

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

PROCEEDING NO. 20AL-0432E

IN THE MATTER OF ADVICE LETTER NO. 1835 - ELECTRIC FILED BY PUBLIC SERVICE COMPANY OF COLORADO TO REVISE ITS COLORADO P.U.C. NO. 8 - ELECTRIC TARIFF TO ELIMINATE THE CURRENTLY EFFECTIVE GENERAL RATE SCHEDULE ADJUSTMENTS ("GRSA") AND GENERAL RATE SCHEDULE ADJUSTMENT - ENERGY ("GRSA-E"), AND PLACE INTO EFFECT REVISED BASE RATES AND OTHER AFFECTED CHARGES FOR ALL ELECTRIC RATE SCHEDULES IN THE COMPANY'S ELECTRIC TARIFF, INCLUDING UPDATED ELECTRIC AFFORDABILITY PROGRAM ("EAP"), LOAD METER, AND PRODUCTION METER CHARGES TO BECOME EFFECTIVE NOVEMBER 19, 2020.

**ANSWER TESTIMONY AND ATTACHMENTS OF JASON TANKO
ON BEHALF OF ON BEHALF OF THE CITIES OF ARVADA, AURORA,
CENTENNIAL, AND THORNTON, THE TOWNS OF ERIE AND WINDSOR, AND THE
COLORADO COMMUNICATIONS AND UTILITY ALLIANCE FOR LEAVE TO A
FILE REPLY IN SUPPORT OF THE MOTION TO INTERVENE OF CITIES OF
ARVADA, AURORA, CENTENNIAL, AND THORNTON, THE TOWNS OF ERIE AND
WINDSOR, AND THE COLORADO COMMUNICATIONS AND UTILITY ALLIANCE**

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LIST OF ATTACHMENTS

- JT-1. Statement of Qualifications**
- JT-2. Acquisition Projects Summary**
- JT-3. PSCo's Response to Local Governments' Discovery Request LG1-4**
- JT-4. Customer-Owned Streetlights PG&E Pole Contact Agreement Between the City of Richmond and Pacific Gas and Electric Company**
- JT-5. PSCo's Response to Local Governments Discovery Request LG1-6**

I. INTRODUCTION AND PURPOSE OF TESTIMONY

Q. PLEASE STATE YOUR NAME, JOB TITLE, AND BUSINESS ADDRESS.

A. My name is Jason Tanko. I am the Chief Executive Officer (“CEO”) of Tanko Streetlighting, Inc. (“Tanko”). My Business address is 220 Bayshore Boulevard, San Francisco, CA 94124.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. On behalf of the Cities of Arvada, Aurora, Centennial, and Thornton, the Towns of Erie and Windsor, and the Colorado Communications and Utility Alliance (collectively “the Local Governments”).

Q. WHAT SERVICES DOES TANKO PROVIDE?

A. Tanko has been involved in the streetlighting industry for over eighteen (18) years. We started with manufacturing street light fixtures for municipalities and expanded to providing consulting services for municipal street light projects, including Light Emitting Diode (LED) fixture conversions and street light maintenance services. For the past ten (10) years Tanko has consulted with municipalities on the ownership and acquisition of streetlights. This consultation includes streetlight separation. We have successfully assisted over sixty (60) municipalities acquire their streetlighting systems through voluntary sales.

Q. AS CEO OF TANKO DO YOU SUPERVISE DECISIONS REGARDING ELECTRICAL SEPARATION OF STREETLIGHTS?

A. Yes.

Q. ARE YOU AN ENGINEER?

1 **A.** Yes. I have an electrical engineering degree from Seattle University and have been
2 practicing as an electrical engineer for over twenty-five (25) years. Prior to starting Tanko,
3 I was a District Engineer for Puget Sound Energy – a utility company in Washington State.

4 **Q. HAVE YOU EVER TESTIFIED AS AN ELECTRICAL ENGINEER BEFORE A**
5 **COURT OR ADMINISTRATIVE COMMISSION?**

6 **A.** Yes.

