the Downtown Boulder Partnership. Each of these participants provided anecdotal information as well as firsthand accounts of the consequences of the outages, including a lack of communication or advance notice by the Company. They also discussed from their perspectives, how the Company should improve its communication and advance notice protocols with local governments to ensure transparency as early in an outage process as possible.

11. The central theme from the emergency management directors was the importance of early, frequent, accurate, and consistent communications between Public Service and local governments. It was apparent for example, that while Larimer County was satisfied with the advance notice it received that a PSPS would be initiated, that satisfaction was not shared by Boulder and Jefferson Counties. Mr. Whittington indicated he only received notification two hours before the press conference announcing the PSPS. According to him, this was only because he was asked to participate in the press conference.

12. Mr. Chard found the Company's integration, operational and situational awareness information was exceptional Tuesday morning after the conclusion of the high wind event and the

PSPS, which allowed Boulder County to move forward with response and recovery plans. However, Mr. Chard noted that efficiency, cooperation and proactive communication from Public Service would have been preferred on Friday, prior to the commencement of the high wind event and initiation of the PSPS. Instead, he was not made aware of the PSPS until mid-morning on Saturday, April 6. As a result, Boulder had limited time to address issues with housing needs, ensuring people reliant on durable medical equipment would have power, and to develop plans for traffic impacts.

13. Boulder, Larimer and Jefferson Counties were in agreement that accurate, up-to-date outage maps are critical in PSPS situations. Mr. Whittington requested that an API or GIS platform be utilized for detailed maps to keep counties better informed of how outages are moving throughout the area. Not only are these maps critical prior to and during outages, but when distribution and transmission lines are re-energized as well, so counties know what areas are functioning. Another component the counties agreed was critical included an integration of effort between Public Service operations teams and the counties. Boulder, Larimer and Jefferson Counties indicated that a predictable response environment resulting from such integration is paramount to ensuring efficiencies and reducing wasted effort and resources.

14. Ms. Swigger, CEO of the Downtown Boulder Partnership provided information on data received from an economic impact survey conducted among Boulder businesses to gauge the impact on businesses because of the outage there. It is estimated that \$1.3 million to \$1.4 million in revenue was lost during the outage, just among surveyed customers in Boulder. Approximately \$240,000 in unpaid wages also resulted from the outage. Because these business losses impact the individuals who own those businesses and the people employed by them, Ms. Swigger urged that

businesses be included in PSPS information sharing as well so they may prepare for outage impacts.

C. Findings and Conclusions

15. The information received from public comments, both written and at the public comment hearing was invaluable and informed the Commission of the consequences of an outage situation accompanied by inadequate communication and cooperation from Public Service. This was buttressed by the information received by local government emergency management leaders as to how the Company could work better with local emergency management offices and first responders to ensure transparency and timely and continuous communications with the public. This was especially important for those members of the public reliant on home medical equipment, to be able to make alternative arrangements in anticipation of a weather-related outage event.

16. Public Service indicated it intended to address these issues in its upcoming 2025-2027 Wildfire Mitigation Plan (WMP) proceeding it intends to file in the very near future. The Company stated it intends to propose a comprehensive plan to implement mitigation programs and lead to more surgical use of PSPS including undergrounding lines in high-risk areas; improved situational awareness through new tools such as cameras, weather stations, etc.; and deployment of WSS including sectionalizing devices to narrow the area of possible PSPS.

17. In discussing its commitment to improve the PSPS process, Public Service represented it did not intend, however, to wait until its WMP application proceeding is complete to begin implementing changes to how it handles PSPS events. Mr. Kenney committed to improvement, including earlier, more frequent more accurate and more consistent communications.

18. Given the 700 plus written comments the Commission received through its website, the 50 people who spoke at the public comment hearing, and the information from local emergency management heads we received at the CIM, it is readily apparent that while Public Service should be acknowledged for initiating its first ever PSPS in Colorado, much can be done to improve that process. More high wind events are inevitable along the Front Range. Therefore, it is imperative we begin to move now to improve the cooperation between Public Service and local governments to ensure a PSPS process that is efficient, effective and transparent.

19. In our deliberations on May 15, 2024, Chairman Blank set out eight areas to be addressed to help inform parties of the Commission's priorities going forward. First, we would like to see developed, a list of business associations, chambers of commerce, emergency operations centers, and downtown partnerships that have been or are likely to be adversely impacted by high winds.

20. We also see a need and therefore a priority to create detailed and accurate PSPS maps defining forecasted high wind and outage areas prior to and during high wind events. These maps should overlay with county maps identifying critical facilities and homes with residents reliant on durable medical equipment so local governments can accordingly direct increased resources to those areas in preparation for outages. In conjunction with map development, we also urge Public Service to develop maps and lists in conjunction with local governments identifying local critical facilities and infrastructure customers including hospitals, water treatment facilities, as well as residential customers and assisted living facilities reliant on durable medical equipment. Information on backup power including batteries and generators at each facility and available backup options for residential customers would also be important to develop and share. We also would like to see options made available through the regulated system

that could be facilitated through rebates or other mechanisms to ensure backup power is available when needed.

21. As encouraged by the emergency management directors, a more integrated system between the Company and counties including protocols for coordinated power outage meetings and a dedicated single point of contact at the utility that counties know will be available and have the most current information available should be implemented.

22. We are also interested in learning about the technology available, including sensors and visual inspection technology that would more quickly restore power and require fewer patrol inspections of power lines following a PSPS or other outages.

23. These are the core questions that need to be answered by the utility and other stakeholders as we now transition to the next phase of incorporating best practices and state of the art technology in what we see as an increasing use of PSPSs.

