

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO

PROCEEDING 14AL-0660E

IN THE MATTER OF ADVICE LETTER NO. 1672 FILED BY PUBLIC SERVICE COMPANY OF COLORADO TO REVISE ITS COLORADO PUC NO. 7-ELECTRIC TARIFF TO IMPLEMENT A GENERAL RATE SCHEDULE ADJUSTMENT AND OTHER RATE CHANGES EFFECTIVE JULY 18, 2014.

MOTION FOR LEAVE TO INTERVENE OF CLEAN ENERGY ACTION

Clean Energy Action (CEA), by its undersigned counsel, and pursuant to Rule 1401(c), 4 C.C.R. 723-1-1401, of the Rules of Practice and Procedure of the Colorado Public Utilities Commission (Commission or PUC) and Commission Decision No. C14-0807 (Mailed Date: July 15, 2014), hereby files this **Motion for Leave to Intervene** in the above-captioned proceeding, and as grounds therefore, states the following:

1. Clean Energy Action is a 501(c)(3) nonprofit organization based in Boulder, Colorado with a mission to educate the public to support a shift in public policy toward a zero carbon economy. CEA brings a unique perspective on the economics of utility regulation and business models related to mitigating the large and growing risks associated with anthropogenic climate change. In addition, CEA has an interest in transitioning away from fuel-based electric generation in order to mitigate the purely economic risk associated with inherently unpredictable future fuel costs. CEA has a strong track record of partnering with organizations to provide input to the PUC and to activate citizen involvement around key federal and state policies relating to energy, the economy, and the environment. CEA and many of its members are also Public Service Company of Colorado (PSCo) electric and gas customers.

2. On June 17, 2014, PSCo filed Advice Letter No. 1672 with tariffs to increase its base rate revenues by \$157.6 million, shifting \$19.9 million from the Transmission Cost Adjustment rider to base rates, resulting in a net revenue increase of \$137.7 million. The proposed increase in base rates will result in a General Rate Schedule Adjustment (GRSA) rider of 28.50% (up from 17.07%) applied to all electric based rate schedules, and estimated to increase a typical small residential customer bill by 5.3% and a small commercial customer by 5.1%. PSCo also proposes to recover \$2.04 billion of new capital investment between January 1, 2014 and December 31, 2015, including a new Clean Air Clean Jobs Act (CACJA) rider and proposed return on equity of 10.35%, which results in an overall rate of return of 7.86%. PSCo also further requests authorization for a revenue decoupling mechanism that would adjust rates automatically to account for changes in the weather-normalized use per customer for its residential and small commercial rate classes.

3. The subject matter and results of this proceeding will affect the pecuniary and other tangible interests of Clean Energy Action. CEA and its members are not only customers of PSCo, but are deeply engaged in moving to a zero carbon economy, and this proceeding affects those interests. CEA is not going to object to the recovery of statutory or Commission approved expenses related to the CACJA. CEA is concerned with the requested authorization for revenue decoupling because of its potential ability to accelerate the utility's investments in fuel free technologies which carry little economic risk. CEA's interest in transitioning to a zero carbon economy will be directly impacted by depreciation and amortization policies and other issues addressed in this proceeding, because they will set precedents for the potential future retirement of additional thermal generation facilities beyond those mandated by the CACJA.

4. CEA will not broaden the issues by intervening, and looks to provide a unique perspective to the Commission and PSCo in this proceeding. At this time, CEA does not know the nature or quantity of evidence it may produce, but CEA may provide evidence concerning revenue decoupling, decommissioning and depreciation of carbon intensive generation assets.

5. No other party represents the same interests as CEA, and CEA can provide a unique perspective on the issues in this proceeding through its utility related data-driven research.

6. This motion is timely filed.

7. CEA supports PSCo's Motion to Consolidate this proceeding with Proceeding No. 14A-0680E.

For all of the above reasons, Clean Energy Action respectfully requests that a hearing be held in this Proceeding and this **Motion for Leave to Intervene of Clean Energy Action** be granted.

Please send copies of all notices, pleadings, correspondence, and other documents, with electronic submissions preferred, to the following, including undersigned counsel:

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Clean Energy Action

Respectfully submitted, this 5th day of August, 2014

VINCENT P. CALVANO, LLC.

/s/ Vincent P. Calvano

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On Behalf of Clean Energy Action

Certificate of Service

I hereby certify that on August 5th, 2014, I caused the foregoing **MOTION FOR LEAVE TO INTERVENE OF CLEAN ENERGY ACTION** to be filed electronically at the Colorado Public Utilities Commission through the Commission's E-Filings System on this date in this Proceeding.

/s/ Vincent P. Calvano