7 **Q. HAVE YOU PREPARED A STATEMENT OF YOUR EXPERIENCE AND**
8 **QUALIFICATIONS?**

9 **A.** Yes. My Statement of Qualifications is attached to this answer testimony as Attachment
10 JT-1.

11 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?**

12 **A.** The purpose of my testimony is to describe the types of streetlight separations approved by
13 other jurisdictions and explain why the separation requirements of the Energy Only Street
14 Lighting Tariff (“ESL Tariff”) and Street Lighting Rules and Regulations are unnecessary,
15 unjust, and unreasonable.

16 **Q: ARE YOU PROVIDING ANY EXHIBITS IN YOUR ANSWER TESTIMONY?**

17 **A:** Yes. I am sponsoring Attachments JT-1, JT-2, JT-3, JT-4, and JT-5.

18 **II. EXPERIENCE WITH STREET LIGHT SEPARATIONS IN OTHER**
19 **JURISDICTIONS**

20 **Q. HAVE YOU BEEN INVOLVED WITH STREET LIGHTING SYSTEM**
21 **SEPARATIONS IN OTHER JURISDICTIONS?**

22 **A.** Yes. As I testified earlier, Tanko and I have been involved in over sixty (60) successful
23 municipal streetlighting acquisitions in multiple jurisdictions. While not every project has

1 ultimately required separation, each of these acquisitions has involved separation
2 considerations. I have prepared Attachment JT-2, Acquisition Projects Summary, which
3 summarizes the municipalities, utilities, and required separation method for the
4 jurisdictions we have worked in.

5 **Q. IN THE JURISDICTIONS YOU HAVE WORKED, WHAT ARE THE STREET**
6 **LIGHT SEPARATION METHODS THAT HAVE BEEN REQUIRED?**

7 **A.** The method of separation varies somewhat depending on the utility, but as Attachment JT-
8 2 shows the predominate method of separation required has been the installation of a fuse
9 holder containing an electrical fuse in the existing “hand hole” at the base of the street light
10 pole (“fuse holder method of separation”). Eversource Energy in Connecticut and
11 Massachusetts and Southern California Edison (“SCE”) in California do not require any
12 physical separation at all. Interestingly, Pike Engineering is SCE’s electrical contractor for
13 street lighting acquisitions. According to PSCo’s discovery responses to the Local
14 Governments, Pike Engineering is also the contractor PSCo utilizes to perform cost studies
15 related to the sale and transfer of lighting facilities. I am providing PSCo’s Response to
16 Local Governments’ Discovery Request LG1-4 as Attachment JT-3.

17 **Q. DO ANY OF THE JURISDICTIONS OR UTILITIES YOU HAVE WORKED**
18 **WITH REQUIRE INSTALLATION OF A SEPARATE PULL BOX AS A METHOD**
19 **OF SEPARATION?**

20 **A.** No. None of the of the jurisdictions or utilities we have worked with have required the
21 installation of a separate pull box containing an electrical fuse (“pull box method of
22 separation”) that PSCo requires. Tanko and I worked on an acquisition of 2,200 streetlights
23 from NY State Gas & Electric (“NYSEG”) for the City of Geneva, New York. NYSEG

1 originally insisted on the pull box method of separation for all acquired street lights. After
2 we explained to NYSEG that the fuse holder method was just as safe and effective, and
3 would result in significant cost savings for the City, NYSEG agreed to permit the fuse
4 holder method of separation for all acquired street lights because it conceded that this
5 method met its need to physically separate the system.

