



1800 Larimer Street
Denver, CO 80202

September 8, 2022

The Honorable Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

**Re: *Public Service Company of Colorado*
Docket No. ER21-291-____
Compliance Filing to Revise Tariff Record and Refund Report**

Dear Secretary Bose:

On August 15, 2022, the Federal Energy Regulatory Commission (“FERC” or the “Commission”) issued an order in Docket No. ER21-291-001 approving the Offer of Settlement (“Settlement”) submitted by Xcel Energy Services Inc. (“XES”) on behalf of its public utility affiliate, Public Service Company of Colorado (“PSCo”).¹ The August 15 Order directed PSCo to make a compliance filing with revised tariff records in eTariff format consistent with those tariff records included as part of the Settlement within 30 days of the August 15 Order.² Pursuant to the August 15 Order and the terms of the Settlement Agreement, XES respectfully submits the enclosed revised tariff records and refund report.

The Settlement resolves all issues set for hearing and settlement judge procedures in the Commission’s December 31, 2020 order³ associated with PSCo’s proposed revisions to Schedule 3 (Regulation and Frequency Response Service), Schedule 3A (Regulation and Frequency Response Service for Point-To-Point Transmission Service for Exports from Public Service Company of Colorado), and Schedule 16 (Flex Reserve Service) of the Xcel Energy Operating Companies Joint Open Access Transmission Tariff (the “Xcel Energy OATT”) in Docket No. ER21-291. In its December 31 Order, the Commission accepted PSCo’s proposed tariff revisions, suspended them for a nominal period, to become effective January 1, 2021, subject to refund, and established hearing and settlement judge procedures.

Among other things, the Settlement provides that the Flex Reserve Requirement (as defined in the Settlement) set forth in Schedule 16 shall be reduced from 977 MW to 752 MW

¹ *Pub. Serv. Co. of Colo.*, 180 FERC ¶ 61,093 (2022) (“August 15 Order”).

² *Id.* at P 4.

³ *Pub. Serv. Co. of Colo.*, 173 FERC ¶ 61,287 (2020) (“December 31 Order”).

upon the effective date of the Settlement Agreement, which is the date of Commission approval of the Settlement. As part of the Settlement, XES submitted *pro forma* clean and redline versions of Schedule 16 reflecting the lower Flex Reserve Requirement and committed to making a compliance filing with revised tariff records in eTariff format to be effective January 1, 2021 upon Commission approval of the Settlement. The Settlement also requires PSCo to provide its customers with refunds, including interest calculated in accordance with 18 C.F.R. § 35.19a, resulting from the lower Flex Reserve Requirement from the beginning of the suspension period (i.e., January 1, 2021) until the Settlement effective date (i.e., August 15, 2022).

PSCo affirms that the tariff records filed as part of this compliance filing do not reflect any changes other than those included as part of the Settlement. PSCo also hereby notifies the Commission that as of August 31, 2022 PSCo refunded, with interest, the amounts owed to its Schedule 16 customers consistent with section 2.8 of the Settlement Agreement. Interest was calculated in accordance with 18 C.F.R. § 35.19a. Details of the interest and refund calculation are enclosed as Attachment B.

In addition to this transmittal letter, this compliance filing includes the following attachments:

- Attachment A – Clean and redline eTariff records of the revisions to Schedule 16 of the Xcel Energy OATT, consistent with the versions filed as part of the Settlement Agreement; and
- Attachment B – Details of the interest and refund amounts provided to customers.

XES respectfully requests that the Commission accept this compliance filing and the enclosed tariff records in satisfaction of the requirements of the August 15 Order.

Respectfully submitted,

/s/ David E. Pettit
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*Counsel for
Public Service Company of Colorado*

cc: All parties on the service list maintained by the Commission in this proceeding

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically served a notice of the enclosed filing on all parties on the Commission's official service list for this proceeding.

Dated at Minneapolis, Minnesota this 8th day of September, 2022.

/s/ Elizabeth Walkup

Elizabeth Walkup

Xcel Energy Services Inc.

Senior Transmission Business Analyst

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ATTACHMENT A

Clean and Redline Tariff Records

Proposed Effective Date: 1-1-2021

Approved Effective Date:

SCHEDULE 16 **Flex Reserve Service**

Flex Reserve Service is needed to maintain generation and load balance in the event of a reduction of online wind generation of 100 MW or more in 30 minutes due to reductions in wind speed. Any Transmission Customer or Ancillary Service Customer using wind generation to serve load in the PSCo Balancing Authority Area or exporting the output of wind generation out of the PSCo Balancing Authority Area must purchase or self-supply Flex Reserve Service.

Flex Reserve Service may be provided by the following resources: (i) generating units that are on-line but unloaded, (ii) generating units off-line but capable of starting in 30 minutes, or (iii) interruptible load or other non-generation resources capable of providing this service.

Determination of Flex Reserve Requirement.

A Transmission Customer's or Ancillary Service Customer's Flex Reserve Service requirement shall be the total Flex Reserve Requirement of 752 MW for the PSCo Balancing Authority multiplied by the customer's proportional share of wind generation in the PSCo Balancing Authority Area, based on the nameplate capacity of installed wind generation in the PSCo Balancing Authority Area serving the customer's load or scheduled exports. This nameplate capacity will be the customer's Flex reserve billing determinants. As conditions change on the PSCo system, PSCo may make a single-issue Section 205 filing with the Commission to update the total Flex Reserve Requirement value.

