

Comment Guide to Xcel's Time of Use (TOU) Rate Case at the PUC

What: Public Utilities Remote Public Comment Hearing + Public comment portal

When: Submit comments by end of the day on April 17th

How: Please see instructions below

Why: Last year Governor Jared Polis and the state legislature set Colorado on a path to a carbon-neutral economy and a reduction in pollution hotspots, by passing House Bill 1261, Colorado's landmark [Climate Action Plan](#). The law recognized the urgent need to address climate change, support disproportionately impacted communities, and set carbon pollution reduction targets through 2050 to do so. Despite excellent recent work by regulators, the legislature, utilities, and other leaders, new data show we're far off-track from meeting our targets.

The current COVID crisis brings the importance of our climate work into even sharper relief. It shows that now, more than ever, public health matters, science matters, and leadership matters. We need strong leadership if we're going to meet our targets and create a clean, just climate future where communities of color are no longer disproportionately impacted by unjust policies and pollution.

What is a Time of Use (TOU) Rate and why is it important for our climate goals?: A Time of Use rate is a utility rate design that helps educate and incentivize people to be smart about what times of day they prioritize using electricity. We know that during certain times of the day (for example, in the peak of a hot summer day) producing electricity takes more resources, including fossil fuels and generates more pollution. Currently, our residential electric rates in Colorado don't reflect that extra toll on our clean air. Time-of-use rates also reward customers for using electricity during non-peak times by charging them a little bit less.

Customers should be informed about the impact that their energy use habits can have on the environment through their electric rates, which can help them understand that it's better to avoid using more energy during some times of the day, when emissions and costs are higher.

Best Practices:

- Keep written comments to 1-2 pages, comments of a shorter length are fine.
- Use personal stories, talk about why you care, and what you care most about
- Keep it friendly, encouraging, and sensitive to the pandemic crisis at hand

Main Messages:

- In these times, leadership matters, public health matters, and science matters. We need strong leadership and the tools to ready us for the economy of our future.
- Despite excellent work by our decision makers in the last year, Colorado has a long way to go to meet its climate goals, but with bold leadership from this commission, we can get there.
- Better electric rate designs like Time of Use Rates are a smart and thoughtful way to help us reduce emissions and get us ready for a clean energy economy.
- Communities of color are [overburdened by climate change](#), so inaction is not an option.

Sample Comment: *[Remember: you're an expert on your own story! Talk about why YOU care about this issue.]*

My name is [_____], and I am a resident of [_____ town/county _____]. As a Coloradan, ratepayer and member of [moms, agriculture, Latinx, students, etc.] community I am very concerned that Colorado is not on track to meet the greenhouse gas reduction objectives established by House Bill 19-1261. The current crisis brings the importance of our climate work into even sharper relief. Climate change is a critical problem increasing in urgency and it is already directly impacting my community. The electricity sector is a significant source of emissions and Time of Use Rates are a smart and thoughtful way to help customers take action to reduce these emissions and provide cleaner air for our communities.

Additional talking points about TOU rates:

- We have a long way to go to meet our emissions goals in Colorado. Beneficial electrification – switching from fossil fuels for our cars and in our homes – is an important tool to meet those goals. But it should be combined with smart electric rate designs like TOU to keep costs and emissions down.
- I understand that during certain hours of the day our electric system has more emissions and is higher cost if we use a lot of electricity. But I need more information from my utility to know what hours of the day when I should be reducing my electric use. I could do my laundry or run my dishwasher later, when costs and emissions are lower. And I could turn on my air conditioner earlier. But I'm currently not getting this information from Xcel.
- We know that some times of the day higher polluting generation is operating than other times of the day. But electric rates in Colorado don't reflect that yet. Customers should be able to understand through their electric rates that it's better to avoid using more energy during some hours, when emissions and costs are higher.
- Utilities in Colorado should have been using TOU rates starting years ago, and it would have helped to avoid emissions from fossil fuel plants, and also avoid some large costs for utility customers.
- I would like a rate design option like TOU that informs me when electricity is more expensive and when there are higher emissions if I use appliances at that time.
- I understand this is not a rate increase, but a different type of rate design. And Xcel is proposing to start rolling this new rate design out to customers over a period of several years, from 2021 - 2024.
- A TOU rate would help me better manage my electric expenses.
- I try to run appliances later in the evening because I heard that is good for emissions and the electric system. But if other people aren't doing that, they are causing more emissions and also causing my bills to be higher in the future because Xcel has to build more peaking generation. I worry that I am wasting my effort to do the right thing, if other people don't have this information.
- I know that it is important to reduce emissions, and I think switching to electric appliances will help. But I am concerned if I do, I could cause more emissions and more costs on the electric system if I don't know what times to turn appliances on and when to avoid using them. I think TOU rates will help make the electric system more efficient and cut emissions and cut costs.

How to file a written public comment:

- 1) Go to https://www.dora.state.co.us/pls/efi/EFI_COMMENT_GUI.Electric
- 2) Select the option to file a comment regarding Public Service Company of Colorado (Xcel)

Colorado.gov



COLORADO
Department of
Regulatory Agencies
Public Utilities Commission



Companies in current Electric Cases
Select the company from the list below regarding your comment

<input type="radio"/> Black Hills Colorado Electric, LLC
<input type="radio"/> La Plata Electric Association, Inc.
<input checked="" type="radio"/> Public Service Company of Colorado (or Xcel Energy)
<input type="radio"/> Rulemaking and Investigations Initiated by Colorado Public Utilities Commission
<input type="radio"/> TRI-STATE GENERATION AND TRANSMISSION ASSOCIATION, INC.
<input type="radio"/> United Power, Inc.
<input type="radio"/> Other - Company Not Listed

1560 Broadway, Suite 250, Denver, CO 80202 [Email](#)
(303) 894-2000 - Phone (800) 888-0170 - Permits and Insurance (800) 456-0858 - Consumer Assistance (303) 894-2065 - Fax
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- 3) Select the Residential Time of Use docket from the page of available proceedings, 19AL-0687E:

Colorado.gov



COLORADO
Department of
Regulatory Agencies
Public Utilities Commission



Cases For Public Service Company of Colorado (or Xcel Energy)
Select the case from the list below regarding your comment

<input type="radio"/> 19A-0225E - Application for Approval of Public Service Company's Community Resiliency Initiative.
<input type="radio"/> 19A-0369E - Application for approval of its 2020-2021 Renewable Energy Compliance Plan
<input checked="" type="radio"/> 19AL-0687E - Tariff Filing to Implement the Modified Residential Energy Time-of-Use Schedule
<input type="radio"/> 20AL-0094E - Filing to Implement an Optional Rate Schedule for Customers Who Opt Out of Receiving an Advanced Metering Infrastructure meter (Advanced Meter) in Favor of an Interval Data Meter
<input type="radio"/> Other - Case Not Listed

- 4) Fill out the Comment page. Be sure to check “I am not a robot.” You can type your comment in the box on the page, but you also have an option to upload a file if you prefer to submit your comment as a word document or .pdf:

Register Your Public Comment

✔ I'm not a robot 
reCAPTCHA
Privacy - Terms

ALL INFORMATION SUBMITTED IS PUBLIC INFORMATION.