6 **Q. DO ANY OF THE JURISDICTIONS YOU HAVE WORKED IN REQUIRE THAT**
7 **STREET LIGHTS ATTACHED TO UTILITY-OWNED DISTRIBUTION POLES**
8 **BE REMOVED UPON MUNICIPAL ACQUISITION?**

9 **A.** No. In every jurisdiction we have worked in municipalities have not been required to
10 remove street lights after acquisition. On every acquisition we have worked on
11 municipally-owned street lights were permitted to remain on the utility-owned distribution
12 pole subject to a simple pole attachment agreement. I have provided a Customer-Owned
13 Streetlights PG&E Pole Contact Agreement Between the City of Richmond, CA and
14 Pacific Gas and Electric Company ("PG&E") as Attachment JT-4, which is exemplary of
15 the simple pole attachment agreements usually required for attachment of municipal-
16 owned street lights to utility-owned distribution poles. As reflected in Attachment JT-4,
17 the municipality is permitted to maintain the municipally-owned street light by using
18 qualified electrical contractors and maintaining required insurance.

19 **Q. HAVE PUBLIC UTILITIES COMMISSIONS OR PUBLIC SERVICE**
20 **COMMISSIONS IN THE JURISDICTIONS YOU HAVE WORKED IN**
21 **APPROVED THE SEPARATION METHODS YOU HAVE DESCRIBED?**

22 **A.** The majority of jurisdictions I have worked in have not required Public Utilities
23 Commission or Public Service Commission approval of municipal street light acquisitions.

1 In California, however, the California Public Utilities Commission (“CPUC”) requires
2 acquisitions costing more than three million dollars (\$3,000,000) to undergo full
3 Commission review. Acquisitions under three million dollars (\$3,000,000) can be
4 approved by filing an advice letter and administrative review. Acquisitions are routinely
5 approved by the CPUC that require no street lighting separation.

6 **III. THE ESL TARIFF’S REQUIREMENTS FOR SEPARATION ARE**
7 **UNNECESSARY, UNJUST, AND UNREASONABLE**

8 **Q. HAVE YOU REVIEWED THE SEPARATION REQUIREMENTS OF PAGES 97A**
9 **– 97B OF THE ESL TARIFF?**

10 **A.** Yes.

11 **Q. ARE THESE REQUIREMENTS NECESSARY OR REASONABLE?**

12 **A.** No. The separation requirements of the pages 97A and 97B of the ESL tariff provide for
13 the pull box method of separation as the default method of street light separation. While
14 the ESL tariff provides some flexibility for alternative methods of separation, it also gives
15 PSCo unilateral discretion to determine whether alternative methods will be acceptable. It
16 is my understanding from reviewing Attachment WP-2, PSCo’s Response to Local
17 Governments’ Discovery Request LG1-5, that PSCo has never approved any method of
18 separation other than the pull box method. The fuse holder method of separation is more
19 cost effective and more practical from an engineering perspective. The fuse holder method
20 is also equally safe and effective as the pull box method. This is reaffirmed by fact that
21 every utility we have worked with has permitted the fuse holder method of separation if
22 separation was required at all.

23 **Q. WHY IS THE FUSE HOLDER METHOD MORE COST EFFECTIVE?**

1 **A.** Installation of a fuse box and associated fuse is ten to twenty times less costly than
2 installation of a new pull box for each underground connection. I have reviewed the
3 testimony of Local Government witness Wyatt Peterson and his separation cost estimates
4 for both the pull box and fuse holder method are consistent with what Tanko has seen on
5 its acquisition projects.