24. We hereby ask Public Service to supplement its presentation at the CIM with responses to these inquiries. We further request that the Company keep this matter a priority and keep the Commission informed of its progress and plans, both here and in the upcoming WMP application. We intend to continue to ensure Public Service is doing everything necessary to improve and implement a PSPS plan that emphasizes early, consistent, transparent and continuous communications until the event precipitating the PSPS has ended, the PSPS is called off and full power is restored. We encourage the Company to adopt the mantra of “transparency” in every process and method it employs as part of a comprehensive, thoughtful plan that begins well before the occurrence of an event.

25. Our oversight has not concluded merely because we completed the CIM in this proceeding. At the Commissioners’ Weekly Meeting of May 15, 2024, we initially voted to close

this proceeding and move forward in other adjudicatory proceedings and rulemakings to implement a well thought out and reasoned PSPS system. However, after further review, a number of questions and concerns have surfaced. Consequently, we placed the matter back on the May 29, 2024, agenda for further discussions.

26. Fundamentally, this Miscellaneous Proceeding will be separate from the Public Service WMP application. While the WMP proceeding will most likely focus on the Company's investments in wildfire mitigation for the next three to five years, this proceeding is focused on securing standards for PSPS events for the next nine months or so, until we issue a final decision in the WMP proceeding. As such, we take this opportunity to set out the foundational criteria we expect Public Service to utilize in establishing a coordinated and effective PSPS scheme as soon as possible.

27. From the over 700 public comments we received (oral and written) it is apparent the PSPS suffered from a lack of effective coordination with municipalities and emergency operation centers during the high wind and subsequent outage event. In order to improve coordination, we want to see a phased approach to extreme weather events that could lead to outages. When an extreme weather event is imminent such that a PSPS is likely, Public Service should share information with (and accept updates) from local jurisdictions in a more proactive manner. This should include:

- a.) Identifying areas of the system where communications are dependent on electric service being operational, including type, location and duration of backup, especially in more remote mountain areas.
- b.) Identify critical infrastructure reliant upon electric service such as hospitals, assisted living facilities, rehabilitation centers, etc., Such information should include the specific type of facility, location, whether emergency electric backup equipment is available and if so, identifying the type of equipment.
- c.) Incident protocols need to be developed and incorporated into trainings with emergency services agencies on a regular basis as well as coordination to establish the identity and

location of customers with medical needs using electric-dependent durable medical equipment. Cross-referencing that information with local jurisdictions if possible, taking into consideration privacy issues, is critical to ensure accuracy.

28. For each of the critical factors cited above, Public Service should identify and address critical communications, infrastructure and facilities, as well as identify medically dependent customers to consider potential roles for the Company to partner with those facilities and customers in order to provide necessary backup equipment for PSPS events. The Company should also investigate whether that backup equipment could be used to provide power back to the grid during other times, or whether demand response programs for backup equipment could be feasible to lessen the cost of implementing such backup programs for all ratepayers.

29. Prior to the occurrence of a PSPS event, written and widely disseminated communication plans should already be in place. Additionally, proactive warnings of a PSPS to local emergency operations centers should occur as a matter of course. As we heard, notifications to local emergency operations centers were inconsistent and unpredictable. Early communication of a PSPS should be a priority to allow local governments to plan their responses with sufficient advance warning. Protocols need to be established that will provide redundancy of communication through multiple channels to meet people where they are.

30. It was evident as well that it is imperative to establish a single point of contact at Public Service available primarily to emergency operations centers. Local emergency officials were adamant this was critical to avoid confusion as to who to contact for information and for verification. We urge the Company to establish a regular cadence for updates to all local emergency operations centers prior to and during PSPS events. Based on comments made by local emergency officials at the CIM, there was concern that some counties received regular updates while other counties received sporadic communications.

31. It is of utmost importance for Public Service to provide accurate information and update information as soon as possible. As reported by local emergency operations directors, some of the initial maps of the April outage were incorrect and information was not timely updated to customers. Further, initial press releases omitted Larimer County, even though it was aware the county was included in the outage. Rather than respond to appeals for updated or corrected information, the Company should have a system in place to continuously provide accurate and timely information at reasonably close intervals.

32. Minimizing the time necessary for an outage during a PSPS should also be of prime importance to Public Service. Mechanisms for remote sensing and verification of energizing capability should be established to speed up reenergization of lines at the conclusion of a PSPS. The Company should also look at ways in which the topological architecture of the system can maximize reliability while isolating areas with the potential for higher risk from extreme weather events and fire.

33. It is clear further action is necessary to improve on the events of the April PSPS. We must ensure a sound transition plan for the interim period until a final decision is issued in the WMP proceeding. We must do this to ensure we collectively do better in the event of a similar extreme weather occurrence. We understand Public Service may be working on a filing to codify lessons learned from the extreme weather event which would address concerns we raised based on what we heard from the public and local emergency operations directors. We look forward to such a filing in order to make certain we employ a state-of-the-art emergency outage plan that ensures the health, safety and welfare of all Colorado citizens, particularly during the time period before there is a final Commission decision in the Company's pending WMP application filing. We also

urge Commission Staff to work with Public Service in any way possible so that such a filing occurs in a timely manner.

II. ORDER

A. The Commission Orders That:

1. The Commission reverses its previous decision in deliberations on May 15, 2024, to close this proceeding.
2. This M Proceeding shall remain open.
3. The Commission requests a filing from Public Service Company of Colorado by June 30, 2024, to address the issues and concerns we raise in this Decision.
4. This Decision is effective upon its Mailed Date.

B. **ADOPTED IN COMMISSIONERS' WEEKLY MEETING May 15, 2024.**

(S E A L)



ATTEST: A TRUE COPY

Rebecca E. White

Rebecca E. White,
Director

THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF COLORADO

ERIC BLANK

MEGAN M. GILMAN

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Commissioners