The Transmission Customer or Ancillary Service Customer shall purchase Flex Reserve Service in the following amounts:

- 1) For Point-To-Point Transmission Service: the Reserve Obligation percentage identified on Table 35, line 29 of the Attachment O-PSCo formula rate
- 2) For Network Integration Transmission Service: the Reserve Obligation percentage identified on Table 35, line 29 of the Attachment O-PSCo formula rate
- 3) For Balancing Authority Area Ancillary Services: the Reserve Obligation percentage identified on Table 35, line 29 of the Attachment O-PSCo formula rate

The charges for Flex Reserve Service are to be based on the rates set forth below, as found in Attachment O – PSCo of this Tariff.

- 4) Monthly Point-To-Point Delivery: the amount identified on Table 2, line 78 of the PSCo formula rate /kW-month
- 5) Weekly Point-To-Point Delivery: the amount identified on Table 2, line 79 of the PSCo formula rate /kW-week
- 6) Daily Point-To-Point Delivery: the amount identified on Table 2, line 80 of the PSCo formula rate /kW-day
- 7) Daily Point-To-Point Delivery: the amount identified on Table 2, line 81 of the PSCo formula rate /kW-day

Proposed Effective Date: 1-1-2021

Approved Effective Date:

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| 8) Hourly Point-To-Point Delivery:
the PSCo formula rate /MWh | the amount identified on Table 2, line 82 of |
| 9) Hourly Point-To-Point Delivery:
the PSCo formula rate /MWh | the amount identified on Table 2, line 83 of |
| 10) Network Integration Delivery:
the PSCo formula rate /kW-month | the amount identified on Table 2, line 84 of |
| 11) Ancillary Services Delivery:
the PSCo formula rate /kW-month | the amount identified on Table 2, line 85 of |

The total demand charge in any day, pursuant to a reservation for Hourly delivery, shall not exceed the rate specified in section (6) above times the highest amount in kilowatts of Reserved Capacity in any hour during such day. In addition, the total demand charge in any week, pursuant to a reservation for Hourly or Daily delivery, shall not exceed the rate specified in section (5) above times the highest amount in kilowatts of Reserved Capacity in any hour during such week.

Notwithstanding the foregoing, an Ancillary Service Customer whose load is served by no more than 10 MW nameplate capacity of wind generation all of which is interconnected to the distribution system behind the meter, shall not pay the charge set forth above but shall instead pay an administrative charge equal to \$0.58/kW-month.

The customer must either purchase this service from the Transmission Provider or BA Operator or make alternative comparable arrangements to satisfy its Flex Reserve Service obligation.

The nameplate capacity of the customer's wind generation used for billing purposes for the calendar year shall be the nameplate capacity of wind generation serving the customer's load or scheduled exports as of January 1 of that calendar year: nameplate capacity figures shall only be updated for billing purposes on January 1 of the applicable year. To facilitate proper billing, the customer shall provide a written certification setting forth each customer's wind generating resources and nameplate capacity of each listed resource. This written certification shall be provided on or before December 1 of each year for the following calendar year.

SCHEDULE 16 **Flex Reserve Service**

Flex Reserve Service is needed to maintain generation and load balance in the event of a reduction of online wind generation of 100 MW or more in 30 minutes due to reductions in wind speed. Any Transmission Customer or Ancillary Service Customer using wind generation to serve load in the PSCo Balancing Authority Area or exporting the output of wind generation out of the PSCo Balancing Authority Area must purchase or self-supply Flex Reserve Service.

Flex Reserve Service may be provided by the following resources: (i) generating units that are on-line but unloaded, (ii) generating units off-line but capable of starting in 30 minutes, or (iii) interruptible load or other non-generation resources capable of providing this service.

Determination of Flex Reserve Requirement.

A Transmission Customer's or Ancillary Service Customer's Flex Reserve Service requirement shall be the total Flex Reserve Requirement of ~~977-752~~ MW for the PSCo Balancing Authority multiplied by the customer's proportional share of wind generation in the PSCo Balancing Authority Area, based on the nameplate capacity of installed wind generation in the PSCo Balancing Authority Area serving the customer's load or scheduled exports. This nameplate capacity will be the customer's Flex reserve billing determinants. As conditions change on the PSCo system, PSCo may make a single-issue Section 205 filing with the Commission to update the total Flex Reserve Requirement value.

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| 11) Ancillary Services Delivery:
the PSCo formula rate /kW-month | the amount identified on Table 2, line 85 of |

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ATTACHMENT B

Refund Report

Counterparty	Refund	Interest	Total
Platte River Power Authority	\$1,344,062.76	\$39,865	\$1,383,927.69
Black Hills Colorado Electric, LLC	\$862,682.91	\$25,587	\$888,270.10
Colorado Springs Utilities	\$348,699.64	\$10,342	\$359,042.08
Tri-State Generation and Transmission, Inc.	\$482,367.83	\$14,307	\$496,674.87