6 **Q. WHY IS THE FUSE HOLDER METHOD OF SEPARATION MORE PRACTICAL**
7 **FROM AN ENGINEERING PERSPECTIVE?**

8 **A.** There are several reasons. First, the method is simpler and requires less construction. The
9 hand hole where the fuse holder is placed already exists in every street light. Because the
10 hand hole already exists, no additional pedestal, hand hole, or other facility meant to
11 contain the fuse holder is required to be constructed. Second, it creates an unnecessary
12 vulnerability in the system because it adds additional infrastructure that can be subject to
13 access issues (e.g. buried underground, paved over, etc.) and a new potential electrical fail
14 point (due to water exposure, etc.). Third, finding a place to interrupt the underground street
15 light feed, which isolates the street light, can be difficult. Street light conductors can often
16 serve multiple secondary loads. In order to isolate the street light, the feeder wire must be
17 traced. We have often found that these lines can run into alleys where separation is difficult
18 and/or are intertwined with residential lines. The difficult task of tracing the underground
19 feeder is completely avoided if the separation is simply done in the existing hand hole at
20 the base of the street light. Fourth, because PSCo never defined the exact location required
21 for the pull box method (likely because the field conditions vary such that no standard is
22 possible), the pull box method creates variability and unknowns in the system versus a

1 consistent and predictable standard location (at the base of each pole) via the fuse holder
2 method.

3 **Q. IS INSTALLING A FUSE HOLDER AT THE BASE OF THE STREET LIGHT**
4 **EQUALLY SAFE AS THE PULL BOX METHOD OF SEPARATION?**

5 **A.** Yes. In fact, the fuse holder method is safer because it is guaranteed to be above ground
6 level, with reduced exposure to moisture and water intrusion and ease of access (because
7 the pole hand hole is typically located several feet above the ground). In contrast, the pull
8 box method installs the fuse below the ground, which inherently increases the risk of fault.

9 **Q. DOES INSTALLING A FUSE HOLDER AT THE BASE OF THE STREET LIGHT**
10 **EQUALLY PROTECT PSCO'S DISTRIBUTION SYSTEM?**

11 **A.** Yes. The purpose of separation is to electrically separate the municipality's street light
12 from the utility's distribution system. In all cases, this is done with a fuse. The fuse allows
13 the municipality to service its street light without de-energizing the transformer serving the
14 street light. A pull box is just a type of container for that fuse. Placing the fuse and fuse
15 holder in the hand hole at the base of the street light has the same effect of electrically
16 separating the street light from the distribution system. This method also creates no
17 additional risk of damage and no challenges for maintenance with respect to the utility's
18 distribution system. Further, the fuse holder method actually enhances PSCo's system
19 protection because the system separation is in a location that is consistent and predictable.

20 **Q. HAVE YOU REVIEWED ATTACHMENT WP-2, PSCO'S RESPONSE TO LOCAL**
21 **GOVERNMENTS' DISCOVERY REQUEST LG1-5?**

22 **A.** Yes.

1 **Q. DO YOU AGREE WITH PSCO'S RESPONSE THAT A SEPARATION POINT**
2 **NEAR THE COMPANY'S DISTRIBUTION FACILITIES IS THE MOST**
3 **LOGICAL PLACE FOR SEPARATION?**

4 **A.** No. As I have explained previously in my testimony, the farther the point of separation is
5 from the street light, the more difficult it is to trace and interrupt the street light feeder line.
6 It is more logical to place the point of separation as close to the street light as possible.

7 **Q. DO YOU AGREE PSCO'S RESPONSE THAT A PULL BOX OR PEDESTAL IS**
8 **THE ONLY WAY TO SEPARATE STREET LIGHTS WHICH CLEARLY**
9 **DELINEATES OWNERSHIP AND RESPONSIBILITIES?**

10 **A.** Absolutely not. It is very easy to determine ownership and maintenance responsibilities
11 with any method of separation involving a fuse. Everything on the distribution side of the
12 fuse is owned by the utility, everything on the street light side of the fuse is owned by the
13 municipality. If an entity owns a facility, it is responsible for the maintenance. Even in
14 jurisdictions where no separation is required, ownership and maintenance responsibilities
15 are easily determined.

16 **IV. THE STREET LIGHTING RULES AND REGULATIONS REQUIREMENT**
17 **THAT STREET LIGHTS ON DISTRIBUTION POLES BE PURCHASED, THEN**
18 **REMOVED IS UNNECESSARY, UNJUST, AND UNREASONABLE**

19 **Q. HAVE YOU REVIEWED THE REQUIREMENTS OF THE RULES AND**
20 **REGULATIONS FOR STREET LIGHTING, PAGES R139-140?**

21 **A.** Yes.