Enter the information below to submit your comment for Public Service Company of Colorado (or Xcel Energy) for the case 19AL-0687E - Tariff Filing to Implement the Modified Residential Energy Time-of-Use Schedule

Required fields are denoted by ▶

▶ First Name	▶ Middle Name / Initial	▶ Last Name
▶ Business Name (If Applicable)		
▶ Address		
▶ City	▶ State Colorado ▼	▶ Zip Code
▶ Email Address (Confirmation Email will be sent if provided)		

▶ **Comment**

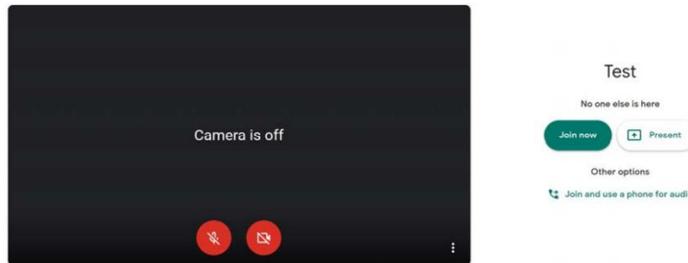
Attach one or more files to the comment
Acceptable formats are: .bmp,.doc,.docx,.gif,.jpg,.jpeg,.odt,.pdf,.png,.rtf,.tif,.tiff,.txt,.wpd,.xls,.xlsx.
Unacceptable formats are: video or audio files, zipped or compressed files, and files larger than 100Mb.

Choose File

 No file chosen

(Optional:) How to participate in the virtual public hearing on 4:00-6:00 p.m. on April 16th:

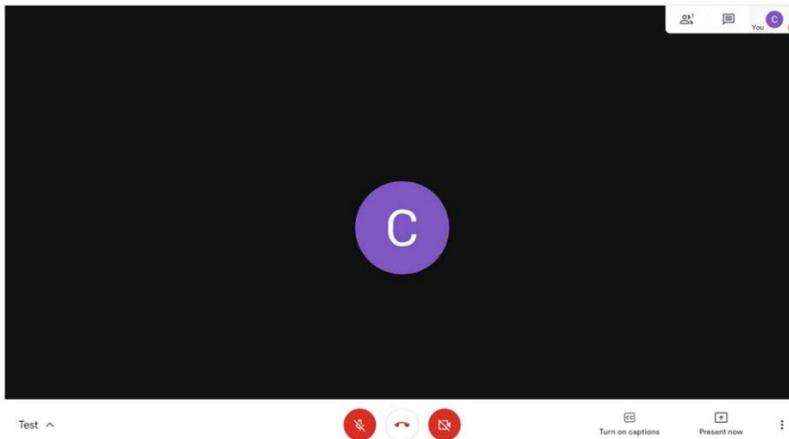
- 1) The PUC **prefers written comments**, but you can participate virtually by computer. Any member of the public or party who wishes to participate in the public comment hearing by computer must use a computer that is connected to the internet and has a microphone and a speaker. At the time of the hearing, go to <https://meet.google.com/grb-qftq-vhx>. The webpage below will appear.



If you do not want others participating in the hearing to see you, click on the camera icon contained in the circle at the bottom of the video screen. The icon will turn red and a slash will be placed over the icon indicating that your camera has been turned off. Likewise, if you do not want others participating in the hearing to hear you, click on the microphone icon contained in the circle at the bottom of the video screen. In the screenshot of the webpage above, both the camera and microphone have been turned off.

- 2) When you have the video and microphone settings the way you want them, click on the “Join Now” button shown in green in the screenshots above. You can control the volume of the audio through the volume controls on your computer.
- 3) You should mute your microphone until you are called on by the administrative law judge (ALJ) to speak. When prompted by the ALJ to provide comments, please click on the microphone icon to turn on your microphone and then commence speaking. While you are speaking, please listen for any direction you are given by the ALJ.

- 4) To terminate your participation in the hearing, click on the telephone handset icon between the microphone and camera icons shown on the screenshot below.



- 5) Alternatively, you can provide comments by telephone during the remote hearing by calling 413-366-1096 when the hearing takes place. When prompted, input 577181939#. You will then be placed into the hearing. You must mute your phone when it is not your time to speak. You can do this by using the mute function on your phone, or by pressing *6 to mute and *6 to unmute.