22 **Q. IS THE REQUIREMENT THAT STREET LIGHTS ON DISTRIBUTION POLES**
23 **BE PURCHASED, THEN REMOVED REASONABLE OR NECESSARY?**

1 A. No. Utilities across the United States have permitted municipally-owned street lights to be
2 attached to utility-owned distribution poles as the standard and not the exception. The only
3 reasonable explanation for the existence of this is to create a barrier which makes it more
4 difficult for municipalities to acquire street lights.

5 **Q. ARE THERE ALTERNATIVES TO THIS REQUIREMENT?**

6 A. Yes. As I have previously testified, other utilities permit municipally-owned street lights
7 to remain on utility-owned street lights pursuant to a simple pole attachment agreement. I
8 have provided such a pole attachment agreement as Attachment JT-4. Attachment JT-4
9 requires the municipal street light owner to use qualified electrical contractors for
10 maintenance on street lights, which are attached to utility-owned distribution poles.
11 Attachment JT-4, also requires the municipality to maintain required insurance. By
12 requiring qualified personnel and insurance, any real risk to the utility caused by permitting
13 the municipally-owned street light to remain on utility-owned distribution poles is
14 mitigated. Further, the relationship that the municipality is seeking regarding the
15 distribution poles is likely consistent with PSCo's other pole sharing agreements with third
16 parties, such as cable television, telephone, and other communication providers.

17 **Q. HAVE YOU REVIEWED PSCO'S RESPONSE TO LOCAL GOVERNMENTS'**
18 **DISCOVERY REQUEST LG1-6?**

19 A. Yes. I have also provided the response as Attachment JT-5, PSCo's Response to Local
20 Governments Discovery Request LG1-6.

21 **Q. DO YOU AGREE WITH PSCO'S RESPONSE THAT THE NESC (NATIONAL**
22 **ELECTRIC SAFETY CODE) PROHIBITS MUNICIPALITIES FROM OWNING**

**STREET LIGHTING FACILITIES ATTACHED TO UTILITY OWNED
DISTRIBUTION POLES?**

A. No. Nationally, municipalities routinely own street lighting facilities on utility-owned distribution poles and are in compliance with NESC requirements. Current industry safety requirements separate high voltage (750V +) distribution lines from the secondary zone (less than 750V) already. The street light facilities on distribution poles are already in the secondary zone of typical distribution pole construction, which limits the voltage to typically 480V and less, and therefore allows a regular qualified electrician to access and maintain them.

V. RECOMMENDATIONS

**Q. DO YOU HAVE ANY RECOMMENDATIONS AS TO HOW THE COMMISSION
SHOULD RULE ON THESE ISSUES?**

A: Yes. The Commission should find that the existing requirements for street light separation contained in the ESL Tariff, pages 97A – 97B, and the Rules and Regulations for Street Lighting, page R139 are unnecessary, unjust, and unreasonable. Specifically, the Commission should find that 1) requiring the pull box method of separation is unjust and unreasonable and 2) that the requirement that municipalities acquire, and then then remove street lights attached to company-owned distribution poles is unjust and unreasonable. The Commission should also order that the existing Tariffs be amended to remove these unjust and unreasonable requirements. I recommend the Commission amend the ESL Tariff, pages 97A – 97B to make the fuse-holder method the default method of street light separation. Changes should also be made to the ESL Tariff, pages 97A – 97B to limit PSCo's authority to unilaterally require other methods of separation without justification.

1 I recommend that the Rules and Regulations for Street Lighting, page R139 be amended to
2 permit indefinite municipal attachment of street lights pursuant to a pole attachment
3 agreement, which requires qualified maintenance personnel and insurance.

4 **Q. HAVE YOU REVIEWED ATTACHMENT WP-5, THE REVISED TARIFF**
5 **SHEETS FOR ESL TARIFF, PAGES 97A – 97B, AND THE RULES AND**
6 **REGULATIONS FOR STREET LIGHTING, PAGE R139 OFFERED BY LOCAL**
7 **GOVERNMENT WITNESS WYATT PETERSON?**

8 **A.** Yes. I assisted Local Government Witness Wyatt Peterson in drafting the attachment.

9 **Q. DO YOU AGREE WITH THE RECOMMENDED CHANGES?**

10 **A.** Yes. I believe the recommended changes make the requirements for street light separation
11 more just and reasonable than the existing requirements. The proposed changes are also
12 aligned with what other utilities and jurisdictions require for street lighting separation.

13 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

14 **A.** Yes.

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING NO. 20AL-0432E

IN THE MATTER OF ADVICE LETTER NO. 1835 - ELECTRIC FILED BY PUBLIC SERVICE COMPANY OF COLORADO TO REVISE ITS COLORADO P.U.C. NO. 8 - ELECTRIC TARIFF TO ELIMINATE THE CURRENTLY EFFECTIVE GENERAL RATE SCHEDULE ADJUSTMENTS ("GRSA") AND GENERAL RATE SCHEDULE ADJUSTMENT - ENERGY ("GRSA-E"), AND PLACE INTO EFFECT REVISED BASE RATES AND OTHER AFFECTED CHARGES FOR ALL ELECTRIC RATE SCHEDULES IN THE COMPANY'S ELECTRIC TARIFF, INCLUDING UPDATED ELECTRIC AFFORDABILITY PROGRAM ("EAP"), LOAD METER, AND PRODUCTION METER CHARGES TO BECOME EFFECTIVE NOVEMBER 19, 2020.

AFFIDAVIT OF JASON TANKO

THE CITIES OF ARVADA, AURORA, CENTENNIAL, AND THORNTON, THE TOWNS OF ERIE AND WINDSOR, AND THE COLORADO COMMUNICATIONS AND UTILITY ALLIANCE FOR LEAVE TO A FILE REPLY IN SUPPORT OF THE MOTION TO INTERVENE OF CITIES OF ARVADA, AURORA, CENTENNIAL, AND THORNTON, THE TOWNS OF ERIE AND WINDSOR, AND THE COLORADO COMMUNICATIONS AND UTILITY ALLIANCE

STATE OF CALIFORNIA

CITY AND COUNTY OF _SAN FRANCISCO

)
) ss.
)

I, Jason Tanko, being duly sworn, state that the foregoing Answer Testimony and Attachments on Behalf of the Cities of Arvada, Aurora, Centennial, and Thornton, the Towns of Erie and Windsor, and the Colorado Communications and Utility Alliance were prepared by me or under my supervision, control and direction; that the Answer Testimony and Attachment are true and correct to the best of my information, knowledge and belief; and that I would give the same testimony orally and would present the same attachment if asked under oath.

Dated this 8th day of March, 2021.

Tanko Streetlighting, Inc.

Subscribed and sworn to before me this 8th day of March, 2021.

WITNESS MY HAND AND OFFICIAL SEAL.

My Commission Expires: September 24, 2023



Elizabeth H. Ingram
NOTARY PUBLIC

CERTIFICATE OF SERVICE

I, Alexandra Smith, on behalf of Kenneth S. Fellman for the Local Governments, hereby certify that on the 8th day of March, 2021, I served a true and correct copy of the foregoing **ANSWER TESTIMONY AND ATTACHMENTS OF JASON TANKO ON BEHALF OF TANKO LIGHTING** in Proceeding No. 20AL-0432E upon each of the persons appearing below either through the E-Filing system or by other means in accordance with applicable law.

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+ Denotes persons eligible to receive highly confidential proprietary information pursuant to Decision No. R20-019-I